



City of Portland, Oregon
Bureau of Development Services
Land Use Services

FROM CONCEPT TO CONSTRUCTION

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**FINAL FINDINGS AND DECISION BY THE DESIGN
COMMISSION RENDERED ON January 7, 2016**

**CASE FILE NUMBER: LU 15-254878 DZ
811 SE Stark St**

BUREAU OF DEVELOPMENT SERVICES STAFF: Jeff Mitchem 503-823-7011 /
Jeffrey.Mitchem@portlandoregon.gov

The Design Commission has **denied** a proposal in your neighborhood. This document is only a summary of the decision. The reasons for the decision, including the written response to the approval criteria and to public comments received on this application, are included in the version located on the BDS website <http://www.portlandonline.com/bds/index.cfm?c=46429>. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

GENERAL INFORMATION

Applicant: Judson Moore
Works Partnership Architecture
524 E Burnside Street, Suite 320
Portland OR 97214

Owner: Michael T Quinn
PO Box 5908
Portland, OR 97228-5908

Site Address: 811 SE STARK ST

Legal Description: BLOCK 182 ELY OF SANDY BLVD-S 5' OF LOT 3 EXC PT IN ST ELY OF SANDY BLVD LOT 4 EXC PT IN ST LOT 5, EAST PORTLAND

Tax Account No.: R226511590
State ID No.: 1N1E35CC 10800
Quarter Section: 3031

Neighborhood: Buckman, contact Matthew Kirkpatrick at 503-236-6350.
Business District: Central Eastside Industrial Council, contact Peter Fry at 503-274-2744.
District Coalition: Southeast Uplift, contact Anne Dufay at 503-232-0010.

Plan District: Central City - Central Eastside
Zoning: EXd, Central Employment with a Design Overlay

Case Type: DZ, Design Review
Procedure: Type III, with a public hearing before the Design Commission. The decision of the Design Commission can be appealed to City Council.

Proposal:

Type III LUR follow-up to previously approved Type III (LU15-119651 DZM). The applicant proposes wood siding at the ground floor storefront in place of steel as required by Condition of Approval in previous case. The specific Condition of Approval generated by the Design Commission at the April 23, 2015 hearing reads as follows:

Replace the wood material at the base of the building with 16-gage lacquered steel, except surrounding the main residential entry where the material shall remain white stained cedar.

Design review is necessary because the proposal is for exterior alteration to a previous land use approval within a Design Overlay Zone.

Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The applicable approval criteria are:

- 33.825 Design Review
- Modification Criteria (33.825.040)
- Central City Fundamental Design Guidelines

ANALYSIS

Site and Vicinity: 811 Stark is located at the intersection SE Stark St and SE Sandy Blvd. At the urban scale of street grid and City block, the site and immediate vicinity derive their character from SE Sandy Blvd as it diagonally bisects the Portland street grid on a NE to SW axis, creating a series of sheared property edges and street intersections as it traverses the historical trajectory of the Sandy River Wagon Road Trail. The site's topography places the project on the higher end of a transitional slope that drops significantly at the intersection of SE Stark St and Sandy Blvd as the boulevard runs toward the River. The site is within the north east quadrant of the Central Eastside Industrial District and connects to the heart of Industrial Sanctuary via SE Stark St.

While the Industrial Sanctuary defines the district character with primarily industrial uses housed in c1920s warehouses, the surrounding area is comprised of a mix of uses including retail, office, and light industry. Local restaurants, bars and a variety of retail activate the area through an extended time range. The adjacent area is also populated by a variety of building types from older one and two story concrete commercial warehouses to masonry apartments. Zoning code changes over the last decade have offered expanded opportunities for the upgrade and adaptation of these older warehouses for new creative industrial office uses which have helped to sustain employment levels in the district. The most significant infill development is the "Goat Blocks" (approximately 110,000 square feet of retail, 247 apartments and 339 parking stalls), presently under construction approximately 5 blocks south of the project site.

Zoning: The Central Employment (EX) base zone implements the Central Employment map designation of the Comprehensive Plan. The zone allows mixed-uses and is intended for areas in the center of the city with predominantly industrial type development. The intent of the zone is to allow industrial and commercial uses which need a central location. Residential uses are allowed, but are not intended to predominate or set development standards for other uses in the area.

The Design Overlay Zone [d] promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. This is achieved through the creation of design districts and applying the Design Overlay Zone as part of community planning projects, development of design guidelines for each district, and by requiring design review. In addition, design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

Land Use History: LU15-119651 DZM. Approval of a 4-story office/retail building including a specific Condition of Approval which this application seeks to overturn.

