Staff Report
Site Plan Review

SP-19-19
December 10, 2019

Summary
The application is for Site Plan Review for new construction of a self-serve storage facility with associated site improvements. The facility will contain 305 self-serve storage units totaling approximately 36,250 square feet of building area. The subject site is located at 440 25th Avenue SW, also known as Linn County Assessor’s Map No. 11S-03W-18B Tax Lot 1018 (Attachment A). The property is zoned Light Industrial (LI), which permits self-serve storage uses with site plan review approval.

Site Plan Review criteria found in section 2.450 of the Albany Development Code (ADC) 2.450 and the Commercial Design Standards found in ADC 8.330-8.390 are addressed in this report. These criteria must be satisfied to grant approval for this application.

Application Information
Review Body: Staff (Type I-L review)
Staff Report Prepared By: Travis North, Project Planner
Property Owner/Applicant: Ferry Street Storage; P.O. Box 807, Albany, OR 97321
Engineer/Representative: Peter Seaders; MSS Engineering; 215 NW 4th Street, Corvallis, OR 97330
Address/Location 440 25th Avenue SW
Map/Tax Lot: Linn County Assessor’s Map No.: 11S03W18B Tax Lot 1018
Zoning: Light Industrial (LI) District
Comp. Plan Designation: Light Industrial, Open Space
Total Land Area 2.10 acres
Existing Land Use: Vacant
Neighborhood: Sunrise
Surrounding Zoning: North: Light Industrial (LI)
East: LI
South: LI
West: Open Space (OS) & Heavy Industrial (HI)
Surrounding Uses: North: Manufacturing and Production (Bussard & Son)
Staff Decision
The applications for Site Plan Review referenced above is **Approved with Conditions** as described in this staff report.

Notice Information
A Notice of Filing for the Site Plan Review application was mailed on October 31, 2019. At the time the comment period ended on November 14, 2019, the Planning Division had received no written comments.

Analysis of Development Code Criteria
The ADC includes the following review criteria, which must be met for this application to be approved. Code criteria are written in **bold** followed by findings, conclusions, and conditions of approval where conditions are necessary to meet the review criteria.

Site Plan Review Criteria (ADC 2.450)

**Criterion 1**

Public utilities can accommodate the proposed development.

Findings of Fact

**Sanitary Sewer**

1.1 City utility maps show an eight-inch public sanitary sewer main in 25th Avenue.

1.2 Albany Municipal Code (AMC) 10.01.010 (1) states that the objective of the AMC requirements pertaining to public sanitary sewers is to facilitate the orderly development and extension of the wastewater collection and treatment system, and to allow the use of fees and charges to recover the costs of construction, operation, maintenance, and administration of the wastewater collection and treatment system.

1.3 ADC 12.470 requires all new development to extend and/or connect to the public sanitary sewer system if the property is within 300 feet of a public sewer line.

1.4 The applicant’s plan shows the construction of a restroom for the proposed development. The development must be connected to the public sanitary sewer system. System development charges will be due at the time of building permit issuance.
**Water**

1.5 City utility maps show a 12-inch public water main in 25th Avenue. This public water main lies approximately six feet south of the subject property’s north boundary. This water main was installed by PP&L in 1979 and there appears to be no documented easement over the main.

1.6 ADC 12.410 requires all new development to extend and/or connect to the public water system if the property is within 150 feet of an adequate public main.

1.7 The applicant’s plan shows the construction of a restroom for the proposed development. The development must be connected to the public water system. System development charges will be due at the time of water service installation permit issuance.

1.8 Public utility easements of at least 15 feet in width, centered over the main, are required for all public water lines and appurtenances (ADC 12.370).

1.9 The applicant must provide a public utility easement over the existing public water main that lies within the subject property. The applicant must locate the main and provide an easement that extends from the north property boundary to a line 7.5 feet south of the water main. The City will take the legal description of this easement that will be provided by the applicant and insert the description into the City’s easement form for approval and recordation.

**Storm Drainage**

1.10 City utility maps show no public storm drainage facilities in 25th Avenue adjacent to the subject property. The nearest public storm drainage piping is located in Ferry Street approximately 160 feet east of the subject property’s easternmost boundary.

1.11 It is the property owner’s responsibility to ensure that any proposed grading, fill, excavation, or other site work does not negatively impact drainage patterns to, or from, adjacent properties. In some situations, the applicant may propose private drainage systems to address potential negative impacts to surrounding properties. Private drainage systems that include piping will require the applicant to obtain a plumbing permit from the Building Division prior to construction. Private drainage systems crossing multiple lots will require reciprocal use and maintenance easements and must be shown on the final plat. In addition, any proposed drainage systems must be shown on the construction drawings. The type of private drainage system, as well as the location and method of connection to the public system must be reviewed and approved by the City of Albany's Engineering Division.

1.12 ADC 12.530 states that a development will be approved only where adequate provisions for storm and flood water run-off have been made, as determined by the City Engineer. Roof drains shall be discharged to a collection system approved by the City Engineer and/or the Building Official.

1.13 ADC 12.560 states that where it is anticipated by the City Engineer that the additional run-off resulting from the development will overload an existing drainage facility, the review body will not approve the development until provisions have been made for improvement of the potential problem.

1.14 The applicant is required to submit a drainage plan, including support calculations, as defined in the City's engineering standards. The applicant is responsible for making provisions to control and/or convey storm drainage runoff originating from, and/or draining to, any proposed development in accordance with all city standards and policies as described in the City’s engineering standards.
1.15 The applicant is proposing to extend the public storm drainage main from the existing main in Ferry Street to the site to provide for stormwater discharge from the proposed development. The existing public storm drainage main in Ferry Street is very shallow, and the applicant’s final design of the public extension will be reviewed for compliance with the City’s engineering standards as part of the required Site Improvement Permit process.

1.16 The applicant has submitted a preliminary storm drainage plan for the proposed development that includes on-site detention and stormwater quality facilities. Final design details for the proposed detention and stormwater quality facilities will be reviewed as part of the site improvement and/or Stormwater Quality Permit that must be obtained before beginning work. The stormwater quality facilities must comply with the City’s engineering design standards.

Fire Safety

1.17 The Albany Fire Department has reviewed the proposal for conformance to the 2014 Oregon Fire Code (OFC). Their findings and requirements are provided in the “Information for the Applicant” section included with the Notice of Decision and are incorporated here by reference.

Conclusions

1.1 The applicant is proposing to construct a restroom for the proposed development and therefore must connect to the public sanitary sewer and water systems. System development charges will be due at the time of permit issuance for connection to the public utilities.

1.2 An existing 12-inch public water main lies along the north boundary of the subject property approximately six feet south of the north boundary. No documented public utility easement appears to exist over this public main. The applicant must provide a public utility easement on the subject property that extends 7.5 feet south of the existing water main.

1.3 The applicant is proposing to extend a public storm drainage main in 25th Avenue from Ferry Street to provide facilities for stormwater discharge from the proposed development. The proposed utility extension must meet all City engineering standards and the final design will be reviewed as part of the required Site Improvement Permit.

1.4 The applicant must provide on-site stormwater detention for the proposed development. The required detention must satisfy the City’s engineering standards.

1.5 Stormwater quality facilities will be required for the proposed development. The applicant must obtain a Stormwater Quality Permit before beginning work on the facilities. Final design details must conform to City engineering standards and will be reviewed as part of the required permit.

1.6 The applicant must sign an agreement holding the City harmless for any damage or reconstruction necessary to repair the private stormwater facilities in the event the City needs to exercise its easement rights over the existing public water main for maintenance or other purposes.

1.7 This criterion can be met with the following conditions.

Conditions

Condition 1 **Storm Drainage.** Before the City will issue a building permit, the applicant must construct a public storm drainage main extension in 25th Avenue to provide for discharge of stormwater from the proposed development. Before beginning construction on the proposed public
storm drainage main in 25th Avenue, the applicant must obtain a Site Improvement Permit through the Public Works Department. Final design details for this public improvement will be reviewed in conjunction with this permit.

Condition 2  **Stormwater Quality Permit.** Before the City will issue a final occupancy permit, the applicant must obtain a Stormwater Quality Permit from the City’s Public Works Department and construct stormwater quality facilities for the proposed development.

Condition 3  **Public Utility Easement.** Before the City will issue a final occupancy permit, the applicant must provide the City with a public utility easement over the northern portion of the subject property that extends south to a line 7.5 feet south of the existing public water main. The City will transfer the legal description provided by the applicant into a City form for signatures and recordation.

Condition 4  **Stormwater Facility Agreement.** Before the City will issue a final occupancy permit, the owner shall enter into an agreement with the City for any stormwater facilities located within the proposed water main easement. In the agreement, the City shall be held harmless for any damage or reconstruction necessary to repair the facilities in the event the City needs to exercise its easement rights for maintenance or other purposes.

**Criterion 2**
The proposed post-construction stormwater quality facilities (private and/or public) can accommodate the proposed development, consistent with Title 12 of the Albany Municipal Code.

**Findings of Fact**

2.1 A post-construction Stormwater Quality Permit shall be obtained for all new development and/or redevelopment projects on a parcel(s) equal to or greater than one acre, including all phases of the development, where more than 8,100 square feet of impervious surfaces will be created or replaced. (Ord. 5841 § 3, 2014).

2.2 The applicant has submitted a preliminary storm drainage plan for the proposed development that includes on-site detention and stormwater quality facilities. Final design details for the proposed detention and stormwater quality facilities will be reviewed as part of the site improvement and/or Stormwater Quality Permit that must be obtained before beginning work. The stormwater quality facilities must comply with the City’s engineering design standards.

