



CITY OF MILWAUKIE

March 8, 2024

Land Use File(s): P-2024-001; TFR-2024-001

NOTICE OF DECISION

This is official notice of action taken by the Milwaukie Planning Manager on March 8, 2024.

Traducciones de este documento e información sobre este proyecto están disponibles en español. Para solicitar información o preguntar en español, favor de email espanol@milwaukieoregon.gov.

Applicant(s): Terry Amundson, Koble Creative Architecture, LLC

Location(s): 9815-9833 SE 17th Ave

Tax Lot(s): 11E26DB01000; 11E26DB01200; 11E26DB01201

Application Type(s): Parking Modification; Transportation Facilities Review

Decision: Approved with Conditions

Review Criteria: Milwaukie Zoning Ordinance:

- MMC Section 19.301 Moderate Density Residential Zone
- MMC Section 19.504 Site Design Standards
- MMC Section 19.505.4 Cottage Cluster Development
- MMC Section 19.605 Vehicle Parking Requirements
- MMC Section 19.609 Bicycle Parking
- MMC Chapter 19.700 Public Improvements
- MMC Section 19.1005 Type II Review

Milwaukie Municipal Code:

- MMC Title 12: Streets, Sidewalks, and Public Places
- MMC Section 16.32 Tree Code

Neighborhood(s): Historic Milwaukie

Appeal period closes: 5:00 p.m., March 25, 2024

This notice is issued in accordance with Milwaukie Municipal Code (MMC) Section 19.1005 Type II Review. The complete case file for this application is available for review by appointment between 8:00 a.m. and 5:00 p.m. on regular business days at the Planning Department, City Hall, 10501 SE Main St. Please contact Vera Koliass, Senior Planner, at 503-786-7653 or koliassv@milwaukieoregon.gov, if you wish to view this case file or visit the project webpage at <https://www.milwaukieoregon.gov/planning/p-2024-001>.

This decision may be appealed by 5:00 p.m. on March 25, 2024, which is 15 days from the date of this decision.¹ (Note: Please arrive by 4:45 p.m. for appeal payment processing.) Any person who is adversely affected or aggrieved by this decision may appeal the decision by filing a written appeal. An appeal of this decision would be heard by the Milwaukie Planning Commission following the procedures of MMC Section 19.1010 Appeals. This decision will become final on the date above if no appeal is filed during the appeal period. Milwaukie Planning staff can provide information regarding forms, fees, and the appeal process at 503-786-7630 or planning@milwaukieoregon.gov.

Findings in Support of Approval

The Findings for this application are included as Exhibit 1.

Conditions of Approval

1. Prior to submittal of the associated development permit application(s), the required replat application and survey plans to consolidate the parcels on the site must be submitted to the Planning Department.
2. At the time of submittal of the associated development permit application(s), the following must be resolved:
 - a. Per Finding 7, the total number of automobile parking spaces provided on the site cannot exceed 49 (1.2 parking spaces per dwelling unit).
 - b. Final plans submitted for development permit review must be in substantial conformance with the plans and drawings approved by this action, which are the plans and drawings received by the City on December 21, 2023, except as otherwise modified by these conditions of approval.
 - c. Provide a narrative describing all actions taken to comply with these conditions of approval. In addition, describe any changes made after the issuance of this land use decision that are not related to these conditions of approval.
 - d. Provide sufficient detail to confirm that the dimensional requirements for bicycle parking are met (as established in MMC Subsection 19.609.3) or are reasonably sufficient for use for the proposed vertical racks provided in the bike-storage building and in the dwelling units.

¹ As per MMC Section 19.1010, if the 15th day falls on a weekend or legal holiday, the end of the appeal period shall be extended to the end of the next business day.

- e. Provide a final sight distance certification on McBrod Avenue at the development access point. The sight distance must be measured for consistency with appropriate design values in the AASHTO document *A Policy on Geometric Design of Highways and Streets, 7th Edition*.
 - f. Identify and implement measures to delineate the inbound and outbound travel paths between vehicles both entering/exiting the site from McBrod Avenue as well as into and out of the two surface parking areas adjacent to the development access point.
 - g. Provide sufficient detail regarding the placement of any above-ground objects, utilities, landscaping, etc. within the entry/exit area to provide adequate sight distance for drivers ingressing and egressing both surface parking lots adjacent to the access simultaneously.
 - h. Provide evidence confirming adequate sight distance at the 17th Avenue/McBrod Avenue intersection, particularly for the eastbound (McBrod Avenue) approach and for the northbound left-turn and southbound right-turn movements on 17th Avenue. The sight distance must be measured for consistency with AASHTO standards.
3. Prior to the issuance of the associated development permits, the final plat consolidating the parcels must be recorded and proof of recording must be provided to the City.
 4. Prior to final inspection of the required building permit and issuance of a certificate of occupancy, the following must be resolved:
 - a. Submit documentation from the project landscape designer and arborist attesting that all proposed site plantings have been completed in conformance with the approved site plans and with applicable City standards.
 - b. Confirm that all required street and utility improvements under the required City Right-of-Way permit have been installed and inspected.

Other requirements

The following items are not conditions of approval necessary to meet applicable land use review criteria. They relate to other development standards and permitting requirements contained in the Milwaukie Municipal Code (MMC) and Public Works Standards that are required at various points in the development and permitting process.

1. At the time of submittal of the associated development permit application(s), the following must be resolved:
 - a. Submit a final stormwater management plan to the City of Milwaukie Engineering Department for review and approval. The plan must be prepared in accordance with Section 2 – Stormwater Design Standards of the City of Milwaukie Public Works Standards. Submit full-engineered plans for construction of all required public improvements to be reviewed and approved by the City of Milwaukie Engineering Department. All utilities must conform to the Milwaukie Public Works Standards.