Agency Review: A “Notice of proposal in Your Neighborhood” was mailed **December 17, 2015**. The following Bureaus have responded with no issue or concerns:

- Portland Bureau of Transportation
- Life Safety
- Urban Forestry
- Water Bureau
- Fire Bureau

Neighborhood Review: A “Notice of Proposal in Your Neighborhood” was mailed on **December 17, 2015**. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

(1) DESIGN REVIEW (33.825)

33.825.010 Purpose

Design Review ensures:

- That development conserves and enhances the recognized special design values of a site or area;
- The conservation, enhancement, and continued vitality of the identified scenic, architectural, and cultural values of each design district;
- That certain types of infill development will be compatible with the neighborhood and enhance the area; and
- High design quality of public and private projects.

33.825.055 Design Review Approval Criteria

A design review application will be approved if the review body finds the applicant to have shown that the proposal complies with the design guidelines for the area.

It is important to emphasize that design review goes beyond minimal design standards and is viewed as an opportunity for applicants to propose new and innovative designs. The design guidelines are not intended to be inflexible requirements. Their mission is to aid project designers in understanding the principal expectations of the city concerning urban design.

The review body conducting design review may waive individual guidelines for specific projects should they find that one or more fundamental design guidelines is not applicable to the circumstances of the particular project being reviewed.

The review body may also address aspects of a project design which are not covered in the guidelines where the review body finds that such action is necessary to better achieve the goals and objectives of design review in the Central City.

Findings: The site is designated with design overlay zoning (d), therefore the proposal requires Design Review approval. Because the site is located generally within the Central City Plan District, the applicable design guidelines are the Central City Plan Fundamental Design Guidelines. As the site is also specifically located within the Design Zone of the Central Eastside District, the Special Design Guidelines for the Design Zone of the Central Eastside District of the Central City Plan also apply.

Special Design Guidelines for the Design Zone of the Central Eastside District of the Central City Plan and Central City Fundamental Design Guidelines

The Central Eastside is a unique neighborhood within Portland's Central City. The property and business owners are proud of the district's heritage and service to the community and region. Light industry, distribution/warehousing, and transportation are important components of the district's personality. To the general public, retail stores and commercial businesses provide the central focus within the district.

The underlying urban design objective for the Central Eastside is to capitalize on and emphasize its unique assets in a manner that is respectful, supportive, creative and compatible with each area as a whole. Part of the charm and character of the Central Eastside District, which should be celebrated, is its eclectic mixture of building types and uses. An additional strength, which should be built on, is the pattern of pedestrian friendly retail uses on Grand Avenue, East Burnside and Morrison Streets, as well as emergent segments of SE Sandy Blvd and Stark St.

The Central City Fundamental Design Guidelines and the River District Design Guidelines focus on four general categories. **(A) Portland Personality**, addresses design issues and elements that reinforce and enhance Portland's character. **(B) Pedestrian Emphasis**, addresses design issues and elements that contribute to a successful pedestrian environment. **(C) Project Design**, addresses specific building characteristics and their relationships to the public environment. **(D) Special Areas**, provides design guidelines for the four special areas of the Central City.

Central Eastside Design Goals

The following goals and objectives define the urban design vision for new development and other improvements in the Central Eastside

- Encourage the special distinction and identity of the design review areas of the Central Eastside District.
- Provide continuity between the Central Eastside and the Lloyd District.
- Provide continuity between the Central Eastside and the river, downtown, and adjacent residential neighborhoods.
- Enhance the safety, convenience, pleasure, and comfort of pedestrians.

Central City Plan Design Goals

This set of goals are those developed to guide development throughout the Central City. They apply within the River District as well as to the other seven Central City policy areas. The nine goals for design review within the Central City are as follows:

1. Encourage urban design excellence in the Central City;
2. Integrate urban design and preservation of our heritage into the development process;
3. Enhance the character of the Central City's districts;
4. Promote the development of diversity and areas of special character within the Central City;
5. Establish an urban design relationship between the Central City's districts and the Central City as a whole;
6. Provide for a pleasant, rich and diverse pedestrian experience for pedestrians;
7. Provide for the humanization of the Central City through promotion of the arts;
8. Assist in creating a 24-hour Central City which is safe, humane and prosperous;
9. Ensure that new development is at a human scale and that it relates to the scale and desired character of its setting and the Central City as a whole.

Commission has considered all guidelines and has addressed only those guidelines considered applicable to this project.

C2. Promote Quality and Permanence in Development. Use design principles and building materials that promote quality and permanence.

Findings: At the April 24, 2015 hearing for LU15-119651 DZM, the Design Commission had a lengthy discussion about wood as a ground floor cladding material for the proposed building. Specific concerns were expressed regarding the likelihood of unintentional and intentional impacts (excessive weathering and vandalism) to exposed, downwardly angled or flat surfaces, particularly on the weather-exposed south and west elevations. Though the Commission appreciated the tactile value of wood as a ground floor material, they were concerned that the requisite frequency of repair and maintenance (though relatively easy to execute) would be incompatible with notions of quality and permanence implied by this Guideline. Therefore, the Commission conditioned the approval to replace the wood with heavy-gage steel for the ground level except at the covered main residential entry.

