

Design Review & Historic Preservation Board Meeting Agenda

The City is providing a hybrid meeting option which will allow for attendance inperson (City Hall, Room 504 - 5th floor), or by remote access via internet and phone. The meeting can be watched and listened to via this conferencing link: https://zoom.us/, click Join a Meeting, Meeting ID: 869 3570 9546, password is 430783. To join the meeting by phone, dial 253-215-8782 and use the same Meeting ID and password as listed above.

Written comments will be accepted at MichelleO@puyallupwa.gov until 3:00 p.m. and be distributed to the Board prior to the meeting.

Thursday, May 4, 2023 4:00 PM

ROLL CALL

APPROVAL OF THE AGENDA

CITIZEN COMMENTS

CONSIDERATION OF MINUTES

Consideration of Minutes - April 6, 2023 April 6, 2023 Draft DRHPB Minutes

1. WORKSESSION TOPICS

1.a Certificate of Appropriateness REVISION - Historic Property - Harris Building (PLCOA20220168)

April 25, 2023 Staff Memo

Floor Plan and Elevations for Revision

New proposed door

Original proposed door

Site Plan

January 19, 2023 COA Decision

January 11, 2023 Staff Report

- 1.b Design Review Application DDG Bradley Heights Multi-Family Project (PLDDG20220021)
 - A) Staff Report
 - B) Design Review Package
 - C) DDG Staff Review Table

2. OTHER BOARD BUSINESS

ADJOURNMENT



Design Review & Historic Preservation Board Agenda Item Report

Submitted by: Kendall Wals

Submitting Department: Development & Permitting Services

Meeting Date: May 4, 2023

Subject:

Certificate of Appropriateness REVISION - Historic Property - Harris Building (PLCOA20220168)

Presenter:

Kendall Wals, Senior Planner | 253-841-5462 | kwals@puyallupwa.gov

Recommendation:

Review, Deliberate, Decision

Background:

The Harris Building, located at 1102 E Main, was listed on the city's local historic register in September 2022. The applicant subsequently applied for Certificate of Appropriateness (COA) review for proposed changes to the subject property, as required by city code. The Board reviewed the COA application at the January 19, 2023 meeting and issued a decision of approval. The applicant is now requesting approval for a revision to the original COA application, which includes the proposed change in material for one new exterior door located on the west building elevation, towards the back of the building. Please refer to the attached staff memo and materials for more information. A decision on the proposed revision is being requested by the Board at the May 4, 2023 meeting.

ATTACHMENTS

April 25, 2023 Staff Memo Floor Plan and Elevations for Revision New proposed door Original proposed door Site Plan January 19, 2023 COA Decision January 11, 2023 Staff Report



City of Puyallup

Planning Division

333 S. Meridian, Puyallup, WA 98371

(253) 864-4165 www.cityofpuyallup.org

To: Design Review and Historic Preservation Board

From: Kendall Wals, Senior Planner **Subject**: **Harris building revisions**

Date of memo: April 25, 2023
Date of meeting: May 4, 2023

BACKGROUND

The "Harris Building" located at 1102 E Main was listed on the city's local historic register in September 2022. The property owner, John Hopkins, subsequently applied for Certificate of Appropriateness (COA) review for proposed changed to the subject building under permit number PLCOA20220168. The Board reviewed and issued an approval at their January 19, 2023 meeting; the decision is attached to the agenda packet for reference. Mr. Hopkins has a building permit currently under review for the changes to the building but has run into an issue with a proposed door; therefore, he is requesting Board review of a proposed revision to the original COA application.

Please refer to the original staff report (attached to agenda packet) for a vicinity map of the subject property, background information on its historical significance, the previous proposal and analysis of the criteria.

PROPOSED REVISION

The original proposal included the replacement of one exterior window on the west building elevation (located on the horse stall portion of the building) for compliance with building code requirements. The proposed door consisted of mostly glass in a grid pattern. Please see the callouts on the "Floor Plan and Elevation" drawings, as well as the "Original Proposed Door" attachment for a visual of the door location and material. While sourcing materials for the project, it was discovered that the original proposed door is made for residential structures, not commercial construction, and is not "crash friendly" (i.e., motor vehicle conflicts, as this is off the parking area). As a result, the applicant is requesting only to modify the one door with a solid door material. Details on the new door material are provided in the agenda packet.

REVIEW CRITERIA & ANALYSIS

In accordance with Puyallup Municipal Code (PMC) Section <u>21.22.030</u>, no person shall change the use, construct any new building or structure, or reconstruct, alter, restore, remodel, repair, move or demolish any existing property on the Puyallup historic register without review by the Board and without receipt of a "certificate of appropriateness".

In determining whether to approve an application for a certificate of appropriateness, the Board shall use the standards for rehabilitation and maintenance of historic properties as provided for in WAC $\underline{254-20-100}$ – the Washington State Advisory Council's Standards for Rehabilitation and Maintenance of Historic Properties. In staff's review of the Washington State Advisory Council Standards for Rehabilitation, it appears that the subject revision would only need to be analyzed under criterion I(b):

The distinguishing original qualities or character of a building, structure or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural features should be avoided when possible.

