



**TOWN OF LOS GATOS
PLANNING COMMISSION
REPORT**

MEETING DATE: 9/14/2022

ITEM NO: 3

ADDENDUM

DATE: September 13, 2022
TO: Planning Commission
FROM: Joel Paulson, Community Development Director
SUBJECT: Review and Recommendation of the Draft Objective Standards to the Town Council.

REMARKS:

Per the request of the Planning Commission at the August 24, 2022 Planning Commission hearing, the community of local architects submitted written comments related to their concerns with the drafted Objective Standards document (Exhibit 16). Staff has prepared a numbered list of the 29 bulleted items presented in the architect community input (Exhibit 19) including staff responses to suggestions and questions. There were several recommendations in the comment letter that staff supports if Planning Commission chooses to incorporate them in their recommendation to Town Council. There were also 10 items which staff recommends that the Planning Commission discuss further; these are summarized below:

- Comment 9 relates to the continuous streetscape requirement in A.11.1, which requires development in a Community Growth District to place at least 75 percent of the ground floor within five feet of the street-facing property lines. The comment suggests that it is not clear whether it applies to the proposed buildings, or the entire length of the property line. This draft standard is currently worded to apply only to proposed buildings.
- Comment 10 questions why section A.11.2 has a maximum percentage for site amenities in front of the front façade. The maximum percentage was originally included to ensure visibility to ground floor commercial uses; however, in the case of restaurant uses, it may be overly restrictive, and therefore the standard could be modified to include a minimum, but no maximum.
- Comment 12 questions how the arcade (B.1.1.d) and the recessed building entry (B.1.1.c) standards could be incorporated in the same building. The Planning Commission could consider removing the "full height of the façade" requirement from B.1.1.c or removing the arcade option (B.1.1.d) in its entirety to remedy this concern.

PREPARED BY: RYAN SAFTY
Associate Planner

Reviewed by: Planning Manager and Community Development Director

DISCUSSION (continued):

- Comment 13 also related to the arcade option in B.1.1.d, stating that longer buildings would look monotonous with a continuous arcade. The arcade option could either be removed, or a limit to the required arcade length could be added.
- Comment 14 requests that an additional section be added to deal with corner lots. Although this does not currently exist, these could be developed in the future.
- Comment 18 and 19 are related to the belly band option in B.4.1.d. Based on the reasoning provided, Planning Commission can consider removing this option.
- Comment 23 questions how B.4.3 would be applied, for example if a single bay window would be sufficient to qualify for the points listed. Staff can either add greater specificity for certain items or remove this requirement. Staff looks for direction from the Planning Commission.
- Comment 24 suggests that the illustration of pilasters should be removed. This illustration was a specific request from a previous hearing, but it could be removed.
- Comment 27 suggests that rather than prohibiting rooftop and upper floor terraces and decks that they could be allowed given certain controls.

In addition to the comments received from the community of local architects in Exhibit 16, additional public comment was received from a local architect and are included in Exhibit 18. The public comment expresses concern with using “real world photo examples” within the document and makes recommendations for specific sections of the draft document. First, the public comment requests that parking structure entry gate setback be reduced to under 25 feet in standard A.5.1. Second, the public comment requests that the six-foot height limit for vehicular entry gates be increased in standard A.8.3. Third, the public comment questions whether landscaped roofs can count towards the landscaping requirement in standard A.10.1.a, and whether 20 percent is too high. Last, the public comment requests that the private and community recreation spaces be reduced in size in standard A.10.1.

Exhibit 20 includes public comment received between 11:01 a.m., September 9, 2022, and 11:00 a.m., September 13, 2022. These comments are meant to update the comments provided in Exhibit 15 with the August 24, 2022 Desk Item report. The public comment in Exhibit 20 also expresses support with the information provided in Exhibits 16, 17, and 18, and provided additional suggestions throughout the Purpose and Applicability section of the document. Staff is supportive of these recommendations and can incorporate the recommendations when forwarding the revised document to the Town Council.

