

- Individual driveways are provided for each of the 11 proposed homes.

On-street parking impacts:

- Each of the proposed homes will have an individual site driveway parking area.
- Peak on-street parking demand in the area was observed and uses approximately 11% of the available parking capacity.
- The proposed subdivision is not expected to substantially impact parking for other residents, as there is an ample parking supply provided on-site and on the surrounding streets.

Availability of transit service and facilities and connections to transit:

- Transit services in the site vicinity are adequate to support the proposed subdivision.
- Impacts on the immediate and adjacent neighborhoods:
- The proposed development will result in 8 weekday AM peak hour trips and 11 weekday PM and 11 weekday PM peak hour trips.
- Increased street connectivity provided by the new segment of SW Pendleton Street within the proposed subdivision could result in some traffic diversion between SW Cameron Road and SW 45th Avenue and the additional traffic volumes can be readily accommodated through capacity available at the study intersections.
- The proposed subdivision is consistent with the pedestrian designations and facilities of the surrounding streets.
- The proposed subdivision is consistent with the bicycle designations and facilities on the surrounding streets.
- The adjacent street system designations are consistent with the proposed subdivision.

Safety for all modes

- The proposed site development includes frontage improvements with sidewalks along SW 48th Street, SW Pendleton Street, and the new north-south local street connecting the two existing termini of SW Pendleton Street.
- Review of crash data did not indicate any safety-related mitigation is needed at the off-site intersections. Given the proposed connection of SW Pendleton Street through the site to the east, the City of Portland may choose to require the proposed development to install traffic control at the SW Pendleton Street/SW 48th Avenue (East) intersection; potentially in the form of a southbound yield sign on SW 48th Avenue.
- We recommend that any future landscaping, above-ground utilities, and site signage along the site frontage be located and maintained such that adequate intersection sight distance is provided.

33.641.030 Mitigation

The applicant may meet the criterion in Section 33.641.020, above, by including mitigation measures as part of the land division proposal. Mitigation measures must be acceptable to the City Engineer and may include providing transportation demand management measures, an access management plan, constructing streets or bicycle, pedestrian, or transit facilities on or off the site or other capital improvement projects such as traffic calming devices.

Response: The Transportation Impact Study report for the proposed development concluded that no offsite mitigation would be needed. This, of course, does not exclude the on-site roadway improvements which are planned to be constructed as part of the land division.

33.660.120 L. SERVICES AND UTILITIES. *The regulations and criteria of Chapters 33.651 through 33.654, which address services and utilities, must be met.*

Response: The applicable sections of Chapters 33.651 through 654 are addressed below with responses to the applicable standards:

Chapter 33.651 Water Service
33.651.020 Water Service Standard

Water service must meet the standard of this section. Adjustments are prohibited. The Water Bureau or District and the Fire Bureau have verified that water facilities with adequate capacity and pressure are available to serve the proposed development.

Response: Water service for the proposed subdivision has been designed to meet the standards of this Section. Preliminary Contact with the Water Bureau in the pre-application conference did not indicate any significant issues regarding the capacity or pressure of nearby water facilities. The proposed subdivision will be served by an extension from the existing water line in the western segment of SW Pendleton Street to connect up with the existing water line within the eastern segment of SW Pendleton. Final water system design will be consistent with Water Bureau and Fire Bureau standards.

33.651.030 Environmental Overlay Zones

If any portion of the water service is within an Environmental Overlay Zone, it is subject to the regulations of Chapter 33.430, Environmental Overlay Zones.

Response: All portions of the water service system for the proposed subdivision are locations outside of the Environmental overlay zoned portion of the site. Therefore, the proposed water systems improvements are not subject to the regulations of Chapter 430.

Chapter 33.652 Sanitary Sewer Disposal Service
33.652.020 Sanitary Sewer Disposal Service Standards

Sanitary sewer disposal service must meet the standards of this section. Adjustments are prohibited.

A. Availability of sanitary sewer.

- 1. The Bureau of Environmental Services has verified that sewer facilities are available to serve the proposed development; or*
- 2. BDS has approved the use of a private on-site sanitary sewage disposal system.*

Response: A sanitary sewer will be installed within the proposed new segment of SW Pendleton Street. The new sewer will connect to the existing sewer within the western segment of SW Pendleton Street.

The Bureau of Environmental Services provided preliminary comments that public sanitary sewer facilities are available to serve the proposed subdivision.

