



Jenkins Road Apartments Land Use Completeness Submittal Narrative

Submitted to:
Edge Development
2233 NW 23rd Ave, Suite 100
Portland, OR 97210

Prepared By:
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April 6, 2022

Project No. 20461

Site Information

Subject Property: 13655 SW Jenkins Road
TLIDs 1S109BA 101 & 106

Site Area: 0.61 acres

Comprehensive Plan Designation: HD-NR

Zoning Designation: City of Beaverton R1

Applicant/Property Owner

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- Appendix A Application Forms and Checklists
- Appendix B Clean Water Services Pre Screen Service Provider Letter dated February 1, 2022
- Appendix C Preliminary Stormwater Report dated February 9, 2022, by Pioneer Design Group, Inc.
- Appendix D TVF&R Service Provider Letter dated February 7, 2022
- Appendix E Beaverton Water Service Provider Letter
- Appendix F Beaverton School District School Service Provider dated February 11, 2022
- Appendix G Preapplication Conference Summaries dated May 26, 2021 & September 29, 2021

- Appendix H Preliminary Sight Distance Analysis dated January 28, 2022, by Pioneer Design Group, Inc.
- Appendix I Solid Waste Vehicle Turning Exhibits dated January, 2022 by Pioneer Design Group, Inc.
- Appendix J Lighting Fixture Details/Cut Sheets by R&W Engineering
- Appendix K Site Survey dated February 26, 2021 by ZTEC Engineers Inc

Exhibits

Civil

- P1.0 Existing Conditions and Demolition Plan
- P2.0 Preliminary Grading and Erosion Control Plan
- P2.1 Site Sections - Plan
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- P3.1 Typical Street Sections
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Landscape

- L0.01 Existing Conditions Plan
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- LU-0.01 Cover Sheet
- LU-0.02 Site Plan
- LU-1.01 Floor Plan - Level 01
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I. Requests

Type 2 Design Review, a Replat 1, and Tree Plan 2 approval is requested for a 22-unit multifamily residential development and associated site improvements.

II. Project Description

The site is comprised of two properties totaling approximately 0.61 acres (26,572 sq. ft.) in size and is bounded by SW Jenkins Road, SW Ecole Avenue, and SW Castlewood Street. All required infrastructure (streets and utilities) is existing or will be constructed as part of this proposal. The proposed development includes 22 multifamily units and associated site work, and dedication of six (6) feet of right-of-way on the SW Jenkins Road frontage.

The proposal consists of one three-story apartment building with associated circulation and open spaces. The residential units are composed of a mix of one- and two-bedroom units, with laundry in each unit, secure indoor bike storage, and common and active open space for use by residents.

Building elevations use a combination of fiber cement horizontal lap siding with vertical joints and fiber cement panel with vertical trim to create a unique juxtaposition of linear patterns and an overall quilting effect. All fiber cement cladding is thoughtfully detailed and painted in a sophisticated palette of colors that break the building scale down into neighborhood-friendly segments while also complementing the different cladding textures.

The site design situates the building footprint to balance privacy for ground floor units while also confidently addressing the streetscape. The building is located on the southern portion of the site, abutting SW Jenkins Road, and the parking and open space areas are to the north of the building, with vehicular access taken from SW Castlewood Street. The open space areas include trellises and bench seating, with pedestrian paths and attractive landscaping. Additional outdoor amenities include bike racks, site landscaping, and site furnishings. Stormwater is largely managed underground with overflows to the storm line, and an extensive pedestrian circulation network connects the apartment community with the adjacent rights-of-way and transit stop.

While not required for this application submittal, the applicant's representative presented the project to members of the community at the regularly scheduled Central Beaverton NAC online meeting on April 4, 2022. The project was described and shown to community member attendees and the applicant's representative answered one question.

III. Conformance with Previous Approvals

Response: The subject site was recently annexed into the jurisdiction of the City of Beaverton and assigned R1 zoning designation. As such, development of the site is required to conform with the uses permitted in the R1 zone. Relevant land use approvals are noted below.

Jenkins Road Annexation ANX2021-0001 and Jenkins Road Comprehensive Plan and Zoning Map Amendments (CPA2021-0003/ZMA2021-0002)

IV. Compliance with Beaverton Development Code Title 20

A. 20.05. Residential Land Use Districts
20.05.15. Site Development Standards

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. [ORD 4584; June 2012]

Response: The site is zoned R1. Compliance with the standards of the R1 zone is provided in Table 1, below.

Table 1. Development Standards

Standard	R1 Zone	Proposed	Findings
Minimum Land Area per Unit	1,000 sq. ft.	25,944 sq. ft.	This standard is met.
Maximum Density	26 units	22 units	This standard is met.
Minimum Density	21 units	22 units	This standard is met.
Minimum Front Yard Setback (including street setback)	10 ft.	10 ft.	This standard is met.
Minimum Rear Yard Setback	15 ft.	122 ft. (north)	This standard is met.
Minimum Side Yard Setback	5 ft.	6.5 ft. (east)	This standard is met.
Maximum Building Height	60 ft.	32 ft., top of parapet	This standard is met.

20.05.20. Land Uses

The following Land Uses are Permitted (P), allowed with a Conditional Use (C) approval, or Prohibited (N) as identified in the following table for the Residential Zoning Districts. All superscript notations refer to applicable Use Restrictions Section 20.05.25.

Response: The proposed development is multifamily residential development the R1 zone. Multifamily residential uses are permitted outright in the R1 zone. See Table 2, below.

Table 2. Land Use Categories and Specific Uses

Standard	R1 Zone	Proposed
Residential Dwellings (Attached)	Permitted	22 Unit Multifamily Building

B. 20.25 Density Calculations

20.25.05. Minimum Residential Density.

A. New residential development in all Residential, Commercial, and Multiple Use districts which permit residential development must achieve at least the minimum density for the zoning district in which they are located. Projects proposed at less than the minimum density must demonstrate on a site plan or other means, how, in all aspects, future intensification of the site to the minimum density or greater can be achieved without an adjustment or variance. If meeting the minimum density will require the submission and approval of an adjustment or variance application(s) above and beyond application(s) for adding new primary dwellings or land division of property, meeting minimum density shall not be required.

For the purposes of this section, new residential development shall mean intensification of the site by adding new primary dwelling(s) or land division of the property. New residential development is not intended to refer to additions to existing structures, rehabilitation, renovation, remodeling, or other building modifications or reconstruction of existing structures.

Minimum residential density is calculated as follows:

1. Refer to the definition of Acreage, Net. Multiply the net acreage by 0.80.
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.

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: The site is located within the R1 zoning designation. The two existing properties are collectively 0.61 acres (26,572 sq. ft.) in size. As part of this application, the two properties will be consolidated into one unit of land, and six (6) feet along the SW Jenkins Road frontage will be dedicated to the public right-of-way. The resulting area of the property will be 25,944 sq. ft. in size. The minimum density for the resulting unit of land is 21 units. The proposed development will include 22 units. This requirement is met.

V. Compliance with Beaverton Development Code Title 40

A. 40.03. Facilities Review Committee

Consistent with Section 10.95.4. (Facilities Review Committee) of this Code, the Facilities Review Committee shall review the following Type 2 and Type 3 land use applications: all Conditional Use, Design Review Two, Design Review Three, Public Transportation Facility Reviews, Street Vacations, and applicable Land Divisions. Applicable land division applications are Replats, Partitions, Subdivisions, Fee Ownership Partitions, and Fee Ownership Subdivisions. In making a recommendation on an application to the decision-making authority, the Facilities Review Committee shall base its recommendation on a determination of whether the application satisfies all the following technical criteria. The applicant for development must establish that the application complies with all relevant standards in conformance with Section 50.25.1.B., and all the following criteria have been met, as applicable.

Response: This proposal is for a Design Review Two, Replat One, and Tree Plan Two, and is subject to this chapter.

40.03.1. All Conditional Use, Design Review Two, Design Review Three, 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: Chapter 90 of the Development Code defines “critical facilities” to be services that include public water, public sanitary sewer, storm water drainage and retention, transportation, and fire protection. Critical facilities and services are either in place or will be at the time of completion of development as described below.

Public Water

Water service will be provided by an existing 12-inch water main located within SW Jenkins Road, adjacent to the project site to the south. A new water service connection will provide fire water and domestic service to the project, including hydrant to be located on the SW Ecole frontage. A Service Provider Letter from the City of Beaverton Water is included as Appendix E, and details of the water connection on Sheet P4.0.

Public Sanitary Sewer

Sanitary sewer will be connected to the existing public 8-inch sewer main located within SW Castlewood Street to the north, adjacent to the project site. This 8-inch sanitary sewer line will be routed to the site and in general will be in the parking lot along the east side parking spaces. See Sheet P4.00 for utility locations. In a request for a Service Provider Letter (SPL) from Clean Water Services (CWS), CWS staff indicated that since the property has been annexed to the

jurisdiction of the City of Beaverton, CWS no longer is responsible for the sanitary sewer facilities serving the property. City of Beaverton Staff provided correspondence via email indicating that there is no SPL available for public sanitary sewer.

Stormwater Drainage, Treatment, and Detention

The stormwater management system will include a conveyance system, vegetated swales, underground detention chambers, and a flow control manhole. There is an existing 15-inch public stormwater line located within SW Ecole Avenue. A Preliminary Stormwater Management Plan is included as Appendix C. This Preliminary Stormwater Management Plan outlines compliance with the 2019 Engineering Design Manual (EDM). Conceptual utility plans are included as Sheet P4.0.