The current proposal – cedar (clear finish at storefront windows and natural at main lobby entrance), limited measure of protection offered by partial overhanging building elements and the lack of protective canopies, and the lack of any proposed maintenance program – falls short of offering the degree of weather protection to horizontal or angled surfaces necessary to ensure the long-term viability of ground floor wood in this application. The design solution as presently depicted is insufficiently resolved in specification and detail necessary to determine that the application will promote quality and permanence.

Therefore this guideline is not met.

C5. Design for Coherency. Integrate the different building and design elements including, but not limited to, construction materials, roofs, entrances, as well as window, door, sign, and lighting systems, to achieve a coherent composition.

Findings: Generally, the project incorporates spatial organizations and building systems within a constrained material pallet and simple concept language predicated on void framing, asymmetry and transparency. Through the use of repeated and varied window and entry framing elements, the building establishes a pattern of faceted apertures and recesses that define the exterior elevations.

The window/framing elements are proposed to be of three different materials – the upper floors are metal, while the ground floor will be two finished of wood (clear finish at storefront windows and natural at main lobby entrance) and metal at the service entry on the east elevation. Incorporating this many finishes at the ground floor detracts from the overall coherency of the building. While the ground floor may be differentiated from upper floors, the overall coherency of the design would be stronger if the ground floor cladding were to be similarly finished, with the primary entrance being the one exception, as was approved in the prior proposal.

Therefore, this guideline is not met.

The following guidelines were considered in the previous land use review (LU 15-119651 DZM).

PORTLAND PERSONALITY

A1. Integrate the River. Orient architectural and landscape elements including lobbies, entries, balconies, terraces and outdoor areas to the Willamette River and Greenway.

A2. Emphasize Portland Themes. When provided, integrate Portland-related themes with the development's overall design concept.

A2-1. Recognize Transportation Modes, Produce, and Commerce as Primary Themes of East Portland. Recognize and incorporate East Portland themes into a project design, when appropriate.

A3. Respect the Portland Block Structures. Maintain and extend the traditional 200-foot block pattern to preserve the Central City's ratio of open space to built space. Where superblock exist, locate public and/or private rights-of-way in a manner that reflects the 200-foot block pattern, and include landscaping and seating to enhance the pedestrian environment.

A4. Use Unifying Elements. Integrate unifying elements and/or develop new features that help unify and connect individual buildings and different areas.

A5. Enhance, Embellish, and Identify Areas. Enhance an area by reflecting the local character within the right-of-way. Embellish an area by integrating elements in new development that build on the area's character. Identify an area's special features or qualities by integrating them into new development.

A5-2 Acknowledge the Sandy River Wagon Road. Acknowledge the historical significance to of the Sandy River Wagon Rd (Sandy Blvd) From East Burnside to 7th Ave.

A5-3. Plan for or Incorporate Underground Utility Service. Plan for or Incorporate Underground Utility Service to development projects.

A5-4. Incorporate Works of Art. Incorporate works of art into development projects.

A5-5. Incorporate Water Features. Enhance the quality of public spaces by incorporating water features.

A7. Establish and Maintain a Sense of Urban Enclosure. Define public rights-of-way by creating and maintaining a sense of urban enclosure.

A7-1 Maintain a Sense of Urban Enclosure When Single-Story Buildings are Set Back.

Maintain a sense of urban enclosure, through the use of landscaping and other means, when single story buildings are set back from the property line.

A8. Contribute to a Vibrant Streetscape. Integrate building setbacks with adjacent sidewalks to increase the space for potential public use. Develop visual and physical connections into buildings' active interior spaces from adjacent sidewalks. Use architectural elements such as atriums, grand entries and large ground-level windows to reveal important interior spaces and activities.

PEDESTRIAN EMPHASIS

B1. Reinforce and Enhance the Pedestrian System. Maintain a convenient access route for pedestrian travel where a public right-of-way exists or has existed. Develop and define the different zones of a sidewalk: building frontage zone, street furniture zone, movement zone, and the curb. Develop pedestrian access routes to supplement the public right-of-way system through superblocks or other large blocks.

B2. Protect the Pedestrian. Protect the pedestrian environment from vehicular movement. Develop integrated identification, sign, and sidewalk-oriented night-lighting systems that offer safety, interest, and diversity to the pedestrian. Incorporate building equipment, mechanical exhaust routing systems, and/or service areas in a manner that does not detract from the pedestrian environment.