No on-site sanitary sewage disposal systems are proposed.

- B. Public sanitary sewage disposal. Where public sewer facilities are available to serve the proposed development, the Bureau of Environmental Services has preliminarily approved the location, design, and capacity of the proposed sanitary sewage disposal system. The approval is based on the Sewer Design Manual; and*

Response: Public sanitary sewage disposal will be provided by 8-inch proposed sanitary sewer line located within the proposed street segment connecting to the existing sanitary sewer within the western segment of SW Pendleton Street. The new segment of sewer will provide service to proposed lots 4 through 11. Lots 1 through 3 will be provided service by connections to the existing sewer within the western segment of SW Pendleton Street. The proposed sewer will be designed consistent with the City's sewer design standards.

- C. *Private sanitary sewage disposal. Where private on-site sanitary sewage disposal is proposed, BDS and Environmental Services have preliminarily approved the location, design, and capacity of the proposed sanitary sewage disposal system.*

Response: No private on-site sanitary sewage disposal is proposed.

33.652.030 Environmental Overlay Zones

If any portion of the sanitary sewer is within an Environmental Overlay Zone, it is subject to the regulations of Chapter 33.430, Environmental Overlay Zones.

Response: All portions of the sanitary sewer system for the proposed subdivision are in locations outside of the Environmental overlay zoned portion of the site. Therefore, the proposed sanitary sewer system improvements are not subject to the regulations of Chapter 430.

Chapter 33.653 Stormwater Management

33.653.020 Stormwater Management Approval Criteria

Stormwater management must meet the following approval criteria:

- A. *If a stormwater tract is proposed or required, an adequate amount of land and an appropriate location must be designated on the Preliminary Plan; and*

Response: Stormwater from the proposed public streets will to be treated through low impact development storm drainage planters located within the public rights-of-way. Outfall from these facilities will be conveyed to the proposed public storm sewer network which discharges to the unnamed drainageway to the west.

Homes on each of the private lots provide water quality treatment through flow-through planters to meet or exceed City of Portland requirements. Detail designs and sizing of these planters will be reviewed through the review process for individual building permits.

- B. *The application must show that a stormwater management system can be designed that will provide adequate capacity for the expected amount of stormwater.*

Response: A stormwater management system that will provide adequate capacity for the expected amount of stormwater has been depicted on the plan set. A Conceptual Stormwater Management Report is included as Appendix D outlining how the proposed network will meet the City's capacity standards.

33.653.030 Stormwater Management Standards

Stormwater management facilities must meet the following standards. Adjustments are prohibited.

- A. *The Bureau of Environmental Services has preliminarily approved the capacity, type, location, feasibility and land area required of the proposed stormwater management system and stormwater disposal facilities as well as any connection to off-site facilities. The approval is based on the Sewer Design Manual and the Stormwater Management Manual;*

Response: The location, design, and capacity of the proposed stormwater treatment and disposal facilities will be reviewed and approved by the Bureau of Environmental Services.

- B. *The Bureau of Development Services has preliminarily approved the capacity, type, location, feasibility, and land area required of any proposed private on-site stormwater disposal facilities; and*

Response: Onsite stormwater treatment and disposal facilities will be proposed with specific building development proposals for the lots within the subdivision. Each lot will be provided with one or more lateral connections to the public storm system.

C. Ownership and maintenance.

1. *Generally, a stormwater facility that serves more than one lot must be in a tract or within the right-of-way; except as allowed by C.2 below. If the facility is in a tract, it must be either owned in common by all of the owners of the lots served by the facility, by a Homeowners' Association, by a public agency, or by a non-profit organization.*
2. *Exceptions.*
 - a. *A private stormwater facility may be in an easement if the location of the tract would preclude compliance with the front lot line requirements of Chapters 33.610 through 33.615;*
 - b. *An existing private stormwater facility may be in an easement, if there is a recorded maintenance agreement, or if the maintenance is addressed in the CC&Rs;*
 - c. *A private stormwater facility serving up to five dwelling units may be in an easement, if there is a recorded maintenance agreement, or if the maintenance is addressed in the CC&Rs.*

D. Driveways may cross stormwater tracts and easements.

Response: Not applicable.

33.653.040 ***Environmental Overlay Zones***

If any portion of the stormwater management system or disposal system is proposed within an Environmental Overlay Zone, it is subject to the regulations of Chapter 33.430, Environmental Zones.