2.3 The location of some of the proposed private stormwater facilities are shown as lying within the required public utility easement over an existing public water main. This is not typically allowed, but due to the limited available area on the site and the depth of the proposed public storm drainage extension, the applicant will be allowed to locate the stormwater facilities generally as shown on the preliminary plan. However, the applicant must sign an agreement holding the City harmless for any damage or reconstruction necessary to repair the facilities in the event the City needs to exercise its easement rights for maintenance or other purposes.

**Conclusions**

2.1 The new development must provide stormwater quality facilities consistent with Title 12 of the AMC and the City’s engineering standards.
2.2 This criterion is satisfied with Condition of Approval Two, which is listed under Site Plan Review Criterion One, above.

**Criterion 3**

**The transportation system can safely and adequately accommodate the proposed development.**

**Findings of Fact**

3.1 The subject site is located on the south side of 25th Avenue, approximately 185 feet west of Ferry Street. The proposed development is for new construction of a self-serve storage facility with associated site improvements.

3.2 Access to the site is provided via two proposed driveway connections to 25th Avenue. The most easterly driveway will be exit only.

3.3 Twenty-fifth Avenue is classified as a local street with two vehicle travel lane in each direction. Improvements along the site's frontage are constructed to city standards with the exception of sidewalks.

3.4 ADC 12.290 requires that new development install public sidewalks along adjoining street frontages.

3.5 The location of the current right-of-way line along the south side of 25th Avenue is approximately three feet behind the face of the curb. There is insufficient right-of-way to construct a five-foot wide public sidewalk without encroaching onto private property.

3.6 The applicant was not required to submit a traffic study with the Site Plan Review application. The City's Traffic Impact Study Guidelines require a traffic study only when a proposed development is expected to generate at least 50 vehicle trips during the peak hour, or if there are specific capacity or safety issues that need to be addressed.

3.7 Staff uses Institute of Transportation Engineers (ITE) trip generation rates to estimate the volume of traffic that will be generated by development. Based on the ITE trip generation rates for Category 140, “Self-Serve Storage,” the new uses will generate 19 vehicle trips per day. Of those trips, two will occur during the peak p.m. traffic hour.

3.8 Albany's Transportation System Plan (TSP) does not identify any congestion or level-of-service problems on streets adjacent to this property.

**Conclusions**

3.1 The public street system adjacent to the site is constructed with curb and gutter.

3.2 The applicant must install a five-foot sidewalk along the frontage of the property. Dedication of additional right-of-way will be needed along the site’s frontage to allow the sidewalk to be located within public right-of-way.

3.3 The development is estimated to generate two p.m. peak hour vehicle trips.

3.4 Albany's Transportation System Plan does not identify any level of service or congestion problems occurring adjacent to the site.

3.5 The transportation system can safely and adequately accommodate the development.
Conditions

Condition 5  **Sidewalk.** Prior to issuance of a certificate of occupancy, the applicant shall install a five-foot sidewalk along the frontage of the property.

Condition 6  **ROW Dedication.** Prior to issuance of a building permit, the applicant shall dedicate a public right-of-way along the site’s frontage on 25th Avenue to a point at least 0.5 feet behind the proposed back of the sidewalk.

Criterion 4
Parking areas and entrance-exit points are designed to facilitate traffic and pedestrian safety and avoid congestion.

Findings of Fact

4.1  **ADC 12.100 (1)** requires that driveway approaches to City streets be paved. The property will be accessed via two proposed driveway approaches to 25th Avenue. The easterly approach will be exit only. The applicant’s site plan (Attachment B.1) indicates that both approaches will be paved.

4.2  **ADC 12.100 (2)** specifies driveway widths for commercial uses shall be between 24 - 32 feet for the portion of driveway located in the public right-of-way. The proposed driveways are approximately 28 feet at the point of the public right-of-way. This standard is met.

4.3  **ADC 12.100 (3)** requires that all driveways be located not less than 40 feet from the intersection of an arterial street, 20 feet from the intersection of a collector street, or 10 feet from the intersection of a local street. The proposed location of the driveway is greater than 20 feet from the intersection of 25th Avenue and Ferry Street, which is classified as a collector street. This standard is met.

4.4  **ADC 12.100(3)** also requires that “all driveways must be located as far as practical from a street intersection….” The proposed driveway is located as far from the street intersection as possible. This standard is met.

4.5  **Vehicle Parking – Required Number of Spaces:** The applicant proposes three parking spaces. According to Table 9-1, ADC 9.020 the minimum parking requirement for self-serve storage units is one off-street parking space for every 100 units with a minimum of three spaces, plus one for each employee and/or caretaker. The proposed development consists of a total 305 units. The applicant's findings (Attachment B.3, page 8) indicate that no employees or caretakers will be on the site. Therefore, the proposed development requires three off-street parking spaces. This standard is met.

4.6  **ADC 9.130, Table 9-2,** lists required parking stall and aisle widths. A travel aisle that is 26 feet wide requires parking stalls that are at least 18.5-feet-by-9-feet. The applicant proposes three 90-degree parking stalls that measure 18.5-feet-by-9-feet with a 26-foot wide travel aisle. Therefore, the parking lot dimensional standards are met.

4.7  **ADC 9.120(3)** requires parking areas to have a durable, dust-free surface. The applicant’s site plan (Attachment B.1) indicates the entirety of the parking area will be paved. This standard is met.

4.8  **ADC 9.120 (4)** requires that all parking lots provide a drainage system to dispose of stormwater runoff. Findings regarding drainage and stormwater runoff are addressed in Criterion 1 and 2 of this report and included here by reference.
4.9 ADC 9.120(5) requires perimeter curbing around all parking areas. The applicant states in the findings that the entire perimeter of the parking area will be curbed (Attachment B.3). However, the site plan does not indicate curb around the outermost travel aisle that also serves as the fire access lane. A condition of approval will require the applicant to submit an updated site plan that demonstrates curbing along the outer edge of the fire access lane and that the curbing is installed prior to issuance of a certificate of occupancy.

4.10 ADC 9.120(6) requires wheel bumpers be used when parking stalls front a sidewalk, alleyway, street, or property line. The applicant’s site plan does not indicate wheel bumpers will be used for the parking stalls. A condition of approval will require the installation of wheel bumpers.

4.11 ADC 9.120(7) requires parking spaces to be served by a travel aisle or turnaround so backing onto the public street is not required. All parking spaces are served by a travel aisle, negating any need to utilize the public right-of-way for backing movements. This standard is met.

4.12 ADC 9.120(8) requires parking stalls to be permanently and clearly striped. The applicant’s site plan indicates the parking lot will be striped. This standard is met.

4.13 ADC 9.120(9) requires that parking lots connect to adjacent existing or future parking areas. The proposed parking lot is located at the west end of the property and is over 200 feet from the closest adjacent parking lot to the south. The existing building and parking lot configuration of the adjoining lots precludes a parking lot connection. Therefore, staff find a parking lot connection is not required at this location. This standard is not applicable.

4.14 ADC 9.120(10) requires conformance with the parking lot landscaping standards found in ADC 9.150. These are discussed below.

4.15 ADC 9.120(11) pertains to compact parking spaces. No compact parking spaces are proposed. This standard is not applicable.

4.16 ADC 9.120(12) requires accessible parking be provided in conformance with the Oregon Specialty Code (OSC). As indicated in the proposed site plan, the applicant has provided accessible parking and an accessible route to the public sidewalk. Its conformance with the OSC will be assessed at the time of building permit.

4.17 ADC 9.120(13)(c) requires commercial developments to provide at least one bicycle parking space for every ten required automobile parking spaces, with a minimum of two bicycle parking spaces. However, ADC 9.120(13)(d) allows for an exemption to, or reductions in, required bicycle parking when the proposed use is unlikely to need bicycle parking. The proposed self-serve storage facility is not likely to generate trips by bicycle; therefore, no bicycle parking is required for this development.

4.18 ADC 9.120(14) requires that any lights provided to illuminate any public or private parking area must be arranged to reflect the light away from any abutting or adjacent properties. Lighting details were not provided. A condition of approval will require the applicant to submit a lighting plan or updated site plan that shows the location of the lighting fixtures and the corresponding lighting type and/or model.

4.19 ADC 9.120(15) requires walkways and accessways to be provided from the front door of new buildings to public sidewalks. The applicant’s site plan indicates a connection to the public sidewalk along 25th Avenue via a five-foot sidewalk extension to the parking area and ADA compliant self-storage units. This standard is met.
4.20 ADC 9.120(16) deals with employee parking areas. No employee parking areas are proposed. Therefore, this standard is not applicable.

4.21 ADC 9.150(1) states that parking areas shall be divided into bays of not more than 12 parking stalls and that the end of each parking bay shall be a curbed planter at least five feet wide. The proposed site plan demonstrates that each parking bay contains no more than 12 parking stalls and that each end of the parking bay is bordered by a five-foot-wide curbed planter. This standard is met.

4.22 ADC 9.150(2) requires that both sides of a parking lot entrance shall be bordered by a minimum five-foot-wide landscape planter strip. As proposed, both sides of the parking lot entrances meet this standard.

4.23 ADC 9.150(3) requires that parking areas shall be separated from the exterior wall of a structure by pedestrian walkways or loading areas by a five-foot strip of landscaping. The parking area is not adjacent to a building. This standard is not applicable.

4.24 ADC 4.260 requires commercial uses to provide a minimum of 250 square feet of loading area for buildings of 5,000 to 20,000 square feet of gross floor area. Customers will utilize space along travel aisles for loading and unloading items adjacent to storage units. This standard is met.