B3. Bridge Pedestrian Obstacles. Bridge across barriers and obstacles to pedestrian movement by connecting the pedestrian system with innovative, well-marked crossings and consistent sidewalk designs.

B3-1. Reduce width of Pedestrian Crossings.

a. Where possible, extend sidewalk curbs at street intersections to narrow pedestrian crossings for a safer pedestrian environment.

b. Maintain large service vehicle turning radii where necessary.

B4. Provide Stopping and Viewing Places. Provide safe, comfortable places where people can stop, view, socialize and rest. Ensure that these places do not conflict with other sidewalk uses.

B5. Make Plazas, Parks and Open Space Successful. Orient building elements such as main entries, lobbies, windows, and balconies to face public parks, plazas, and open spaces. Where provided, integrate water features and/or public art to enhance the public open space. Develop locally oriented pocket parks that incorporate amenities for nearby patrons.

B6. Develop Weather Protection. Develop integrated weather protection systems at the sidewalk-level of buildings to mitigate the effects of rain, wind, glare, shadow, reflection, and sunlight on the pedestrian environment.

B6-1. Provide Pedestrian Rain Protection. Rain protection is encouraged at the ground level of all new and rehabilitated commercial buildings located adjacent to primary pedestrian routes. In required retail opportunity areas, rain protection is strongly recommended.

B7. Integrate Barrier-Free Design. Integrate access systems for all people with the building's overall design concept.

PROJECT DESIGN

C1. Enhance View Opportunities. Orient windows, entrances, balconies and other building elements to surrounding points of interest and activity. Size and place new buildings to protect existing views and view corridors. Develop building façades that create visual connections to adjacent public spaces.

C1-1. Integrate parking.

- a. Integrate parking in a manner that is attractive and complementary to the site and its surroundings.
- b. Design parking garage exteriors to visually respect and integrate with adjacent buildings and environment.

C13 Integrate Signs. Integrate signs and their associated structural components with the building's overall design concept. Size, place, design and light signs to not dominate the skyline. Signs should have only a minimal presence in the Portland skyline.

C1-2. Integrate Signs.

- a. Retain and restore existing signage which reinforces the history and themes of the district, and permit new signage which reinforces the history and themes of the East Portland Grand Avenue historic district.
- b. Carefully place signs, sign supports, and sign structures to integrate with the scale, color and articulation of the building design, while honoring the dimensional provisions of the sign chapter of the zoning code.
- c. Demonstrate how signage is one of the design elements of a new or rehabilitation project and has been coordinated by the project designer/ architect. Submit a Master Signage Program as a part of the project's application for a design review.

C2. Promote Quality and Permanence in Development. Use design principles and building materials that promote quality and permanence.

C3-1. Design to Enhance Existing Themes in the District. Look to buildings from throughout the district for contextual precedent. Innovation and creativity are encouraged in design proposals, which enhance overall district character.

C4. Complement the Context of Existing Buildings. Complement the context of existing buildings by using and adding to the local design vocabulary.

C6. Develop Transitions between Buildings and Public Spaces. Develop transitions between private development and public open space. Use site design features such as movement zones, landscape elements, gathering places, and seating opportunities to develop transition areas where private development directly abuts a dedicated public open space.

C7. Design Corners that Build Active Intersections. Use design elements including, but not limited to, varying building heights, changes in façade plane, large windows, awnings, canopies, marquees, signs and pedestrian entrances to highlight building corners. Locate flexible sidewalk-level retail opportunities at building corners. Locate stairs, elevators, and other upper floor building access points toward the middle of the block.

C8. Differentiate the Sidewalk-Level of Buildings. Differentiate the sidewalk-level of the building from the middle and top by using elements including, but not limited to, different exterior materials, awnings, signs, and large windows.

C9. Develop Flexible Sidewalk-Level Spaces. Develop flexible spaces at the sidewalk-level of buildings to accommodate a variety of active uses.

C8-1 Allow for Loading and Staging Areas on Sidewalks. On local service streets, adjacent businesses may use the sidewalk area for temporary loading and staging as long as pedestrian access through it is maintained.

C11. Integrate Roofs and Use Rooftops. Integrate roof function, shape, surface materials, and colors with the building's overall design concept. Size and place rooftop mechanical equipment, penthouses, other components, and related screening elements to enhance views of the Central City's skyline, as well as views from other buildings or vantage points. Develop rooftop terraces, gardens, and associated landscaped areas to be effective storm water management tools.

C12. Integrate Exterior Lighting. Integrate exterior lighting and its staging or structural components with the building's overall design concept. Use exterior lighting to highlight the building's architecture, being sensitive to its impacts on the skyline at night.

Findings: These guidelines were considered in the previous land use review (LU 15-119651 DZM) and found to be met by the Design Commission.