2. Prior to commencement of any earth-disturbing activities, the applicant must obtain a City erosion control permit.
3. Obtain a City ROW permit for construction of all required public improvements.
 - a. Pay an inspection fee equal to 5.5% of the cost of the public improvements.
 - b. Provide a payment and performance bond for 130% of the cost of the required public improvements.
 - c. Upgrade or install all necessary underground utilities, including water and wastewater service laterals.
 - d. The existing driveways on 17th Avenue must be removed and replaced with landscaping and reflective markers in conformance with the adjacent improvements. Existing concrete in the bike path may remain.
 - e. Street tree planting may be required where sufficient space for a landscape strip is available along the McBrod Avenue Frontage. Street tree planting will be evaluated at the time of permit review.
 - f. The final site plan must be approved by the City Engineer prior to construction.
 - g. Provide a 12-month Maintenance Bond for 10% of the cost of the required public improvements upon completion of the construction.
 - h. Provide a final approved set of electronic (PDF file) “As Constructed” drawings to the City of Milwaukie prior to final inspection.
4. Expiration of Approval
As per MMC Subsection 19.1001.7.E, the land use approval granted with this decision will expire and become void unless the following criteria are satisfied. For proposals requiring any kind of development permit, the development must complete both of the following steps:
 - a. Obtain and pay for all necessary development permits and start construction within two years of land use approval.
 - b. Pass final inspection and/or obtain a certificate of occupancy within four years of land use approval.

Manager's Declaration of Impartiality

I certify that neither I nor any member of my immediate family has a material, personal, or financial relationship with the applicant. I further certify that no other relationship, bias, or ethical conflict exists which would have prevented me from evaluating the land use application solely on its merits and in accordance with the Milwaukie Municipal Code.

Decision

- Approved
 Approved with Conditions
 Denied



Laura Weigel, AICP
Planning Manager

Exhibits

1. Findings in Support of Approval

cc: Terry Amundson, Koble Creative Architecture, LLC (via email)
Karl Refi, Koble Creative Architecture, LLC (via email)
Planning Commission (via email)
Joseph Briglio, Community Development Director (via email)
Jennifer Garbely, City Engineer (via email)
Engineering Development Review (via email)
Patrick McLeod, Building Official (via email)
Stephanie Marcinkiewicz, Inspector/Plans Examiner (via email)
Harmony Drake, Permit Technician (via email)
Shawn Olson, CFD#1 (via email)
NDA(s): Historic Milwaukie (via email)
Interested Persons

Land Use File(s): P-2024-001; TFR-2024-001

ATTACHMENT 1
Findings in Support of Approval
File # P-2024-001, TFR-2024-001 – McBrod Cottage Cluster Development

Sections of the Milwaukie Municipal Code not addressed in these findings are found to be inapplicable to the decision on this application.

1. The applicant, Terry Amundson, on behalf of Ethos Development LLC, has applied for approval to construct a 41-unit cottage cluster development on three tax lots currently addressed as 9815-9833 SE 17th Ave. This site is in the R-MD Zone. The land use application primary file number is P-2024-001.
2. The proposal is to construct a 41-unit cottage cluster development of 2- and 3-bedroom cottages in 5 clusters. The proposed development includes landscaping and bicycle and vehicular parking. The proposed vehicular parking totals 61 parking spaces, which exceeds the maximum of 41 parking spaces for a cottage cluster development. A parking modification is requested to exceed the maximum number of vehicular on-site parking spaces.
3. The proposal is subject to the following provisions of the Milwaukie Municipal Code (MMC):
 - MMC Title 12: Streets, Sidewalks, and Public Places
 - MMC Section 19.301 Moderate Density Residential Zone
 - MMC Section 19.504 Site Design Standards
 - MMC Section 19.505.4 Cottage Cluster Development
 - MMC Section 19.605 Vehicle Parking Requirements
 - MMC Section 19.609 Bicycle Parking
 - MMC Chapter 19.700 Public Improvements
 - MMC Section 19.1005 Type II Review
 - MMC Section 16.32 Tree Code

The application has been processed and public notice provided in accordance with MMC Section 19.1005 Type II Review.

4. MMC Title 12 Streets, Sidewalks, and Public Places
 - a. MMC Chapter 12.08 – Street & Sidewalk Excavations, Construction, and Repair

This will apply to all construction that is completed in the right of way including, but not limited to, all public utilities, accessways, and all pedestrian/bicycle facilities including those located within public sidewalk easements. The public improvement process will follow MMC 12.08.020.

A right-of-way permit is required for all frontage improvements, utility connections, accessway construction, sidewalk construction, and any other work in the right-of-way.

As conditioned, this standard is met.
 - b. MMC Chapter 12.16.040 – Access Requirements and Standards

MMC Section 12.16.040 establishes standards for access (driveway) requirements, including access spacing, number and location of accessways, and limitations for access onto collector and arterial streets. New driveways accessing collector streets must be spaced at least 300 ft from the nearest intersection and at least 10 ft from the side property line. New multi-unit driveways onto local streets must be at least 100 ft from the nearest intersection. For multi-unit residential uses with more than eight units, the driveway apron must have a minimum width of 24 ft and maximum width of 30 ft.

The subject property has frontage on 17th Avenue, an arterial street with a multi-use path, and McBrod Avenue, a local street. Both streets are currently under the jurisdiction of the City. The site is currently accessed by two existing accessways on 17th Avenue.

As proposed, the existing accessways on 17th Avenue will be removed. No accessways on 17th Avenue will be permitted as it has a multi-use pathway, a higher roadway classification, and cannot meet the required 600 ft distance from the nearest intersection.

A new 30 ft wide accessway will be installed on McBrod Avenue. The new accessway will be over 100 ft from the nearest intersection.

As proposed, the Planning Manager finds that the proposed development is consistent with the applicable standards of MMC 12.16.

c. MMC Chapter 12.24 – Clear Vision at Intersections

MMC 12.24 establishes standards to maintain clear vision areas at intersections and accessways to protect the safety and welfare of the public in their use of city streets.

The proposed accessway must conform to the clear vision requirements.

As conditioned, this standard is met.

5. MMC Section 19.301 Moderate Density Residential (R-MD)

MMC 19.301 establishes standards for the R-MD zone.

a. MMC Subsection 19.301.2 Uses

MMC 19.301.2 establishes the uses allowed in the R-MD zone, including all types of residential development except for multi-unit residential dwellings.

The proposed development is a 41-unit cottage cluster development. This use is allowed outright in the R-MD zone.

This standard is met.

b. MMC Subsection 19.301.4 Development Standards

MMC Table 19.301.4 lists the general categories of development standards for the R-MD zone.

(1) MMC Subsection 19.301.4.B Minimum lot size

The minimum lot size for a cottage cluster development is 7,000 sq ft.

The proposed development will be on a 2.51-acre site (when the 3 tax lots are consolidated).

As conditioned, this standard is met.

(2) MMC Subsection 19.301.4.D Residential Density

Minimum density for cottage cluster developments shall be a minimum of 5 units per acre. There is not maximum density for middle housing.

The proposed development is a 41-unit cottage cluster development on a 2.51-acre site. This translates into a minimum density of 13 units.