Response: All portions of the storm sewer system for the proposed subdivision are locations outside of the Environmental overlay zoned portion of the site. Therefore, the proposed storm sewer improvements are not subject to the regulations of Chapter 430.

Chapter 33.654 ***Rights-of-Way***

33.654.010 ***Purpose***

Rights-of-way provide for movement and access to, within, and through a land division site by pedestrians, bicycles, and motor vehicles. These regulations ensure that the right-of-way system will serve each lot in the land division. Where possible, the system will extend through the land division to reach adjacent sites. Constraints, such as steep slopes or environmental zones on or near the site may influence the location or preclude connected rights-of-way. These regulations protect the public health and safety by ensuring safe movement and access for emergency and service vehicles.

Response: No response to the purpose statement is necessary

33.654.020 ***Where These Regulations Apply***

The regulations of this chapter apply to all land divisions.

Response: the regulations of this chapter are applicable to the current land division approval request.

33.654.110 ***Connectivity and Location of Rights-of-Way***

- A. Purpose. The regulations of this section ensure provision of efficient access to as many lots as possible, and enhance direct movement by pedestrians, bicycles, and motor vehicles between destinations. Direct routes for bicycles and pedestrians from residential areas to neighborhood facilities, such as schools and parks,*

are particularly important to increase the convenience of travelling by foot or bicycle. The specific location of rights-of-way is influenced by a variety of conditions, including existing development, streets and lot patterns, and environmental features.

B. *Approval criteria.*

1. *Through streets and pedestrian connections in OS, R, C, and E Zones. In OS, R, C, and E zones, through streets and pedestrian connections are required where appropriate and practicable, taking the following into consideration:*
 - a. *Through streets should generally be provided no more than 530 feet apart, and pedestrian connections should generally be provided no more than 330 feet apart. Through street and pedestrian connections should generally be at least 200 feet apart;*
 - b. *Where the street pattern in the area immediately surrounding the site meets the spacing of subparagraph a., above, the existing street pattern should be extended onto the site;*
 - c. *Characteristics of the site, adjacent sites, and vicinity, such as:*
 - (1) *Terrain;*
 - (2) *Whether adjacent sites may be further divided;*
 - (3) *The location of existing streets and pedestrian connections;*
 - (4) *Whether narrow frontages will constrain creation of a through street or pedestrian connection;*
 - (5) *Whether any of the following interrupt the expected path of a through street or pedestrian connection:*
 - *Environmental, Pleasant Valley Natural Resource, or Greenway overlay zones;*
 - *Tree groves;*
 - *Streams;*
 - *Special flood hazard areas; or*
 - *Wetlands; and*
 - (6) *Whether existing dwelling units on- or off-site obstruct the expected path of a through street or pedestrian connection. Alternative locations or designs of rights-of-way should be considered that avoid existing dwelling units. However, provision of through streets or pedestrian connections should take precedence over protection of existing dwelling units where the surrounding transportation system will be significantly affected if a new through street or pedestrian connection is not created;*
 - d. *Master street plans for the area identified in Goal 11B of the Comprehensive Plan;*
 - e. *Pedestrian connections should take the most direct route practicable. Users should be able to see the ending of the connection from the entrance point, if possible.*

Response: The proposed street systems will not create any actual “blocks” which are longer than 530 feet in length. The east-west distance between SW 47th Avenue and SW 48th Avenue in the area of the site is approximately 450 feet. The distance between the eastern segment of SW Pendleton Street and SW Iowa Street to the south is approximately 430 feet.

The proposed development plan provides a connection between the existing dead-ended eastern segment of SW Pendleton Street to the western segment of SW Pendleton Street through a new connecting road segment. The proposed street connection will significantly improve east-west pedestrian and vehicular access routes by connecting the two existing dead end streets into a through street by extending the existing street pattern onto the site, consistent with subsections a. and b. above. The presence of wetlands on the subject site and apparently on the parcel to the south restrict the potential for another connection to SW 48th Avenue any further to the south.

There was substantial interest expressed at the neighborhood association meeting regarding the proposed development to not have any road connection between the two existing segments of SW Pendleton Street or to have the connection barricaded so as to prohibit through traffic – other than possible emergency vehicle traffic. The applicant's project team believes that the proposed street system is what is most appropriate in order to address the standards listed above and to provide appropriate vehicular and pedestrian circulation. Nevertheless, the applicant would be willing to barricade the street connection if it is determined to be appropriate by the City of Portland.

