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November 4, 2024

Community Development Department
Attn Wendy Farley-Campbell
Community Development Director
City of Florence
250 Hwy 101
Florence, OR 97439

Re: Elm Park PUD, PC 24 38 DR 12 Elm Park (Early Learning Only)

Dear Wendy Farley-Campbell,

This letter responds to your NOIC dated October 18, 2024, relating to the design review application for the Elm Park Early Learning Center. It modifies the portion of the NOIC Revised Combined Attachment submitted on 9-26-24 related to the Early Learning Center. It also identifies the revised and new exhibits provided with the Supplemental Design Review (“DR”) Exhibits submitted concurrently.

We have revised the design to reduce the building's height and cost. The floor plan, as well as all building materials and colors, remain the same. The rooflines have changed.

The text of the NOIC appears below in italics, and our responses are bold.

Thank you for submitting Land Use application PC 24 38 DR 12, a request for a design review of the early learning facility and associated development on the property as part of the Elm Park PUD. The project property is located on Lane County Assessor’s Map Ref 18-12-27-31, Tax Lots 01100 and 01200. After reviewing the application materials, the application was deemed “incomplete” and needs the following information:

Due to the exceptions to the code requested for decreased separation from Buildings A and C from Building B, reduced front and side yard setbacks, and parking demand analysis requested, the multi-unit dwelling will require a Type III design review or for this application to be run concurrently with the PUD application.

FCC 10-3: Off-Street Parking and Loading

FCC 10-3-3-D: Electric Vehicle parking

For new commercial developments a minimum 20% of the parking stalls are required to have conduit installed to support installation of a level II EV charging station.

The ELF requires 11 parking stall and 11 parking stalls are provided. This requires 2 stalls to include electrical conduit for level II EV charging stations. Currently only 1 is proposed and it is the ADA parking stall.

Please submit revised plans that indicate 1 additional stall that will have electrical conduit for a level II EV charging station.

Response No. 1: Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheet C300, provides these details.

FCC 10-3-9: Parking Line striping shall be double line striping 2 feet on center with a minimum 4- inch striping. Please include these details on revised plans.

FCC 10-3-5: Provide the width of the required access aisles for the ADA parking

1 ADA parking stalls are required and 1 is provided.

1 ADA stall is required to have a minimum 96-inch-wide access aisle, please revise the site plan to include the access aisle dimension.

FCC 10-3-8-L Parking lot plan requirements

Provide examples of all proposed parking lot signage

This should include, but not be limited to ADA parking signage, bike parking, and informational or directional signage.

Location of the signs are included on the site plans (Sheet A001), but not specific examples of signage

Revise site plan to include dimensions of parallel parking on the street. It appears to meet minimum dimensions, but please indicate this on the plans.

Curb height or wheel stops are required to be a minimum 6 inches in height. Please provide details of the wheel stop dimensions.

Response No. 2: Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheets C200 and C500, provides these details.

Access aisle width for parking lots is 23 ft. minimum. The two parking spaces backing into the drive aisle do not appear to have sufficient maneuvering area.

Response No. 3: Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheet C200, provides this detail. We have replaced two 90-degree spaces with one parallel ADA space. The additional regular space is picked up where the ADA space was on the prior version.

FCC 10-6: Design Review. Due to the building being part of a PUD, Design review criteria of FCC 10-6-6 apply to this project. Additional details of building dimensions will be required to ensure articulation requirements are met in accordance with FCC 10-6-6-3 (building facades) and additional finish material details will be required to review criteria of FCC 10-6-6-4 (Permitted visible building materials) and FCC 10-6-6-5 (material applications and configuration). FCC 10-25-5 Design Criteria also apply to this project.

Articulations are required every 30 to 40 feet using either a recess with a minimum 4 feet on depth or an extension a minimum of 2 feet running a minimum of 4 feet horizontally.

FCC 10-25-5-A requires wall offsets including projections, recesses, and changes in floor level to be used to add architectural interest and variety to massing of a building.

Wall offsets through projects and recesses are used.

Consider architectural details at changes in floor levels to meet this criterion as well as the criteria from FCC 10-6-6-3.