As proposed, this standard is met.

The proposed development meets the applicable development standards of MMC 19.301.4.

As proposed, and as conditioned or discussed elsewhere in these findings, the Planning Manager finds that the applicable standards of the R-MD zone are met.

6. MMC Chapter 19.500 Supplementary Development Regulations

a. MMC Subsection 19.505.4 Cottage Cluster Housing

MMC 19.505.4 establishes the specific design and development standards for cottage cluster housing, which has the benefits of a single detached dwelling while also being an affordable housing type for new homeowners and households that do not require as much living space. These standards are intended to: support the growth management goal of more efficient use of urban residential land; support development of diverse housing types in accordance with the Comprehensive Plan; increase the variety of housing types available for smaller households; provide opportunities for small, detached dwelling units within existing neighborhoods; increase opportunities for home ownership; and provide opportunities for creative and high-quality infill development that is compatible with existing neighborhoods.

- (1) MMC Subsection 19.505.4.B states that all new cottage clusters and modifications to existing cottage clusters are subject to the standards in this section, including the development standards in Table 19.505.4.C.

The proposed development will have 41 cottages in 5 separate clusters on a single lot. The proposed development meets the applicability standards of MMC 19.505.4.B.

- (2) MMC Subsection 19.505.4.C contains development standards for cottage cluster housing.

The application meets the standards of this section as described in Table 19.505.4.C.1 below.

Table 19.505.4.C.1 Cottage Cluster Development Standards		
Standards	Required	Proposed
A. Structure Types		
1. Building types allowed, minimum and maximum number per cluster	Detached and Attached cottages 3 minimum 12 maximum dwelling units Maximum number of attached units = 3	<i>Attached cottages in clusters between 5 and 11 cottages each.</i> <i>This standard is met.</i>
B. Dwelling Unit Size		
1. Max building footprint per dwelling unit	900 sf	2 BR cottages = 600 sf 3 BR cottages = 750 sf
2. Max average floor area per dwelling unit	1,400 sf	2 BR cottages = 1,120 sf 3 BR cottages = 1,420 sf Average = 1,259 sf <i>This standard is met.</i>
C. Height		
1. Max height	25 ft or 2 stories, whichever is greater	2 stories <i>This standard is met.</i>
2. Max structure height between 5 & 10 ft of rear lot line	15 ft	<i>No structures are proposed within 10 ft of the rear lot line.</i>
3. Max height to eaves facing common green	1.618 times the narrowest average width between two closest buildings	<i>The narrowest courtyard is 33 ft between facing buildings. 33 ft x 1.618 = 53.4 ft. All buildings are well below 53.4 ft in height.</i> <i>This standard is met.</i>
D. Setbacks, Separations, and Encroachments		
1. Separation between structures (minimum)	6 ft	6 ft <i>This standard is met.</i>
2. Side and rear site setbacks	5 ft	5 ft <i>This standard is met.</i>
3. Front site setback (minimum)	10 ft	20 ft <i>This standard is met.</i>
4. Front site setback (maximum)	20 ft	20 ft <i>This standard is met.</i>

5. Separation between clusters (minimum)	10 ft	10 ft <i>This standard is met.</i>
E. Impervious Area, Vegetated Area		
1. Impervious area (maximum)	60%	53% <i>This standard is met.</i>
2. Vegetated site area (minimum)	35%	47% <i>This standard is met.</i>
F. Community and Common Space		
1. Community building footprint (maximum) ¹	1,000 sf	<i>No community building is proposed.</i>
2. Common Space	19.505.4.E.2	<i>See Finding 7 (4)</i>
G. Parking (see also 19.505.4.E.4)		
1. Automobile parking spaces per primary home (minimum)	See Finding 7	<i>1.5 space/home proposed. See Finding 7</i>
2. Dry, secure bicycle parking spaces per home (minimum)	1.5 = 62 spaces required	<i>64 (40 in-unit racks and 24 in a bike shed) This standard is met.</i>
3. Guest/short-term bicycle parking spaces per home (minimum)	0.5 = 21 required	<i>22 – dispersed throughout the site. This standard is met.</i>

The Planning Manager finds that, as conditioned, the cottage cluster development standards have been met.

(3) MMC Subsection 19.505.4.D contains cottage design standards.

(a) Size

The total footprint of a cottage unit must not exceed 900 sq ft, and the maximum average floor area for a cottage cluster is 1,400 sq ft per dwelling unit.

As identified above, no cottage footprint exceeds 900 sq ft, and the proposed average floor area for the development is 1,259 sq ft.

(b) Height

The height for all structures must not exceed 25 ft or 2 stories, whichever is greater.

As identified above, all cottages are 2 stories in height.

(c) Orientation

- (i) Cottages must be clustered around a common courtyard, meaning they abut the associated common courtyard or are directly connected to it by a pedestrian path, and must meet the following standards:

- (i) Each cottage within a cluster must either abut the common courtyard or must be directly connected to it by a pedestrian path.

The proposed cottage unit entrances all face pedestrian paths and/or common courtyards.

- (ii) A minimum of 50% of cottages within a cluster must be oriented to the common courtyard and must:

1. Have a main entrance facing the common courtyard;
2. Be within 10 ft from the common courtyard, measured from the façade of the cottage to the nearest edge of the common courtyard; and
3. Be connected to the common courtyard by a pedestrian path.

Of the 41 units proposed, 36 units have main entrances directly facing, and within 10 feet of, common courtyards. The most restricted condition is found at Cluster #5, where 4 cottages face the courtyard, and 4 cottages face a pedestrian path adjacent to parking. With 4 of 8 cottages directly facing the courtyard at Cluster #5 (50%), this standard is met. Clusters #1 through #4 meet this standard.

- (iii) Cottages within 20 ft of a street property line may have their entrances facing the street.

Cottages facing SE 17th Avenue may either have their entrances face the street or the courtyard. Units #1.4, 1.5, 1.6 and #2.4, 2.5, 2.6 face their respective courtyards.

- (iv) Cottages not facing the common courtyard or the street must have their main entrances facing a pedestrian path that is directly connected to the common courtyard.

The proposed cottage unit entrances all face pedestrian paths and/or common courtyards.

- (d) Design

The design standards in this subsection apply to cottages when the closest wall of the street-facing façade is within 50 ft of a front or street side lot line, when the front of the cottage faces the street, and to dwellings in a cluster or grouping, either facing a shared open space (e.g. a common

courtyard) or a pedestrian path. An architectural feature may be used to comply with more than one standard.