Conclusions

4.1 The site is accessed via a proposed driveway from 25th Avenue.

4.2 The proposed driveway and parking area meet parking lot dimensional standards.

4.3 The proposal meets the minimum number of required parking spaces.

4.4 Bicycle parking spaces are not required.

4.5 Curb shall be provided along the entirety of the outermost travel aisle.

4.6 Wheel bumpers shall be provided in accordance with ADC 9.120(6).

4.7 ADA compliance will be assessed at the time of building permit.

Conditions

Condition 7 Curb. Prior to issuance of a building permit, the applicant shall submit an updated site plan for review that demonstrates curbing along the entirety of the outermost travel aisle. These improvements shall be installed prior to issuance of a certificate of occupancy.

Condition 8 Wheel Bumpers. Prior to issuance of a certificate of occupancy, wheel bumpers must be installed in accordance with ADC 9.120(6).

Condition 9 Lighting. Prior to issuance of a building permit, the applicant shall submit a lighting plan or updated site plan that shows the location of the lighting fixtures and the corresponding lighting type and/or model. Fixtures with backlight control (i.e. full cut-off shield) shall be used around the perimeter of the property to ensure light does not trespass onto adjacent property.

Criterion 5

The design and operating characteristics of the proposed development are reasonably compatible with surrounding development and land uses, and any negative impacts have been sufficiently minimized.
Findings of Fact

5.1 **Site Plan Review.** Site Plan Review is intended to promote functional, safe, and attractive developments that maximize compatibility with surrounding developments and uses and with the natural environment. Site Plan Review is not intended to evaluate the proposed use or structural design of the proposal. Rather, the review focuses on the layout of a proposed development, including building placement, setbacks, parking areas, external storage areas, open areas, and landscaping. Where conflicts are identified, mitigation can be required through conditions of approval.

5.2 **Operating characteristics of the neighborhood.** The operating characteristic of this neighborhood is predominately commercial and industrial, consisting of a cluster of manufacturing and storage operations on the west side of Ferry Street and mostly vacant land on the east side of Ferry Street. The property is entirely surrounded by Light-Industrial and Heavy Industrial zoned property, with the exception of the Albany-Santiam Canal that borders the west side of the property. The closest residentially zoned land is over 600 feet away on the east side of Ferry Street.

The site is 2.10 acres. The proposal calls for a self-serve storage facility consisting of 305-unit single-story units that total 36,250 square feet of building area. Approximately 75 of those units are walk-up. The remainder are directly accessible and adjacent to a vehicle travel aisle. The remainder of the site will be used for landscaping, stormwater facilities and associated parking areas and travel aisles. Self-Serve Storage uses are allowed through Site Plan Review approval in the Light Industrial (LI) district.

According to ADC 4.060(12), self-serve storage units are subject to the following standards:

a) The minimum driveway width between buildings is 20 feet for one-way drives and 24 feet for two-way drives.

b) The maximum storage unit size is 1,000 square feet.

c) All outdoor lighting shall be shielded to prevent glare and reflection on adjacent properties.

d) Repair of autos, boats, motors, and furniture and the storage of flammable materials are prohibited on the premises, and rental contracts shall so specify.

As shown on the site plan, all proposed travel aisles are 24 feet or greater in width (Attachment B.1), with a 20-foot fire access lane overlaid on the perimeter travel aisle. The three banks of walk-up units are separated via five-foot pedestrian walkways. Travel aisle standards are not applicable to walk-up units. The site plan indicates that the storage units will be less than 1,000 square feet (Attachment B.1). Unit sizes vary from 5-foot-by-10-foot (50 square feet) to 10-foot by 20-foot (200 square feet).

The self-serve storage facility does not manufacture nor utilize toxic materials, nor will it allow toxic materials to be stored on site. The repair of automobiles, boats, motors and furniture, and the storage of flammable materials must be prohibited on the premises. A condition of approval will include that future rental contracts specify this restriction.

5.3 **Building and Parking Lot Setbacks.** Per ADC 4.090, Table 1, the minimum front setback in the LI zoning district is 15 feet. The proposed buildings are set back 19 feet from the front property line and the proposed parking area is set back a minimum of 15 feet. Therefore, the front setback standard is met as proposed. However, Condition 6 requires the dedication of right-of-way along the property’s frontage. The exact width of the dedication is unknown at this time and will be based on an updated site plan. The minimum front setback standard of 15 feet shall be met based on the new property line established with the right-of-way dedication. Because the property does not abut a residential zoning district, there are no interior setbacks.
5.4 **Lot Coverage.** The total site is approximately 91,476 square feet (2.10 acres). There is no maximum lot coverage requirement for the LI district. Most of the property will be used for structures, access, and circulation, and parking. According to the applicant’s site plan, ninety percent of the site will be covered with impervious surface.

5.5 **Landscaping.** ADC 9.140(2) says all required front and interior setback yards, exclusive of access ways and other permitted intrusions, must be landscaped before an occupancy permit will be issued. The applicant provided a conceptual landscaping plan (Attachment B.4). A condition of approval will require the applicant to submit a final landscaping and irrigation plan for review.

5.6 **Parking Lot Landscaping.** (ADC 9.150). The purpose of landscaping in parking lots is to provide shade, reduce stormwater runoff, and direct traffic. The site plan demonstrates the proposal meets the requirement to provide landscape areas at the terminus of parking bays and along both sides of the entryway. However, as noted above, a landscape plan was not provided, and a condition of approval will require that the applicant submits a landscaping and irrigation plan for review.

5.7 **Irrigation of Required Landscaping.** (ADC 9.160). All required landscape areas must be provided with an irrigation system unless a licensed landscape architect, landscape construction professional, or certified nurseryman submits written verification that the proposed plants do not require irrigation. An irrigation plan was not provided. A condition of approval will require that the applicant submit a landscaping and irrigation plan for review.

5.8 **Screening.** To reduce the impacts on adjacent uses of a different type, buffering and screening is required in accordance with the matrix that follows ADC 9.270. The subject property is zoned LI and is surrounded to the north, south, and east by LI zoning and to the west is the Albany-Santiam Canal. Therefore, no screening is required.

5.9 **Signs.** If any new signage is proposed, it will be reviewed separately from this Site Plan Review application. Planning will review applications for sign permits when they are submitted to the Building Division. See ADC 13.421-13.425 for regulations regarding sign size and number allowances in the LI zoning district.

5.10 **Environmental Standards.** ADC 9.440 - 9.500 include environmental standards related to noise, visible emissions, vibrations, odors, glare, heat, insects, rodents, and hazardous waste. No adverse environmental impacts are expected from this development.

5.11 **Lighting and Glare.** ADC 9.480 states that “no direct or sky-reflected glare in excess of 0.5-foot candles of light…visible at the property line shall be permitted.” The proposal is not anticipated to produce lighting or glare that exceeds this parameter. Condition 8 above addresses lighting related to illumination of the parking lot and travel aisles.

5.12 **Outside Storage.** ADC 4.290(4) states that outside storage is allowed in the LI zone in front and interior yards outside of the required setback. ADC 4.300 requires that any refuse container or disposal area that would otherwise be visible from a public street, customer, resident parking area, public facility, or any residential area must be screened from view by placement of a sight-obscuring fence, wall, or hedge at least six feet tall. All refuse materials must be contained within the screened area. The applicant states in the findings that a small refuse container will be kept in the restroom. No outside storage of materials has been proposed. This standard is met.
Conclusions

5.1 The proposed use is self-serve storage and is allowed through Site Plan Review approval in the LI district.

5.2 The proposal shows that the project will meet the standards for building height, lot coverage, setbacks, parking, and environmental standards.

5.3 The proposed use is compatible with the operating characteristics of the neighborhood.

5.4 Based on the observations above, the proposed development will be compatible with existing or anticipated uses in terms of size, building style, intensity, setbacks, and landscaping when the following conditions are met.

Conditions

Condition 10 Rental Agreement. A copy of the rental contract must be provided to the Planning Division before the buildings are occupied. ADC 4.060, Note 12, prohibits repair of autos, boats, motors, and furniture, and the storage of flammable materials. The rental contracts for the storage facility must specify this prohibition.

Condition 11 Landscape and Irrigation Plan. The applicant shall submit a final landscape and irrigation plan to the Community Development Department for review and approval prior to issuance of a building permit. The landscape and irrigation plans shall be consistent with the standards under ADC 9.140(2), 9.150, and 9.160. The landscape plan shall include a planting schedule that indicates the plant species, size, and quantity of each plant.

Criterion 6 Activities and developments within special purpose districts must comply with the regulations described in Articles 4 (Airport Approach), 6 (Natural Resources), and 7 (Historic), as applicable.

Findings of Fact

6.1 Article 4: Airport Approach. The subject property is not located within the Airport Approach District.

6.2 Article 6 Steep Slopes. Comprehensive Plan, Plate 7: SLOPES, does not show any steep slopes on this portion of property.

6.3 Article 6 Floodplains. Comprehensive Plan Plate 5: Floodplain, does not show a 100-year floodplain on the property. FEMA/FIRM Community Panel Number 41043C0526G, dated September 29, 2010, shows the property is in Zone X, an area determined to be outside the 0.2 percent annual chance floodplain.

6.4 Article 6 Wetlands. Comprehensive Plan, Plate 6: Wetland Sites, do not show significant wetlands regulated locally; however, wetlands under state and federal jurisdiction have been identified on the subject site. The Oregon Department of State Lands (DSL) issued a Wetland Delineation determination (WD 2018-0239) for the subject property on April 16, 2018. Staff have notified the Oregon Department of State Lands of the pending application.