Analysis: The exterior window of one of the original horse stalls is proposed to be replaced with a new exterior door, which was noted in the original application as being a building code requirement for

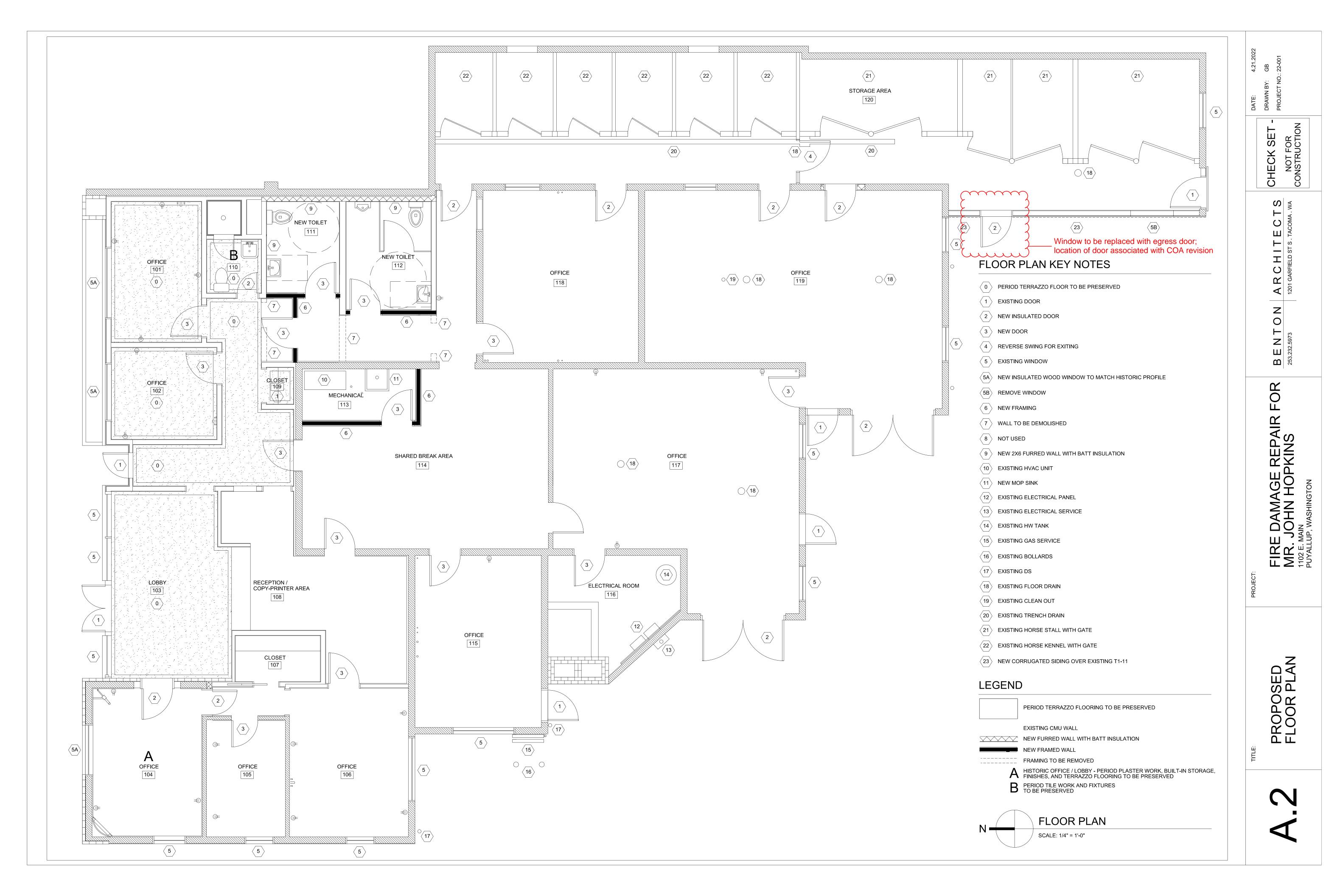
building egress purposes. The proposed door material in the original COA application included windows for the majority of the door, with the intent of honoring the period style and architecture of the building. However, after further research the applicant found that the proposed door material is not suitable for commercial construction and would not protect against potential collision with the building. Therefore, the applicant is proposing a solid door in this proposed revision.

During the Board's original reviews of the building, staff recalls discussion about the fact that the dog run/horse stalls portion of the building were constructed following the original building construction and did not appear to contain architectural characteristics of the "post war modern architecture" which is evident on the front façade. But the dog run/horse stalls did demonstrate the historical use/function of the building. Further, the applicant notes that the original use of that portion of the building was for caring of horses and large livestock, in which glass doors would not have been suitable.