EXHIBITS:

Previously received with the June 22, 2022, Staff Report:

1. Town Council Resolution 2019-053
2. Summary of feedback received during community engagement meetings
3. Draft Objective Standards
4. Public Comments received prior to 11:00 a.m., Friday, June 17, 2022

Previously received with the June 22, 2022, Addendum Report:

5. Staff response to Commissioner's questions
6. Issues considered by the Objective Standards Subcommittee
7. Commissioner email regarding City of Palo Alto Objective Standards

Previously received with the June 22, 2022, Desk Item Report:

8. Suggested additions and modifications provided by a Planning Commissioner

Previously received with the August 24, 2022 Staff Report:

9. Revised Draft Objective Standards
10. Revised Draft Objective Standards with Redlines
11. Summary of Revisions Made and Responses to Comments Received at the Planning Commission Hearing of June 22, 2022
12. Evaluation of Existing Developments

Previously received with the August 24, 2022 Addendum Report:

13. Planning Commissioner Comments

Previously received with the August 24, 2022 Desk Item Report:

14. Planning Commissioner Comments
15. Public Comment received between 11:01 a.m., August 23, 2022, and 11:00 a.m., August 24, 2022

Previously received with the September 14, 2022 Staff Report:

16. Architect Comments, received September 7, 2022
17. Planning Commissioner Comments
18. Public Comments received prior to 11:00 a.m., Friday, September 9, 2022

Received with this Addendum Report:

19. Staff's responses to architect comments in Exhibit 16.
20. Public Comments received between 11:01 a.m., September 9, 2022, and 11:00 a.m., September 13, 2022.

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To: Chair and Planning Commissioners
From: Lee Quintanta
Re : September 14, 2022, Agenda Item 3

Planning Commission:

1. Attached as Attachment 1 are my comments submitted for the August 24th Planning Commission on the Draft Objective Standards. I have added additional comments in red.
2. I concur with Exhibit 17 attached to the Staff Report.
3. I agree with most of the comments contained in Exhibit 16 and Exhibit 17. The following are my Comments on Draft Objective Standards and to the included Exhibits 16, 17, and 18. Both Exhibits 16 and 18 raise indicate that further work is needed for clarity in the areas of landscaping, private and community recreation space and the question of line drawings/photos.
4. Below are a few additional suggestions to increase the understanding of these Objectives. Many of the suggestions are based on Section 18.24 of the Palo Alto Municipal Code Project Contextual Design Criteria and Objective Standards. While I understand that it is not the intent of the Town's Objective Standards to include Contextual Design Criteria, I none the less suggest considering the following ideas taken from of the Palo Alto Code be incorporated into the Town's Objective Standards Document.
 - *Purpose:* Purpose of the Objectives:
 - The purpose of these Objective Design Standards is to establish the intent of and objective design criteria and their intent for project that qualify for the streamlined approval review of Housing Development Projects eligible as defined by the Housing Development Act., ie eligible for ministerial approval (as defined by Cal. Gov. Code 65589.5)
 - Include an statement of intent prior to each section of the Objectives b (before A.1, A.2 etc) to provide guidance as to what the objectives are intended to achieve. (18.24.010 Purpose and Applicability)
 - Include a statement that diagrams are illustrative only, that They are not intended to convey a required architectural style. Rather the objective standards aim to accommodate a variety of styles, construction types.
 - *Applicability:* Suggestions:
 - Include a list of the zoning districts in which Housing Development Projects (as identified in California Gov. Code) and add a statement that the Objective Standards applies to both new construction and renovations.
 -

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- Include a statement to the effect that the streamlined approval process applies only if all objective standards are met, both those in these Objective Design Standards, and those in all other Town Regulation etc. (i.e. as listed on page one of the Objective Standards.
5. In order to submit this by 11:00 my additional comments on landscaping, private and common space and illustration/photos will follow tomorrow.

Thank you for your consideration.

Lee Quintana

To Planning Commission
Item 2 August 24th Planning Commission Meeting
From: Lee Quintana

COMMENTS ON TOWN OF LOS GATOS
DRAFT OBJECTIVE STANDARDS,
AUGUST 24, 2022

GENERAL COMMENTS:

Comprehensive stand alone document: It is my understanding, from previous public discussions of the Objective Guidelines, that the Objective Standards would be a comprehensive “stand alone” document containing the objective standards from all relevant documents and regulations. It is difficult to assess the Draft Objective Standards without knowing what other objective standards also apply to “qualified projects”. At a minimum, please consider adding a list of *all* objective standards contained . Consider adding a Table of all other objective standards that would apply to multi-family and mixed-use residential projects and include hyper-links to the individual standards.