These guidelines are not relevant to this proposed revision.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

CONCLUSIONS

The design review process exists to promote the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. The Design Commission has been clear in multiple land use review hearings regarding the approvability of wood as a cladding material at the ground floor vis-à-vis the applicable approval criteria (C2 Promote Quality and Permanence in Development) – the wood must be protected overhead from weather, the species must be appropriately durable, horizontal or angled surfaces are to be avoided and maintenance programs shall be conditions of approval. As proposed, this project has not demonstrated that it complies with these requirements and therefore does not warrant approval.

DESIGN COMMISSION DECISION

It is the decision of the Design Commission to **deny** Design Review for the proposal to use wood siding at the ground floor storefront in place of steel as required by Condition of Approval in previous case (LU15-119651 DZM).

By: 
David Wark, Design Commission Chair

Application Filed: October 30, 2015
Decision Filed: January 8, 2016

Decision Rendered: January 7, 2016
Decision Mailed: January 19, 2016

About this Decision. This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

Procedural Information. The application for this land use review was submitted on October 30, 2015, and was determined to be complete on **November 13, 2015**.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on October 30, 2015.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant did not waive or extend the 120-day review period. **The 120 days expire on March 12, 2016.**

Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. This report is the final decision of the Design Commission with input from other City and public agencies.

Appeal of this decision. This decision is final unless appealed to City Council, who will hold a public hearing. Appeals must be filed by 4:30 pm on February 2, 2016 at 1900 SW Fourth Ave. Appeals can be filed at the Development Services Center Monday through Wednesday and Fridays between 8:00 am to 3:00 pm and on Thursdays between 8:00 am to 2:00 pm. After 3:00 pm Monday through Wednesday and Fridays, and after 2:00 pm on Thursdays, appeals must be submitted at the reception desk on the 5th floor. Information and assistance in filing an appeal is available from the Bureau of Development Services in the Development Services Center or the staff planner on this case. You may review the file on this case by appointment at, 1900 SW Fourth Avenue, Suite 5000, Portland, Oregon 97201. Please call the file review line at 503-823-7617 for an appointment.

If this decision is appealed, a hearing will be scheduled and you will be notified of the date and time of the hearing. The decision of City Council is final; any further appeal is to the Oregon Land Use Board of Appeals (LUBA).

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to City Council on that issue. Also, if you do not raise an issue with enough specificity to give City Council an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Who can appeal: You may appeal the decision only if you have written a letter which was received before the close of the record at the hearing or if you testified at the hearing, or if you are the property owner or applicant. Appeals must be filed within 14 days of the decision. **An appeal fee of \$5,000.00 will be charged.**

Neighborhood associations may qualify for a waiver of the appeal fee. Additional information on how to file and the deadline for filing an appeal will be included with the decision. Assistance in filing the appeal and information on fee waivers are available from the Bureau of Development Services in the Development Services Center, 1900 SW Fourth Ave., First Floor. Fee waivers for neighborhood associations require a vote of the authorized body of your association. Please see appeal form for additional information.

