

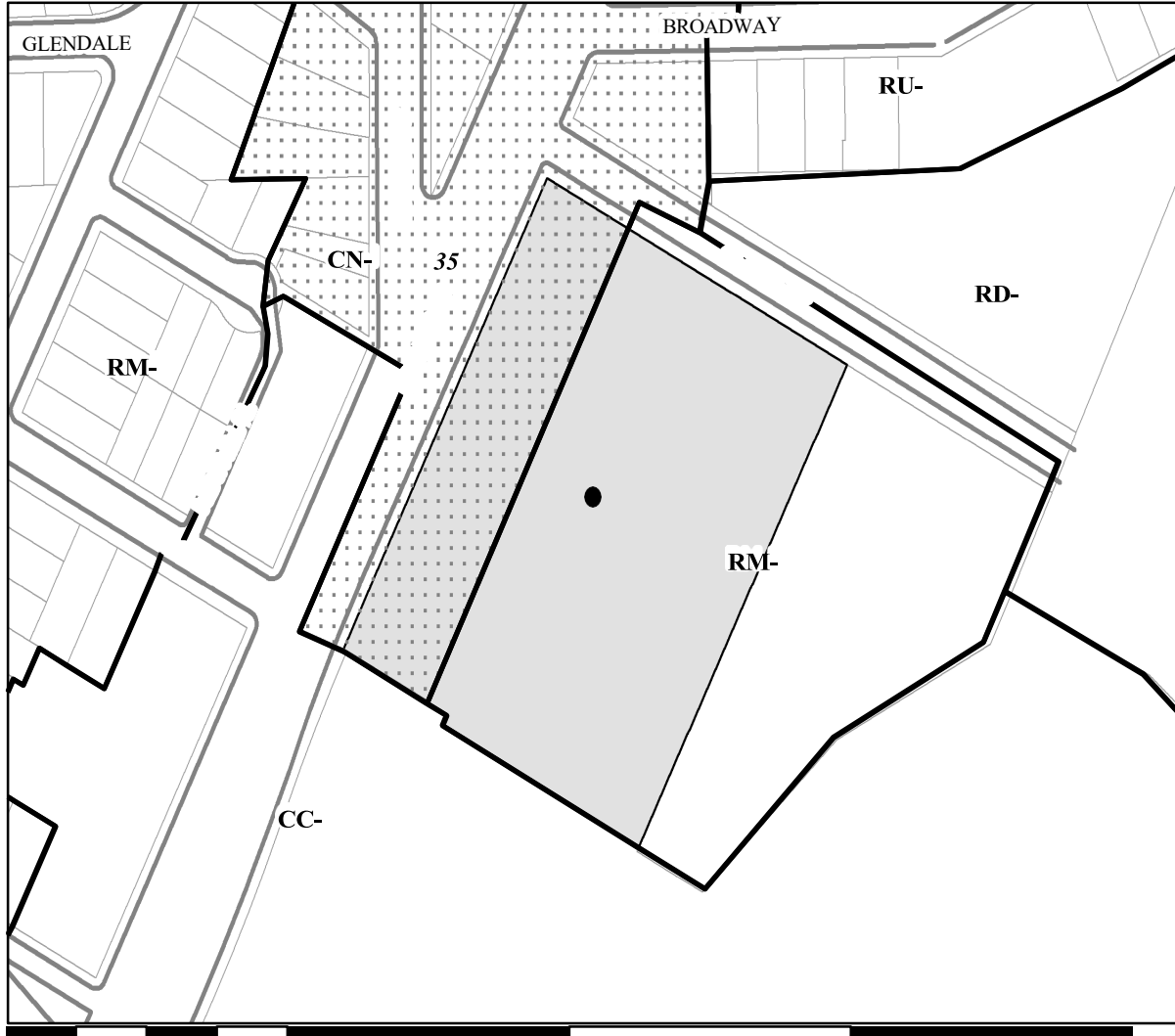
Landmarks Preservation Advisory Board

STAFF REPORT

September 12, 2022

Location:	5212 Broadway California College of Arts
Assessor's Parcel Number	014-124-300-101
Proposal:	<p>Redevelopment of the site as a 510 unit Planned Unit Development (PUD) project.</p> <ol style="list-style-type: none"> 1. Development of two buildings ranging in height from 45 feet to 90 feet. Building 1: Mixed use, 248 residential units and 6,982 Square Feet (SF) of commercial space, 233 parking spaces, 248 bicycle spaces. Building 2: Residential, 262 units, 35 parking spaces, 262 bicycle spaces. 2. Preservation and renovation of Carriage House (2,612 SF), Macky Hall (7,700 SF), Macky lawn (10,718 SF), the entry staircase, gate, Broadway wall, view corridor and art icons within the Treadwell Estate Landmark Designation. 3. Demolition of 10 buildings and the California College of the Arts Campus Historic District. 4. Private Open Space with Public Access (29,310 SF) and Public Event Space within the open space (14,263 SF) and on the first floor of Carriage House (1,487 SF). 5. General Plan Amendment: Change from Institution Land Use to Community Commercial Land Use. 6. Rezoning: Change from Mixed Use Residential (RM-3) and Neighborhood Center Commercial (CN-1) to Community Commercial (CC-2). Height change from 35 feet to 90 feet. 7. Design Guidelines for demolition and redevelopment of the campus.
Applicant:	Arts Campus LLC
Phone Number:	415-489-1313
Owner:	California College of the Arts
Case File Number:	PLN 20141, ER19003
Planning Permits Required:	Planned Unit Development, Design Review, Rezone, General Plan Amendment, Variance, Conditional Use Permit
General Plan:	Institutional, Urban Residential
Zoning:	CN-1, RM-3
Environmental Determination:	Environmental Impact Report (EIR) is required.
Historic Status:	Landmark, API, Campus District including 12 buildings: 4 A1+.4 B1+, and 4 C1+
City Council district:	1
Status:	Under Review
Staff Recommendation	Review and identify issues to be addressed
Finality of Decision:	Oakland City Council
For further information:	Contact Case Planner Rebecca Lind at (510) 238-3472 or by email at rlind@oaklandca.gov .

LANDMARKS PRESERVATION ADVISORY BOARD



Case File: Applicant: Address: Zone:
Maximum Height:

PLN 20141
Arts Campus LLC 5212 Broadway CN-1/ RM-3
35 ft

SUMMARY

The issue before the Landmarks Preservation Advisory Board (LPAB) is preliminary review of site- specific design guidelines for re-development at 5212 Broadway, the former California College of the Arts (CCA) Campus. In October 2020, an application for a Planned Unit Development Permit (PUD) was submitted for redevelopment of the site. The proposal includes demolition of substantial historic resources including the Campus District Area of Primary Importance (API) and 4 buildings individually eligible for rating on the California Register. The proposal also includes retention of a Landmark resource, the Treadwell Estate, a separate Area of Primary Importance (API) that overlaps the Campus boundary. The historic status of the CCA site triggers a high level of review under the Oakland Planning Code and mandatory findings apply to the re-development proposal. Design guidelines are intended to provide supplemental information to decision makers to support the required findings and to provide guidance for design review as part of the PUD. Staff requests the LPAB review and comment on the proposed PUD Design Guidelines

BACKGROUND