PURPOSE AND APPLICABILITY

This section defines “qualifying project” and where the definition can be found in the California Government Code. However it does not define “Objective Standards” as defined by the Government Code. Most importantly, it does not explain how these apply to the approval process for “qualifying projects”.

Please delete and revise the first paragraph to better define the purpose of Objective Standards, (streamlining approval process? .

Delete and ~~receive revise~~ the second paragraph and to include the following as part of that paragraph:

Gov. Code 65559.5 identifies Qualifying Housing Development Projects:

- Multi-family housing developments.
- Residential Mixed Use Housing developments with a minimum of two-thirds of the square footage is designated for residential use.
- Supportive and transitional housing development

Delete and revise the last paragraph as follows:

A Qualifying project shall be approved through a ministerial review process when the project complies with these Objective Site Standards as well as complying with all existing objective development regulations in the Town., including but not limited to the following:

- General Plan

- Town Code
- Guideline and Standards Near Streams
- Bicycle and Pedestrian Master Plan
- Parks and Public Works Standards
- Santa Clara County Fire Department Regulations.

ORGANIZATION

The Following Objective ~~Design~~ Standards are organized into two primary sections:.....

KEY TERMS

Community recreation space Delete and replace with: **Note: Separate the definitions for Community Recreation space in mixed use developments and multi-family developments as individual definitions.**

Community recreation space in a mixed use residential development means public gathering spaces such as: plazas, outdoor dining, squares, pocket parks, or other community areas for the use of the **general** public.

- Please clarify whether this applies to non-residential and residential parts of a mixed use residential project or just to the non-residential part.
- **Note: Residential uses in a mixed use development should have some opportunity for gathering space as do residents in a MF only development. - please modify here and in objective standards to include this.**
- Should the Community space require a public access easement. **?**
-

Community recreation space in multi-family developments means gathering spaces such as: play areas, pool areas, patios, rooftop decks, and other community areas available for the use of all residents.

- Please clarify whether this applies to projects just with MF zoning designation or applies to the multi-family part of a Mixed Use Residential Project **See Note above.**

Mixed Use means a development project where a variety of uses such as office, commercial, or institutional, ~~and residential~~ are combined with residential use(s) in a single building or on a single site in an integrated project.

Private recreation space above ground level means an outdoor balcony, or rooftop deck, ~~or similar~~, accessible from a single dwelling unit.

similar” = subjective. Delete or replace with more specific language

Note: Add a space to separate above and at ground private recreation space

Private recreation space at ground level means ~~a single~~ an outdoor enclosed patio or deck accessible from a single dwelling unit.

Objective Standard means.....(add language)

A .SITE STANDARDS

A.1 Pedestrian Access

1.2 & Figure A.1.1: Is there a minimum width for the sidewalk? Or for the planting strip

A.2 Bicycle Access

2.4. 1.2 was “modified from walkway” to “pathway”. Should 2.4 also be changed to “pathway as well?”

A.3 Vehicular Access and A.4 Parking Location and Design

Figure A.3.1, A.3.1 and A4.3 need clarification

What is the difference between aisle to aisle circulation (A3.1) and parking areas (Figure A3.1)? Does Figure A.3.1 represent multiple parking areas (see A.4.2) or aisle-to-aisle circulation of A.3.1.

4.3 *Comment:* Consider decreasing spacing between trees. Aside from aesthetic value, the shading trees decrease radiation from the parking lot surfaces

Note: Shading from trees also lowers the temperature in cars. Consider adding a standard to ensure X% of parking spaces are shaded, or that addresses of trees to optimize shading (relates to Climate Change, energy, resiliency etc)n

4.4 Move 4.4 up under 4.1

Note:

I still suggest moving 4.4 up under 4.1 or combining the two as follows:

Except for driveways to access surface parking lots or carports, surface parking lots and carports shall not be located between ~~the~~ a primary building frontage and the street.

A.5 Parking Structure Access

Add a standard for pedestrian access to a parking garage

A.6 Utilities

6.3-Delete and separate ground and rooftop:

6.3 Views from the street of ground level utility cabinets, mechanical equipment, trash enclosures shall be screened from view.

- a. Screening shall be provided by landscaping, fencing or a wall.
- b. The screening shall be at least the same height as the utility being screened.
Comment: Should they also be screened from within a site? Or at a minimum from common areas?