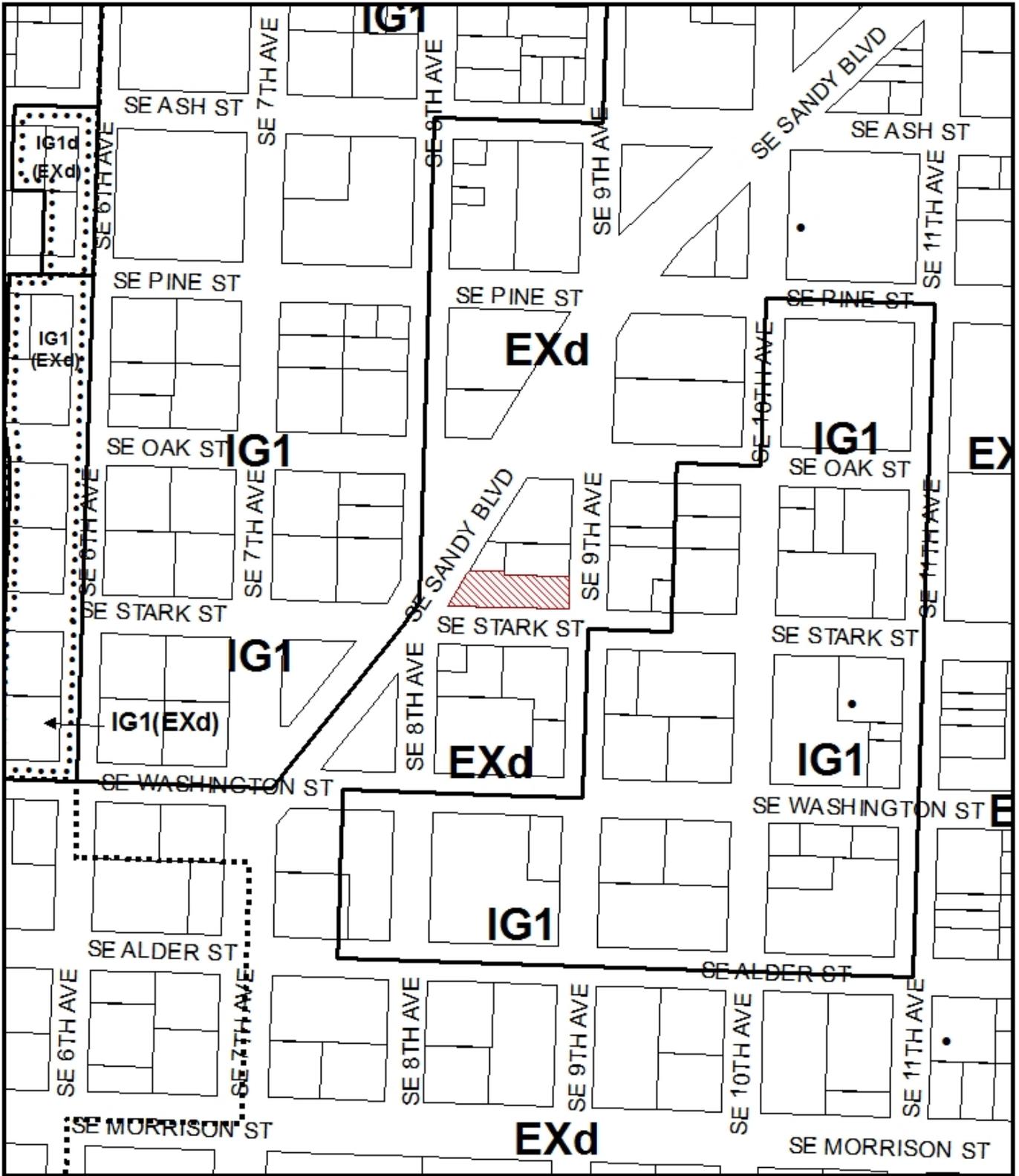
Jeff Mitchem
January 14, 2016

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior

to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).

EXHIBITS – NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans & Drawings
 - 1. Design Review Drawing Set (Sheet C.1-C.19)
 - Sheet C.4, Concept (attached)
 - Sheet C.5, South and East Elevation (attached)
 - Sheet C.6, North and West Elevation (attached)
- D. Notification information:
 - 1. Request for response
 - 2. Posting letter sent to applicant
 - 3. Notice to be posted
 - 4. Applicant's statement certifying posting
 - 5. Mailed notice
 - 6. Mailing list
- E. Agency Responses:
 - 1. Portland Bureau of Transportation
 - 2. Life Safety
 - 3. Urban Forestry
 - 4. Water Bureau
 - 5. Fire Bureau
- F. Letters - None
- G. Other
 - 1. Original LUR Application
- H. Hearing
 - 1. Staff Report and Recommendation to the Design Commission, January 7, 2016



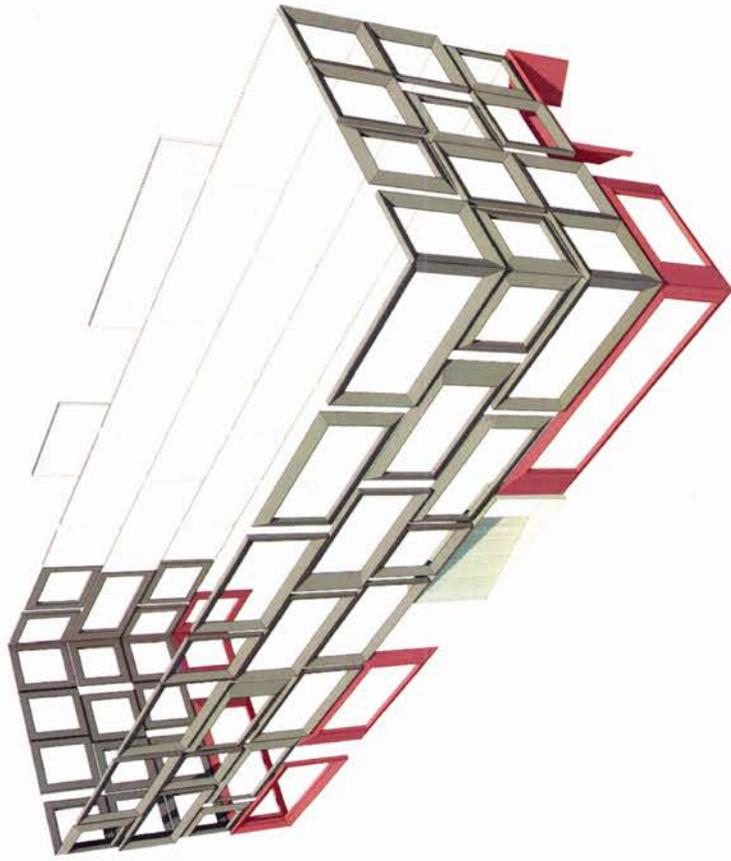
ZONING

- Site
- Historic Landmark

This site lies within the:
 CENTRAL CITY PLAN DISTRICT
 CENTRAL EASTSIDE SUBDISTRICT