Transportation

Access to the site is proposed from SW Castlewood Street, a Local street, which has access to SW Jenkins Road and SW Walker Road, both Arterial streets, via SW Ecole Avenue, which is a Neighborhood Route. Each of the streets is suitable for emergency vehicles.

Internal circulation will be provided by private drive aisles forming a loop which affords forward-in and forward-out vehicular motion. Pedestrian pathway connections from the main building entrances to the adjacent rights-of-way of SW Jenkins Road, SW Castlewood, and SW Ecole are proposed as shown on the site plan (Sheet P4.0).

Fire Protection

Fire protection will be provided to the site by Tualatin Valley Fire and Rescue Department (TVF&R). Primary emergency access is required to the proposed development for emergency vehicle access. The proposed emergency access is provided through the parking lot with access to SW Castlewood Street. See Sheet FS1.0 for details. A fire hydrant will be installed on the SW Ecole frontage as directed by City of Beaverton and TVF&R. A Service Provider Letter from TVF&R is included as Appendix D.

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: Chapter 90 of the Development Code defines “essential facilities” to be services that include schools, transit improvements, police protection, and pedestrian and bicycle facilities in the public right-of-way. Essential facilities and services are either in place or will be at the time of completion of development as described below.

Schools

The site is located within the Beaverton School District (BSD) boundaries and will be served by Barnes Elementary School; Meadow Park Middle School; and Beaverton High School. Per the SPL dated February 11, 2022, the Beaverton School District has provided comments addressing the anticipated impacts of the subject project to the District. In summarizing their comments, the District has indicated that the proposal will result in a moderate impact to schools in the area and anticipates sufficient capacity to accommodate new students from the proposed development. See Appendix F for the SPL from the Beaverton School District.

Transit Improvements

There is one transit stop located adjacent to the site on the corner of SW Ecole Avenue and SW Jenkins Road. The transit stop is served by Tri-Met Route Number 62. Tri-Met Route Number 20 is located within 0.5 miles from the site on SW Cedar Hills Blvd. Both routes connect to the Beaverton Transit Center for connection to destinations elsewhere in the region.

Parks & Open Space

Though parks and open space are not identified as “essential facilities,” the site will be served by the Tualatin Hills Parks and Recreation District (THPRD). The site is approximately 0.9 miles from Cedar Hills Park and is approximately 1.1 miles from Commonwealth Lake Park. There will be approximately 5,940 sq. ft. of open space in the form of site landscaping and active open space on site for use by residents.

Police Protection

The site will be served by the City of Beaverton Police Department.

Pedestrian & Bicycle Facilities in the Public Right-of-Way

SW Jenkins Road and portions of SW Castlewood Street have been improved with sidewalks, and SW Ecole has none. The proposed development will construct or reconstruct sidewalks on all frontages, and install curb and stormwater facilities on SW Ecole and Castlewood. There will be a 6 ft. dedication along the frontage of SW Jenkins Road.

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: The proposed development is consistent with all applicable provisions of Chapter 20. The property is zoned R1, which is a multi-family zoning within the City of Beaverton.

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: Relevant provisions related to this chapter include Section 60.30 Off-Street Parking and Section 60.55 Transportation Facilities. Further compliance with Chapter 60 is addressed below in Section VII of this narrative.

Off-Street Parking (Section 60.30)

According to this section, attached dwellings require between 1.25 and 1.75 off-street parking space per unit, depending on the number of bedrooms. As detailed in the responses to Section 60.30, below, the proposed building contains 22 attached dwelling units and require a total of 29 vehicle parking spaces. Twenty-nine (29) spaces are proposed; therefore, this standard is met. Further compliance with Chapter 60 is addressed below in Section VII of this narrative.

Transportation Facilities (Section 60.55)

The surrounding streets include partial pedestrian and bicycle facilities that, when improved as proposed with project, will provide safe and efficient circulation and access to/from the site. Further compliance with Chapter 60 is addressed below in Section VII of this narrative.

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: The applicant will retain ownership of the site and will be responsible for maintenance of the site.

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

Response: The site is served by three streets, and each will be improved with pedestrian facilities meeting the standards of the EDM. Within the site there are pedestrian connection that provide access to each of the three rights-of-way. The site will include two short term bicycle parking spaces, bench seating, site lighting, and each unit will have one long term bicycle storage space.

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: The proposed on-site vehicular circulation system provides vehicular access to and from SW Castlewood Street, a Local Street, to the south. SW Castlewood is the lowest classification of street abutting the subject property. Pedestrian circulation systems connect the main building entrances with the on-site pedestrian network and the adjacent sidewalk network of SW Jenkins Road, SW Ecole Avenue, and SW Castlewood Street.

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: Fire protection will be provided by TVF&R. A fire hydrant is proposed to be installed on the SW Ecole Avenue frontage. Specific details regarding fire flow will be reviewed by TVF&R during site development and building permit stages. Hydrant location has been approved as noted on the TVF&R SPL included as Appendix D.

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: All street frontages and public facilities are designed in accordance with adopted City codes and standards. The existing street frontages include streetlights, which will provide protection from crime and accident. Development permits will be submitted for life and safety review prior to site development.

J. Grading and contouring of the development site are 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: Site grading is subject to the standards of Subsection 60.15.10 Grading. Responses to Section 60.15.10 are provided in that section below in this written narrative. Compliance with Section 210 of the EDM will be reviewed with the Site Development Permit for the development. See Sheets P2.0 through P2.2 for details.

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: The site circulation networks are designed in accordance with the City of Beaverton's EDM to provide accessibility as required. Any required on-site pedestrian routes will meet the standards of the American with Disabilities Act (ADA). ADA ramps, an ADA parking space and loading area will be provided within the development to facilitate accessible travel.

L. *The application includes all required submittal materials as specified in Section 50.25.1. of the Development Code.*

Response: This application includes all required submittal materials specified in this section.

B. 40.20. Design Review

40.20.10. Applicability.

1. *The scope of Design Review shall be limited to the exterior of buildings, structures, and other development and to the site on which the buildings, structures, and other development are located. [ORD 4584; June 2012]*
2. *Considering the thresholds for the Design Review Compliance Letter, Design Review Two, or Design Review Three applications and unless exempted by Section 40.20.10.3. (Design Review) approval shall be required for the following: [ORD 4584; June 2012]*
[...]
 - B. *All uses listed as Permitted and Conditional Uses in the R4, R2, and R1 Residential zoning districts. [ORD 4584; June 2012]*

Response: The applicant requests Type 2 Design Review approval for a new multifamily residential community, which is a permitted use in the R1 zone.

40.20.15. Application.

There are three (3) Design Review applications which are as follows: Design Review Compliance Letter, Design Review Two, and Design Review Three.

[...]

2. Design Review Two

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

[...]

3. *New construction of attached residential dwellings excluding duplexes, in any zone where attached dwellings are a Permitted or Conditional Use. [ORD 4410; December 2006]*

[...]

7. *Any new or change to existing on-site vehicular parking, maneuvering, and circulation area which adds paving.*

[...]

Response: The proposed development is an attached residential multi-family building, and a paved surface parking lot in the R1 zone. Because multifamily residential is a permitted use in the R1 zone, the proposal meets thresholds (3) and (7) for a Design Review Two.

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

Response: Acknowledged.

- C. *Approval Criteria. In order to approve a Design Review 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 Design Review Two application.*

Response: The proposal satisfies Threshold 3 and 7 above. This criterion is met.

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

Response: The City application fees have been submitted with this application.

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

Response: Submittal requirements have been submitted with this application and outstanding items will be provided when received.

4. *The proposal is consistent with all applicable provisions of Sections 60.05.15 through 60.05.30 (Design Standards).*

Response: As provided in section VII of this narrative, the proposed development is designed in conformance with the applicable design standards of the BDC.

5. *For additions to or modifications of existing development, the proposal is consistent with all applicable provisions of Sections 60.05.15 through 60.05.30 (Design Standards) or can demonstrate that the proposed additions or modifications are moving towards compliance with specific Design Standards if any of the following conditions exist:
[...]*

Response: The proposal is not an addition to or modification of an existing development. This criterion is not applicable

6. *The proposal complies with the grading standards outlined in Section 60.15.10 or approved with an Adjustment or Variance. [ORD 4782; April 2020]*

Response: Grading standards are addressed in Section VII of this narrative and no adjustment or variance is requested.

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

Response: This is a consolidated application for a Design Review 2, Tree Plan 2, and a Replat 1. The applicant has submitted the requests in the proper sequence.

- D. *Submission Requirements. An application for a Design Review Two 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 Two 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: The application forms have been signed by the owner of the property and include the required information. This criterion is met.

- E. Conditions of Approval. The decision making authority may impose conditions on the approval of a Design Review Two application to ensure compliance with the approval criteria.

Response: Acknowledged.

C. 40.45 Land Division and Reconfiguration

40.45.10. Applicability.

The provisions of this section apply to all subdivisions, partitions, developments involving the dedications of public right-of-way, and the reconfiguration of existing property lines. Code requirements for the vacation of public rights-of-way are in Section 40.75. (Street Vacations).

Response: The proposed development includes a request for lot configuration; therefore, the provisions of this section are applicable.

40.45.15. Application.

[...]

2. Replat One.

- A. *Threshold*. An application for Replat One shall be required when any of the following thresholds apply:
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: The subject site is currently comprised of two lots. The applicant requests Replat One approval for the proposed lot consolidation/replat which will result in one lot. No additional lots or parcels are proposed. See Sheet P3.2 for the replat site plan.

- 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.

Response: The applicant will follow applicable Type 1 procedures in the formal application. However, it is being submitted for review concurrently with a Design Review 2 application, which is a Type 2 review.