6.5 Archaeological and Historic Sites. Comprehensive Plan, Plate 9: Historic Districts, shows the property is not located in any historic districts. There are no known archaeological sites on the property.
Conclusions

6.1 The site is not located in the Airport Approach District.
6.2 The site is shown to have wetlands on the property. A Wetland Delineation determination was previously issued for the subject property.
6.3 The site does not contain steep slopes, is not in a 100-year floodplain, and is not located in a historic district.
6.4 This criterion is met without conditions.

Criterion 7
The site is in compliance with prior land use approvals.

Findings of Fact and Conclusions
7.1 There are no known outstanding conditions of approval from previous land use approvals.
7.2 This criterion is not applicable.

Criterion 8
Sites that have lost their nonconforming status must be brought into compliance and may be brought into compliance incrementally in accordance with Section 2.370.

Findings of Fact and Conclusions
8.1 The site is not considered nonconforming.
8.2 This review criterion is not applicable.

Commercial and Institutional Design Standards (ADC 8.330-8.390)
In addition to the review criteria above, the following Design Standards must be met. Note: If there is a checked box symbol (✔) preceding a standard, it means that staff has compared the applicant’s findings and plans to the standard(s) and find the standard(s) is met without comment. If the box is unchecked (☐), staff has provided findings and conclusions as to the reason(s) why the standard is not met and has added a condition. "NA" preceding the standard means it is not applicable to this particular development.

N/A Relationship to Historic Overlay Districts (ADC 8.320).
Applicable only for residential property inside the Monteith or Hackleman Historic Overlay Districts, see Article 7 for additional historic review criteria.

✔ Building Orientation (ADC 8.330).
Building orientation and maximum setback standards are established to help create an attractive streetscape and pleasant pedestrian environment. These standards apply in all zoning districts except HD, DMU, CB, and WF. Development in HD, CB, DMU, and WF shall demonstrate appropriate building orientation through compliance with maximum front setback standards in ADC Section 5.120.

(1) New buildings shall be oriented to existing or new public streets. Building orientation is demonstrated by placing buildings and their public entrances close to streets so pedestrians have a direct and convenient route from the street sidewalk to building entrances.
(a) On sites smaller than three acres, new buildings shall be oriented to the public street/sidewalk and off-street parking shall be located to the side or rear of the building(s), except where it is not feasible due to limited or no street frontage, the site is an infill site less than one acre, conservation of natural resources, or where there are access restrictions.

(b) Buildings on sites larger than three acres may be setback from the public street and oriented to traffic aisles on private property if the on-site circulation system is developed like a public street with pedestrian access, landscape strips, and street trees.

(2) Customer entrances should be clearly defined, highly visible, using features such as canopies, porticos, arcades, arches, wing walls, and planters.

Findings of Fact and Conclusions

The subject site is a 2.10 acres site with street frontage on 25th Avenue. As shown in the site plan, the proposed structures are oriented along the internal travel aisles. The outer bank of storage units to the north are oriented parallel with 25th Avenue (Attachment B.1). The location of the buildings allows the development to provide efficient circulation throughout the site, while also orienting the outer most bank of storage units along 25th Avenue. Therefore, the building orientation standards of ADC 8.330(1)(a) have been met. There is no public entrance to the individual storage units and the proposal does not include a manager’s office. Therefore, the customer entrance standards of ADC 8.330(2) are not applicable.

☑ General Building Design (ADC 8.340).

The following standards apply in all zoning districts except HD, CB, DMU, and WF, which are subject to ADC Section 8.345. New commercial buildings shall provide architectural relief and interest, with emphasis at building entrances and along sidewalks, to promote and enhance a comfortable pedestrian scale and orientation. Blank walls shall be avoided except when not feasible.

(1) Ground floor windows shall be provided along frontages adjacent to sidewalks. The main front elevation(s) of buildings shall provide windows or transparency at the pedestrian level in the following minimum proportions:

LI District—zero percent transparency. The minimum window and door requirements are measured between 2 and 8 feet from the ground. Only the glass portion of doors may be used in the calculation. If there are upper floor windows, they shall continue the vertical and horizontal character of the ground level windows.

(2) Walls that are visible from a public street shall include a combination of architectural elements and features such as offsets, windows, entry treatments, wood siding, brick stucco, synthetic stucco, textured concrete block, textured concrete, and landscaping.

Findings of Fact and Conclusions

The subject property is located in the Light Industrial (LI) zoning district. Therefore, ADC 8.340(1) is not applicable. The applicant provided sample building elevations from another self-storage project and stated that the buildings “will be articulated in accordance with the design standards” and that “final details and design will be provided at time of building permit.” A condition of approval will ensure updated building elevations are provided and that the proposed elevations meet building design standards in accordance with ADC 8.340(2).

☑ Street Connectivity and Internal Circulation (ADC 8.350).

The following standards emphasize the importance of connections and circulation between uses and properties. The standards apply to both public and private streets. Development in the HD, DMU, CB and WF zoning districts on sites under three acres is exempt from these standards.
(1) New commercial buildings may be required to provide street or driveway stubs and reciprocal access easements to promote efficient circulation between uses and properties, and to promote connectivity and dispersal of traffic.

(2) The internal vehicle circulation system of a commercial development shall continue the adjacent public street pattern wherever possible and promote street connectivity. The vehicle circulation system shall mimic a traditional local street network and break the development into numerous smaller blocks.

(3) Traffic aisles shall not be located between the building(s) and the sidewalk(s), except as provided in (4) below, or where drive-through windows are permitted, sites are constrained by natural resources, or are infill sites less than one acre.

(4) Where drop-off facilities are provided, they shall be designed to meet the requirements of the American with Disabilities Act but still provide for direct pedestrian circulation.

(5) Internal roadways shall be designed to slow traffic speeds. This can be achieved by keeping road widths to a minimum, allowing parallel parking, and planting street trees to visually narrow the road.

Findings of Fact and Conclusions

As discussed under site plan review Criterion 3 related to transportation (above), the transportation system can safely accommodate the proposed 305-unit self-serve storage facility and reciprocal access between adjoining properties is not required. Traffic aisles are not located between the public sidewalk and self-storage units and drop off facilities are not proposed. New private or public streets interior to the site are not proposed or required. These standards are met.

Pedestrian Amenities (ADC 8.360).

(1) All new commercial structures and improvements to existing sites shall provide pedestrian amenities. The number of pedestrian amenities shall comply with the following sliding scale.

<table>
<thead>
<tr>
<th>Size of Structure or Improvement</th>
<th>Number of Amenities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 5,000 square feet</td>
<td>1</td>
</tr>
<tr>
<td>5,000 – 10,000 square feet</td>
<td>2</td>
</tr>
<tr>
<td>10,001 – 50,000 square feet</td>
<td>3</td>
</tr>
<tr>
<td>More than 50,000 square feet</td>
<td>4</td>
</tr>
</tbody>
</table>

(2) Acceptable pedestrian amenities include the following improvements. No more than two of any item may be used to fulfill the requirement:

(a) Sidewalks at least ten feet wide with ornamental treatments (e.g., brick pavers), or sidewalks which are 50 percent wider than required by the Code.

(b) Benches and public outdoors seating for at least four people.

(c) Sidewalk planter(s) enclosing a total of eight square feet.

(d) Pocket parks or decorative gardens (minimum usable area of 300 square feet).

(e) Plazas (minimum usable area of 300 square feet).

(f) Street trees that are 50 percent larger than required by the Code.

(g) Weather protection (awnings, etc.).

(h) Other pedestrian amenities that are not listed but are similar in scale and benefit.

(3) Pedestrian amenities shall comply with the following standards:

(a) Amenities shall be located outside the building main entrance, along pedestrian corridors, or near transit stops. Amenities shall be visible and accessible to the general public from an improved public
or private street. Access to pocket parks, plazas, and sidewalks must be provided via a public right-of-way or a public access easement.

(b) Amenities are not subject to setback requirements.

(c) Amenities are consistent with the character and scale of surrounding developments. For example, similarity in awning height, bench style, planter materials, street trees, and pavers is recommended to foster continuity in the design of pedestrian areas. Materials should be suitable for outdoor use, easily maintained, and have a reasonably long life cycle (e.g., 10 years before replacement).

Findings of Fact and Conclusions
The combined size of the proposed self-serve storage facilities is 34,800 square feet; therefore, three pedestrian amenities are required (see ADC 8.360(1) above). No pedestrian amenities have been proposed with this development. A condition of approval will ensure that at least three pedestrian amenities complying with ADC 8.360(2)-(4) are shown on the site plan prior to the issuance of a building permit. A condition of approval will also ensure the installation of pedestrian amenities prior to building occupancy.

N/A Pedestrian Connections (ADC 8.370).

(1) New retail, office and institutional buildings at or near existing or planned transit stops shall provide for convenient pedestrian access to transit.

(2) Walkways shall be provided connecting building entrances and streets adjoining the site.

(3) Pedestrian connections to adjoining properties shall be provided except where such a connection is impractical. Pedestrian connections shall connect the on-site circulation system to existing or proposed streets, walkways, and driveways that abut the property. Where adjacent properties are undeveloped or have potential of redevelopment, streets, access ways and walkways on site shall be laid out or stubbed to allow for extension the adjoining property.

N/A Large Parking Areas (ADC 8.380).
The large parking area standards apply to commercial development with more than 75 parking spaces. The proposed development will create 22 additional parking stalls; therefore, this criterion is not applicable to this development.