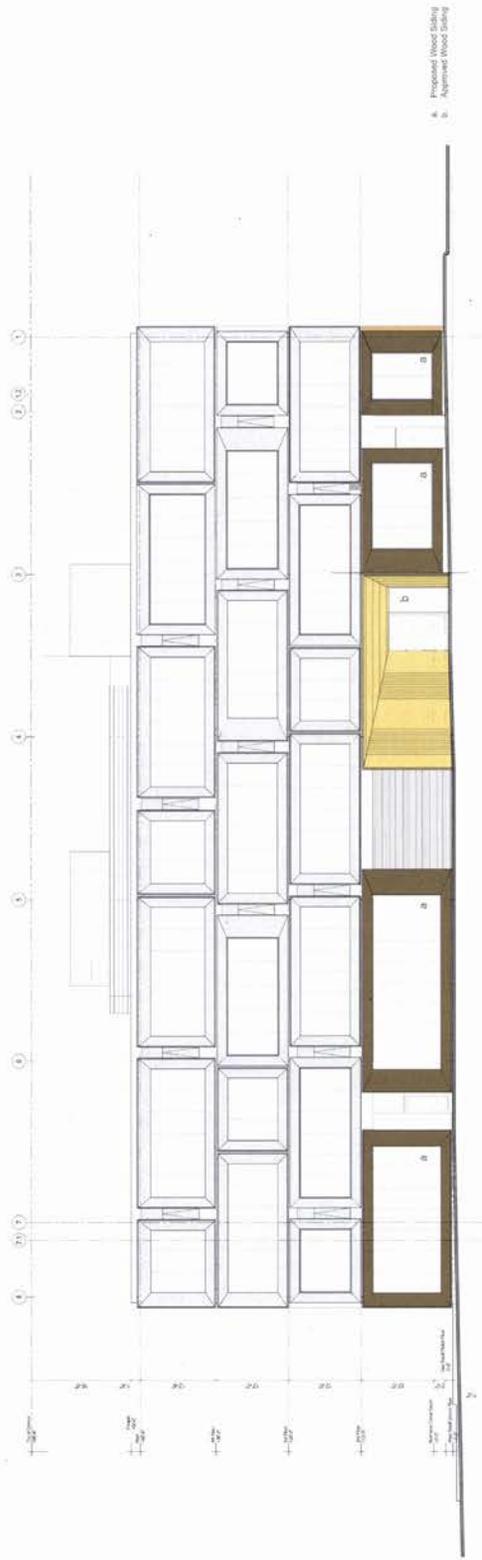


File No.	<u>LU 15-254878 DZM</u>
1/4 Section	<u>3031</u>
Scale	<u>1 inch = 200 feet</u>
State_Id	<u>1N1E35CC 10800</u>
Exhibit	<u>B</u> (Nov 04, 2015)