- 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: The proposal satisfies the threshold requirement 2 as it seeks to consolidate two existing units of land and is not creating an additional unit of land.

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

Response: All application fees have been submitted.

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: There are no conflicts with existing City approvals. This criterion is met.

4. *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: The subject property is an oversized lot because it is greater than the minimum lot size for the R1 zone. There are sufficient streets and accessways and future development is not precluded by this application.

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 proposal does not include lot averaging. This criterion is not applicable.

6. *If lot area averaging standards are proposed pursuant to Section 20.05.15.D, no further applications for Adjustment or Variance from this standard are required or permitted. [ORD 4584; June 2012] [ORD 4782; April 2020]*

Response: The proposal does not include lot averaging. This criterion is not applicable.

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 proposed as part of this project. This criterion is not applicable.

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

Response: The proposed development will not eliminate pedestrian, utility service, or access to the property and will improve each of those with the development of the lot. This standard is met.

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

Response: The entire property is zoned R1. This standard is met.

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

Response: The applicant will demonstrate compliance with applicable criteria in formal application.

D. 40.90. Tree Plan

40.90.15. Application.

2. Tree Plan Two.

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:

1. *Removal of five (5) or more Community Trees, or more than 10% of the number of Community Trees on the site, whichever is greater, within a one (1) calendar year period, except as allowed in Section 40.90.10.1.*

[...]

Response: The applicant proposes to remove more than 5 Community Trees (greater than 10-inch diameter) as part the development proposal; therefore, Tree Plan Two review is required. The applicant is requesting Tree Plan Two review concurrent with the Design Review Two and Replat One applications, with associated approval criteria addressed below.

C. *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.*
2. *All City application fees related to the application under consideration by the decision making authority have been submitted.*
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.*
4. *If applicable, removal of any tree is necessary to accommodate physical development where no reasonable alternative exists.*
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.*
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.*
7. *If applicable, removal of any tree is necessary to enhance the health of the tree, grove, SNRA, or adjacent trees, or to eliminate conflicts with structures or vehicles.*
8. *If applicable, removal of a 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.*
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.*
10. *The proposal is consistent with all applicable provisions of Section 60.60. (Trees and Vegetation) and Section 60.67. (Significant Natural Resources).*
11. *Grading and contouring of the site is designed to accommodate the proposed use and to mitigate adverse effects on neighboring properties, public right-of-way, surface drainage, water storage facilities, and the public storm drainage system. [ORD 4584; June 2012]*
12. *The proposal contains all applicable application submittal requirements as specified in Section 50.25.1. of the Development Code.*

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: As part the development proposal, the applicant proposes to remove all trees on the site, including nine (9) Community Trees (greater than 10-inch diameter); therefore, Tree Plan Two review is triggered. The applicant is requesting Tree Plan Two review concurrent with the Design Review and Replat applications, with associated fees paid. Tree removal will comply with ANSI and ASI standards, as applicable. Tree removal is required to accommodate site development and utility installation, as well as meet development standards, such as minimum density. Nuisance considerations and health of retained trees are not applicable to the proposed removal of the trees, nor are the criterion associated with SNRA or Significant Groves.

The provisions of Section 60.60 address tree protection and mitigation; all of the trees on site will be removed for development and the provisions of this section are not applicable. The site does not contain natural resources and Section 60.67 is not applicable. Grading and contouring of the site are addressed elsewhere in the narrative, as well as in the grading plan (Sheet P2.0). All required documents are included with the Tree Plan application, including a Tree Plan (Sheets L0.01 and L0.02) and those items indicated in the application checklist.

VI. Compliance with Beaverton Development Code Title 50

A. 50.25 Application Completeness

1. *A complete application is one which contains the information required by the Director to address the relevant criteria, development requirements, and procedures of this Code. Non-Discretionary Annexation Related Zoning Map Amendment and Discretionary Annexation Zoning Map Amendment applications processed by the City shall be determined to be complete upon submittal of a valid annexation petition or executed annexation agreement. All other complete application shall consist of the requisite number of copies of the following: [ORD 4265; October 2003]*
 - A. *A completed original application form provided by the Director and application checklist provided by the Director, signed by:*
 1. *The applicant.*
 2. *If the applicant is not the owner, the owner of the property, or the authorized agent of the property owner. If an authorized agent, a written statement made by the owner of the property shall be submitted stating that the agent is authorized to sign on the owner's behalf.*
 3. *If the applicant is exercising its statutory authority to condemn property, the representative of the public agency accompanied by written documentation of such condemnation or intent to condemn the property.*
 4. *Property owner signatures are not required for City initiated Type 4 Text Amendment applications and City initiated Type 1, Type 3, and Type 4 Zoning Map Amendments. [ORD 4265; October 2003]*

Response: The proposed development includes the subject site. This submittal includes completed application forms and checklists signed by the applicant, the property owner, and the applicant's representative.

- B. *A written statement, supported by substantial evidence, that identifies the criteria and development regulations considered relevant to the application, states the facts alleged to show that the application complies with applicable criteria and development regulations, and explains why the application should be approved based on the criteria and development regulations and facts set forth in the application. In addition to*

addressing applicable criteria and development regulations relevant to the application type, the written statement shall address all the applicable technical criteria specified in Section 40.03. (Facilities Review Committee) of the Code. [ORD 4265; October 2003] [ORD 4404; October 2006] [ORD 4487; August 2008] [ORD 4584; June 2012]

[...]

Response: This narrative is the written statement and addresses the criteria and development regulations applicable to the proposal.

D. The information required by Section 50.30.4. regarding Neighborhood Meeting requirements, if applicable.

Response: Because the highest-level review for this proposal is a Type 2 procedure, a neighborhood meeting is not required per 50.30. This standard is not applicable.

E. For a Type 2, Type 3, or Type 4 application, a copy of the pre-application conference summary.

Response: The September 16, 2021, and May 12, 2021, pre-application conference summaries are included as Appendix G.

F. Documentation from service providers, as determined by the Director, stating that essential and critical facilities are available can be made available or will not be adversely affected by the proposal.

Response: An SPL from the Beaverton Water Department is included as Appendix E; an SPL from TVF&R is included as Appendix D; and an SPL from Beaverton School District is included as Appendix F. No additional SPLs were requested by the City.

G. The applicable fee in effect at the date of submittal.

Response: The applicable fee has been submitted with the application.

B. 50.30. Neighborhood Review Meeting

[...]

Response: Because the highest-level review for this proposal is a Type 2 procedure, a neighborhood meeting is not required per 50.30. This standard is not applicable.

VII. Compliance with Beaverton Development Code Title 60

Response: Design Review approval is requested for the proposed multifamily residential building. Design Standards have been met, as described below.

A. 60.05. Design Review Principles, Standards, and Guidelines

60.05.15. Building Design and Orientation Standards.

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

1. Building articulation and variety.

A. Attached residential buildings in Residential zones shall be limited in length to two hundred (200) feet.

Response: The subject site is zoned R1, therefore, this standard is applicable. As depicted in the Architectural Sheets LU0.02 through LU04.0, the length of the building is approximately

120 ft. at its longest point west to east. See Sheets LU3.00 through LU4.01 for details. This standard is met.

- B. Buildings visible from and within 200 feet of an adjacent public street shall have a minimum portion of the street-facing elevation(s) and the elevation(s) containing a primary building entrance or multiple tenant entrances devoted to permanent architectural features designed to provide articulation and variety. These permanent features include, but are not limited to windows, bays and offsetting walls that extend at least eighteen inches (18”), recessed entrances, loading doors and bays, and changes in material types. Changes in material types shall have a minimum dimension of two feet and minimum area of 25 square feet. The percentage of the total square footage of elevation area is:*
- 1. Thirty (30) percent in Residential zones and all uses in Commercial and Multiple Use zones.*

Response: There are three public streets adjacent to the site: SW Jenkins Road, SW Ecole Avenue, and SW Castlewood Street. The buildings are within 200 ft. of and visible from each of these streets. At least 30 percent of each building elevation is devoted to permanent architectural features including windows, bays, changes in plane, and changes in material type. See Sheets LU3.00 through LU4.01 for details.

[...]

- C. The maximum spacing between permanent architectural features, both vertically and horizontally, shall be no more than:*
- 1. Forty (40) feet in Residential zones, and all uses in Commercial and Multiple Use zones.*

[...]

Response: The R1 zone is a residential zone, and these standards are applicable to the proposed building. Building plans and elevations are included in Architectural Sheets LU0.02 through LU04.0. Each of the elevations is well-articulated and includes a variety of permanent architectural features. The spacing between permanent architectural features on the building does not exceed 40 ft.

- D. In addition to the requirements of Section 60.05.15.1.B. and C, detached and attached residential building elevations facing a street, common green or shared court shall not consist of undifferentiated blank walls greater than 150 square feet in area. Building elevations shall be articulated with architectural features such as windows, dormers, porch details, alcoves, balconies or bays.*

Response: The residential building elevations face two streets, SW Jenkins Road and SW Ecole. The building has been designed such that there are no areas of blank walls greater than 150 sq. ft. on these street facing elevations. This standard is met.

- 2. Roof forms.*
 - A. All sloped roofs exposed to view from adjacent public or private streets and properties shall have a minimum 4/12 pitch.*

Response: There are no sloped roofs proposed for the building. This standard is not applicable.

- B. Sloped roofs on residential uses in residential zones and on all uses in multiple use and commercial zones shall have eaves, exclusive of rain gutters, that must project from the building wall at least twelve (12) inches.*

Response: There are no sloped roofs proposed for the building. This standard is not applicable.