Response No. 4: We provide these details in Exhibit 13 in Supplemental DR Exhibits submitted herewith, Sheets A001, A201, and A280. Wall offsets are utilized throughout the façade. These are dimensioned on the plans. A recess has been added at the storage room door on the north elevation to provide shelter to the opening and provide a recess on the north elevation. This is a single-story structure so no details can be added at floor changes. The roof shape has been modified to reduce the overall height of the structure and avoid the suggestion of a two-level building. Clerestory windows above the south-facing shed roof remain to provide

natural light for interior circulation spaces. Canopies have been added at north doors of classrooms to provide shelter from weather and architectural interest.

FCC 10-25-5-B states buildings on corner lots shall be considered especially significant structures and shall be built with additional architectural details and embellishment.

FCC 10-25-5-C requires Buildings facing internal open space or in public view shall be architecturally emphasized through window treatment, entrance treatment, and details.

Provide additional detailing and emphasis around windows and entrances on internal facing elevations.

Provide additional details of exterior building materials for review

Width of door and window trim

Dimensions of the solid wood columns listed under Key Notes as "06 1000-K SOLID WOOD COLUMN" on sheets A201 on the south and west elevations.

Response No. 5: Exhibit 13 in Supplemental DR Exhibits submitted herewith, at Sheets A201 and A280, provides these details. Window trim color has been adjusted to provide additional emphasis around windows on all sides of the building. Classroom windows have been grouped together with trim and siding panels for an alternate color, pattern, and texture. Exterior building material callouts have been updated to clarify material types and colors. Door and window trim widths have been added to exterior elevations. The solid wood column dimensions have been noted on exterior elevations. To the extent this is deemed to be less than full conformity with the standard, we request a modification under the PUD ordinance.

FCC 10-6-6-5-D requires windows to be square or vertical rectangular. Please revise plan to include either configurations of square windows or vertical rectangular windows.

Response No. 6: Exhibit 13 in Supplemental DR Exhibits submitted herewith, at Sheet A201, provides this detail. All windows have been separated by trim to prevent the appearance of horizontal glazing openings. All window openings are square or vertical. To the extent this is deemed to be less than full conformity with the standards, we request a modification under the PUD ordinance.

FCC 10-25: Professional Office Residential Mixed-Use.

FCC 10-25-4-D-1 Minimum Front and street side yards is a minimum 20 feet.

10-foot setbacks are proposed on east and south, street facing lot lines. (PUD applied for)

Response No. 7: We have requested a modification of setbacks in NOIC Revised Attachment submitted 9-26-24, p. 21. PUD application and DR application will proceed concurrently, so no further information is provided here.

FCC 9-5: Stormwater Management Utility. Stormwater Management Report: The statement in the stormwater report seems to be conflicting with the Civil Plans.

Stormwater and Utility Plan Sheet C 200 indicates a plan to use both infiltration and filtration rain

gardens and an infiltration soakage trench for managing post development runoff. The Stormwater Management Report indicates a plan to use a presumptive approach with infiltration rain gardens, lined soakage trench, and stormwater planter. The inconsistencies between the two need to be corrected to resolve conflicting information.

Maximum side slope for rain gardens and swales is 3:1, where 4:1 is proposed.

Rain gardens and planters are both approved facilities for the presumptive approach on private property.

Three Soakage Trenches are proposed (SE site corner, playground, and parking lot).

Table 5.1 of the Stormwater Design Manual does not include soakage trenches as an available system for the presumptive approach.

Soakage trenches require 10 feet between the bottom of the system and ground water level. The geo tech report found the groundwater level between 7 and 8 feet below the surface. While 3 feet of fill is proposed over much of the site this does not seem adequate separation to utilize the soakage trench system.

Soakage trenches are injection wells and the surface drainage for the PUD requires pre- treatment. The parking lot planter is not illustrated to be a treatment system.

Response No. 8: Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheet C300. The soakage trenches are designed to meet the UIC rule authorization standards.

The landscaping plan submitted with the NOIC response includes a planting list for these facilities. However, a soakage trench is “a shallow trench in permeable soil that is backfilled with sand and coarse stone and lined with filter fabric. The trench surface may be covered with grating, stone, sand, or a grassed cover with a surface inlet.” The landscaping plan or this facility type should be revised.

Response No. 9: Revised Exhibit H(2) in Supplemental PUD/Replat Exhibits submitted on 11-1-24, provides this detail at Sheets 8 and 11.