6.4 Rooftop mechanical equipment shall be screened from view from the street

- a. Solar equipment is exempt from this requirement

Consider a height exemption of the area required for an elevator shaft.

Note: I still think my comments under A.6, including screening utilities from within the site, are valid and should be incorporated.

A.7 Landscaping and Landscape Screening

A.7.2.c *Comment:* Is there a requirement for planting between the trees?

Note: Suggest requiring shrubs between the trees X high at planting

A.10. Landscaping, Private, and Community Recreation Spaces

A10.1. The following landscaped, private, and community recreation spaces shall be ~~are~~ required for all qualifying projects and ~~are~~ shall be calculated independent of each other:

A.11 Building Placement

~~41.1. 10.c.~~ 10.c. How shade is calculated needs to be more specific.

Note: Break this paragraph up into:

- Minimum dimensions.....
- % of to sky
- % shading

B.4 Facade Design and Articulation

4.3 Change format consistent with the rest of the document

B. BUILDING DESIGN

B.1.3.e and Figure B.1.3..e

Comment: I don't understand this one. The illustration does not fit my understanding of a courtyard. Is this intended to be private the private use of the dwelling units? Is this an illustration of B.1.3 (Townhouse)

B.2.2 If the intent is to prevent full transparency into the structure, should there be a minimum as well as a maximum?

B.3 Roof Design

Figure B.3.3 *Comment:* This figure looks more like the gable illustrated in Figure.3.1 than it looks like a dormer

B.4 Facade Design and Articulation

B.4.3 Why change in format?

Architect Comments with Staff Responses *(in italic font)*

GENERAL

1. The Planning Dept needs to make sure the Planning Commissioners understand that these design guidelines/standards are not to be referred to or used at all when evaluating Discretionary Review projects that go through the normal DRC/PC approval process. The two processes are mutually exclusive, and Discretionary projects should be reviewed on their own merits. It must be understood and clearly stated that these “Standards” are not to be considered a standard that is compared to projects that do not apply for this streamlined process. These standards are not standards of excellence and should never be considered as such.
 - *Staff supports this recommendation and can include an additional statement when forwarding do Town Council.*
2. Could there be a tiered system for some of these requirements? Projects that are 3 units or 50 units or 500 units shouldn’t necessarily have the same standards.
 - *Although Objective Standards could be developed to differ depending on project size, the metric for most Standards has generally been applied to the street-facing façade. They have also been developed under the assumption that most projects will be 3-stories or less based on current height limits, and therefore significant differentiation may not be warranted.*

KEY TERMS

3. Are community recreation space and landscaped areas mutually exclusive?
 - *Yes, per A.10.1, “the following landscaped, private, and community recreation spaces are required for all qualifying projects and are calculated independent of each other.”*
4. In community areas, is there a minimum size of such ap space? How big must it be to have it considered community space? Example: could a widened, paved node at a pathway intersection be considered community space? Like with a bench?
 - *Yes, minimum horizontal dimensions are 10’ by 6’ for each area.*
5. Does landscape area include pathways? A pathway is not included in the list of elements that are considered to not be a part of “Landscaping.” (additional site open space and/or maximum lot coverage standards exist in the Municipal Code.)
 - *If landscaping is proposed along the walkway, it would count towards the landscaped space requirement. A pathway/walkway without landscaping would not count.*

A.10 LANDSCAPE, PRIVATE, AND COMMUNITY RECREATION SPACES

6. Does landscape area mean any and all planted areas, including planters and pots on every floor?
 - *Area used for landscaped, private, and community recreation spaces are calculated independent of each other with no area counted twice, additional clarity could be added.*

7. Private recreation space should be proportionally based on the size of the unit. The Palo Alto standards require just 50 SF for each unit regardless of which floor or unit size. We propose a requirement of 10% of the living area. A 500 SF studio should not be required to have a 10'x15' balcony. There could be a minimum as well, 50 SF, so that it must still be able to hold a couple of people comfortably.
 - *The private recreation space standard was included for consistency with Town Code Section 29.10.065. Section A.10.1 requires each new dwelling unit to have private recreation space: 200 square feet on the ground floor, and 120 square feet above the ground floor. If the Planning Commission recommends an adjustment to this requirement, staff recommends ensuring there are still minimum dimension requirements.*
8. Can the required recreation space be broken down into many smaller community spaces? If so, what are the minimum dimensions? (Refer back to key terms comment.)
 - *Yes, if each area is a minimum of 6' by 10' for both community and private recreation spaces (A.10.1).*