An applicant may request a variance to the detailed design standards in Subsection 19.505.4.C.4 through a Type II review, pursuant to Subsection 19.911.3.B. Variances to any other design standards requires a variance through a Type III review, per Subsection 19.911.3.C.

(i) Articulation

All buildings must incorporate design elements that break up all street-facing façades into smaller planes as follows:

(i) For buildings with 30-60 ft of street frontage, a minimum of one of the following elements must be provided along the street-facing façades.

1. A porch at least 5 ft deep.
2. A balcony that is at least 2 ft deep and is accessible from an interior room.
3. A bay window that extends at least 2 ft wide.
4. A section of the façade that is recessed by at least 2 ft deep and 6 ft long.
5. A gabled dormer.

(ii) For buildings with less than 30 ft of street frontage, the building articulation standard is not applicable.

Two of the buildings proposed, each comprised of three attached cottages (Units 1.4, 1.5, 1.6 & Units 2.4, 2.5, 2.6), have elevations facing SE 17th Avenue that measure 70 ft in length. These buildings incorporate 2 ft deep wall offsets that divide each façade into shorter lengths measuring 2 ft, 2 ft, and 25 ft.

(ii) Eyes on the Street

At least 15% of the area of each street-facing façade must be windows or entrance doors.

(i) Windows used to meet this standard must be transparent and allow views from the building to the street. Glass blocks and privacy windows in bathrooms do not meet this standard.

(ii) Half of the total window area in the door(s) of an attached garage counts toward the eyes on the street standard. All of the window area in the street-facing wall(s) of an attached garage count toward meeting this standard.

- (iii) Window area is considered the entire area within the outer window frame, including any interior window grid.
- (iv) Doors used to meet this standard must face the street or be at an angle of no greater than 45 degrees from the street.
- (v) Door area is considered the portion of the door that moves. Door frames do not count toward this standard.

The facades of each building have been designed to accommodate 15% or more windows & entry doors where required.

(iii) Main Entrance

At least one main entrance must meet both of the following standards.

- (i) Be no further than 8 ft behind the longest street-facing wall of the building.
- (ii) Face the street, be at an angle of up to 45 degrees from the street, or open onto a porch. If the entrance opens up onto a porch, the porch must meet all of these additional standards.
 1. Be at least 25 sq ft in area with a minimum 4-ft depth.
 2. Have at least one porch entry facing the street.
 3. Have a roof that is no more than 12 ft above the floor of the porch.
 4. Have a roof that covers at least 30% of the porch area.

The main entrance of each cottage unit is flush with the longest building wall and faces either a common courtyard, or a pedestrian path connecting to the courtyard.

(iv) Detailed Design

All buildings shall include at least 5 of the following features on any street-facing façade.

- (i) Covered porch at least 5 ft deep, as measured horizontally from the face of the main building façade to the edge of the deck, and at least 5 ft wide.
- (ii) Recessed entry area at least 2 ft deep, as measured horizontally from the face of the main building façade, and at least 5 ft wide.
- (iii) Offset on the building face of at least 16 in from one exterior wall surface to the other.
- (iv) Dormer that is at least 4 ft wide and integrated into the roof form.

- (v) Roof eaves with a minimum projection of 12 in from the intersection of the roof and the exterior walls.
- (vi) Roof line offsets of at least 2 ft from the top surface of one roof to the top surface of the other.
- (vii) Tile or wood shingle roofs.
- (viii) Horizontal lap siding between 3 to 7 in wide (the visible portion once installed). The siding material may be wood, fiber-cement, or vinyl.
- (ix) Brick, cedar shingles, stucco, or other similar decorative materials covering at least 40% of the street-facing façade.
- (x) Gable roof, hip roof, or gambrel roof design.
- (xi) Window trim around all windows at least 3 in wide and 5/8 in deep.
- (xii) Window recesses, in all windows, of at least 3 in as measured horizontally from the face of the building façade.
- (xiii) Balcony that is at least 3 ft deep, 5 ft wide, and accessible from an interior room.
- (xiv) One roof pitch of at least 500 sq ft in area that is sloped to face the southern sky and has its eave line oriented within 30 degrees of the true north/south axis.
- (xv) Bay window at least 2 ft deep and 5 ft wide.
- (xvi) Attached garage width, as measured between the inside of the garage door frame, of 35% or less of the length of the street-facing façade.
- (xvii) The following design element counts as 2 elements.
Dwelling must be built to meet universal access as follows:
 1. Dwelling must have a bedroom on the ground floor.
 2. A ramp complying with R311.8 Oregon Residential Specialty Code (ORSC) must be provided to the main entrance of the dwelling.
 3. Doors must have a minimum clear width of 32 in.
 4. Horizontal and vertical grab bars must be provided in one bathroom on the main floor at the toilet, bath and shower. (See ANSI A117-1 section 609 for size and location requirements.)

As shown on the architectural plans Units 1.4, 1.5, 1.6 and Units 2.4, 2.5, 2.6 face 17th Avenue. Reference the street-facing cottage exteriors on sheets A503 & A504 – Street-Facing Unit Elevations. As shown, the following five detailed design features are incorporated:

- *Offset building faces*
- *Roof eaves*
- *Roof line offsets*
- *Horizontal lap siding*
- *Window trim (See details 1/A801, 2/A801 & 3/A801)*

(4) MMC 19.505.4.E Site design and other standards

(a) Number of cottages allowed

A cottage cluster must include a minimum of 3 cottages and a maximum of 12 cottages, subject to Table 19.505.4.B.1. Minimum separation between detached units is 6 ft.

Each cluster is proposed to have between 5 and 11 cottages. As shown on the site plan, each cottage is a minimum of 6 ft from an adjacent cottage.

(b) Common open space

Each cottage cluster must share a common courtyard in order to provide a sense of openness and community of residents. Common courtyards must meet the following standards:

- (i) The common courtyard must be a single, contiguous piece.

As shown on the plans, each courtyard is a single piece.

- (ii) Cottages must abut the common courtyard on at least 2 sides of the courtyard.

The proposed courtyards all have cottages facing them on two or more sides.

- (iii) The common courtyard must contain a minimum of 150 sq ft per cottage within the associated cluster (as defined in Subsection 19.505.1.C.1).

The submitted site plans show all calculations for each cluster. The drawings confirm that each proposed cluster will have a common courtyard that exceeds the minimum area requirements.

- (iv) The common courtyard must be a minimum of 15 ft wide at its narrowest dimension.