2. *Dead-end streets in OS, R, C, and E zones. In OS, R, C, and E zones, dead-end streets may be provided where through streets are not required. Dead-end streets should generally not exceed 200 feet in length, and should generally not serve more than 18 dwelling units. Public dead-end streets should generally be at least 200 feet apart.*

Response: The entire site is within an R zone – the R7 district. Portions of the site are within an Environmental zone. Therefore, this section is applicable.

The proposed subdivision would modify the western segment of SW Pendleton Street from its current approximately 275 foot long cul de sac serving six dwelling units into a combination of a and an approximately 60-foot long dead end providing access to only one dwelling unit. In addition, the proposed street system would eliminate the existing approximately 110-foot long dead end eastern segment of SW Pendleton Street and would eliminate the presence of two dead end streets which are separated by approximately 160 feet. The proposed street system would therefore be consistent with the above standards.

3. *Pedestrian connections in I Zones. In I zones, pedestrian connections to all Regional Transitways, Major Transit Priority Streets, Transit Access Streets, Community Transit Streets, Off-Street Paths, and recreational trails within 1,300 feet of the site are required where appropriate and practicable. The connections should take the most direct route practicable. Users should be able to see the ending of the connection from the entrance point, if possible. Only the portion of the pedestrian connection that is on the land division site is required.*

Response: The site is not located within an I zone. Therefore, this standard does not apply.

4. *Alleys in all zones. Alleys may be provided where the provision of an alley is appropriate to mitigate transportation or development impacts. Alleys may be appropriate to move garage access away from busy streets, reduce the number of driveways crossing sidewalks, provide alternative locations on the site for parking, limit the number of garage doors facing the street, and maintain on-street parking. Where alleys are not required, applicants may choose to provide them.*

Response: No alleys are proposed.

33.654.120 ***Design of Rights-of-Way***

- A. *Purpose. The purpose of these standards and approval criteria is to ensure that the vehicle, bicycle, and pedestrian circulation system is designed to be safe, efficient, and convenient.*
- B. *Non-local street standard. For streets other than local service streets, the Office of Transportation has approved the right-of-way width and all elements within the street right-of-way.*

Response: All streets within and adjacent to the proposed subdivision are local streets.

C. *Local street approval criteria and standards. The following approval criteria and standards apply to all local service streets except for common greens:*

1. *Approval criterion for width of the right-of-way. The width of the local street right-of-way must be sufficient to accommodate expected users, taking into consideration the characteristics of the site and vicinity, such as the existing street and pedestrian system improvements, existing structures, and natural features.*
2. *Standard for configuration of elements within the right-of-way. For public streets, the Office of Transportation has approved the configuration of elements within the street right-of-way. For private streets, the Bureau of Development Services has approved the configuration of elements within the street right-of-way.*

Response: All existing and proposed street segments will be local streets with low levels of traffic.

The proposed rights-of-way will be sufficient for their anticipated uses as low volume local streets with rare truck traffic related to emergency service providers and occasional delivery vehicles.

3. *Standards for turnarounds.*

- a. *When a turnaround is required. A turnaround is required on a dead-end street in the following situations:*
 - (1) *The street will serve 4 or more lots;*
 - (2) *The street is at least 300 feet long; or*
 - (3) *When required by the City Engineer, the Fire Bureau, or BDS.*
- b. *Temporary turnaround. Where a street is temporarily terminating within the land division site, the City Engineer, BDS, or Fire Bureau may require a temporary turnaround.*
- c. *The following approval criteria and standard applies to permanent and temporary turnarounds: Approval criteria. The turnaround must:*
 - *Be of a size to accommodate expected users, taking into consideration the characteristics of the site such as existing structures, natural features, the length of the street, and the number of housing units served by the street;*
 - *Minimize paved area;*
 - *Provide adequate area for safe vehicular movement; and*
 - *Provide adequate area for safe and convenient movement by bicyclists and pedestrians traveling on the street or traveling from the street to a pedestrian connection.*
 - (2) *Standard. For public streets, the Office of Transportation has approved the configuration of elements within the turnaround right-of-way. For private streets, the Bureau of Development Services has approved the configuration of elements within the turnaround right-of-way.*

Response: A 20-foot radius turnaround will be provided on the eastern end of SW Pendleton Street (west). This dead end street segment will serve only one dwelling unit.