☑ Compatibility Details (ADC 8.390).
Commercial development shall be designed to comply with the following applicable details and any other details warranted by the local conditions:

(1) On-site lighting is arranged so that light is reflected away from adjoining properties and/ or streets.

(2) Any undesirable impacts produced on the site, such as noise, glare, odors, dust or vibrations have been adequately screened from adjacent properties.

(3) The site is protected from any undesirable impacts that are generated on abutting properties.

(4) Unsightly exterior improvements and items such as trash receptacles, exterior vents and mechanical devices have been adequately screened.

(5) Storage areas, trash collection facilities and noise generating equipment are located away from public streets, abutting residential districts or development, or sight obscuring fencing has been provided.
Where needed, loading facilities are provided on-site and are of sufficient size and number to adequately handle the delivery or shipping of goods or people. Where possible, loading areas should be designed so that vehicles enter and exit the site in a forward motion.

Findings of Fact

As found under Site Plan Review Criterion 5, above, the design and operating characteristics of the proposed development will comply with applicable development standards and will be compatible with surrounding development. No additional requirements are necessary to ensure compliance with the compatibility details described at ADC 8.390. This standard is met.

Conclusions

DS.1 The proposal meets the building orientation standards.

DS.2 Building elevations were not provided. A condition of approval will require the applicant to submit elevation plans in accordance with ADC 8.340(2) for review and approval by the Planning Division prior to issuance of a building permit.

DS.3 Site circulation, parking areas, setback standards, and parking lot landscaping standards will be satisfied when conditions of approval are met.

DS.4 Three pedestrian amenities are required. This standard will be satisfied when conditions of approval are met.

DS.5 No adverse environmental impacts are expected from this development; self-serve storage facilities do not create any out-of-the-ordinary impacts.

DS.6 The Commercial Design Standards will be met when the following condition is met.

CONDITIONS – Design Standards

Condition 12 Architectural Element/Feature. The applicant shall submit elevation plans in accordance with ADC 8.340(2) for review and approval by the Planning Division prior to issuance of a building permit.

Condition 13 Pedestrian Amenities. Prior to the issuance of a certificate of occupancy, a minimum of three pedestrian amenities shall be installed in accordance with ADC 8.360(2-4).

Conditions of Approval

Condition 1 Storm Drainage. Before the City will issue a building permit, the applicant must construct a public storm drainage main extension in 25th Avenue to provide for discharge of stormwater from the proposed development. Before beginning construction on the proposed public storm drainage main in 25th Avenue, the applicant must obtain a Site Improvement Permit through the Public Works Department. Final design details for this public improvement will be reviewed in conjunction with this permit.

Condition 2 Stormwater Quality Permit. Before the City will issue a final occupancy permit, the applicant must obtain a Stormwater Quality Permit from the City’s Public Works Department and construct stormwater quality facilities for the proposed development.

Condition 3 Public Utility Easement. Before the City will issue a final occupancy permit, the applicant must provide the City with a public utility easement over the northern portion of the subject
property that extends south to a line 7.5 feet south of the existing public water main. The City will transfer the legal description provided by the applicant into a City form for signatures and recordation.

**Condition 4**  
**Stormwater Facility Agreement.** Before the City will issue a final occupancy permit, the owner shall enter into an agreement with the City for any stormwater facilities located within the proposed water main easement. In the agreement, the City shall be held harmless for any damage or reconstruction necessary to repair the facilities in the event the City needs to exercise its easement rights for maintenance or other purposes.

**Condition 5**  
**Sidewalk.** Prior to issuance of a certificate of occupancy, the applicant shall install a five-foot sidewalk along the frontage of the property.

**Condition 6**  
**ROW Dedication.** Prior to issuance of a building permit, the applicant shall dedicate public right-of-way along the site’s frontage on 25th Avenue to a point at least 0.5 feet behind the proposed back of the sidewalk.

**Condition 7**  
**Curb.** Prior to issuance of a building permit, the applicant shall submit an updated site plan for review that demonstrates curb along the entirety of the outermost travel aisle. These improvements shall be installed prior to issuance of a certificate of occupancy.

**Condition 8**  
**Wheel Bumpers.** Prior to issuance of a certificate of occupancy, wheel bumpers must be installed in accordance with ADC 9.120(6).

**Condition 9**  
**Lighting.** Prior to issuance of a building permit, the applicant shall submit a lighting plan or updated site plan that shows the location of the lighting fixtures and the corresponding lighting type and/or model. Fixtures with backlight control (i.e. full cut-off shield) shall be used around the perimeter of the property to ensure light does not trespass onto adjacent property.

**Condition 10**  
**Rental Agreement.** A copy of the rental contract must be provided to the Planning Division before the buildings are occupied. ADC 4.060, Note 12, prohibits repair of autos, boats, motors, and furniture, and the storage of flammable materials. The rental contracts for the storage facility must specify this prohibition.

**Condition 11**  
**Landscape and Irrigation Plan.** The applicant shall submit a final landscape and irrigation plan to the Community Development Department for review and approval prior to issuance of a building permit. The landscape and irrigation plans shall be consistent with the standards under ADC 9.140(2), 9.150, and 9.160. The landscape plan shall include a planting schedule that indicates the plant species, size, and quantity of each plant.

**Condition 12**  
**Architectural Element/Feature.** The applicant shall submit elevation plans in accordance with ADC 8.340(2) for review and approval by the Planning Division prior to issuance of a building permit.

**Condition 13**  
**Pedestrian Amenities.** Prior to the issuance of a certificate of occupancy, a minimum of three pedestrian amenities shall be installed in accordance with ADC 8.360(2-4).
**Condition 14**  **Substantial Conformance.** Development shall occur consistent with the plans and narrative submitted by the applicant, or as modified by conditions of approval and shall comply with all applicable state, federal, and local laws.

**Attachments**

A. Location Map
B. Applicant’s Plan Set
   1. Site Plan
   2. Sample Elevation
   3. Written Findings
   4. Conceptual Landscape Plan

**Acronyms**

ADC  Albany Development Code  
FEMA  Federal Emergency Management Agency  
FIRM  Flood Insurance Rate Map  
HI  Heavy Industrial District  
LI  Light Industrial District  
ITE  Institute of Transportation Engineers  
OFC  Oregon Fire Code  
PP&L  Pacific Power and Light  
ROW  Right-of-way  
SHPO  State Historic Preservation Office  
TSP  Transportation System Plan  
WD  Wetland Delineation
This letter is prepared in accompaniment of the attached site plan review application for the proposed self-serve storage facility to be constructed at 440 25th Ave SW, or taxlot 001018 / map 11S03W18B. The 2.11 acre parcel is currently undeveloped. The comprehensive plan designation is Light Industrial, Open Space, and the zoning is LI. The proposal is for 305 storage units, parking, sidewalks, stormwater quality and detention facilities, gates and fences, and public street improvements to 25th Ave including installing a sidewalk and extending the public storm main. This letter will indicate the proposal’s compliance with the applicable sections of the Albany Development Code. Below, please find all applicable code sections, followed by a response demonstrating the proposal’s compliance.

Article 4 – Commercial and Industrial

4.050 – Schedule of Permitted Uses

RESPONSE: In LI-zoned properties, self-serve storage use is permitted with site plan review.

4.060 – Special Conditions

(12) Self-Serve Storage. These facilities are subject to the following standards:

(a) The minimum driveway width between buildings is 20’ for one-way drives and 24’ for two-way drives.

RESPONSE: The minimum driveway width proposed onsite is 25 feet.

(b) The maximum storage unit size is 1000 square feet.

RESPONSE: The maximum proposed storage unit size is 200 square feet.

(c) All outdoor lighting shall be shielded to prevent glare and reflection on adjacent properties.

RESPONSE: All outdoor lighting shall be so shielded.

(d) Repair of autos, boats, motors, and furniture and the storage of flammable materials are prohibited on the premises, and rental contracts shall so specify.
RESPONSE: Rental contracts shall so specify.

4.090 – Development Standards

RESPONSE: The tabulated standards in section 4.090 specify a 15’ minimum front setback across from non-residential development, and a 100% maximum landscaped area requirement. This project proposes a 16’ minimum front setback, and 10% landscaped area.

4.100 – Minimum Standards. All setbacks must meet the minimum standards in Table 4-2, Development Standards. In addition to the setbacks in this Article, all development must comply with Section 12.180, Clear Vision Area. For residential accessory structures, see also Article 3, Table 2, Accessory Structure Standards.

RESPONSE: All setbacks meet the minimum standards specified in Table 4-2. The clear vision area standards in Section 12.180 do not apply because there are no existing or proposed street intersections on or fronting the property.

4.110 – Measurements. Setback distances must be measured perpendicular to all portions of a property line.

RESPONSE: All setbacks shown on the site plan are measured perpendicular to the property line.

4.130 – Setback Alternative in Developed Areas. When an addition or new development is proposed in an area containing the same types of uses that were developed to a previous setback standard, the Director or review body may approve setbacks that are the same as those for the existing buildings on the site for additions, or the same as those for buildings on abutting parcels for new development. In such instances, the Type I procedure will be used to process requests, and approval will be based upon the following criteria:

RESPONSE: No alternative setbacks are proposed.

4.140 – General Exceptions to Setback Requirements. The following may project into required setbacks, provided that they conform to the conditions and limitations indicated:

(1) Depressed Areas. In any zoning district, open-work fences, berms, hedges, guard railings, or other landscaping or architectural devices for safety protection around depressed areas, ramps, stairs, or retaining walls may be located in required setbacks, provided that the devices are not more than 3-1/2 feet tall.