The narrowest courtyard proposed is at Cluster #2, and its narrowest dimension is 23 ft.

- (v) The common courtyard must be developed with a mix of landscaping, lawn area, pedestrian paths, and/or paved courtyard area, and may also include recreational amenities. Impervious elements of the common courtyard must not exceed 75% of the total common courtyard area.

The submitted site plans include the landscaping details for the common courtyard for each cluster. The drawings confirm that each proposed cluster will have a common courtyard that exceeds the design requirements.

- (vi) Pedestrian paths must be included in a common courtyard. Paths that are contiguous to a courtyard must count toward the courtyard's minimum dimension and area. Parking areas, required setbacks between cottages, and driveways do not qualify as part of a common courtyard.

Each courtyard incorporates pedestrian paths connecting the entries of each cottage to common parking areas, trash and mail areas, and other cottage clusters.

(c) Pedestrian circulation

The on-site pedestrian circulation system must include the following:

- (i) Continuous connections between the primary buildings, streets abutting the site, ground level entrances, common buildings, common open space, and vehicle and bicycle parking areas.

As shown on the proposed plans, the pedestrian circulation system connects the entries of each cottage to common parking areas, trash and mail areas, and other cottage clusters throughout the site.

- (ii) At least one pedestrian connection to an abutting street frontage for each 200 linear ft of street frontage.

The eastern property frontage at 17th Ave measures over 250 ft. Two pedestrian connections are provided to 17th Ave. At the short frontage at McBrod Ave, one pedestrian connection is provided.

- (iii) Pedestrian walkways must be separated from vehicle parking and maneuvering areas by physical barriers such as planter strips, raised curbs, or bollards.

Where pedestrian paths are adjacent to vehicular areas, they will be protected by raised curbs.

- (iv) Walkways must be constructed with a hard surface material and must be no less than 3 ft wide. If adjacent to a parking area where vehicles will overhang the walkway, a 7-ft-wide walkway must be provided. The walkways must be separated from parking areas and internal driveways using curbing, landscaping, or distinctive paving materials.

The proposed pedestrian walkways are shown as being 5 ft wide concrete. Where parking areas are adjacent to walkways, wheel stops will be utilized to limit vehicle encroachment.

(d) Off-Street parking

- (i) There must be at least 0.5 off-street parking spaces per dwelling unit per Table 19.505.4.B.1. The parking space must be located together with parking spaces for other cottages in a common area, and not located on the same lot as an individual cottage unit.

Refer to Finding 6.

- (ii) A cottage cluster parking area must be set back from the street. The distance of the setback is dependent on the orientation of the structure or lot. If the axis of the longest dimension of the parking area has an angle of 45 degrees or more to the lot line, the narrow dimension may be within 5 ft of the street. If the angle is less than 45 degrees, the parking area must be at least 20 ft from the street.

Proposed parking areas are closest to the street at the McBrod Ave property line. The parking areas are 45 degrees from the lot line, requiring a minimum setback of 5 ft. The parking shown is 10 ft from the property line.

- (iii) If there are more than 8 units in a cottage cluster, there must be at least 2 separate parking areas with a minimum of 4 parking spaces in each area. A drive aisle connecting the 2 areas is permitted if a separate driveway access for each area is not permitted per Chapter 12.16 Access Management.

The only driveway access permitted for the project will be from McBrod Ave. No access will be allowed from 17th Ave due to road classification and intersection spacing requirements. The multiple parking areas provided by the project will be connected by a 2-way drive aisle.

- (iv) Parking spaces may be located within a garage or a carport. Garages or carports in a cottage cluster may not contain more than 4 parking spaces, must be at least 10 ft from any cottage dwelling; and must match the materials, trim, and roof pitch of the cottages. The interior height of a garage or carport shall not exceed 8 ft high, unless a modification is requested for cases that would use space saving parking technology (e.g., interior car stacking) that might require

additional interior height. This modification would be requested per Section 19.911 Variances.

No garages or carports are proposed.

- (v) Parking spaces that are not in a garage or carport must be screened from common open space, public streets, and adjacent residential uses by landscaping and/or screen, such as a fence. Chain-link fencing with slats are not allowed as a screen.

As shown on the submitted plans, parking areas will be buffered from common courtyards and adjacent buildings by a minimum 4 ft wide landscape buffer.

- (vi) Off-street parking may be arranged in clusters, subject to the following standards:
 - (i) Cottage cluster projects with fewer than 16 cottages are permitted parking clusters of not more than 5 contiguous spaces.
 - (ii) Cottage cluster projects with 16 cottages or more are permitted parking clusters of not more than 8 contiguous spaces.
 - (iii) Parking clusters must be separated from all other areas by at least 4 ft of landscaping.
 - (iv) Clustered parking areas may be covered.

As shown on the proposed site plan, parking clusters have been limited to a maximum of 8 contiguous spaces. As shown on the submitted landscaping plan, all parking areas will be buffered by a minimum 4 ft wide landscape buffer. Covered parking is not proposed.

- (vii) Off-street parking spaces and vehicle maneuvering areas must not be located:
 - (i) Within 20 ft of any street property line, except alley property lines;
 - (ii) Between a street property line and the front façade of cottages located closest to the street property line. This standard does not apply to alleys;
 - (iii) Off-street parking spaces must not be located within 10 ft of any other property line, except alley property lines. Driveways and drive aisles are permitted within 10 ft of other property lines.

Parking areas at an angle of 45 degrees or more from the lot line may be within 5 ft of the street. Proposed parking areas are closest to the street at the McBrod Ave property line. The parking areas are 45 degrees from the lot line, requiring a minimum setback of 5 ft. The parking shown is 1 ft from the property line.

- (viii) Landscaping, fencing, or walls at least 3 ft tall must separate clustered parking areas and parking structures from common courtyards and public streets.

Landscape buffers and fencing, when required, are proposed to separate clustered parking areas from common courtyards and public streets.

- (ix) Garages and carports (whether shared or individual) must not abut common courtyards.

No garages are proposed.

- (e) Fences

All fences on the interior of the development shall be no more than 3 ft high. Fences along the perimeter of the development may be up to 6 ft high, except as restricted by Chapter 12.24 Clear Vision at Intersection. Chain-link fences are prohibited.

On the proposed plan a 3 ft fence is called for at the Cluster #3 courtyard, separating it from the adjacent parking. Perimeter fences are not currently proposed. If perimeter fences are added as the design develops, they will be limited to 6 ft in height.