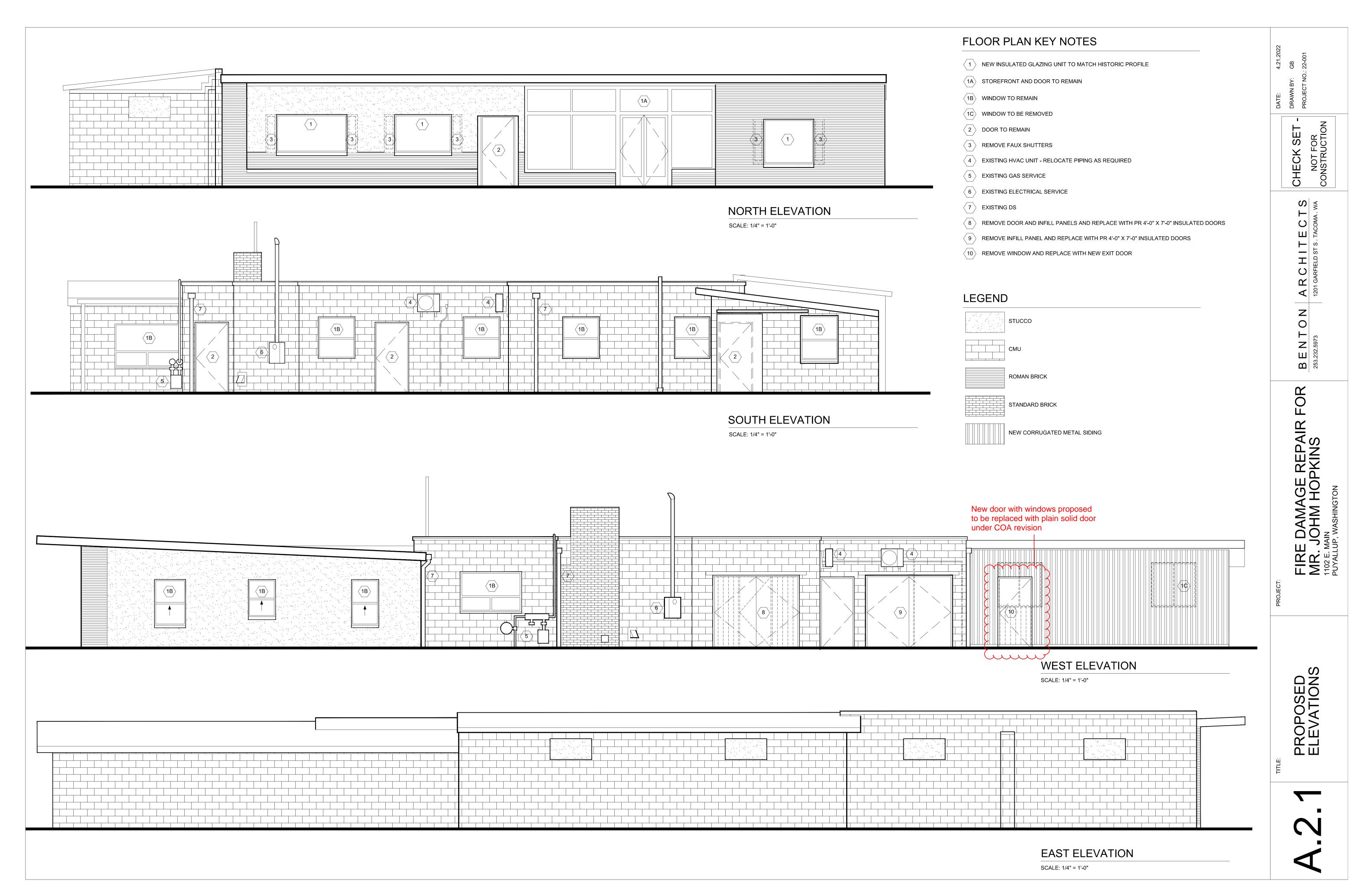
As a result, staff finds the revision proposal to meet this criterion.

STAFF RECOMMENDATION

Staff finds the proposed revision to the original Certificate of Appropriateness application (PLCOA20220168) to be generally consistent with the Washington State Advisory Council's Standards for the Rehabilitation of Historic Properties (WAC 254-20-100) based on the analysis and findings provided above and in the original staff report dated January 11, 2023; therefore, staff recommends the Board approve the proposed modification.



œ

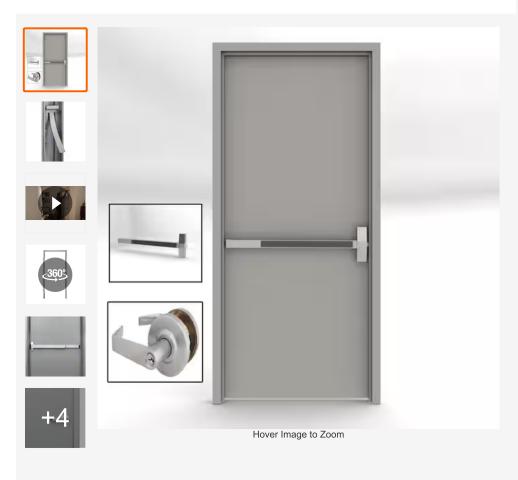


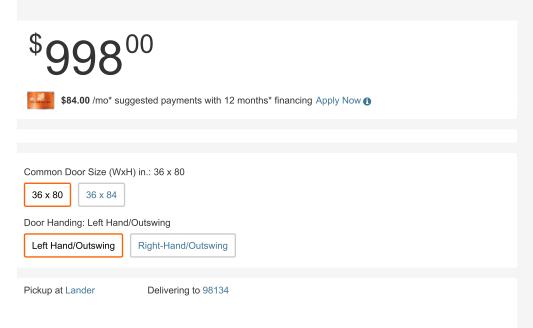
969

L.I.F Industries

36 in. x 80 in. Gray Flush Exit Left-Hand Fire Proof Steel Prehung Commercial Door with Welded Frame