C. *All roofs with a slope of less than 4/12 pitch shall be articulated with a parapet wall that must project vertically above the roof line at least twelve (12) inches or architecturally treated, such as with a decorative cornice.*

Response: All roofs with a slope of less than 4/12 pitch are articulated with a parapet wall that projects vertically above the roof line by 12 inches, and a cornice. These parapets are unoccupied and planned to hold no rooftop equipment. This standard is met.

[...]

3. *Primary building entrances.*

A. *Primary entrances, which are the main point(s) of entry where the majority of building users will enter and leave, shall be covered, recessed, or treated with a permanent architectural feature in such a way that weather protection is provided. The covered area providing weather protection shall be at least six (6) feet wide and four (4) feet deep.*

Response: All primary building entrances are recessed into the building structure by 2 ft. and have a canopy that extends out from the structure by 2 ft., for a total depth of 4 ft. They are approximately 8 ft. wide and therefore exceed the minimum standard to provide substantial weather protection. See Sheet LU 1.01 for a floor plan demonstrating this feature, and elevations on Sheets LU3.00 through LU4.01. This standard is met.

4. *Exterior building materials.*

A. *For attached residential uses in Residential zones and all residential uses in Multiple Use zones, a minimum of seventy-five (75) percent of each elevation that is visible from and within 200 feet of a public street or a public park, public plaza or other public open space, and on elevations that include a primary building entrance or multiple tenant entrances shall be double wall construction.*

Response: The proposed building is in the R1 zone, and this standard is applicable. All walls of the building are double wall construction. This standard is met.

[...]

5. *Roof-mounted equipment.*

A. *All roof-mounted equipment shall be screened from view from adjacent streets or adjacent properties in one of the following ways:*

1. *A parapet wall; or*
2. *A screen around the equipment that is made of a primary exterior finish material used on other portions of the building; or*
3. *Setback from the street-facing elevation such that it is not visible from the public street(s); or*
4. *Screened from view by another building.*

Response: No roof-mounted equipment is proposed. The dwelling units will be served with electric heating and ventilation through windows. This standard is met.

[...]

6. *Building location and orientation along streets in Commercial and Multiple Use zones.*

[...]

Response: The proposed development is in the R1 zone. These standards are not applicable.

7. *Building scale along Major Pedestrian Routes*

[...]

Response: The proposed development is not located on a Major Pedestrian Route. This standard is not applicable.

[...]

60.05.20. Circulation and Parking Design Standards.

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

1. Connections to the public street system.

- A. Pedestrian, bicycle, and motor vehicle connections shall be provided between the on-site circulation system and adjacent existing and planned streets as specified in Tables 6.1 through 6.6 and Figures 6.1 through 6.23 of the Comprehensive Plan Transportation Element.*

Response: The proposed development includes frontage improvements along SW Jenkins Road, SW Castlewood Street, and SW Ecole Avenue. The vehicular access to the site will be taken from SW Castlewood, a Local Street. The on-site pedestrian circulation provides direct connections between building entrances and the three abutting streets. The improvements to the site and to the public right-of-way have been designed to meet the requirements of the EDM. See Sheet P3.0. This standard is met.

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

- A. All on-site service areas, outdoor storage areas, waste storage, disposal facilities, recycling containers, transformer and utility vaults and similar activities shall be located in an area not visible from a public street, or shall be fully screened from view from a public street.*

Response: One main service area is proposed to be located in the center of the parking lot. This area will serve as a solid waste/recycling disposal area and be connected via a pedestrian accessway constructed of a surface material differing from that used in the parking lot. The solid waste disposal area will be constructed from CMU and screened by a gated enclosure and will not be seen from the street. In addition, parking and landscape areas are also proposed between the service area and the nearest property line. As a result of the enclosure and landscaping, the solid waste facility will not be visible from the nearby Ecole or Castlewood. All other storage is provided within the proposed building. The location of utility vaults is not known at this time; screening will be provided for utility vaults, as required.

- B. Except for manufacturing, assembly, fabricating, processing, packing, storage and wholesale and distribution activities which are the principle use of a building in Industrial districts, all loading docks and loading zones shall be located in an area not visible from a public street, or shall be fully screened from view from a public street.*

Response: The proposed development is residential. This standard is not applicable.

- C. Screening from public view for service areas, loading docks, loading zones and outdoor storage areas, waste storage, disposal facilities, recycling containers, transformer and utility vaults and similar activities shall be fully sight-obscuring, shall be constructed a minimum of one foot higher than the feature to be screened, and shall be accomplished by one or more of the following methods:*

- 1. Solid screen wall constructed of primary exterior finish materials utilized on primary buildings,*
- 2. Solid hedge wall with a minimum of ninety-five (95) percent opacity within two (2) years.*
- 3. Solid wood fence.*

Response: One main service area is proposed to be located in the center of the parking lot. This area will serve as a solid waste/recycling disposal area and be connected via a pedestrian accessway constructed of materials differing from those used in the parking lot. The solid waste disposal area will be constructed from CMU, and include landscaping, and a metal gate, and will therefore be fully sight-obscuring. The exact location of transformer and utility vaults will be determined during permit design in coordination with the utility providers and will be screened using one of the described methods. These standards will be met.

D. Screening from public view by chain-link fence with or without slats is prohibited.

Response: The use of chain-link fence is not proposed.

[...]

3. *Pedestrian circulation.*

A. Pedestrian connections shall be provided that link to adjacent existing and planned pedestrian facilities as specified in Tables 6.1 through 6.6 and Figures 6.1 through 6.23 of the Comprehensive Plan Transportation Element, and to the abutting public street system and on-site buildings, parking areas, and other facilities where pedestrian access is desired. Pedestrian connections shall be provided except when one or more of the following conditions exist:

- 1. Where physical or topographic conditions, such as a grade change of ten (10) feet or more at a property line to an adjacent pedestrian facility, make connections impractical,*
- 2. Where uses including manufacturing, assembly, fabricating, processing, packing, storage and wholesale and distribution activities which are the principle use of a building in Industrial districts occur,*
- 3. Where on-site activities such as movement of trucks, forklifts, and other large equipment would present potential conflicts with pedestrians, or*
- 4. Where buildings or other existing development on adjacent lands physically preclude a connection now or in the future.*

Response: As shown in Sheet P3.0, on-site pedestrian connections are provided to connect each building entrance to the public way. The connections lead from the building to SW Castlewood Street, to SW Ecole Avenue, and to SW Jenkins Road. This standard is met.

B. A reasonably direct walkway connection is required between primary entrances, which are the main point(s) of entry where the majority of building users will enter and leave, and public and private streets, transit stops, and other pedestrian destinations.

Response: As shown in Sheet P3.0, on-site pedestrian connections are provided to connect primary entrances and to connect the entrances to the three adjacent public streets. The transit stop located on the corner of Jenkins Road and Ecole Avenue will be served by the onsite pathway leading from the rear of the building to the sidewalk along Jenkins, and from the path connecting to the sidewalk along Ecole. This standard is met.

C. A reasonably direct pedestrian walkway into a site shall be provided for every 300 feet of street frontage or for every eight aisles of vehicle parking if parking is located between the building and the street. A reasonably direct walkway shall also be provided to any accessway abutting the site. This standard may be waived when topographic conditions, man-made features, natural areas, etc. preclude walkway extensions to adjacent properties.

Response: Each of the three frontages abutting the site is less than 300 ft. Parking is not located between the building and Jenkins Road, an Arterial street and the front lot line, or SW Ecole, which abuts the western side property line. The parking lot is located between the

building and SW Castlewood Street, which is approximately 120 ft. away, and is a Local classified street. Reasonably direct walkways are provided to each of these streets as described above in this narrative. See Sheet P3.0. This standard is met.

D. Pedestrian connections through parking lots shall be physically separated from adjacent vehicle parking and parallel vehicle traffic through the use of curbs, landscaping, trees, and lighting, if not otherwise provided in the parking lot design.

Response: There is a pedestrian accessway from the building's north entrances, crossing drive aisles through the parking lot, and connecting to the right-of-way of SW Castlewood Street. This pedestrian path is to be constructed of scored concrete which is a different material than the asphalt parking lot. This pathway does not run parallel to parking spaces, except where it is adjacent to the ADA van loading space and one parking space. As a result, the pathway is flush with the parking lot, but constructed of scored concrete to differentiate the material. See Sheet P3.0 for details. This standard is met.

E. Where pedestrian connections cross driveways or vehicular access aisles a continuous walkway shall be provided and shall be composed of a different paving material than the primary on-site paving material.

Response: Where pedestrian walkways cross driveways or vehicular access aisles, the paving material will be scored concrete to distinguish it from the primary asphalt paving material. See Sheet P3.0 for details. This standard is met.

F. Pedestrian walkways shall have a minimum of five (5) foot wide unobstructed clearance and shall be paved with scored concrete or modular paving materials. In the event that the Americans with Disabilities Act (ADA) contain stricter standards for any pedestrian walkway, the ADA standards shall apply.

Response: Pedestrian walkways are a minimum of 5 ft. wide and unobstructed, and they will be paved with concrete. Walkways also meet ADA standards. This standard is met.