- (f) Conversions

A preexisting single detached dwelling may remain on a lot or parcel with a cottage cluster as described in the code.

No preexisting dwellings are proposed for conversion.

The Planning Manager finds that, as conditioned, the cottage cluster design standards have been met.

7. MMC Chapter 19.600 Off-Street Parking and Loading

MMC 19.600 regulates off-street parking and loading areas on private property outside the public right-of-way. The purpose of these requirements includes providing adequate space for off-street parking, minimizing parking impacts to adjacent properties, and minimizing environmental impacts of parking areas.

- a. MMC Section 19.602 Applicability

MMC 19.602 establishes the applicability of the provisions of MMC 19.600, and MMC Subsection 19.602.3 establishes thresholds for full compliance with the standards of MMC 19.600. Development of a vacant site is required to provide off-street parking and loading areas that conform fully to the requirements of MMC 19.600.

Per Oregon Administrative Rules (OAR) 660-012-0012 and 660-12-0440, which relate to Climate-Friendly and Equitable Communities (CFEC) rulemaking, the City is prohibited from mandating minimum off-street vehicular parking quantity requirements because of the subject property's proximity to a TriMet bus stop. However, all other provisions of MMC 19.600 may still apply.

The applicant is proposing to develop the subject property, which is currently vacant, as a 41-unit cottage cluster development with 61 on-site parking spaces. Although the CFEC-related limitations noted above prevent the implementation of minimum off-street vehicular parking quantity requirements, the Planning Manager finds that the proposal constitutes the development of a vacant site and that compliance with the other applicable sections of MMC 19.600 is required.

The Planning Manager finds that the provisions of MMC 19.600 are applicable to the proposed development.

b. MMC Section 19.605 Vehicle Parking Quantity Requirements

MMC 19.605 establishes standards to ensure that development provides adequate vehicle parking (off-street) based on estimated parking demand.

(1) MMC Subsection 19.605.1 Minimum and Maximum Requirements

MMC Table 19.605.1 provides minimum and maximum quantity requirements for cottage cluster developments. For cottage cluster developments, a minimum of one-half space per unit is required and a maximum of 1 space per unit is allowed.

The proposed development would establish 41 residential units. No minimum number of off-street spaces is required; a maximum of 41 spaces are allowed. A total of 61 on-site parking spaces are proposed; quantity modifications are discussed below in Finding 7-b-2.

(2) MMC Subsection 19.605.2 Quantity Modifications and Required Parking Determinations

MMC 19.605.2 establishes a process for modifying the minimum and maximum parking ratios listed in MMC Table 19.605.1.

(a) MMC Subsection 19.605.2.B Application

The application for a parking modification must include a description of the proposed uses of the site and identification of factors specific to the proposed use and/or site (e.g., proximity of transit, parking demand management programs, etc.) that affect parking demand. Additionally, the application must provide data and analysis to support the modification request (i.e., parking demand information from professional literature, parking standards for similar uses in other jurisdictions, and parking quantity and use data from similar existing developments). The Planning Manager may waive any of the specific data analysis requirements if the information is not readily available or relevant, as long as sufficient documentation is provided to support the request.

The applicant has included a description of the site and addressed the factors specific to the site, including proximity to transit, limited on-street parking in the vicinity, sight distance and topographic challenges on McBrod Ave, and a site-

specific analysis of the need for off-street parking at this location. The site is near downtown and has access to light rail and multiple bus lines, and is located on a public bike path, the Trolley Trail. The site is limited in adjacent on-street parking.

(b) MMC Subsection 19.605.2.C Approval Criteria

MMC Subsection 19.605.2.C.1 provides the baseline approval criteria for granting a parking modification, including a demonstration that the proposed parking quantities are reasonable based on the data and information that the Planning Manager has deemed relevant. In addition, MMC Subsection 19.605.2.C.2 requires that requests for modifications to increase the amount of maximum allowed parking must demonstrate that (a) The proposed development has unique or unusual characteristics that create a higher-than-typical parking demand; (b) the parking demand cannot be accommodated by shared or joint parking arrangements or by increasing the supply of spaces that are exempt from the maximum amount of parking allowed under Subsection 19.605.3.A; and (c) the requested increase is the smallest increase needed based on the specific circumstances of the use and/or site.

As noted above, the Planning Manager has determined that it is reasonable to ground an assessment of the proposed parking modification in consideration of the nature of McBrod Ave while assessing available multimodal transportation options.

17th Ave is an arterial roadway with a two-to-four-lane cross-section and a posted speed of 35 mph. Curbs and sidewalks are provided intermittently along both sides of the roadway, and a striped bicycle lane is provided on the east side of the roadway. A multi-use path is provided along the west side of the roadway. Parking is not permitted along either side of SE 17th Avenue.

McBrod Ave is a local roadway with a two-lane cross-section and a posted speed of 20 mph. West of 17th Ave, the roadway ends in a cul-de-sac and provides access to eight single-family houses. Curbs and sidewalks are provided intermittently along both sides of the roadway, and there are no striped bicycle lanes along the roadway. Parking is permitted along both sides of McBrod Ave. A majority of the roadway has a steep grade as well as multiple curves.

The projected parking demand that will be generated as a result of the proposed development was estimated using parking rates from the 5th edition of the Parking Generation Manual. For a development like the proposed cottage cluster development, the average parking demand would be 67 spaces according to the Parking Generation Manual. That said, the maximum allowed parking is 41 spaces for this type of development in the City of Milwaukie.

Other jurisdictions' codes were reviewed, with the majority having no maximum parking ratio. Oregon City has a maximum parking ratio of 2.5 space per dwelling unit; the City of Tigard, which was not included in the application materials, has a maximum parking ratio of 1.2 spaces per dwelling unit. The proposed parking ratio for the development is 1.5 spaces per dwelling unit, which is within the range of surrounding communities. Milwaukie has an adopted maximum parking of 1 space per dwelling unit and has no parking minimums.

All units of the 41-unit cottage cluster development will be either two or three-bedroom residential units. As argued by the applicant, given that the development is composed entirely of two-and three-bedroom cottages, it is reasonable to expect that every unit will have at least one car. In addition, a residential area is likely to have guests which would warrant additional spaces for guest parking. The applicant has proposed a total of 61 parking spaces to accommodate 41 dwelling units (a total of 101 bedrooms), which is a parking rate of 0.60 spaces/bedroom.