***** (43) V Questions & Answers (58)





1/10



Hover Image to Zoom

36 in. x 80 in. Gray Flush Exit Left-Hand Fire Proof Steel Prehung Commercial Door with Welded Frame

by L.I.F Industries

Related Videos & 360° View







Product Images









Ship to Store

May 22 - May 25 58 available

FREE

Delivery

May 24 - May 31 58 available

Have Questions? We're Here to Help.

Speak to a Virtual Associate about Doors or Windows today.

Monday - Friday from 9AM - 11PM ET &

Saturday - Sunday from 9AM - 9PM ET.

Request Appointment y

What to Expect

Or call 1-833-HD-APRON(1-833-432-7766)



Product Details

Heavy duty steel flush unit with exit device and commercial grade lever entrance trim installed and welded frame. Complete with a commercial grade lever entrance Trim set and spring hinges in a satin chrome finish. Equipped with a 90-minutes fire and smoke label. Manufactured with the highest quality Galvanneal steel that is satin smooth to the touch and ready to receive premium latex or oil based paint once cleaned. Even though it looks like raw steel it is not. The Priming process is done at the Steel Mill when the steel is being manufactured. Included with the order are the Installation Instructions which include a detailed summary of the priming process and Finish Painting Guidelines. The Frame is made for a wall thickness of 4-7/8 in. and used primarily in new masonry or drywall construction when the wall is being built. Frame comes complete with combination anchors for either masonry or drywall applications. Installation instructions as well as finishing guidelines and warranty information can be downloaded for your convenience.

Additional Resources

From the Manufacturer

Specifications

Dimensions

| Actual Door Height (in.) | 79 in |
|------------------------------|-----------|
| Actual Door Thickness (in.) | 1.75 |
| Actual Door Width (in.) | 35.75 in |
| Door Height (in.) | 80 in |
| Door Width (in.) | 35.75 in |
| Nominal Door Height (in.) | 80 in |
| Nominal Door Thickness (in.) | 2 in |
| Nominal Door Width (in.) | 36 in |
| Rough Opening Height (In.) | 82.125 in |
| Rough Opening Width (In.) | 40.25 in |