D. *Common green approval criteria and standards. The following approval criteria and standards apply to common greens:*

Response: No common greens are proposed. Therefore, this section is not applicable.

- E. *Pedestrian connections. The following approval criteria and standards apply to pedestrian connections:*
1. *Approval criterion for width of the right-of-way. The width of the pedestrian connection right-of-way must be sufficient to accommodate expected users and provide a safe environment, taking into consideration the characteristics of the site and vicinity, such as the existing street and pedestrian system improvements, existing structures, natural features, and total length of the pedestrian connection. As much as is possible, the users should be able to stand at one end of the connection and see the other end.*
 2. *Standard for configuration of elements within the right-of-way. For public pedestrian connections, the Office of Transportation has approved the configuration of elements within the pedestrian connection right-of-way. For private pedestrian connections, the Bureau of Development Services has approved the configuration of elements within the pedestrian connection right-of-way.*

Response: No off-street pedestrian ways are proposed.

- F. *Alleys. The following approval criteria and standards apply to alleys:*

Response: No alleys are proposed. Therefore, this section is not applicable.

- G. *Shared court approval criteria and standard.*

Response: No shared courts are proposed. Therefore, these standards do not apply.

- H. *Standard for Street Trees. For existing and proposed public streets, the City Forester, in consultation with the City Engineer, has preliminarily approved the proposal and found it acceptable for the retention of existing street trees and providing adequate areas for future street tree planting. For private streets, the Bureau of Development Services has preliminarily approved the street tree planting plan.*

Response: Six street trees will be planted on existing and proposed portions of the SW Pendleton Street public street frontages of the site, as illustrated on Sheet L1.2 – the preliminary Planting Plan. The requirements for Low Impact Development stormwater treatment swales along other portions of the street right-of-way have severely limited options for planting street trees. The applicant is willing to work with the City to find other opportunities to plant street trees within the subdivision and/or will be willing to pay a fee in lieu of planting the typically required number of street trees for a development of this size.

33.654.130 Additional Approval Criteria for Rights-of-Way

- A. *Utilities. Utilities must be located within rights-of-way or utility easements that are adjacent to rights-of-way to the maximum extent practicable. Utility easements up to 15 feet in width may be required adjacent to rights-of-way. To the extent practicable, utility easements needed to serve the lots must be identified during the preliminary land division plan review.*

Response: Utility lines will all be located within public rights-of-way.

- B. *Extension of existing public dead-end streets and pedestrian connections. Existing public dead-end streets and pedestrian connections adjacent to the site must be extended onto the site as needed to serve the site.*

Response: The proposed development plan provides for the extension of SW Pendleton Street (east), an existing dead end street, into the site to serve development of the site as is required by this standard. SW Pendleton Street will be extended through the site to connect

up with the existing dead end street – SW Pendleton Street (west). SW Pendleton Street North will then be a much shorter dead end street of approximately 60 feet.

There are no exiting public pedestrian connections which stub into the site.

C. *Future extension of proposed dead-end streets and pedestrian connections. Where the land division site is adjacent to sites that may be divided under current zoning, dead-end streets and pedestrian connections must be extended to the boundary of the site as needed to provide future access to the adjacent sites. The following factors are considered when determining if there is a need to make provisions for future access to adjacent sites. A need may exist if:*

1. *The site is within a block that does not comply with the spacing standards or adopted street plan of the Transportation Element of the Comprehensive Plan; or*
2. *The full development potential of adjacent sites within the block will not be realized unless a more complete street system is provided to improve access to those sites.*

Response: No new dead end streets are proposed.

D. *Partial rights-of-way. Partial rights-of-way and street improvements may be appropriate where the proposed right-of-way and street improvements are expected to be provided by the owner of the adjacent property. Partial rights-of-way and street improvements may also be required where needed to provide future access to adjacent sites. The Office of Transportation must approve the configuration of a partial right-of-way or public street improvement.*

Response: No partial rights-of-way are proposed for the streets within the proposed development.

E. *Ownership of alleys. Where the proposed alley abuts sites that may be divided or further developed under current zoning, the alley may be required to be dedicated to the public. Factors to be considered include the spacing of existing rights-of-way, whether adjacent sites are already fully developed under the current zoning, and whether the alley can provide vehicle access to adjacent developable sites. The Office of Transportation must approve the dedication and configuration of any public alley improvements.*

Response: No alleys are proposed. Therefore, this section is not applicable.