On-street parking is not allowed on 17th Avenue. Limited on-street parking is possible on McBrod Ave. The roadway is curved and has a steep grade which could be difficult for residents or guests with limited mobility to navigate.

The city's comprehensive plan policies and associated development code strive to reduce vehicular use and negative environmental impacts associated with vehicle travel. The development site is immediately adjacent to a multi-use path with direct access provided in the proposed design. A light rail station is located in downtown Milwaukie, as well as a TriMet bus depot. Further, the Line 70 bus runs on a frequent basis along 17th Ave connecting downtown Milwaukie to NE 33rd Ave, the Sunderland neighborhood, and Sellwood.

In light of the development's proximity to multiple modes of transportation and the city's policy that no off-street parking is required and a maximum of 1 space per dwelling unit is codified a smaller parking ratio than the one proposed by the applicant is warranted. A parking ratio of 1.2 spaces per unit more appropriately reflects the need for guest parking on the site while accounting for proximity and availability to alternative forms of transportation and the city's climate goals of reducing vehicle trips.

The Planning Manager finds that a revised parking modification of 1.2 space per unit satisfies the applicable approval criteria.

As proposed, the Planning Manager finds that the maximum allowed off-street parking for the proposed use can be modified to 49 on-site spaces.

c. MMC Section 19.606 Parking Area Design and Landscaping

MMC 19.606 establishes standards for parking area design and landscaping, to ensure that off-street parking areas are safe, environmentally sound, and aesthetically pleasing, and that they have efficient circulation. These standards are intended

primarily for outdoor parking areas, though some of the standards are applicable to parking structures as well.

MMC Subsection 19.606.1 establishes dimensional standards for required off-street parking spaces and drive aisles. For 90°-angle spaces, the minimum width is 9 ft and minimum depth is 18 ft, with 22-ft drive aisles. MMC Subsection 19.606.3 establishes various design standards, including requirements related to paving and striping, wheel stops, pedestrian access, internal circulation, and lighting.

The proposed plans show 90-degree parking and stalls that measure 9 ft x 18 ft. The 2-way drive aisles shown measure 24 ft. Conceptual landscape and tree planting plans have been developed to illustrate understanding and compliance with code requirements at a high level.

As proposed, and subject to approval of the requested parking modification, the Planning Manager finds that this standard is met.

d. MMC Section 19.608 Loading

MMC 19.608 establishes standards for off-street loading areas and empowers the Planning Manager to determine whether loading spaces are required. Fewer than 50 dwelling units on a site that abuts a local street: no loading spaces required.

The proposed project is for 41 dwelling units which abut a local street. No loading spaces are required.

This standard is met.

e. MMC Section 19.609 Bicycle Parking

MMC 19.609 establishes standards for bicycle parking for new development, including for multifamily housing and commercial uses. Unless otherwise specified, the number of bicycle parking spaces is at least 10% of the minimum required vehicle parking for the use. For multifamily residential development with four or more units, MMC Subsection 19.609.2 requires a minimum of one bicycle parking space per unit, with at least 50% of the spaces covered and/or enclosed (in lockers or a secure room). MMC Subsection 19.609.3.A requires that each bicycle parking space have minimum dimensions of 2 ft by 6 ft, with 5-ft-wide aisles for maneuvering. MMC Subsection 19.609.4 requires bike racks to be located within 50 ft of a main building entrance.

For the proposed development of 41 cottages, 62 long-term (dry/secure) bike parking spaces are required and 64 are provided. Of the dry/secure bike parking provided, 40 spaces are within individual units (see unit plans) and 24 are in the commonly accessible bike shed. Additionally, 21 guest bikes are required, and 22 are provided, dispersed throughout the site.

The project proposes a combination of horizontally and vertically stored bicycles. All the bikes that are commonly accessible (in the bike shed and guest bikes on site) accommodate a typical 2 ft x 6 ft stall and 5 ft access aisle for each required bicycle. Bike racks will be the inverted "U" style. The Project proposes that the balance of the dry/secure bicycle storage requirement be accommodated within individual residential units. Many regular riders prefer to keep their

valuable bicycles close at hand and safely within their residence. In these locations, wall-hung bicycle racks will be installed.

The project proposes an in-unit bike storage closet. Each in-unit bike space is a dedicated closet a minimum of 2 ft wide, 4 ft deep, and allows for 5 ft of maneuvering clearance behind the bike. Of the 41 cottages proposed, 40 units accommodate a bike.

All the proposed bicycle parking locations are adjacent to 5 ft walkways that are connected throughout the site, to both McBrod Ave and 17th Ave. Maneuvering areas will be unimpeded when bikes are parked. Bike parking areas will be separated from parking areas by a raised curb.

The Planning Manager finds that the proposed bicycle parking exceeds the minimum number of required spaces, is located as required and, as conditioned, that the other applicable standards are met.

As proposed, and as conditioned where necessary, the Planning Manager finds that the proposed development meets all applicable standards MMC 19.600 for off-street parking.

8. MMC Chapter 19.700 Public Facility Improvements

MMC 19.700 is intended to ensure that development, including redevelopment, provides public facilities that are safe, convenient, and adequate in rough proportion to their public facility impacts.

a. MMC Section 19.702 Applicability

MMC 19.702 establishes the applicability of the provisions of MMC 19.700, including new construction.

The applicant proposes to develop a 42-unit cottage cluster residential development. The proposed new construction triggers the requirements of MMC 19.700.

b. MMC Section 19.703 Review Process

MMC 19.703 establishes the review process for development that is subject to MMC 19.700, including requiring a preapplication conference, establishing the type of application required, and providing approval criteria.

The applicant had a preapplication conference with City staff on December 1, 2022, prior to application submittal. The proposed development requires a full Transportation Impact Study (as addressed in Finding 8-c). The proposal's compliance with MMC 19.700 has been evaluated through a concurrent Transportation Facilities Review application. Finding 8-f addresses the proposal's compliance with the approval criteria established in MMC Subsection 19.703.3, particularly the required transportation facility improvements.

c. MMC Section 19.704 Transportation Impact Evaluation

MMC 19.704 establishes the process and requirements for evaluating development impacts on the surrounding transportation system, including determining when a formal Transportation Impact Study (TIS) is necessary and what mitigation measures will be required.

The proposed development will trigger a significant increase in trip generation above the existing use on the site, therefore a full Traffic Impact Study is required. City Engineering staff and the City's on-call traffic consultant (Kittelson & Associates) provided the applicant with a scope of work for the TIS. Lancaster Mobley, the applicant's traffic consultant, prepared the TIS that was included with the applicant's larger submittal for the proposed development. The TIS outlines sight distance, access management, pedestrian, biking, and transit facilities, and intersection analysis.