4. *Street frontages and parking areas.*

A. Surface parking areas abutting a public street shall provide perimeter parking lot landscaping which meets one of the following standards:

- 1. A minimum six (6)-foot wide planting strip between the right-of-way and the parking area. Pedestrian walkways and vehicular driveways may cross the planting strip. Trees shall be planted at a minimum 2 1/2 inch caliper at a maximum of thirty (30) feet on center. Planting strips shall be planted with an evergreen hedge that will provide a 30-inch high screen and fifty (50) percent opacity within two years. The maximum height shall be maintained at no more than thirty-six (36) inches. Areas not covered by trees or hedge shall be landscaped with live ground cover. Bumper overhangs which intrude into the planting strip shall not impact required trees or hedge; or*
- 2. A solid wall or fence 30 to 36 inches in height parallel to and not nearer than four (4) feet from the right-of-way line. The area between the wall or fence and the street line shall be landscaped with live ground cover. Pedestrian walkways and vehicular driveways may cross the wall or fence.*

Response: As shown on Sheet P3.0, portions of the parking lot abut the SW Ecole Avenue and SW Castlewood Street rights-of-way; therefore, this standard is applicable. A 36-in. fence is proposed to be located four feet from the right-of-way on both streets, separating the right-of-way from the parking lot. The area between the fence and the right-of-way line will be landscaped with a combination evergreen shrubs and ground cover, as shown on landscape Sheet L1.01. The proposed parking lot meets option 2 of this standard.

5. *Parking area landscaping.*

A. *Landscaped planter islands shall be required according to the following:*

1. *Residential uses in residential zones, one for every eight (8) contiguous parking spaces.
[...]*

Response: The site is zoned R1, and these standards are applicable. As shown in Sheet L1.01, one landscaped planter island is provided on each side of the row of eight vehicle parking spaces on the east side of the parking lot, and one is provided on the east side of the vehicle parking spaces next to the building. This standard is met.

- B. *The island shall have a minimum area of 70 square feet, and a minimum width of 6 feet, and shall be curbed to protect landscaping. The landscaped island shall be planted with a tree having a minimum mature height of 20 feet. If a pole-mounted light is proposed to be installed within a landscaped planter island, and an applicant demonstrates that there is a physical conflict for siting the tree and the pole-mounted light together, the decision-making authority may waive the planting of the tree, provided that at least seventy-five (75) percent of the required islands contain trees. Landscaped planter islands shall be evenly spaced throughout the parking area.*

Response: Each landscaped planter island provided in the parking lot is 70 sq. ft. in area, 6 ft. in width and has curbs on all sides where abutting the parking lot. Each island is planted with at least one tree with a minimum mature height of 20 ft. See Sheet L1.01 for details. This standard is met.

C. *Linear raised sidewalks and walkways within the parking area connecting the parking spaces and on-site building(s) may be counted towards the total required number of landscaped islands, provided that all of the following is met:*

1. *Trees are spaced a maximum of 30 feet on center on a minimum of one side of the sidewalk.*
2. *The minimum unobstructed sidewalk width is five feet.*
3. *The sidewalk is separated from the parking area by curbs, bollards, or other means on both sides.*
4. *Trees are located in planting area with groundcover or planted in covered tree wells.*
5. *Trees within the linear sidewalk area shall constitute no more than 50 percent of the total required number of trees within required landscaped planter islands. All remaining required trees shall be located within landscaped planter islands.*

Response: Though there is a pedestrian path within the parking area, it is not proposed to be counted toward the required landscape islands. This standard is not applicable.

D. *Trees planted within required landscaped planter islands or the linear sidewalk shall be of a type and species identified by the City of Beaverton Street Tree List or an alternative approved by the City Arborist.*

Response: All proposed trees are on the City of Beaverton Street Tree List. This standard is met.

6. *Off-Street parking frontages in Multiple Use zones. [...]*

Response: The subject site is zoned R1, a residential zone. This standard is not applicable.

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

Response: The subject site is zoned R1, a residential zone. This application does not propose any development in a Commercial or Multiple Use Zone. This standard is not applicable.

8. *Connect on-site buildings, parking, and other improvements with identifiable streets and drive aisles in Residential, Commercial, and Multiple Use zones.*

A. *Parking lot drive aisles that link public streets and/or private streets with parking stalls shall be designed as private streets consistent with the standard as described under Section 60.05.20.8.B., unless one of the following is met:*

1. *The parking lot drive aisle is less than 100 feet long;*
2. *The parking lot drive aisle serves 2 or less residential units; or*
3. *The parking lot drive aisle provides direct access to angled or perpendicular parking stalls.*

Response: The parking lot drive aisle is less than 100 ft. in length and is not subject to this requirement.

B. *Private streets, common greens, and shared courts shall meet the following standards:*

1. *Private streets serving non-residential uses and residential uses having five or more units shall have raised curbs and minimum five (5) foot wide unobstructed sidewalks on both sides.*

Response: No private streets are proposed. This standard is not applicable.

2. *Private streets serving less than five (5) residential units shall have raised curbs and a minimum five (5) foot wide unobstructed sidewalk on at least one side.*

Response: No private streets are proposed. This standard is not applicable.

3. *When common greens and shared courts are utilized, an unobstructed walkway a minimum of five (5) feet wide shall be provided within the common green or shared court.*

Response: No common greens or shared courts are proposed with the proposed development. This standard is not applicable.

[...]

60.05.25. Landscape, Open Space, and Natural Areas Design Standards.

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

[...]

3. *Minimum landscape requirements for residential developments consisting of eight (8) or more units of Attached Housing or Compact Detached Housing.*

Response: The proposed development consists of more than 8 units of Attached Housing and these standards are applicable.

A. *Common open space shall consist of active, passive, or both open space areas, and shall be provided as follows:*

1. *A minimum of 15% of the gross site area shall be landscaped as defined in Section 60.05.25.4*

[...]

Response: See Table 3 below. The subject site is 25,944 sq. ft. in size after lot consolidation and a 6 ft. dedication along SW Jenkins. Therefore, the site requires 3,892 sq. ft. of landscaping. Site landscaping provided is 4,121 sq. ft. This standard is met.

Table 3. Required Landscaping and Open Space

	Site Area (sq. ft.)	Standard	Minimum Required (sq. ft.)	Provided (sq. ft.)	Standard Met
Site Landscaping	25,944	15% of Site Area	3,892	4,121	Meets Standard
	Site Landscaping (sq. ft.)	Standard	Minimum Required (sq. ft.)	Provided (sq. ft.)	Standard Met
Active Open Space	3,892	25% of Minimum Landscaping	973	1,369	Meets Standard

B. At least twenty-five (25) percent of the total required open space area shall be active open space.

Response: Table 4 provides a breakdown of the open space and landscaping requirement. As shown on Sheet P3.0, there are two areas proposed for active open space. Active open space is provided at the rear/north of the building on the east and west sides. Both sides provide an attractive and usable space for residents to gather and enjoy the outdoors. These spaces will be landscaped with trees and shrubs and include trellises and seating areas to encourage recreational use. This standard is met.

Table 4. Landscaping and Open Space

Landscaping Type	Amount (sq. ft.)	Minimum Required (sq. ft.)	Standard Met
Site Landscaping	4,121	3,892	Meets Standard
Interior Parking Lot Landscaping	392	350	Meets Standard
Perimeter Parking Lot Landscaping	294	N/A	N/A
Active Open Space (west side)	642	973 combined	Meets Standard
Active Open Space (east side)	727		
Total Active Open Space	1,369	973	Meets Standard
Private Patios as used for Common Open Space	306	N/A	Meets Standard

C. For the purposes of this Section, environmentally sensitive areas shall be counted towards the minimum common open space requirement. Aboveground landscaped water quality treatment facilities shall be counted toward the minimum common open space requirement.

Response: As shown in the CWS Pre-Screen SPL included as Appendix B, there are no environmentally sensitive areas located on or within 200 ft. of the site, and there are no aboveground landscaped water quality treatment facilities on site. This standard is not applicable.

D. For the purposes of this Section, vehicular circulation areas and parking areas, unless provided as part of a common green or shared court, shall not be considered common open space.

Response: The parking area landscaping is not part of a common green or shared court and landscaping proposed in the parking area is not counted toward the common open space requirement. This standard is met.

E. Individual exterior spaces such as outdoor patios and decks constructed to serve individual units shall count toward the common open space requirement, with the following restrictions:

- 1. Only a maximum of 120 square feet per unit may count toward the requirement.*
- 2. Only patios and decks provided on the ground floor elevation level may count toward the requirement.*

Response: As shown above in Table 4, private outdoor patios on the ground floor contribute a combined total of 306 sq. ft. to the minimum required common open space provided. Each private outdoor patio used in this calculation is less than 45 sq. ft. individually, which meets the maximum allowance of 120 sq. ft. per unit. This standard is met.

F. Common open space shall not abut a Collector or greater classified street as identified in the City's adopted Functional Classification Plan, unless that common open space shall be allowed adjacent to these street classifications where separated from the street by a constructed barrier at least three (3) feet in height.

Response: Common open space is not proposed abutting a Collector or greater classified street. This standard is not applicable.

G. Common open space shall be no smaller than 640 square feet in area, shall not be divided into areas smaller than 640 square feet, and shall have minimum length and width dimensions of 20 feet, except as allowed by 60.05.25.6.A.1.

Response: As shown in Table 4 and on Sheet P3.0, the development proposes two active open space areas approximately 642 sq. ft. and 727 sq. ft. in size. Both spaces exceed the minimum 20 ft. dimensions. This standard is met.

H. In phased developments, common open space shall be provided in each phase of the development consistent with or exceeding the requirements for the size and number of dwelling units proposed.

Response: This development is not proposed to be completed in phases. This standard is not applicable.