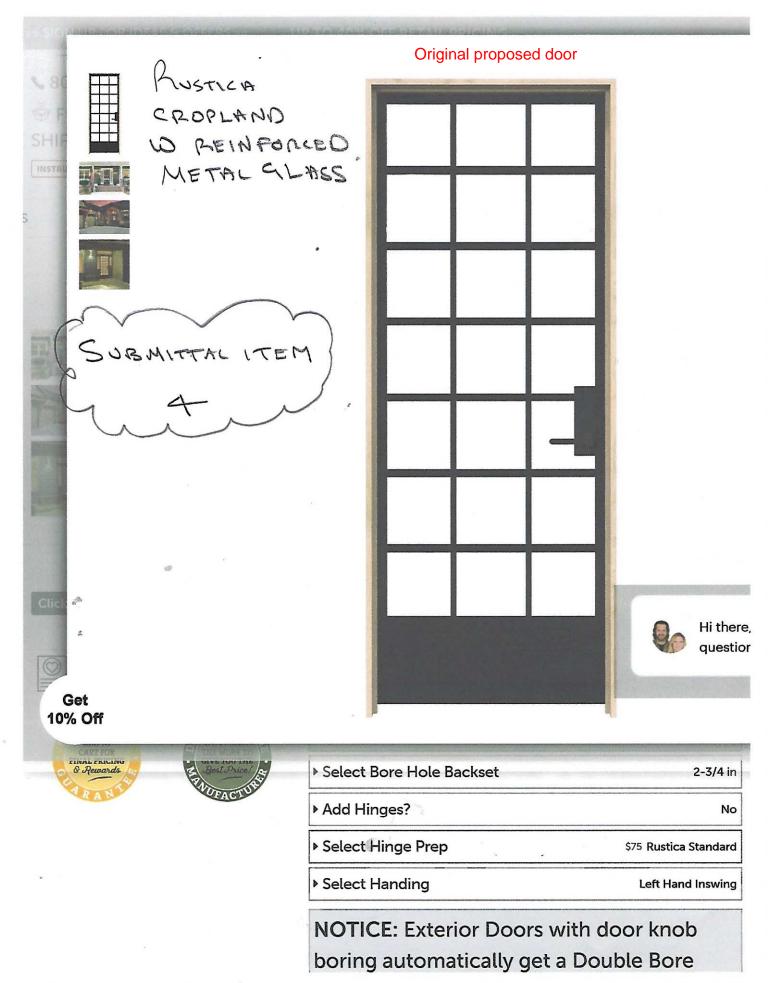
Details

| Bore Type | Single Bore |
|----------------------|------------------------|
| Color Family | Gray |
| Color/Finish | Gray |
| Commercial | Yes |
| Door Configuration | Single Door |
| Door Depth (in.) | 1.75 in |
| Door Handing | Left Hand/Outswing |
| Door Type | Exterior Prehung |
| Features | No Additional Features |
| Finish Type | Primed |
| Frame Material | Steel |
| Hinge Finish | Chrome |
| Hinge Type | Spring |
| Included | Lockset |
| Material | Steel |
| Number of Hinges | 3 |
| Product Weight (lb.) | 120 lb |
| Returnable | 90-Day |

Warranty / Certifications

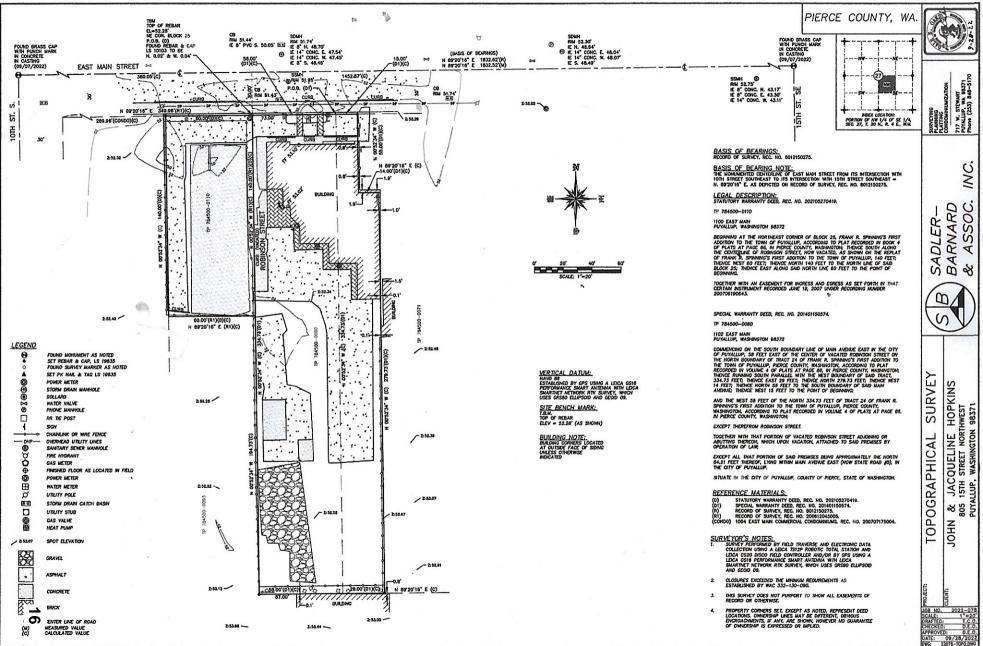
4/24/23, 9:43 AM L.I.F Industries 36 in. x 80 in. Gray Flush Exit Left-Hand Fire Proof Steel Prehung Commercial Door with Welded Frame UWX368...

| Fire rating | 90 minute |
|-----------------------|----------------|
| Manufacturer Warranty | 1 Year limited |
| | |



https://rustica.com/cropland-exterior-door/

12/10/22, 7:13 PM Page 1 of 4





Date

City of Puyallup

Planning Division 333 S. Meridian, Puyallup, WA 98371 (253) 864-4165 www.cityofpuyallup.org

Certificate of Appropriateness Decision

CITY USE ONLY

Case Number: PLCOA20220168

DRHPB Meeting Date: January 19, 2023

NAME OF PROJECT: Harris building revisions

PROJECT DESCRIPTION: Proposed interior and exterior changes to the "Harris Building", a property listed on the local historic register.

| | APPROVED. Issue the building permit as proposed. |
|------|---|
| | APPROVED WITH CONDITIONS. Issue the building permit in accordance with conditions. |
| | DENIED. Do not issue the building permit or allow work. |
| DRH | PB Representative Signature |
| 1-20 | -2023 |

APPEALS: In accordance with PMC 2.29.080, appeals of board decisions shall be to the hearing examiner. Appeals shall be filed with the city clerk within 10 calendar days after the date of the board's decision. A notice of appeal shall be in writing, signed by the appellant, accompanied by the required appeal fee (\$570), and shall contain the following information:

- (a) Appellant's name, address and phone number;
- (b) A description of standing, as the applicant or applicant's representative authorized to appeal;
- (c) Identification of the application and decision which is the subject of the appeal;
- (d) A brief statement of grounds for appeal; and
- (e) A statement of the relief sought.