RESPONSE: No such features are proposed in required setback areas.

(2) Projecting Building Features. The following may project into the required front setback up to 5 feet and into the required interior setbacks up to 2 feet:
(a) Awnings, eaves, buttresses, architectural appendages (such as, but not limited to, bay windows, planters, cantilevered stairways)
(b) Chimneys and fireplaces, provided they do not exceed 8 feet in width.
(c) Porches, steps, platforms or landings, raised patios or decks (applies only to structures above 30 inches in height: structures 30 inches or less are not subject to setback provisions).
(d) Projecting signs must conform to applicable ordinance requirements. See Article 13, Sign Code.

RESPONSE: No such features are proposed in required setback areas.

4.150 – Zero Lot Line. Any residential dwelling or accessory building may be located on the property line when:

(1) There are no openings or windows in the wall abutting the property line. Additionally, a minimum 6-foot setback and maintenance easement must be recorded on the adjoining property deed or plat. This easement shall be written so it is not revocable without City approval.

OR Two or more dwelling units are attached at the property line and are approved for such in accordance with other provisions of this Code.

RESPONSE: No buildings are proposed on property lines.

4.160 – Interior Setbacks for Attached Dwellings. The interior setback requirement for attached single-family dwellings is zero where the units adjoin; however, all other setbacks must conform to the requirements of this Code. The setback requirements for residential uses do not apply to a dwelling legally located above a commercial use.

RESPONSE: No attached dwellings are proposed.

4.170 – Setbacks and Fencing for Swimming Pools. Swimming pools must conform to the setback regulations for main buildings, except that outdoor swimming pools must be set back at least 10 feet from all interior lot lines. Also, all swimming pools must be fenced or equipped with electric alarm systems that prevent entry or alarm upon entry. Required pool fencing must be at least four feet tall and have a self-locking gate that closes automatically.

RESPONSE: No swimming pools are proposed.

4.180 – Setbacks for Properties Abutting Future Street Rights-of-Way. Where the adopted Comprehensive Plan and future street plans include widening or connecting existing streets, or establishing new streets, the placement of all buildings and the establishment of all required setbacks must be in relation to the proposed street right-of-way boundaries. Also, no building may be erected on a lot that abuts a proposed street right-of-way unless the lot will have the width and depth needed to complete the street width plus the width and depth of the setbacks required on the lot.

RESPONSE: The property does not abut any future street rights-of-way.
4.200 – Special Noise Corridor Setbacks. Residential developments adjacent to the following listed streets and highways must maintain the setbacks listed from the designated right-of-way in addition to the required setbacks for the zoning district:

<table>
<thead>
<tr>
<th>Street/Highway</th>
<th>Additional Setback</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interstate 5</td>
<td>50 feet</td>
</tr>
<tr>
<td>Pacific Boulevard (Hwy. 99E)</td>
<td>25 feet</td>
</tr>
<tr>
<td>Santiam Highway (Hwy. 20)</td>
<td>25 feet</td>
</tr>
<tr>
<td>Waverly Drive (S. of Santiam Hwy.)</td>
<td>10 feet</td>
</tr>
<tr>
<td>Geary Street (Pacific to Grand Prairie)</td>
<td>10 feet</td>
</tr>
<tr>
<td>Queen Avenue</td>
<td>10 feet</td>
</tr>
</tbody>
</table>

In reviewing development proposals, the review body may require additional noise-mitigating features such as berms, landscaping, fences, or walls within the above-described setback areas.

RESPONSE: The property does not front any of the listed special corridors.

4.210 – Special Setbacks for Educational and Religious Institutions, Public and Semi-Public Buildings. Any new construction of a school, church, or public or semi-public building must be set back at least 25 feet from any property line adjoining or directly across public right-of-way from any residential district. Stockpiling or storing materials or equipment is not permitted in the required front or interior setbacks. All other setbacks of the district where the property is located apply.

RESPONSE: No such buildings are proposed.

4.220 – Parking Restrictions in Setback Areas. Parking and loading spaces may not be located in a required front or side setback, except:

   (1) Driveways meeting dimensional standards may be used to fulfill parking requirements for single-family and two-family residences. Each space must be a paved area at least 10 feet wide and 20 feet long.

RESPONSE: No parking or loading spaces are proposed in required setback areas.

4.230 – Height Standards. See Table 4-2 for height restrictions.

RESPONSE: Table 4-2 presents no height restrictions in the LI zone.

4.240 – Height Exceptions.

   (1) Roof structures for the housing of elevators, stairways, tanks, ventilating fans and similar equipment required to operate and maintain the building, fire walls, skylights, towers, flagpoles, chimneys, smokestacks, wireless masts, antennas, steeples, and similar structures may be erected above the height limits prescribed in this article, provided that no roof structure, feature, or any other device above
the prescribed height limit may be allowed or used for the purpose of providing additional floor space.

(2) Religious Institutions and Public and Semi-Public Buildings. In zoning districts where churches and certain public and semi-public buildings require Conditional Use approval, the height restrictions may be waived as a part of the Conditional Use proceedings, provided that a request for such has been noted in the public hearing notice.

RESPONSE: No exceptions to the height requirements are proposed.

4.260 – Loading Standards. Loading spaces for all uses except office and residential uses shall be off the street. Loading spaces shall be provided in addition to the required vehicle parking spaces, and shall meet the following requirements:

(1) Vehicles in the berths shall not protrude into a public right-of-way or sidewalk. Loading berths shall be located so that vehicles are not required to back or maneuver in a public street.

(2) A school having a capacity greater than 25 students shall have a driveway designed for continuous forward flow of passenger vehicles for the purpose of loading and unloading children.

(3) The minimum required loading area is as follows:
   (a) 250 square feet for buildings of 5,000 to 20,000 square feet of gross floor area.
   (b) 500 square feet for buildings of 20,000 to 50,000 square feet of gross floor area.
   (c) 750 square feet for buildings in excess of 50,000 square feet of gross floor area.

(4) The required loading area shall not be less than 10 feet wide by 25 feet long and shall have an unobstructed height of 14 feet.

(5) Required loading facilities shall be installed prior to final building inspection and shall be permanently maintained as a condition of use.

(6) Loading areas shall be subject to the same provisions as parking areas relative to plan information, setbacks, buffering/screening requirements, and lighting.

RESPONSE: The area adjacent to each unit shall serve as the loading area. No such areas protrude into public rights-of-way, or are located in required setback or screening areas.

4.290 – Outside Storage.

RESPONSE: No outside storage is proposed.

4.300 – Screening of Refuse Containers. The following standards apply to all development, except for one- and two-family dwellings. Any refuse container or disposal area that would otherwise be visible from a public street, customer or resident parking area, any public facility, or any residential area, must be screened from view by placement of a sight-obscuring fence, wall, or hedge at least 6 feet tall. All refuse materials must be contained within the screened area. Refuse disposal areas may not be located in required setbacks or buffer yards and must be placed at least 15 feet from any dwelling window.
RESPONSE: Due to the limited amount of garbage that will be generated on site, a single small curbside receptacle will be stored in the restroom.

**Article 8 – Design Standards**

8.330 – Building Orientation. Building orientation and maximum setback standards are established to help create an attractive streetscape and pleasant pedestrian environment. These standards apply in all zoning districts except HD, DMU, CB, and WF. Development in HD, CB, DMU, and WF shall demonstrate appropriate building orientation through compliance with maximum front setback standards in ADC Section 5.120.

1. New buildings shall be oriented to existing or new public streets. Building orientation is demonstrated by placing buildings and their public entrances close to streets so pedestrians have a direct and convenient route from the street sidewalk to building entrances.
   a. On sites smaller than three acres, new buildings shall be oriented to the public street/sidewalk and off-street parking shall be located to the side or rear of the building(s), except where it is not feasible due to limited or no street frontage, the site is an infill site less than one acre, conservation of natural resources, or where there are access restrictions. [Ord. 5832, 4/9/14]
   b. Buildings on sites larger than three acres may be setback from the public street and oriented to traffic aisles on private property if the on-site circulation system is developed like a public street with pedestrian access, landscape strips, and street trees.

RESPONSE: The multi-unit storage facility buildings are oriented as close as possible to the street, sidewalk and parking area. The unit entrances are directly accessible from the onsite circulation system.

8.340 – General Building Design. The following standards apply in all zoning districts except HD, CB, DMU, and WF, which are subject to ADC Section 8.345. New commercial buildings shall provide architectural relief and interest, with emphasis at building entrances and along sidewalks, to promote and enhance a comfortable pedestrian scale and orientation. Blank walls shall be avoided except when not feasible.

1. Ground floor windows shall be provided along frontages adjacent to sidewalks. The main front elevation(s) of buildings shall provide windows or transparency at the pedestrian level in the following minimum proportions: (Table 8-1)
2. Walls that are visible from a public street shall include a combination of architectural elements and features such as offsets, windows, entry treatments, wood siding, brick, stucco, synthetic stucco, textured concrete block, textured concrete, and landscaping.

RESPONSE: Due to the nature of storage units, it is not desirable or practical to provide windows along frontages adjacent to sidewalks. This wall will be articulated in accordance with the design standards. Alternately, a combination of an architecturally pleasing screening fence and/or landscape buffering may be provided to buffer this façade from the public way. Example elevation views from a similar storage project are included with the application documents that
provide an example of the type of architectural elements that are anticipated for this project. Final details and design will be provided at time of building permit.

8.350 – Street Connectivity and Internal Circulation. The following standards emphasize the importance of connections and circulation between uses and properties. The standards apply to both public and private streets. Development in the RD, DMU, CB and WF zoning districts on sites under three acres is exempt from these standards.