I. Active common open spaces shall be included in all developments, and shall include at least two (2) of the following improvements:

- 1. A bench or other seating with a pathway or other pedestrian way;*
- 2. A water feature such as a fountain;*
- 3. A children's play structure;*
- 4. A gazebo;*
- 5. Clubhouse;*
- 6. Tennis courts;*
- 7. An indoor or outdoor sports court; or*
- 8. An indoor or outdoor swimming and/or wading pool.*
- 9. Plaza*

Response: The two active open space areas proposed at the site will be developed with benches and a pedestrian way, and large trellis structures. The trellises, benches, and landscaping in the active open space areas offer an attractive space for building residents to

gather outdoors and will provide a distinct visual separation between the right-of-way of Ecole Avenue and the building site. This standard is met.

[...]

4. *Additional minimum landscape requirements for Attached Housing and Compact Detached Housing:*

A. *All front yard areas and all required open space areas not occupied by structures, walkways, driveways, plazas or parking spaces shall be landscaped.*

Response: All front yard areas and unpaved areas are proposed to be landscaped. Refer to Sheet L1.01 for details. This standard is met.

B. *Landscaping shall include live plants or landscape features such as fountains, ponds or other landscape elements. Bare gravel, rock, bark and similar materials are not a substitute for plant cover, and shall be limited to no more than twenty-five (25) percent of the landscape area.*

Response: Landscape plantings, including ground cover, shrubs, and trees are proposed to cover the site's entire landscape area. Gravel, rock, and bark are not proposed for use at this time. See Sheet L1.01 for details. This standard is met.

C. *For the purposes of this Section, vehicular circulation areas and parking areas, unless provided as part of a shared court, shall not be considered landscape area.*

Response: As shown above in Table 4, the site landscaped area calculations do not include the landscaping required for parking or vehicular circulation. This standard is met.

D. *All street-facing building elevations shall have landscaping along their foundation, excluding buildings that are placed at the property line or setback less than 12-inches from the property line. When a porch obstructs a foundation, landscaping shall be installed along the outer edge of the porch. This landscaping requirement shall not apply to portions of the building facade that provide access for pedestrians or vehicles to the building, or for plazas adjacent to the building. The foundation landscaping shall meet the following minimum standards:*

1. *The landscaped area shall be at least three (3) feet wide; and,*

Response: This standard is applicable to the SW Jenkins Road and SW Ecole Avenue street-facing elevations. The street-facing elevations are landscaped with trees, shrubs and groundcovers. See Sheet L1.01 for more information. This standard is met.

2. *For every three (3) lineal feet of foundation, an evergreen shrub having a minimum mature height of twenty-four (24) inches shall be planted; and,*

Response: As shown on Sheet L1.01, evergreen shrubs with a minimum mature height of 24 inches are provided at the foundation along applicable building foundations.

3. *Groundcover plants shall be planted in the remainder of the landscaped area.*

Response: Groundcover plants are planted in the remainder of the foundation landscape area. See Sheet L1.01 for more information. This standard is met.

E. *The following minimum planting requirements for required landscaped areas shall be complied with. These requirements shall be used to calculate the total number of trees and shrubs to be included within the required landscape area:*

1. *One (1) tree shall be provided for every eight hundred (800) square feet of required landscaped area. Evergreen trees shall have a minimum planting height of six (6) feet. Deciduous trees shall have a minimum caliper of 1.5 inches at time of planting.*

Response: The minimum required landscaping is 3,892 sq. ft., based on the site's 25,944 sq. ft. of total area. As a result, 5 trees are required. A total of 13 onsite trees, 1.5 inches or greater, are proposed with this development. See Sheet L1.01 for locations and details. This standard is met.

2. *One (1) evergreen shrub having a minimum mature height of forty-eight (48) inches shall be provided for every four hundred (400) square feet of required landscaped area.*

Response: The minimum required landscaping is 3,892 sq. ft., based on the site's 25,944 sq. ft. of total area. As a result, 10 evergreen shrubs are required, and as shown on Sheet L1.01, there are more than 10 evergreen shrubs meeting the minimum size requirements shown with this development. This standard is met.

3. *Live ground cover consisting of low-height plants, or shrubs, or grass shall be planted in the portion of the landscaped area not occupied by trees or evergreen shrubs. Bare gravel, rock, bark or other similar materials may be used, but are not a substitute for ground cover plantings, and shall be limited to no more than twenty-five (25) percent of the required landscape area.*

Response: Live ground cover plantings are planned for the areas surrounding trees and shrubs and elsewhere throughout the site. Gravel, rock, and bark are not proposed. This standard is met.

F. *A hard surface pedestrian plaza or combined hard surface and soft surface pedestrian plaza, if proposed, shall be counted towards meeting the minimum landscaping requirement, provided that the hard-surface portion of the plaza shall not exceed twenty-five (25) percent of the minimum landscaping requirement. [...]*

Response: No hard surface pedestrian plazas are proposed.

[...]

8. *Retaining walls. Retaining walls greater than six (6) feet in height or longer than fifty (50) lineal feet used in site landscaping or as an element of site design shall be architecturally treated with contrasting scoring, or texture, or pattern, or off-set planes, or different applied materials, or any combination of the foregoing, and shall be incorporated into the overall landscape plan, or shall be screened by a landscape buffer. Materials used on retaining walls should be similar to materials used in other elements of the landscape plan or related buildings, or incorporate other landscape or decorative features exclusive of signs. If screening by a landscape buffer is utilized, a buffer width of at least five (5) feet is required, landscaped to the B3-High Screen Buffer standards.*

Response: A retaining wall is proposed along the site's eastern boundary, adjacent to the parking lot, which is 4 ft. at its highest point and is approximately 124 ft. in length. Another wall surrounds the building's east, south, and west side along the SW Jenkins frontage, and the southern portion of the SW Ecole frontage. This wall is 247 lineal ft. The retaining walls will be

constructed of textured cornerstone blocks, or similar material, meeting the requirements of this section. Tiebacks are not proposed. See detail of the retaining wall on Sheet P2.1. This standard is met.

9. *Fences and walls.*

- A. *Fences and walls shall be constructed of any materials commonly used in the construction of fences and walls such as wood, stone, rock, or brick, or other durable materials.*
- B. *Chain link fences are acceptable as long as the fence is coated and includes slats made of vinyl, wood or other durable material. Slats may not be required when visibility into features such as open space, natural areas, parks and similar areas is needed to assure visual security, or into on-site areas in industrial zones that require visual surveillance.*
- C. *Masonry walls shall be a minimum of six inches thick. All other walls shall be a minimum of three inches thick.*
- D. *For manufacturing, assembly, fabricating, processing, packing, storage and wholesale and distribution activities which are the principle use of a building in Industrial districts, the preceding standards apply when visible from and within 200 feet of a public street.*
- E. *Fences and walls:*
 - 1. *May not exceed three feet in height in a required front yard along streets, except required above ground stormwater facilities fencing which may be four feet in height in a required front yard, and eight feet in all other locations.*
 - 2. *May be permitted up to six feet in a required front yard along designated Collector and Arterial streets.*
 - 3. *For detached housing along streets and housing facing common greens and shared courts in Multiple Use zones, 3 feet high fences and walls are permitted in front of the building, and on corner lots abutting a street, along the side of the building. Higher fences and walls are permitted on corner lots along the side of the building beginning within 15 feet of the back end of the building nearest to the property line.*

Response: A 36-inch-tall fence, constructed of wooden materials typical for fencing, is proposed at the property line around the footprint of the building abutting SW Jenkins Road and SW Ecole Avenue. A 36-inch-tall fence, constructed of wooden materials typical for fencing, is proposed to be constructed adjacent to the parking lot abutting SW Ecole Avenue and SW Castlewood Street. A retaining wall, up to 5 ft. at its highest point, is proposed along SW Jenkins Road, which is an Arterial. Where the wall is proposed along SW Ecole Avenue, it does not exceed the maximum permitted height of 8 ft. A 6 ft. privacy fence is proposed to be constructed between the retaining wall and the eastern property line. This standard is met.

10. *Minimize significant changes to existing on-site surface contours at residential property lines.*

- A. *Where grading is proposed, the requirements listed in in Section 60.15.10.2 shall apply .*

Response: The standards of 60.15.10.2 are addressed in below in this section of the narrative.

11. *Integrate water quality, quantity, or both facilities. Non-vaulted surface stormwater detention and treatment facilities having a side slope greater than 2:1 shall not be located between a street and the front of an adjacent building.*

Response: Stormwater detention and treatment facilities are a combination of belowground detention basins located within the parking lot, and water quality treatment swales (LIDA), located in SW Ecole Avenue. None of these facilities have slopes greater than 2:1 or are located between the street and the front of the building. See Appendix C for the Preliminary Stormwater Report. This standard is met.

12. *Natural areas. Development on sites with City-adopted natural resource features such as streams, wetlands, significant trees and significant tree groves, shall preserve and maintain the resource without encroachment into any required resource buffer standard unless otherwise authorized by other City or CWS requirements.*

Response: The site does not contain any City-adopted natural resource features; therefore, this standard is not applicable.

13. *Landscape buffering and screening. All new development and redevelopment in the City subject to Design Review shall comply with the landscape buffering requirements of Table 60.05-2. and the following standards. For purposes of this Section, a landscape buffer is required along the property lines between different zoning district designations. A landscape buffer is required for non-residential land uses and parks in Residential zoning districts.*

A. *Applicability of buffer standards:*

1. *The buffer standards shall not be applicable to individual single-family buildings on individual parcels.*
2. *The buffer standards shall not apply to areas where emergency access is required.*
3. *The buffer standards shall not apply to areas where a public utility easement exists. This exemption only applies to trees and does not exempt the requirement of shrubs and ground cover.*
4. *The buffer standards shall not apply along property lines where a non-residential use is already buffered by a natural feature or an open space dedication, if such a natural buffer or dedication is at least 40 feet in width, or if the width of the natural feature or open space dedication and the density and quality of landscaping meet or exceed the applicable landscape buffer standard.*
5. *The buffer standards shall not apply where required for visual access purposes as determined by the City Traffic Engineer or City Police. This exemption only applies to trees and shrubs and does not exempt the requirement of ground cover.*

[...]