Sheet C 200 has stormwater from the building collecting in the filtration and infiltration rain gardens south of the ELF then discharging to the infiltration soakage trench north of the building then into a future stormwater main located within the alley north of the ELF. The Stormwater Management report narrative and sheet A3 are inconsistent with the narrative calling out overflows to the parking lot rain garden with the plans A3 and C200 bypassing the garden. Please correct the inconsistencies.

Response No. 10: Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheet C300, provides this detail. Exhibit 14 in Supplemental DR Exhibits submitted herewith, at p. 3, also addresses this detail.

Additional grading and drainage information is required for the parking spaces, drop off lane and alley to determine where post development run off will be collected and treated.

Response No. 11: Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheet C400, provides this detail.

The stormwater management plan narrative states in the site description that the parking spaces will drain directly to the infiltration planter, whereas the analysis section states they will be routed to rain gardens for quality treatment. Sheet A3 of the plan states the parking lot planter is not a treatment system but rather just an infiltration system. The planter is the proposed pass-through location for the ELF storm system prior to overflowing into the alley stormwater pipe system connecting to Greenwood. Is the planter a treatment system? And if so, can the planter treat the required storm event for the area it serves prior to receiving overflows from the other storm systems to the south?

No drainage or stormwater management plan is indicated for the one-way drop off lane or the 2 parking stalls located east of the one-way lane. Please provide stormwater management details and plans for these areas.

Response No. 12: Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheet C300, provides these details. Exhibit 14 in Supplemental DR Exhibits submitted herewith, at p. 3, also addresses this detail.

FCC 10-37: Lighting

Maximum lighting pole height in residential areas and uses is 20 feet. The Luminaire Schedule provided on sheet E101 state the proposed pole height is 20 feet. Please ensure this is the finished height of the fixture and that it will not be installed on a base that will increase the overall height above the maximum allowed.

Provide details and specifications for wall pack fixtures including mounting heights.

Response No. 13: Exhibit 15 in Supplemental DR Exhibits submitted herewith, at Sheets E103 and E104, provides this detail.

Also see FCC 10-25-5-E that states buildings shall be lit from the exterior and lights shall be concealed through shielding, or recessed behind architectural features. Submit exterior wall lighting to meet this Code requirement.

Response No. 14: Exhibit 15 in Supplemental DR Exhibits submitted herewith, at Sheets E103 and E104, provides this detail.

Wetland Delineation from Branch indicates wetlands in the NW corner of the property which are regulated in the Yaquina and Wet Area references of FCC 10-7. The drainage plan for this area may be required with this application in accordance with 10-7-3-H

Response No. 15: The ELF Site is not in the NW Corner of the property. We previously responded to this comment in the NOIC Revised Attachment submitted on 9-26-24, p. 4. Because the DR and PUD applications are proceeding concurrently, we provide no further information here.

Figure-3 and Figure-5 of the wetland delineation report indicates a riverine wetland area R4SBC on the south western portion of the property. This wetland area is not identified in the introduction section of the wetland delineation.

Provide additional information regarding the presence or absence of this riverine wetland area. If present, include additional details for staff to review required setbacks and mitigation as required by FCC 10-7-4.

Figure-9 of the wetland delineation report indicates sample points and photo locations in the northwest property corner only. No testing of the possible riverine wetland area is indicated on this figure.

Response No. 16: The ELF Site is not located in the southwestern portion of the property. We responded to this comment in the Response to NOIC (Apartments) dated 11-4-24, Response No. 30, and we incorporate that response here.

A TIS was submitted for the ELM Park PUD. If this application runs concurrent with the PUD application, then nothing further is needed. If they are to run separate then please submit the TIS for this application.

Response No. 17: The PUD and DR applications will proceed concurrently, so no further information is provided here.

Items that are not included with the preliminary PUD application, but are required to be submitted with the Design Review applications or Final PUD plan whichever occurs first.

Width and locations of all sidewalks and pedestrian walkways on the infrastructure and site plans.

Response No. 18: These details are previously addressed in NOIC Revised Combined Attachment filed 9-26-24, p. 7. Exhibit 12 in Supplemental DR Exhibits submitted herewith, at Sheet C200, also shows this detail.

Please let us know if you have any questions or comments.

Chestnut Management, LLC

By 
K. Layne Morrill, Manager