1. New commercial buildings may be required to provide street or driveway stubs and reciprocal access easements to promote efficient circulation between uses and properties, and to promote connectivity and dispersal of traffic.
2. The internal vehicle circulation system of a commercial development shall continue the adjacent public street pattern wherever possible and promote street connectivity. The vehicle circulation system shall mimic a traditional local street network and break the development into numerous smaller blocks.
3. Traffic aisles shall not be located between the building(s) and the sidewalk(s), except as provided in (4) below, or where drive-through windows are permitted, sites are constrained by natural resources, or are infill sites less than one acre.
4. Where drop-off facilities are provided, they shall be designed to meet the requirements of the American with Disabilities Act but still provide for direct pedestrian circulation.
5. Internal roadways shall be designed to slow traffic speeds. This can be achieved by keeping road widths to a minimum, allowing parallel parking, and planting street trees to visually narrow the road.

RESPONSE: No street or driveway stubs or easements are needed to promote efficient circulation, connectivity and circulation of traffic. The onsite circulation pattern is designed as a one-way loop (two-way for emergency vehicles only) taken off of 25th Avenue, with traffic aisles running parallel and perpendicular to the street. Each building is effectively its own block. At the one location where a traffic aisle runs between the buildings and a sidewalk, an ADA-accessible path is provided across the aisle to the rest of the development. There are no internal roadways per se, and the onsite traffic aisles are sufficiently short for low speeds.

8.360 – Pedestrian Amenities. The following standards apply in all zoning districts except HD, CB, DMU, and WF, which are subject to ADC Section 8.365. Amenities such as awnings, seating, special paving, and planters can have a dramatic effect on the pedestrian environment. Commercial developers should give as much thought to the pedestrian environment as they give to vehicle access, circulation, and parking. The standards for pedestrian amenities are related to the scale of the development and also provide the flexibility for the developer to select the most appropriate amenities for the particular site and use.

RESPONSE: These standards do not apply because an office is not proposed on the site.

8.390 – Compatibility Details. Attention to detail can significantly increase the compatibility of commercial development with adjacent uses. Commercial development shall be designed to comply with the following applicable details and any other details warranted by the local conditions:
1. On-site lighting is arranged so that light is reflected away from adjoining properties and/or streets.
2. Any undesirable impacts produced on the site, such as noise, glare, odors, dust, or vibrations have been adequately screened from adjacent properties.
3. The site is protected from any undesirable impacts that are generated on abutting properties.
4. Unsightly exterior improvements and items such as trash receptacles, exterior vents, and mechanical devices have been adequately screened.
5. Storage areas, trash collection facilities and noise generating equipment are located away from public streets, abutting residential districts or development, or sight obscuring fencing has been provided.
6. Where needed, loading facilities are provided on-site and are of sufficient size and number to adequately handle the delivery or shipping of goods or people. Where possible, loading areas should be designed so that vehicles enter and exit the site in a forward motion.

RESPONSE: On-site lighting is proposed on the walls of the buildings, and will be shielded from adjoining properties and streets. No undesirable impacts are anticipated to be produced on-site which could affect adjacent properties; there are no known undesirable impacts being generated by adjacent properties which could affect this site. Due to the limited amount of garbage that will be generated on-site, a single small curbside receptacle will be stored in the restroom. Loading areas are provided in accordance with Section 4.260. Each is designed to accommodate the one-way flow of vehicular traffic on the site.

Article 9 – On-Site Development and Environmental Standards

Off-Street Parking

9.020 – Space Requirements. Off-street parking and loading must be provided for all development in the amounts indicated in [Table 9-1].

RESPONSE: Per Table 9-1 for storage facilities, one space is required for each 100 units, plus an additional space for each employee/caretaker. Fractional spaces are counted to the nearest whole space, with half spaces rounding up. The proposal is for 305 units with no onsite employees or caretakers. Therefore three spaces are proposed, including one handicap space.

9.120 – Parking Area Improvement Standards. All public or private parking areas, loading areas and outdoor vehicle sales areas must be improved based on the following standards:

1. General. All parking spaces must be improved in accordance with these standards and available for use at the time of project completion.

   RESPONSE: All parking spaces will be improved accordingly and available for use at the time of project completion.

2. Other Requirements. All parking areas shall conform to the setback, clear vision, landscaping, and buffering/screening provisions of this Code.
RESPONSE: The parking area is located out of all required setback areas. It is screened from the property line with a 5-foot-wide sidewalk. The landscaping requirements are met as detailed below. The clear vision requirements are met as shown on the site plan.

3. **Surfacing.** All required parking, including travel aisles and access, shall have a durable, dust-free surface of asphalt, cement concrete, or other materials approved by the Director. Parking lot surfacing shall not encroach upon the public right-of-way except when it abuts a concrete public sidewalk or has been otherwise approved by the Director of Public Works. Pervious pavements, such as pervious asphalt or pervious concrete, may be allowed by the Director of Public Works.

RESPONSE: The parking area will be paved with asphalt.

4. **Drainage.** All parking lots must provide a drainage system to dispose of the runoff generated by the impervious surface. Post-construction stormwater quality facilities are required per Title 12 of the Albany Municipal Code when applicable. Provisions shall be made for the on-site collection of drainage water to eliminate sheet flow of such water onto sidewalks, public rights-of-way, and abutting private property. All drainage systems must be approved by the Director of Public Works.

RESPONSE: The parking area is drained by a single catch basin, which is connected to the stormwater system for the rest of the project.

5. **Perimeter Curb.** Perimeter curbing is required for protection of landscaped areas and pedestrian walkways, and to prevent runoff onto adjacent properties. All parking areas except those required in conjunction with a single- or two-family dwelling or approved overflow parking areas shall provide a curb at least 6 inches high along the perimeter of all parking areas. Exceptions may be allowed for connections to approved vegetated post-construction stormwater quality facilities.

RESPONSE: The entire perimeter of the parking area will be curbed as shown on the site plan.

6. **Wheel Bumper.** All parking stalls fronting a sidewalk, alleyway, street or property line, except for those required in conjunction with a single- or two-family dwelling, shall provide a secured wheel bumper at least six inches high and at least six feet long, set back from the front of the stall at least 2-1/2 feet, but no more than three feet. If the sidewalk is widened to seven feet six inches to allow for vehicle encroachment, no wheel bumpers are required.

RESPONSE: Wheel stops are proposed for all three parking spaces.

7. **Turnaround.** Except for single-family and duplex dwellings, groups of more than two parking spaces must be located and served by an aisle or turnaround so that their use will require no backing movements or other maneuvering in a street right-of-way other than an alley.
RESPONSE: The parking area is served with sufficient turnaround and backing space.

8. Striping. Lots containing more than two parking spaces must have all required spaces permanently and clearly striped. Stripes must be at least four inches wide. When motorcycle parking, compact, or handicapped parking spaces are provided, they shall be designated within the stall.

RESPONSE: All spaces will be permanently striped.

9. Connecting to Adjacent Parking Areas. Where an existing or proposed parking area is adjacent to a developed or undeveloped site within the same zoning district, any modifications to the parking areas must be designed to connect to the existing or future adjacent parking area. This requirement may be waived by the Director when it is deemed impractical or inappropriate due to the nature of the adjoining uses.

RESPONSE: The proposed parking area is not adjacent to any other site.


RESPONSE: The parking area will be landscaped accordingly, as detailed below.

11. Compact Car Parking. No more than 40 percent of parking spaces provided may be designated for compact cars. Compact spaces must be signed and/or the space painted with the words “Compact Car Only.”

RESPONSE: No compact spaces are proposed.

12. Parking Accessible to the Disabled. All parking areas must provide accessible parking spaces in conformance with the Oregon Structural Specialty Code.

RESPONSE: One handicap space is proposed, along with the associated loading zone.

13. Bicycle Parking. Bicycle parking space requirements are as follows:
   a. For multiple-family dwellings (three or more units) and units above or attached to a business – one space per four units.
   b. For industrial development – one space for every ten automobile spaces required.
   c. For commercial or office development - one space for every ten automobile spaces required with a minimum of two spaces.
   d. Exemptions -- the Director may allow exemptions to or reductions in required bicycle spaces in connection with temporary uses or uses that are not likely to need bicycle parking.

Bicycle parking spaces shall meet the following standards:
e. Required spaces should be visible and not hidden, and must be located as near as possible to building entrances used by automobile occupants. Within the HD, CB, CMU, and WF zoning districts, bicycle parking may be located on a public sidewalk with approval from the City Engineer.

f. Each required bicycle parking space must have a parking rack securely fastened to the ground. Parking racks must support each bicycle at a minimum of two points, including at least one point on the frame, and must allow the frame and at least one wheel to be locked with a U-type lock.

g. Bicycle parking areas must provide at least three feet of clearance around all three sides of a fully-loaded bicycle rack and have an overhead clearance of at least seven feet.

h. At least one-half of required bicycle parking spaces must be sheltered. Spaces must be protected from precipitation by a roof overhang or a separate roof at least seven feet tall. Bicycle parking spaces within roofed buildings and bike lockers are considered sheltered spaces.

RESPONSE: Bicycle parking does not make sense for self-serve storage. If any patrons were to ride to the facility to access their storage, they would undoubtedly ride all the way to their unit, regardless of provided bicycle parking. If bicycle parking is deemed a requirement for this project, it can be added as a condition of approval.

14. Lighting. Any lights provided to illuminate any public or private parking area or vehicle sales area must be arranged to reflect the light away from any abutting or adjacent properties.