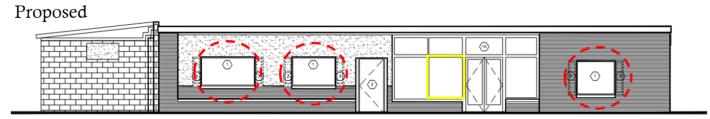
Certificate of Appropriateness Determination Harris building revisions

FINDINGS OF FACT:

- 1. The subject property was listed on the local historic register in 2022.
- 2. In accordance with PMC 21.22.030, no person shall change the use, construct any new building or structure, or reconstruct, alter, restore, remodel, repair, move, or demolish any existing property on the Puyallup historic register without review by the Board and without receipt of a certificate of appropriateness.
- 3. In determining whether to approve an application for a certificate of appropriateness, the Board shall use the standards for rehabilitation and maintenance of historic properties provided in WAC 254-20-100 Washington State Advisory Council Standards [PMC 21.22.030, subsection 3(d)].
- 4. In review of the proposed elevation drawings and application materials, the Design Review & Historic Preservation made the following findings based on the rehabilitation evaluation criteria of WAC 254-20-100. Subsection 1:
 - a. Based on the scope of work, the review criteria in subsections g and h are not applicable to the proposal; and,
 - b. The property was originally used as a veterinary clinic and office for nearly 50 years, and then later as an animal hospital and rescue. The applicant currently does not have a tenant in the space but has indicated that it is intended to be used as an office, which would continue the professional office and services use, and therefore is found to be consistent with the criterion of subsection I(a); and,
 - c. The proposed changes appear to largely consist of improving areas that are not original but previously altered to materials that would not be consistent with the original architecture or time period of the structure. The proposed changes largely avoid removing or altering historic materials or distinctive features of the structure, and the alterations are intended to be complementary to the original character of the building; therefore, the proposal is found to be consistent with subsections I(b) and I(c) of the evaluation criteria; and,
 - d. The newer vinyl windows proposed to be replaced and the TI-II exterior siding were not found to have acquired significance overtime, therefore the proposed improvements are found consistent with the subsection I(d); and,
 - e. The original terrazzo flooring was found to be a distinctive stylistic feature which is proposed to be retained, but a very limited amount will be removed where it's located on a portion of a wall proposed for demolition; as a result, the Board found consistency subsection I (e); and,
 - f. The proposed modifications are largely to areas that were previously changed, and the proposed replacements will be "like for like" or of materials more appropriate for the post war architectural style of the building; therefore, the proposal is found to be consistent with the criterion of subsection I(f); and,
 - g. The Board analyzed the proposed covering of TI-II siding with corrugated metal and found it would not destroy significant historical architecture or cultural material, and would be compatible with the existing building and surroundings; therefore, finding consistency with subsection I(i); and,
 - h. The removal of the former infill work will retore the prior exterior openings, and the other proposed improvements appear to not alter essential form and integrity of the structure; therefore, the Board found consistency with subsection I(j).
- 5. Please see the notes below for clarification on the approval for windows located on the north and west building elevations:
 - a. North Elevation: the three proposed window replacements for existing exterior windows on the north building façade, as shown on the proposed building elevation drawings (also captured

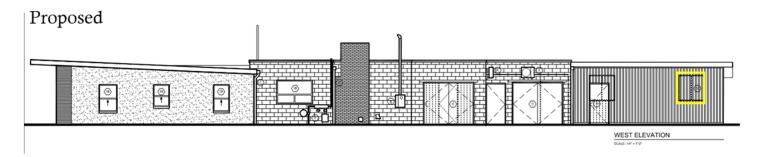
Certificate of Appropriateness Determination Harris building revisions

below and called out with red dashed circles), is what the Board approved in this determination (i.e. picture windows). In addition, one panel of the existing storefront window is also approved to be replaced "like for like"; the subject window panel denoted below with a yellow outline.



NORTH ELEVATION

b. West Elevation: the existing south window on the old horse stall, highlighted in yellow on the elevation drawing below, was shown on the elevation drawings to be eliminated; however, the applicant clarified at the meeting that it was not intended to be eliminated but replaced with a single-hung window, which was approved by the Board in this decision.





City of Puyallup

Planning Division

333 S. Meridian, Puyallup, WA 98371

(253) 864-4165

www.cityofpuyallup.org

To: Design Review and Historic Preservation Board

From: Kendall Wals, Senior Planner

RE: Harris Building Revisions, Project # PLCOA20220168

Date: January 11, 2023 Meeting Date: January 19, 2023

PROJECT OVERVIEW

Applicant: John Hopkins

Staff Coordinator: Kendall Wals, Senior Planner

Property Owner: HOPKINS JOHN L &

JACQUELINE E

Parcel ID#: 7845000080;

Recommendation Options:

- **I. Approve** the request, consistent with the staff recommendation.
- 2. Approve with modification.
- 3. Continue to a future date to obtain additional information or to further consider information presented. The next available meeting date is February 2, 2023.
- **4. Deny** the request and provide findings based on the required review criteria.

Proposal: Proposed changes to a property listed on the city's local historic register. Please see the proposal description section for more detailed information on the proposed changes.