33.654.150 Ownership, Maintenance, and Public Use of Rights-Of-Way

A. *Purpose. To protect long-term access and both public and private investment in the street system, the rights and responsibilities for the street system must be clear. Public ownership of streets is preferred to provide long-term access to sites and meet connectivity goals. However, where a dead-end street serves a limited number of units, the public benefit may be very limited and the maintenance costs may be relatively high. In that limited situation, private streets may be appropriate. Where public ownership is not feasible, property owners must know their maintenance responsibilities and what public use to expect on rights-of-way.*

B. *Ownership. Ownership of rights-of-way is determined through the following standards:*

1. *Through streets. Through streets must be dedicated to the public.*
2. *Partial streets. Partial streets must be dedicated to the public.*
3. *Dead-end streets. In general, dead-end streets and turnarounds must be dedicated to the public. A dead-end street may be privately owned if the street will abut no more than eight lots within the land division site, and the street is not proposed as, or required to be a partial street. If the street is not dedicated to the public, it must be in a tract, and owned in common by the owners of property served by the street or by the Homeowners' Association.*

4. *Exception for temporary turnarounds. Temporary turnarounds may be in an easement.*
5. *Exceptions for common greens....*
6. *Pedestrian connections.*
 - a. *Pedestrian connections that connect or are intended to eventually connect two through streets, must be dedicated to the public.*
 - b. *Pedestrian connections that connect or are intended to eventually connect to a public school, park or library, must be dedicated to the public.*
 - c. *Pedestrian connections that are not dedicated to the public may be privately owned in common by the owners of the property within the land division site or the Homeowners' Association. If the pedestrian connection will not be dedicated to the public, it must be in a tract.*
7. *Alleys. ...*
8. *Public rights-of-way. All elements of public rights-of-way must be dedicated to the public, except as allowed by paragraph B.10, below.*
9. *Private rights-of-way. For rights-of-way held in common ownership or owned by the Homeowners' Association, all elements of the right-of-way must be in a tract, except as allowed by paragraph B.10, below. This standard does not apply to alleys serving five or fewer lots.*
10. *Right-of-way elements in easements. Right-of-way elements may be in an easement if the following standards are met:*
 - a. *Temporary turnarounds. Temporary turnarounds allowed under this Chapter may be placed in easements that also include a public access easement that allows public access on all parts of the turnaround;*
 - b. *Street elements. Sidewalks and other street elements may be placed in easements adjacent to a right-of-way if the following standards are met:*
 - (1) *A tree, rock outcropping, or other natural feature within the right-of-way precludes construction of the sidewalk or other element within the right-of-way;*
 - (2) *The easement may be up to 50 feet long, measured along the right-of-way, and up to 10 feet wide. See Figure 654-3;*
 - (3) *The easement must also include a public access easement that allows public access on all parts of the easement; and*
 - (4) *The City Engineer has approved the use of an easement adjacent to a public street or the Bureau of Development Services has approved the use of an easement adjacent to a private street.*
- C. *Maintenance. If the right-of-way is privately owned, a maintenance agreement must be recorded that commits the owner to maintain all elements of the right-of-way.*
- D. *Public use of right-of-way.*
 1. *Street tracts must include a public access easement that allows public access on all parts of the sidewalks;*
 2. *Pedestrian connections must include a public access easement that allows public access on all parts of the connection; and*
 3. *Public access easements must be recorded with the County Recorder.*

Response: All proposed streets will be located within public rights-of-way and will be constructed to the applicable public street standards of the City of Portland.

No private streets, alleys, pathways or common greens are proposed.

This is the end of responses for 33.660.120 Approval Criteria items A-L

B. COMPLIANCE WITH R7 DISTRICT STANDARDS

33.110 *Single-dwelling zones*

In addition, the proposed development must also meet the development standards of the R7 base zoning district provided by Chapter 33.110 – Single-dwelling zones. Since the subject lots are currently undeveloped, none of the standards will be applicable until actual home development on the lots. The applicable sections of Chapter 33.110 for future home development on the proposed lots are addressed below.

33.110.010 *Purpose*

The single-dwelling zones are intended to preserve land for housing and to provide housing opportunities for individual households. The zones implement the comprehensive plan policies and designations for single-dwelling housing.