Response: Through a City-initiated project, the subject site was recently changed from Washington County R-24 to City of Beaverton R1. The R1 zone was identified by City of Beaverton Staff as the comparable zoning district to Washington County R-24. Currently the site abuts property still zoned Washington County R-24 to the east, and across SE Ecole to the west. As a result, per Table 60.05-2, no buffers are required on those frontages because it is comparable zoning to R1, and there are no buffer requirements adjacent to and abutting R1 zones. To the south across Jenkins Road is property zoned Ind, which does not require a landscaped buffer. The site is across SW Castlewood Street from Washington County R-5 zoning which requires a buffer 10 ft. As shown on Sheets P3.0 and L1.01, there is a 10 ft. landscaped buffer provided. This standard is met.

14. *Community Gardens*

- A. *Fences. Community Gardens shall have a fence constructed of a durable materials commonly used in the construction of fencing. Fences shall be a minimum of four (4) feet in height. Coated chain link may be permitted. Temporary construction fencing, erosion control fencing, tree protection fencing and other temporary fencing materials shall not be permitted.*
- B. *Parking. Parking must be available in the general vicinity of the garden, on-street parking spaces may count toward this requirement.*
- C. *Size. Community gardens shall not exceed one acre in size.*

Response: No community gardens or garden beds are proposed on site. These standards are not applicable.

60.05.30. Lighting Design Standards.

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

- 1. *Adequate on-site lighting and minimal glare on adjoining properties.*
 - A. *Lighting shall be provided at lighting levels for development and redevelopment in all zoning districts consistent with the City’s Technical Lighting Standards.*
 - B. *Lighting shall be provided in vehicular circulation areas and pedestrian circulation areas.*
 - C. *Lighting shall be provided in pedestrian plazas, if any developed.*
 - D. *Lighting shall be provided at building entrances.*
 - E. *Canopy lighting shall be recessed so that the bulb or lens is not visible from a public right-of-way.*

Response: Lighting for the proposed development is provided in vehicular parking and circulation areas, pedestrian circulation areas, on the walkway along the east side of the building, and at building entrances. Sheet E1.0 and Appendix J describe the location, illumination, pole height, wattage, and light levels for the proposed development. The proposed lighting plan provides illumination for all on-site pedestrian pathways. These standards are met.

- 2. *Pedestrian-scale on-site lighting.*
 - A. *Pole-mounted Luminaires shall comply with the City’s Technical Lighting Standards, and shall not exceed a maximum of:*
 - 1. *Fifteen (15) feet in height for on-site pedestrian paths of travel.*
 - 2. *Twenty (20) feet in height for on-site vehicular circulation areas for residential uses in Residential zoning districts.*
 - 3. *Thirty (30) feet in height for on-site vehicular circulation areas in non-residential zoning districts.*
 - 4. *Fifteen (15) feet for the top deck of non-covered parking structures.*
 - 5. *The height of the poles for on-site pedestrian ways and on-site vehicular circulation areas shall be measured from the site’s finished grade.*
 - 6. *The height of the poles on the top deck of non-covered parking structures shall be measured from the finished floor elevation of the top deck.*
 - 7. *The poles and bases for pole-mounted luminaires shall be finished or painted a non-reflective color.*

Response: The subject property is in a residential zone and has light poles and fixtures located within the vehicle circulation area and parking lot. Therefore, Subsections 2 and 7 are applicable to this proposal. As shown and noted on Sheet E1.0 and Appendix J, pole-mounted luminaires in vehicular circulation and parking areas do not exceed 20 ft. in height. Pedestrian paths of travel are located within the parking lot and adjacent to the building, and any pedestrian pole mounted luminaires proposed in these areas will not exceed 15 ft. in height. These standards are met.

B. 60.15 Land Division Standards

[...]

60.15.10. Grading Standards

[...]

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

- A. *Public right-of-way road improvements such as new streets, street widening, sidewalks, and similar or related improvements.*

Response: The 6 ft. right-of-way dedication and reconstruction of the public sidewalk on the SW Jenkins Road frontage resulted in a steep transition between the site and Jenkins Road. As a result, the building was moved farther north on the subject site, resulting in the need for a retaining wall to manage the steep grade necessitated by the right-of-way improvements.

- B. Storm water detention facilities subject to review and approval of the City Engineer.
- C. On-site grading where the grading will take place adjacent to an existing public street right-of-way, and will result in a finished grade that is below the elevation of the subject public street right-of-way; provided such grading is subject to the approval of the City Engineer, who may require appropriate erosion and sediment control mitigation measures.

Response: No above-ground stormwater detention facilities are proposed on site, and the finished grade of the site is not below the elevation of the adjacent right-of-way.

- 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:
 - A. 0 to 5 feet from property line: Maximum of two (2) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable. [ORD 4584; June 2012]

Response: The Grading Plan is included as Sheet P2.0. Grades within 5 ft. of the eastern property line are design to be within 2 ft. of the existing elevation. To adequately provide connection from the building to existing sanitary sewer facilities, the development required a raised base height elevation, which impacts the grading adjacent to the eastern property line. The raise in grade has been staggered such that there is no greater than a two ft. differential between the raised parking lot and the adjacent property to the east. This standard is met.

- B. More than 5 feet and up to and including 10 feet from property line: Maximum of four (4) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable. [ORD 4584; June 2012]

Response: The staggered grading has been designed to meet this standard. Between five and ten feet of the property line, there is no grading differential greater than four feet.

- C. More than 10 feet and up to and including 15 feet from property line: Maximum of six (6) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable. [ORD 4584; June 2012]

Response: The Grading Plan does not result in any slopes with 6 or more feet of differential to the perimeter property lines. This standard is met.

- D. More than 15 feet and up to and including 20 feet from property line: Maximum of eight (8) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable. [ORD 4584; June 2012]

Response: The Grading Plan does not result in any slopes with 8 or more feet of differential to the perimeter property lines. This standard is met.

- E. More than 20 feet and up to and including 25 feet from property line: Maximum of ten (10) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable. [ORD 4584; June 2012]

Response: The Grading Plan does not result in any slopes with 10 or more feet of differential to the perimeter property lines. This standard is met.

F. *Where an existing (pre-development) slope exceeds one or more of the standards in subsections 60.15.10.3.A-E, above, the slope after grading (post-development) shall not exceed the pre-development slope.*

Response: There is an existing 3 ft. rock wall along the eastern boundary of the property. Post-development grading proposes a wall along the east property line with a maximum height of 4.5 ft, which exceeds the 3 ft. existing rock wall. The need for this height is described above and is necessary for the development to adequately connect to existing public sewer facilities.

G. *The on-site grading contours standards above apply only to the property lines of the parent parcel of a development. They do not apply to internal property lines within a development. [ORD 4584; June 2012]*

Response: The applicant has directed responses to the boundaries of the parent parcel. There are no internal property lines within the development.

4. *Significant Trees and Groves. 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: There are no significant trees or groves on the subject property. This standard is not applicable.

C. 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.

- 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.*
- 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.*
- 3. Bicycle Parking. 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: Vehicle parking and bicycle parking is required for the proposed development and will be provided per these requirements.

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.
- 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-Term 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.*

Response: Required vehicle and bicycle parking spaces for the proposed development were calculated as shown in Table 5 and Table 6 below and as described on Sheets P3.00 and LU1.01 through LU1.03.

Table 5. Required Off-Street Vehicle Parking Spaces

Use Category	Required Ratio	Units/GSF	Required Spaces	Proposed Spaces	Comments
Attached Dwellings					Meets the standards.
1 Bedroom	1.25/du	16	20		
2 Bedroom	1.5/du	6	9		
3 Bedroom	1.75/du	N/A	N/A		
4 Bedroom	1.75/du	N/A	N/A		
Total		22	29	29	

Table 6. Required Bicycle Parking Spaces

Use Category	Required Spaces		Proposed Spaces		Comments
	Short Term	Long term	Short Term	Long Term	
Multi-dwelling Structure of 4 or more units	2 or 1 sp/20 du	1 sp/du			Meets the standards.
Total	2	22	2	22	

[...]

8. *Residential Parking Dimensions.* For all residential uses, any required parking space shall not be less than 8 1/2 feet wide and 18 1/2 feet long. (See also Section 60.30.15. (Off-Street Parking Lot Design) for other standards.) [ORD 4312; July 2004]

Response: As shown on Sheet P3.0, the required parking spaces have been designed to be a minimum in accordance with the minimum dimensional standards. The parking spaces on the east side of the parking lot are located at least six feet from the eastern property line. This standard is met.

[...]

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 required parking spaces are provided on the same lot as the proposed building. This standard is met.

- 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: Each of the parking areas has been designed so that the use of the parking spaces will require no backing movements or other maneuvering within a street or right-of-way.

- C. *In R10, R7, R5 and R4 zones parking and loading spaces may be located inside and rear yards and may be located in the front yard of each dwelling unit only if located in the driveway area leading to its garage.*

Response: The subject site is zoned R1. This standard is not applicable.

[...]

12. *Compact Cars. Compact car parking spaces may be allowed as follows:*

- A. *For residential uses, required vehicle parking spaces shall be provided at standard size pursuant to Section 60.30.10.8. Parking in excess of the required parking may be provided as compact parking subject to Section 60.30.10.7. [ORD 4471; February 2008]*

Response: No parking in excess of the required parking is proposed, and no compact parking spaces are proposed; therefore, this standard is not applicable.