A.11 BUILDING PLACEMENT

9. Requirement 11.1 states that 75% of the ground floor of a building shall be placed within 5 feet of the front & street side setbacks. Does this mean all the buildings on site? Does this mean 75% of the entire street frontage must have a building on its frontage? Or only the buildings that abut the street when multiple buildings are on site? Will buildings be calculated individually? What about corner lots and corner open plazas?
 - *This draft standard is currently worded to apply only to proposed buildings. The requirement applies to the buildings, not the street frontage. This does not mean that 75 percent of the street frontage needs buildings along the front; instead, it means that 75 percent of the area of the primary building(s) proposed must be on the street frontage (see Figure A.11.1).*
10. Requirement 11.2 states that there must be between 15-30% of the street frontage area shall have site amenities. If a restaurant is at this ground floor, and they would like the whole frontage to be tables & chairs and landscaping, how can they meet the 30% max. Why is a maximum necessary?
 - *Staff agrees that the maximum percentage could be deleted. The maximum percentage was initially included to ensure visibility to ground floor commercial uses.*

B.1 BUILDING DESIGN - Massing & Scale

11. Do these options apply to each individual building that abuts the street separately? Does this apply to buildings on site that do not abut the street?
 - *Staff can clarify that this requirement applies to the combined area of all primary buildings that face and abut the street.*
12. Some of these options seem mutually exclusive. How would a continuous arcade, continuously vertical recessed entries and recessed courtyards all exist on the same building facade? How would any of these options work with the arcade?
 - *Staff agrees that the arcade (B.1.1.d) and recessed building entry (B.1.1.c) options could not be used together unless the "full height of the façade" requirement is removed from B.1.1.c. An additional option would be to remove the arcade option. Staff looks for direction from the Planning Commission.*

13. Longer buildings and corner buildings will look monotonous with a continuous arcade. And architecturally speaking not attractive unless in a very particular setting. Shouldn't this option be contingent on the length of the building? When over 80 or 100 ft long, a 2/3 arcade approach could apply? And special treatment for corner lots. What about open corner plazas?
 - *If the Planning Commission agrees, staff can remove the arcade option (B.1.1.d) or include a limit when the building façade is over a certain length.*
14. There should be an entire section that deals with corner lots, with points awarded for an open plaza/public amenity at the corner, or a tower at a corner (with a height increase exception for the tower), or another creative way to highlight/celebrate a corner, etc. although maybe too complex for this cookie cutter approach document.
 - *Though not currently included, these could be developed in the future.*
15. B.1.1c suggests entries should be recessed all the way up the entire building height, but it is not good practice to have uncovered entries. How will this option be beneficial? Would a roof/covered porch at these entries be allowed for this option? Especially when this conflicts directly with the recommendation for a 3' recessed entry per diagram B.4.6a. If any fenestration element needs an awning it's the entrance.
 - *A covered awning or eave would be allowed as long as the wall plane for the entry is recessed. Staff can clarify that this requirement applies to the wall plane, and projections such as awnings beyond the wall plane would be allowed.*
16. Option B.1.1f offers pilasters as an option, but pilasters are much less about massing as they are about facade articulation. Shouldn't this be in section B.4?
 - *The pilaster option was added here as it would break up massing, but could be relocated.*

B.3 ROOF DESIGN

17. B.3 illustration has all pitched roofs This is not exemplary of most modern architecture and seems to show favor for sloped pitches. Offer more examples of flat roofs with eaves or parapets.
 - *Staff recommends keeping the text of this standard, but deleting the graphic.*

B.4 FACADE DESIGN & ARTICULATION

18. B.4.1d & f shows a continuous belly band and cornice. Do these bands have to be continuous and unbroken? The pop outs, recesses, and continuous pilasters suggested in the other options would not be very harmonious with these options. These also seem to conflict with the recessed courtyards and entries and recessed upper floors if the bands must be continuous. What about different roof heights? This option is not very compatible with many other design elements suggested.
 - *Staff can remove the belly band option (B.4.1.d).*
19. B.4.1d - A 10" tall belly band is quite thick for a modern line. This suggests only a traditional style building will be allowed. Palo Alto objectives require 4" min, not 10" min.
 - *Staff can remove the belly band option (B.4.1.d), or the standard can be revised to reflect Palo Alto's four-inch requirement.*