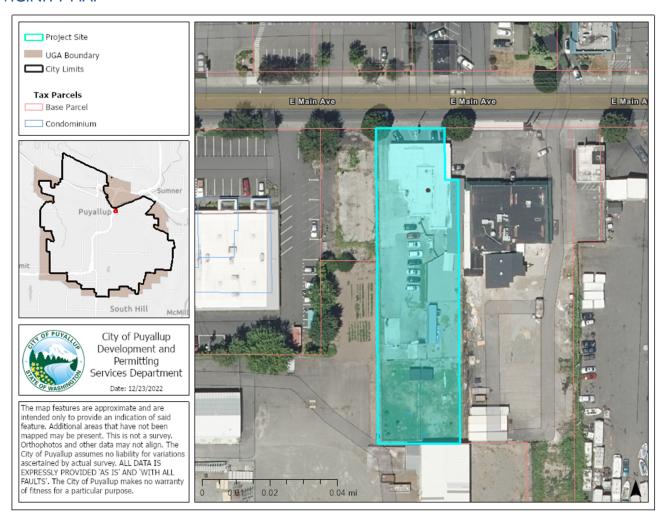
Relevant History:

The Board held a pre-application meeting with the applicant on historic register listing and the proposed changes to the subject building in September 2021; subsequently the property was listed on the Puyallup historic register in October, 2022.

Staff Recommendation:

Staff recommends approval based on the analysis of the required review criteria and findings provided in this staff report. However, staff also recommends the Board further analyze criteria "f" and "i" prior to making a final decision.

VICINITY MAP



BACKGROUND

The Board conducted pre-application review for the "Harris Building" on September 16, 2021, for historic register listing, as well as the proposed changes to the structure. The applicant subsequently applied for historic register listing, which was reviewed by the Board at a Public Hearing on August 18, 2022; the Board unanimously (4-0) recommended approval to City Council. The Council accepted the Board's recommendation and approved its listing on the city's Register of Historic Places on September 27, 2022.

The historic register nomination noted the historic significance of Dr. William F. Harris who established a veterinary clinic in Puyallup in 1946 and operated the clinic in the subject building from approximately 1949 to 1996. Harris was a well-known veterinarian in the area and member of several professional organizations, author of professional publications and guest speaker at professional events. The primary structure was built in 1949, with later additions of a "dog run" and horse stalls. The Harris Building character defining features were noted as being its post-war modern architecture; single-story construction with roman brick on the front façade set in a running band with strong horizontal and vertical elements, flat roof and elongated overhang at the storefront containing plate glass on a narrow base surrounding the main entry to the building. The nomination also noted original interior features such as original dividers in the dog run and horse stalls, unusual stucco finish, canning shelves, terrazzo flooring and ribbed cedar paneling, as well as classic tile in the bathroom.

The September 16, 2021 pre-application submittal included proposed exterior changes to windows, doors, roofing and paint. Site alterations were also identified which would alter the existing parking at the front of the building, walkways, widening of the existing driveway, and regrading of the existing parking lot area. The proposed exterior improvements in the current application are largely the same as discussed at the pre-application meeting, except for the proposed modification to an exterior wall that currently has TI-II siding and is proposed to be replaced with corrugated metal.

At the time of the pre-application meeting, Board members provided general feedback regarding the two areas that originally contained exterior garage doors but were previously modified and infilled with TI-II and man doors. The applicant requested Board input on these specific areas, and the following guidance was provided:

- Swinging doors or garage doors; historically, garage doors were a single unitary material that opened as one solid piece, rather than today's rolling garage doors that operate in sections close to the building.
- The infill areas are located at the back of the building and board members noted that due to their location the material used was, in general, less of a concern.
- Board members noted consideration of the function behind the subject doors and building code requirements when determining the type/style of the material used to modify the two subject areas.

PROPOSAL

The applicant requests formal Certificate of Appropriateness approval for proposed improvements to the exterior façade and minor changes to the interior.

Proposed Interior Changes

- Minor change to the original terrazzo flooring where it's extended up the wall in a new hallway location for new bathrooms
- Original canning shelves to be removed for a new bathroom
- Original bathroom will largely remain the same, except for upgrades to fixtures
- Replacement of interior doors that have been replaced over time; replacement material not specified
- Insulation will be restored in the building as it was previously removed due to fire damage
- One existing interior window to be reglazed

Proposed Exterior Changes

- Remove and replace two garage doors that were previously infilled with man doors and TI-11 with new garage doors
- Cover TI-II siding on the existing horse stall with corrugated iron
- New exterior door proposed at the location of an existing window at the north horse stall, which is a building code requirement for egress
- Replacement of the south horse stall window with a new single-hung window
- Replacement of one vandalized storefront window, like for like
- Replacement of three windows (two vinyl, one original damaged window) on the front façade with anodized aluminum single hung insulated windows

REVIEW CRITERIA

In accordance with Puyallup Municipal Code (PMC) Section <u>21.22.030</u>, no person shall change the use, construct any new building or structure, or reconstruct, alter, restore, remodel, repair, move or demolish any existing property on the Puyallup historic register without review by the Board and without receipt of a "certificate of appropriateness". Commencement of any work for a property on the Puyallup historic register without receiving a certificate of appropriateness is grounds for the board to review the property for removal from the register.