- A. Use regulations. The use regulations are intended to create, maintain and promote single-dwelling neighborhoods. They allow for some non-household living uses but not to such an extent as to sacrifice the overall image and character of the single-dwelling neighborhood.*
- B. Development standards. The development standards preserve the character of neighborhoods by providing six different zones with different densities and development standards. The development standards work together to promote desirable residential areas by addressing aesthetically pleasing environments, safety, privacy, energy conservation, and recreational opportunities. The site development standards allow for flexibility of development while maintaining compatibility within the City's various neighborhoods. In addition, the regulations provide certainty to property owners, developers, and neighbors about the limits of what is allowed. The development standards are generally written for houses on flat, regularly shaped lots. Other situations are addressed through special regulations or exceptions.*

Response: No response to this purpose statement is required because it is not an approval standard applicable to the land division application request. Nevertheless, it is pointed out that the proposed land division will provide lots only for single-family detached dwellings as is permitted in the R7 zoning district. The proposed development will be consistent with the overall allowed density/housing opportunity on the site provided by the R7 district. The proposal will utilize the environmental review section of the Code to achieve flexibility with regard to lot sizes and lot dimensional standards in exchange for preserving more than 24 percent of the gross site area as permanent open space.

33.110.020 *List of the Single-Dwelling Zones*

Response: No response to this section is necessary.

33.110.030 *Other Zoning Regulations*

The regulations in this chapter state the allowed uses and development standards for the base zones. Sites with overlay zones, plan districts, or designated historical landmarks are subject to additional regulations. The Official Zoning Maps indicate which sites are subject to these additional regulations. Specific uses or development types may also be subject to regulations in the 200s series of chapters.

Response: The subject site is partially covered by the Ec overlay zone in its southwestern corner. Standards applicable to this overlay zone are addressed below in the responses to Chapter 33.430-Environmental Zones. There are no other overlay zones, plan districts, or designated historical landmarks on the site. No specific uses or development types subject to the regulations in the 200s chapters.

33.110.100

Primary Uses

A. Allowed uses. Uses allowed in the single-dwelling zones are listed in Table 110-1 with a "Y". These uses are allowed if they comply with the development standards and other regulations of this Title...

Response: Household living, as is proposed for all of the proposed lots within the subdivision, is listed in table 33-110-1 with a "Y" under the R7 column.

Parks and open areas are listed with an "L" as allowed but with special limitations. The applicable limitations states that parks and open areas are allowed by right, but certain accessory uses and facilities of these areas may require conditional use review. These special accessory uses include things such as swimming pools, cemeteries, golf courses, boat ramps, parking areas, and recreational fields for organized sports. The proposed open space tract, tract A, within the proposed subdivision will not include any of the listed accessory uses or facilities which would require conditional use review.

Therefore, the proposed uses are all allowed on the subject site by the R7 zoning district.

33.110.110

Accessory Uses

Accessory uses to a primary use are allowed if they comply with all development standards. Accessory home occupations, accessory dwelling units, and accessory short-term rentals have specific regulations in Chapters 33.203, 33.205, and 33.207 respectively.

Response: No accessory uses to the proposed primary uses within the development project are currently proposed.

33.110.200

Housing Types Allowed

Response: The proposed land division provides lots for detached dwelling units or houses on individual lots. "House" is listed as a "Housing Types Allowed in the Single-dwelling Zones" in the R10 column.

Other sections of Chapter 33.110

Table 33-110-3 provides development standards including maximum building height, setbacks, and required outdoor areas for homes in the R7 and other single-dwelling zones:

Response: The standards in Table 110-3 will generally apply to homes to be built on the proposed lots (and as modified through Environmental Review). However, the development standards of this table are not approval standards for the current proposed land division request but instead will apply at the time of building permit issuance to homes to be built on the proposed lots.

All lots are configured so that detached houses should be able to be built on the proposed lots in accordance with the standards of Table 110-3. Standard R7 building setbacks will apply for construction on all of the eleven proposed lots. The minimum front yard setback standard of 15 feet; the minimum side yard setback standard of 5 feet; the minimum rear yard setback standard of 5 feet; and the minimum garage face setback standard of 18 feet have not been requested to be modified.

Table 110-3 requires that required outdoor areas be provided for homes in the R7 district with a minimum square footage of 250 square feet, and minimum dimensions of 12 feet by 12 feet. All of the proposed lots are configured so that a home can be built on the lot, satisfy the applicable setback standards, and provide enough outdoor recreation area to satisfy this standard within the