RESPONSE: Lights are proposed on the building walls which will illuminate the parking area. The lighting will be shielded from adjoining properties.

15. Pedestrian Access. Walkways and accessways shall be provided in all new off-street parking lots and additions to connect sidewalks adjacent to new development to the entrances of new buildings. All new public walkways and handicapped accessible parking spaces must meet the minimum requirements of the Oregon Structural Specialty Code.

RESPONSE: An ADA-accessible sidewalk and pathway is proposed, connecting from the 25th Avenue sidewalk, around the parking area to the proposed accessible storage units as shown on the site plan.

16. When employee parking is designated in new developments, parking for carpools and vanpools shall be provided and located near the employee entrances to buildings.

RESPONSE: This standard does not apply because there will be no employees or caretakers stationed on the site.

9.130 – Off-Street Parking Lot Design. All off-street parking lots must be designed in accordance with City standards for stalls and aisles as set forth in Table 9-2: Parking Lot Design and supplemental drawings. Stall dimensions are measured from inside the stripes.
1. Compact spaces shall be at least 8 feet wide by 16 feet long.

   RESPONSE: No compact spaces are proposed.

2. Accessible spaces shall be a minimum of 9 feet wide and 17 feet long and designed in accordance with the Oregon Structural Specialty Code (OSSC). An adjacent access aisle must be provided that is at least eight feet wide and 17 feet long for a van-accessible space, and six feet wide for a standard accessible space.

   RESPONSE: The accessible space is 9 feet wide, 18.5 feet long, and features an access aisle that is 8 feet wide and 18.5 feet long.

3. Stall Width. Long-term parking spaces must be at least 8.5 feet wide. Parking stalls for grocery stores or adjacent to planter islands must be at least 9.5 feet wide.

   RESPONSE: All spaces are 9 feet wide.

4. Minimum Aisle Widths. Aisles for two-way traffic and emergency vehicle operations must be at least 24 feet wide. One-way aisles and one-way emergency vehicle access must be at least 20 feet wide.

   RESPONSE: The minimum access aisle and backing space width is greater than 24 feet.

5. The design of driveways and on-site maneuvering and loading areas for commercial and industrial developments shall include 20 feet of storage length for entering and exiting vehicles, in order to prevent vehicles from backing into the flow of traffic on the public street or causing unsafe conflicts with on-site circulation.

   RESPONSE: The closest parking stall is set back greater than 20 feet from the right of way. See the site plan.

Landscaping

9.140 – General Requirements. Landscaping requirements by type of use are listed below [non-applicable uses are omitted]:

2. Landscaping Required – Non-Residential. All required front and interior setbacks (exclusive of accessways and other permitted intrusions) must be landscaped or have landscaping guaranteed in accordance with ADC 9.190 before an occupancy permit will be issued. Minimum landscaping acceptable for every 1,000 square feet of required setbacks in all commercial-industrial districts is as follows:
   a. One tree at least six feet tall for every 30 feet of street frontage.
   b. Five 5-gallon or eight 1-gallon shrubs, trees or accent plants.
   c. The remaining area treated with suitable living ground cover, lawn, or decorative treatment of bark, rock, or other attractive ground cover.
d. When the yard adjacent to a street of an industrially zoned property is across a right-of-way from other industrially or commercially zoned property, only 30 percent of such setback area must be landscaped.

**RESPONSE:** The property will be landscaped as shown on the conceptual landscape plan. The required front setback area is across the street from other industrial-zoned property, therefore at least 30% of the area will be landscaped. Additionally, a biofiltration swale is proposed in a portion of the front setback area, which will feature its own landscaping.

9.150 – Parking Lot Landscaping. The purpose of landscaping in parking lots is to provide shade, reduce stormwater runoff, and direct traffic. Incorporation of approved vegetated post-construction stormwater quality facilities in landscaped areas is encouraged. Parking lots must be landscaped in accordance with the following minimum standards:

1. **Planter Bays.** Parking areas shall be divided into bays of not more than 12 parking spaces. At both ends of each parking bay, there shall be curbed planters at least five feet wide, excluding the curb. Gaps in the curb may be allowed for connections to approved post-construction stormwater quality facilities. Each planter shall contain one canopy tree at least ten feet high and decorative ground cover containing at least two shrubs for every 100 square feet of landscape area. Neither planter bays nor their contents may impede access on required public sidewalks or paths, or handicapped-accessible parking spaces.

**RESPONSE:** The site contains one bay of three parking spaces. A five-foot-wide landscaped planter is proposed on one side, and a larger landscaped area proposed on the other. Both will feature the required trees, shrubs, and ground cover.

2. **Entryway Landscaping.** Both sides of a parking lot entrance shall be bordered by a minimum five-foot-wide landscape planter strip meeting the same landscaping provisions as planter bays, except that no sight-obscuring trees or shrubs are permitted.

**RESPONSE:** The entrance to the parking lot will be flanked with the required landscaped front setback area on one side and a larger landscaped area on the other. Any trees will be out of the vision clearance area.

3. **Parking Space Buffers.** Parking areas shall be separated from the exterior wall of a structure by pedestrian walkways or loading areas or by a five-foot strip of landscaping materials.

**RESPONSE:** The parking area is separated from the buildings by loading area and a pedestrian walkway.

4. **Alternate Plan.** An alternate plan may be submitted that provides landscaping of at least five percent of the total parking area exclusive of required landscaped yard areas and that separates parking areas of more than 100 spaces into clusters divided by landscape strips. Each planter area shall contain one tree at least ten feet tall and decorative
ground cover containing at least two shrubs for every 100 square feet of landscape area. Landscaping may not impede access on required public sidewalks or paths, or handicapped-accessible parking spaces.

**RESPONSE:** No alternate plan is proposed.

5. **Landscape Protection.** Required landscaped areas adjacent to graveled areas must be protected, either by railroad ties secured by rebar driven 18 inches into the ground, by large boulders, or by another acceptable means of protection.

**RESPONSE:** No graveled areas are proposed.

**Fences**

9.380 – **Standards.** Fences and walls shall meet the following standards. If a fence or wall is used to meet required screening, it shall meet the provisions of Section 9.385 [non-applicable sections are omitted].

**Standards in Commercial, Industrial, ES, LE, MS, PB, and TD zones:**

4. **Fences in front setbacks.** Fences shall be no taller than 6 feet in required front setbacks. 6-foot fences containing barbed wire on top or fences taller than 6 feet are not permitted in the front setback.

**RESPONSE:** A combination of an architecturally pleasing screening fence and/or landscape buffering may be provided to buffer the street-facing building façade from the public way.

**Standards for All Fences**

6. In no instance or zone shall a fence exceed eight feet except when permitted in 9.370. Fences over seven feet tall require a building permit prior to construction. Fences over six feet tall shall meet building setbacks, except when permitted along property lines in Sections 9.370(4)(d) or permitted in required setbacks in 9.380(3)(a).

7. In no instance shall a fence extend beyond the property line.

8. All fences shall meet the Clear Vision Area standards in Section 12.180.

9. **Measuring Fence Height.** Fence height shall be measured from the average height of the grade adjacent to where the fence is to be located. If a fence is to be constructed on top of a berm, the height shall be measured from the bottom of the berm. Fence height includes the height of the fence, wall, or picket and does not include the posts, or arbors and trellises at entrance gates.

10. **Maintenance.** Every fence, whether required or not, will be maintained. No fence is allowed to become or remain in a condition of disrepair including, but not limited to noticeable leaning, missing slats, broken supports, and overgrowth of weeds or vines.

**RESPONSE:** If fences are proposed, they will comply with the design standards.
9.385 – **Screening.** Whenever a sight-obscuring fence, wall or hedge is required under the provisions of this Code, it must meet the following provisions and the vision clearance standards in Section 12.180:

1. **Opacity.** In order to be “sight-obscuring,” fences and walls must be at least 75 percent opaque when viewed from any angle at a point 25 feet away from the fence or wall. Hedges must be an evergreen species that will meet the standards year-round within two years of planting.

2. **Height.** Fences and walls will be a minimum of 6 feet tall. Hedges will be of a species capable of attaining a height of at least six feet within two years of planting, given their age, height, and health when planted.

3. **Maintenance.** Fences and walls will be maintained in safe condition and opacity is maintained as required in subsection (a) of this section. Wooden materials will be protected from rot, decay, and insect infestation. Plants forming hedges will be replaced within six months after dying or becoming diseased to the point that the opacity required in subsection (a) of this section is not met.

**RESPONSE:** A combination of an architecturally pleasing screening fence and/or landscape buffering may be provided to buffer the street-facing building façade from the public way. Whichever is finally proposed will comply with the design standards.

9.390 – **Non-Conforming Fences.** Existing fences that were constructed legally and/or that were in place at the time the property was annexed to the City that do not meet the current fencing standards shall be considered a legal non-conforming use, provided that the barbed wire or upturned barbed selvage does not extend over a street or alley and where it does slant toward the public right-of-way, it is located not less than one foot from said right-of-way.

**RESPONSE:** There are no existing fences on the property.
NOTE:
THESE ELEVATION VIEWS ARE NOT OF THE EXACT BUILDING FOOTPRINTS SHOWN, BUT ARE REPRESENTATIVE OF WHAT WILL BE CONSTRUCTED. FINAL DETAILS OF THE BUILDING DESIGN WILL BE RESOLVED IN THE BUILDING PERMIT PHASE. FINAL BUILDING DESIGN WILL BE IN ACCORDANCE WITH ARTICLE 8 - DESIGN STANDARDS.