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:[...]

Response: The off-street parking lots have been designed in accordance with City Standards.

D. 60.55. Transportation Facilities

60.55.10. General Provisions.

1. *All public and private 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: The adjacent public streets serving the site are existing rights-of-way. As part of this development, the applicant will construct half street improvements, including curb, sidewalk, and stormwater management along the frontages of SW Ecole and SW Castlewood. There will be a 6 ft. dedication on the SW Jenkins Road frontage and the applicant will construct a sidewalk. The improvements to these rights-of-way, in conjunction with the on-site transportation facilities meets this standard.

[...]

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: The streets required to serve the site will be improved as described above in this narrative. There is adequate connection to all modes of transportation to and from the subject property.

[...]

10. Pedestrian Circulation.

- A. *Walkways are required between parts of a development where the public is invited or allowed to walk.*

Response: Access to the site is expected to be primarily used by residents and their visitors. Walkways are provided between the public sidewalk system and the entrances, as well as between the building and the multiuse path being constructed along the buffer for the riparian corridor and wetland at the eastern portion of the site. This standard is met.

- B. *A walkway into the development shall be provided for every 300 feet of street frontage. A walkway shall also be provided to any accessway abutting the development.*

Response: None of the three street frontages exceed 300 ft. in length. The pedestrian circulation system connects the entrances with the onsite pedestrian network and to each of the three surrounding streets. See Sheet P3.0 for details on walkway locations.

- C. *Walkways shall connect building entrances to one another and from building entrances to adjacent public streets and existing or planned transit stops. Walkways shall connect the development to walkways, sidewalks, bicycle facilities, alleyways and other bicycle or pedestrian connections on adjacent properties used or planned for commercial, multifamily, institution or park use. The City may require connections to be constructed and extended to the property line at the time of development.*

Response: As shown on Sheet P3.0, walkways are proposed to connect the building to adjacent streets, the transit stop, and pedestrian facilities. This standard is met.

- D. *Walkways shall be reasonably direct between pedestrian destinations and minimize crossings where vehicles operate.*

Response: Onsite walkways provide safe pedestrian connections between the building, parking lot, adjacent sidewalks, and the transit stop. These walkways are reasonably direct and do not require out of direction travel. This standard is met.

- E. *Walkways shall be paved and shall maintain at least five (5) feet of unobstructed width. Walkways bordering parking spaces shall be at least seven feet wide unless concrete wheel stops, bollards, curbing, landscaping, or other similar improvements are provided which prevent parked vehicles from obstructing the walkway. Stairs or ramps shall be provided where necessary to provide a reasonably direct route. The slope of walkways without stairs shall conform to City standards.*

Response: Walkways will be paved and will be at least five feet in width. The walkway adjacent and parallel with the north side of the building is seven feet in width which

accommodates parking overhang. The walkway to the east of the building is five feet wide. This standard is met.

F. The Americans with Disabilities Act (ADA) contains different and stricter standards for some walkways. The ADA applies to the walkway that is the principal building entrance and walkways that connect transit stops and parking areas to building entrances. Where the ADA applies to a walkway, the stricter standards of ADA shall apply.

Response: Walkways that are subject to the ADA have been designed to ADA standards.

G. On-site walkways shall be lighted to 0.5 foot-candle level at initial luminance. Lighting shall have cut-off fixtures so that illumination does not exceed 0.5 foot-candle more than five (5) feet beyond the property line.

Response: On-site sidewalks, including the east side walkway, will be illuminated to at least a 0.5 foot-candle level. See Sheet E01 for lighting details. This level is reduced to below 0.5-foot candles at the property lines. This standard is met.

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: [...]

Response: There are no Major Transit Stops within or near the project. This standard is not applicable.

[...]

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: No bicycle and pedestrian connections along residential rear lot lines are proposed. This standard is met.

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:

- A. Physical or topographic conditions make a general street, bicycle, or pedestrian connection impracticable. Such conditions include but are not limited to the alignments of existing connecting streets, freeways, railroads, slopes in excess of City standards for maximum slopes, wetlands or other bodies of water where a connection could not reasonably be provided;*
- B. Existing buildings or other development on adjacent lands physically preclude a connection now and in the future, considering the potential for redevelopment; or,*
- C. Where streets, bicycle, or pedestrian connections would violate provisions of leases, easements, covenants, or restrictions written and recorded as of May 1, 1995, which preclude a required street, bicycle, or pedestrian connection.*

Response: Street, bicycle, and pedestrian connections are proposed as part of the street and pedestrian facilities with the on-site pedestrian pathways and vehicle accessway, and are not precluded by this list. These provisions are not applicable.

60.55.30. Minimum Street Widths.

Minimum street widths are depicted in the Engineering Design Manual

1. Any project-specific modifications of the standards contained in the Engineering Design Manual regarding the widths of features relating to the movement of vehicles, including but

not limited to rights of way, travel lanes, parking lanes, bike lanes, driveway aprons, curb radii, or other such features shall be processed in accordance with the provisions contained in the Section 145 Design Modifications of the Engineering Design Manual. [ORD 4418; February 2007]

Response: As shown on Sheet P3.1 the widths of widths of SW Ecole Ave and SW Castlewood Street are 32.5 ft. and 28 ft. respectively in rights-of-way of 60 ft. and 50 ft. respectively. No right-of-way dedication is required or proposed on these streets. SW Jenkins Road is within an approximate right-of-way of 97 ft. and a 6 ft. dedication is proposed. This standard is met.

2. *Any project-specific modifications of the standards of the Engineering Design Manual relating to the location and dimensions of required street landscaping and pedestrian features including, but not limited to, sidewalks, planter strips, street trees, street tree wells, street tree easements, or street furniture are subject to the procedures contained in Chapter 40 (Applications). The required application will depend on the scope of the proposed project and the type of application filed with the City. [ORD 4418; February 2007]*

Response: No modifications to the EDM are requested at this time.

3. *Street trees shall be planted at a maximum linear spacing of 30 feet along street frontages or in accordance with an approved street tree plan approved by the City Arborist. Proposed tree wells shall be designed to meet standards in the City Engineering Design Manual.*

Response: Street trees are proposed as shown on Sheet L0.02 and are spaced at the maximum interval of 30 ft., except at the location of the LIDA facilities and transportation features such as the driveway approach. This standard is met.

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: As shown on Sheet P3.0, safe access from the proposed development to the surrounding street network is provided through pedestrian walkways leading to and from SW Jenkins, SW Ecole, and SW Castlewood. Vehicular access is taken from SW Castlewood Street. This standard is met.

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: The site does not take access from a closed-end street system. This standard is not applicable.

3. *Intersection Standards.*

- A. *Visibility at Intersections. All work adjacent to public streets and accessways shall comply with the standards of the Engineering Design Manual except in Regional and Town Centers.*

1. *The sight clearance area requirements for Town Centers and Regional Centers shall be determined on a case-by-case basis by the decision-making authority. In making its determination, the decision-making authority shall consider the safety of the users*

of the intersection (including pedestrians, bicyclists, and motorists), design speeds, the intersection sight distance standards of the Engineering Design Manual and Standard Drawings, and other applicable criteria. [ORD 4111; July 2000]

Response: The visibility at the site driveway to SW Castlewood Street is designed to the standards of the EDM. The proposed building location meets sight distance standards at the intersection of SW Jenkins Road and SW Ecole Avenue. See Appendix H for sight distance analysis. This standard is met.

2. *The requirements specified in 60.55.35.3.A. may be lessened or waived by the decision-making authority if the project will not result in an unsafe traffic situation. In making its determination, the decision-making authority shall consider the safety of the users of the intersection (including pedestrians, bicyclists and motorists), design speeds, the intersection sight distance standards of the Engineering Design Manual, and other applicable criteria.*

Response: No modifications to these requirements are requested at this time.

- B. *Intersection angles and alignment and intersection spacing along streets shall meet the standards of the Engineering Design Manual and Standard Drawings.*

Response: The vehicular access to the site is taken from the lowest classification of streets surrounding the property. SW Castlewood is a Local classified street, and the proposed driveway location is approximately 80 ft. from the intersection with SW Ecole Avenue. This standard is met.

- C. *Driveways.*

1. *Corner Clearance for Driveways. Corner clearance at signalized intersections and stop-controlled intersections and spacing between driveways shall meet the standards of the Engineering Design Manual and Standard Drawings.*

Response: Access is taken from SW Castlewood, which is a Local street. The proposed driveway location is approximately 80 ft. from the intersection with SW Ecole Avenue which meets the standards of the EDM and Standard Drawings.

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: The site will take access from SW Castlewood, a Local street. No shared driveways are proposed. This standard is not applicable.

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: No detached dwellings are proposed. This standard is not applicable.

E. 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 because of the proposed development. [...]

Response: The proposed development will include utilities, which will be placed underground.

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: Any utilities within the site will be placed underground. See Sheet P4.0 for details.

60.65.25. Optional Fee In Lieu of the Undergrounding Requirement.

Response: The applicant is not requesting a Fee in Lieu option. These requirements are not applicable.

F. 60.67. Significant Natural Resources

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.*

60.67.10. Significant Riparian Corridors. *Prior to issuing a development permit, the list of Significant Riparian Corridors shall be reviewed to determine if the site proposed for development is identified as being listed corridor.*

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

Response: No wetlands are located on the subject property. This standard is not applicable.

VIII. Conclusion

The request for the Jenkins Apartments development and related approvals has been shown to be consistent with the applicable standards of the City of Beaverton. Edge Development LLC respectfully requests approval of the applications.