20. B.4.1f - Requiring a “floor to ceiling height” is a structural dimension that is measured in a cross section and cannot be perceived from the outside. The height between the top of the top windows and the top of the parapet is what is perceived. Is this what is supposed to be 24” + lower floor framing/ceiling assembly height? Interior finishes, such as dropped ceilings should not be part of this calculation as they are not perceived from the outside. How does a sloped interior ceiling height get calculated? It’s really the facade height, parapet height, etc that should be controlled.
- *Staff agrees and can work with the Consultant to update the standard to apply to the exterior façade height.*
21. B4.2 - When a building side facade is on the property line or within 5' of it, how can this requirement be fulfilled? Windows are not allowed. Further, expensive accent materials, that can enhance a street side facade will be wasted money on a side no one can see. This will prohibit small amounts of high end exterior materials from being used at all.
- *This section refers to window types, not windows in general. The Commission directed staff to include a 360-degree architecture requirement.*
22. B.4.3 - Almost all of the first listed architectural features are found in the previous section under B.4.1. These are redundant.
- *Section B.4.1 includes four items that are listed under B.4.3 (awnings, belly bands, balconies, and material changes); however, B.4.1 only applies to buildings greater than two stories, while B.4.1 applies to buildings greater than one-story. Due to the requirements in Section B.4.1, buildings greater than two-stories will already have implemented some of the requirements in B.4.3. Section B.4.3 is to ensure that buildings greater than one-story also include façade variations.*
23. B.4.3 - Who will determine if a particular architectural “solution”, aka decorative feature, will constitute points? Will one juliet balcony, or planter box mean the points are achieved? One chimney, one bay window? This points system lacks specificity and at the same time is entirely too specific about traditional style architectural features. Most of these features are entirely inappropriate on modern architecture. When we say “Bay Window”, can we add in “or Box Window”, and “angled Box Window”? The term Bay Window is too specific/limiting. And what about the unfortunate designer that decides “hey maybe I’ll take one of each thing on the menu?” One bay window, one planter, one awning, one pilaster, one arcade - oh wait maybe two, one balcony, one trellis, one braced overhang, one corbel, one scoop with sprinkles, and why don’t you just throw in a 10” thick caramel flavored belly band just for fun”. Are we making an ice cream sundae here? In my absurd example, the Town would have no choice but to approve it as long they scored the minimum 16 points” To quote their own language: “ . . . by incorporating any combination of the following architectural solution to achieve a minimum of 16 points” with no mention of any cohesive design theme, scale, proportion, repetition, cadence, architectural nuance, color, materials, etc.
- *Staff can either add greater specificity for certain items or remove this requirement. Staff looks for direction from the Planning Commission.*
24. B.4.5 - This illustration should be stricken of the “Architectural Features” pilasters. Not Good
- *The illustration showing the column or “architectural feature” was a specific request from a previous Planning Commission hearing, but it could be removed.*

25. B.4.6a - This requirement seems to conflict with the vertically continuously recessed entry option from section B.1.1c.
- *This section requires recessed entries or covered entries. Additionally, Section B.1.1.C refers to the wall plane, not an awning projection. Staff can clarify that B.1.1.c applies to the wall plane.*
26. B.4.6b - How about adding in another drawing that shows glass extending to the floor? Why say between 2 and 10 feet above the sidewalk? Why can't the glass extend to the sidewalk?
- *Glass can extend down to the grade, but it wouldn't count towards the 60 percent requirement between two and 10 feet.*
27. B.4.10 - Wouldn't it be more appropriate to have a setback to roof top decks and balconies, rather than prohibiting them entirely from a building? The building could be very large and deep. What about a daylight plane?
- *This change could be made if recommended by Planning Commission.*
28. B.4.11 - Why can't the balconies extend beyond the footprint if you can prove that views to residential uses are prevented?
- *As previously discussed, this is included as one method for objectively reducing privacy impacts.*
29. B.4.12 - Why is this even a section? Isn't this all covered in great detail in the previous sections?
- *This standard was developed from Planning Commission Subcommittee direction to restrict long, unarticulated buildings fronting the street.*

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