The TIS concluded that the proposed development does not trigger mitigation of impacts beyond the required frontage improvements as outlined in Finding 8-f.

As submitted, the applicant's TIS is sufficient to meet the requirements of MMC 19.704.

d. MMC Section 19.705 Rough Proportionality

MMC 19.705 requires that transportation impacts of the proposed development be mitigated in proportion to its potential impacts.

The TIS concludes that the proposed development will result in an increase in 19 AM peak hour trips, 22 PM peak hour trips, and 286 daily trips in an average weekday. The TIS concluded that no other mitigation factors are required outside of the frontage improvements outlined in Finding 8-f for the proposed development.

As proposed the transportation impacts of the proposed development is consistent with MMC 19.705.

e. MMC Section 19.707 Agency Notification and Coordinated Review

MMC 19.707 establishes provisions for coordinating land use application review with other agencies that may have some interest in a project that is in proximity to facilities they manage.

The application was referred to the Oregon Department of Transportation (ODOT), Clackamas County Department of Transportation and Development (DTD), TriMet, and Metro for comment.

f. MMC Section 19.708 Transportation Facility Requirements

MMC 19.708 establishes the City's requirements and standards for improvements to public streets, including pedestrian, bicycle, and transit facilities.

(1) MMC Subsection 19.708.1 General Street Requirements and Standards

MMC 19.708.1 provides general standards for streets, including for access management, clear vision, street layout and connectivity, and intersection design and spacing.

As proposed, the development is consistent with the applicable standards of MMC 19.708.1.

(2) MMC Subsection 19.708.2 Street Design Standards

MMC 19.708.2 provides design standards for streets, including dimensional requirements for the various street elements (e.g., travel lanes, bike lanes, on-street parking, landscape strips, and sidewalks).

Curb and sidewalk facilities have already been installed along the McBrod Avenue frontage. New curb and sidewalk are not required, however a new ADA compliant accessway must be constructed as outlined in Finding 4-b.

Street trees will be required along the McBrod Avenue frontage where sufficient space for a landscape strip is available. Street tree improvements will be evaluated at the time of permit review. If required, street trees must be planted at a minimum of every 40 ft in accordance with the Public Works Standards and the Milwaukie Street Tree List and Planting Guidelines.

Bicycle and pedestrian facilities have already been installed along the 17th Avenue frontage as part of the 17th Avenue Multi-Use Trail Project and will not be required except where the existing driveway is to be removed. A Right-of-Way Permit is required to remove the existing driveway, to install new landscaping, and reflective markers.

As conditioned, the development is consistent with all applicable standards of MMC 19.708.2.

As proposed, the development meets all applicable standards of MMC 19.708.

As conditioned, the Planning Manager finds that the proposed development meets the applicable public facility improvement standards of MMC 19.700.

9. MMC Chapter 16.32 Tree Code

Compliance with Milwaukie Tree Code is required for a cottage cluster development.

An Arborist's Report has been completed by Todd Prager & Associates and is included as an attachment to the land use application submittal. The submitted landscape drawings demonstrate how tree canopy requirements will be met. Compliance with the tree code will be verified during permitting review.

10. The application was referred to the following departments and agencies on January 24, 2024:

- Milwaukie Engineering Department
- Milwaukie Building Department
- Milwaukie Public Works Department
- Historic Milwaukie Neighborhood District Association (NDA) Chairperson and Land Use Committee (LUC)
- Clackamas Fire District #1 (CFD)
- Metro
- Oregon Department of Transportation (ODOT)
- TriMet

- North Clackamas School District
- NW Natural

Public notice was sent to all properties within 300 ft of the site on January 24, 2024. Comments were received, and are summarized, as follows:

- **Robin Maier, 1698 SE McBrod Ave:** concern about McBrod Ave during the recent ice storm and access for the proposed dwellings. States that 17th Ave should be used for access.
- **Scott and Michelle Schlimpert, 1674 SE McBrod Ave:** concern about the adequacy of Mc Brod Ave as access for the development, impacts on nearby intersections, and the increased traffic on the street.
- **Lyndon and Cindy Murray, 9908 SE Cambridge Ln:** comments related to the existing pedestrian easement, opposed to the parking modification request, and that the proposed design of the homes could be improved.
- **Diane Grant, Coral Sales, 9840 SE 17th Ave:** concerns about stormwater impacts and traffic impacts on 17th Ave.
- **Ernest Ogard and Janine Allen, 1626 SE McBrod Ave:** concern about adequacy of McBrod Ave to handle the increase in traffic, sight distance, and impacts to the 17th Ave multi-use path.
- **Sherry Basinger, 1638 SE 17th Ave:** concern about adequacy of access to the development related to McBrod Ave.
- **Brent and Erin Thielman, 1650 SE McBrod Ave:** concerns about: existing blind spots, parking on McBrod Ave, emergency vehicle access, roadway maintenance, multi-use path impacts, and quality of life issues.
- **Margaret and Steven Reaume, 10240 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Jon and Thayer Willis, 10252 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Diane and Don Snow, 9900 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Karleanne Rogers:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Residents of 1695 SE McBrod Ave:** Opposition to use of McBrod Ave for access to the development.
- **Robert and Cathie Crawford, 10115 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence. Concern about entry to the development from 17th Ave.

- **Lori and David Manougian, 10100 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Charlotte Price:** opposed to the additional parking spaces.
- **Justin (no last name given):** opposed to the additional parking spaces.
- **Nancy Dalton, 1505 SE Oxford Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Mark Hudspeth, 9800 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence. Concerns shared about increased traffic and safety impacts on McBrod Ave.
- **Diana Johnson, 1682 SE Waverly Dr:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Mike Howell, 1682 SE Waverly Dr:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Greg Lathrop, 9712 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **James and Dorothy Skinner, 1621 SE McBrod Ave:** concerns regarding adequacy of McBrod Ave for access to the development, including emergency vehicle access, infrastructure and maintenance concerns, use of 17th Ave an alternative access point.
- **Steve and Gloria Stone, 10230 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Michael and Alexandra Pitts, 10005 SE Cambridge Ln:** opposed to the additional parking spaces, and requests for a perimeter fence.
- **Susan Hoelzer:** supports the development type and building design, requests a perimeter fence, supports the parking space request, concern about McBrod Ave for on-street parking.