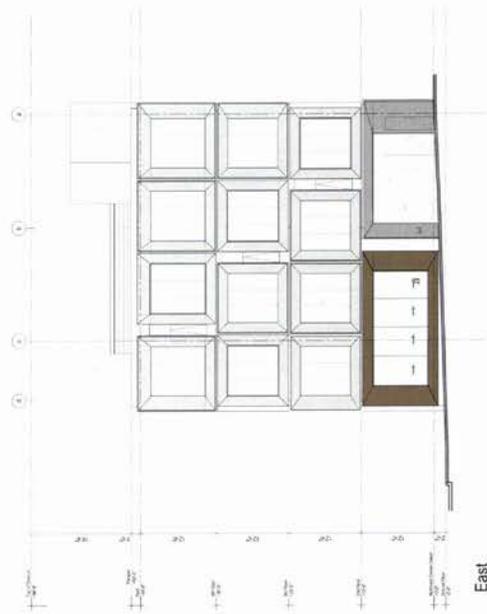


Framing Interface

Areas under review highlighted red



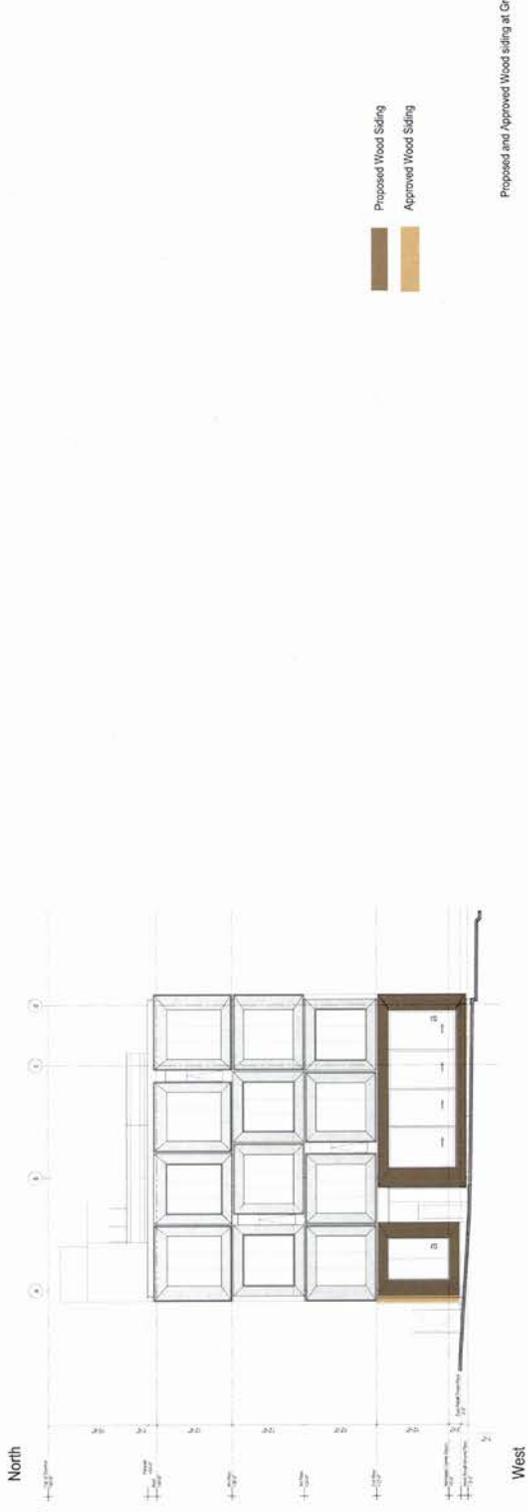
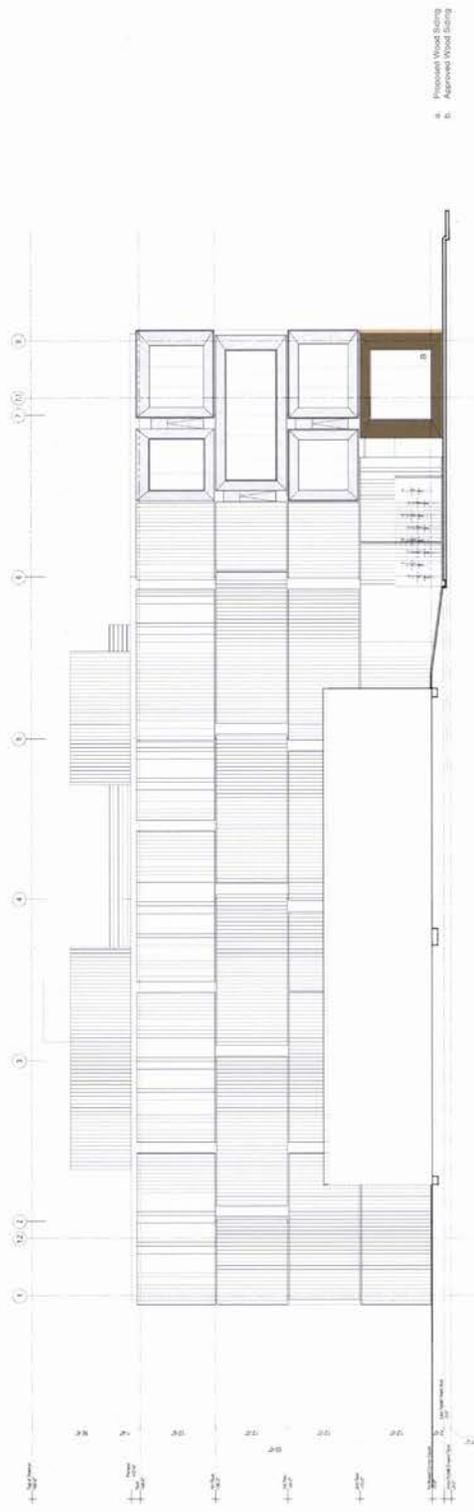
South



East



Proposed and Approved Wood siding at Ground Level



Proposed Wood Siding
Approved Wood Siding

Proposed and Approved Wood siding at Ground Level