The review required shall apply to all features of the property, interior and exterior, which contribute to the property's designation on the register and are listed on the nomination form. In determining whether to approve an application for a certificate of appropriateness, the Board shall use the standards for rehabilitation and maintenance of historic properties as provided for in WAC <u>254-20-100</u>. The subject standards are provided in the analysis section below.

ANALYSIS

WAC 254-20-100 – Washington State Advisory Council's Standards for the Rehabilitation and Maintenance of Historic Properties. Analysis is provided for the subsection on rehabilitation only, as the maintenance criteria is only used at the time of special property tax valuation.

I. Rehabilitation

a) Every reasonable effort shall be made to provide a compatible use for an historic property which requires minimal alteration of the building, structure, or site and its environment, or to use an historic property for its originally intended purpose.

<u>Analysis:</u> The property was originally used as a veterinary clinic and office for many years, and then later as an animal hospital and rescue. The applicant currently does not have a tenant in the space but has indicated that it is intended to be used as an office space, which would continue the professional office and services use. Staff finds the project to be consistent with this criterion.

b) The distinguishing original qualities or character of a building, structure or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural features should be avoided when possible.

Analysis: The proposed changes appear to largely consist of improving areas that are not original but previously altered to materials that would not be consistent with the original architecture or time period of the structure. Two changes were noted in the interior, including removal of the original canning shelves and modification to the original terrazzo flooring for an area that will become a hallway for a new bathroom. Additionally, an exterior window in one of the original horse stalls is proposed to be replaced with a new exterior door, which was noted to be a building code requirement for building egress purposes. By the project description it appears the proposed changes have largely avoided removing or altering historic materials or distinctive features of the structure; therefore, staff finds the proposal to meet this criterion.

c) All buildings, structures, and sites shall be recognized as products of their own time. Alterations that have no historical basis and which seek to create an earlier appearance shall be discouraged.

Analysis: The proposed changes to windows on the frontage appear to be correcting prior replacements that were uncomplimentary to the original architectural style of the structure or replacing original windows with an appropriate material. The other exterior changes are proposed toward the rear of the building, which includes putting exterior garage doors back in place for two areas that were previously infilled with TI-II siding and newer exterior doors, as well as replacing TI-II siding material for a

portion of the building with corrugated metal. Based on the project description and the material information provided, staff finds consistency with this criterion.

d) Changes which may have taken place in the course of time are evidence of the history and development of a building, structure, or site and its environment. These changes may have acquired significance in their own right, and this significance shall be recognized and respected.

<u>Analysis:</u> The newer vinyl windows and TI-II exterior siding that were previously updated do not appear to have acquired significance over time. Staff finds that the proposed changes are consistent with this criterion.

e) Distinctive stylistic features or examples of skilled craftsmanship which characterize a building, structure, or site shall be treated with sensitivity.

<u>Analysis</u>: The project description notes minor modification to the original terrazzo flooring inside the building, which appears to be a distinctive stylistic feature. The applicant notes that the modification to the material is in a location where the tile is on the wall where a new hallway is proposed for new bathrooms. The remaining terrazzo flooring will be retained. Based on the description, it appears the material is being treated with sensitivity and minimal changes are proposed; therefore, staff finds consistency with this criterion.

f) Deteriorated architectural features shall be repaired rather than replaced, whenever possible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplication of features, substantiated by historic, physical, or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings or structures.

<u>Analysis:</u> Many of the features that are proposed to be replaced are ones that were previously modified. One of the storefront windows is proposed to be replaced "like for like" and three vinyl windows on the front façade are proposed to be replaced with adonized aluminum single hung insulated windows. In review of similar style buildings that were included in the architect's narrative with the original nomination (see attachment), the proposed replacement materials appear to be consistent with the type of architecture; <u>however, the Board should further analyze whether the proposed window replacements meet this criterion</u>.

g) The surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning methods that will damage the historic building materials shall not be undertaken.

Analysis: This criterion does not appear to apply in this case.

h) Every reasonable effort shall be made to protect and preserve archaeological resources affected by, or adjacent to, any project.

Analysis: This criterion does not appear to apply in this case.

i) Contemporary design for alterations and additions to existing properties shall not be discouraged when such alterations and additions do not destroy significant historical, architectural or cultural material, and such design is compatible with the size, scale, color, material, and character of the property, neighborhood, or environment.

<u>Analysis:</u> The applicant is proposing to replace TI-II siding for a portion of the building with corrugated metal. In general, staff finds that the proposed changes are consistent with this criterion; <u>however</u>, the <u>Board should consider whether the proposed material is compatible and consistent with this criterion</u>.

j) Wherever possible, new additions or alterations to structures shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired.

<u>Analysis:</u> The removal of the former infill work will retore the prior exterior openings. The other proposed improvements appear to not alter essential form and integrity of the structure. As a result, staff finds consistency with this criterion.

STAFF RECOMMENDATION

Staff finds the proposed improvements to be generally consistent with the Washington State Advisory Council's Standards for the Rehabilitation of Historic Properties (WAC 254-20-100) based on the analysis and findings provided above; therefore, staff recommends approval. However, staff also recommends the Board further analyze criteria "f" and "i" prior to making a final decision.

25