The site was used as a college campus and a center for arts education associated with the American of Arts and Craft Movement from 1922 to 2022. The California College of Arts consolidated its academic program in San Francisco over the last decade and completed its relocation to San Francisco in 2022. The site is now vacated with buildings and numerous site features remaining.

An environmental review application was received on March 21, 2019, under case file ER-19003, and an environmental impact report is in process. A development application was received for redevelopment of the site as a PUD, under case file PLN20141, on October 6, 2020.

An Historic Resources Evaluation (HRE) was prepared as part of the environmental review process and was made available to the public in November 2019. The HRE documents the following historic resources associated with the California College of Arts use of the site.

- The campus is a California Register and National Register-eligible historic district Criterion 1 (Events) and City of Oakland Area of Primary Importance (API).
- Four buildings are individually eligible for listing on the California Register under Criterion 3 (Architecture).
- Two structures, Macky Hall and the Carriage House, were designated as a City of Oakland Historic Landmark in August 1975 (LM 75-221), together with two sequoia trees, the Broadway Wall & Stairs, and an eighty-foot view corridor. This resource is referenced as the Treadwell Estate. The two buildings were listed on the National Register of Historic Places in 1977.
- The Treadwell Estate is also a City of Oakland API, based on the original Oakland City Historical Survey documentation from 1986.

PROJECT DESCRIPTION

The development application subject to the proposed Design Guidelines proposes replacement of the existing CCA campus with a new multifamily/mixed use development. The new development includes up to 510 units in residential buildings with parking, and a small amount of commercial

use on Broadway. The concept includes retaining the Treadwell Estate as an API bounded by the Broadway wall to the west, Clifton Street to the north and the property lines to the south and east. Macky Hall and Carriage House would be rehabilitated for commercial use. The Broadway wall, steps, and view corridor would be retained as part of private open space with public access. New outdoor public use areas are proposed along with enhancements to site access and installation of new landscaping.

The project requires a General Plan amendment from Institution Land Use to Community Commercial Land Use and rezoning from Mixed Use Residential (RM-3) and Neighborhood Center Commercial (CN-1) to Community Commercial (CC-2).

The proposed CC-2 zone allows modification of the design review process when a project is processed as a PUD. The Design Guidelines would be adopted as part of the PUD for the project and provide alternative standards and criteria for demolition and a replacement project, consistent with the mandatory findings in Planning Code section 17.135.070 for Landmarks, and 17.135.075 for projects within an API.

PROPERTY DESCRIPTION

The 3.9-acre site is located at 5200 Broadway in the Rockbridge neighborhood. This location is prominent along Broadway close to the terminus of College Avenue. The site is characterized by a steep upslope rising above Broadway which levels toward Clifton St. The site functions as a transition point in the urban fabric between residential neighborhoods, institutional uses, and the commercial corridor. Structures are between one and four stories in height, and range in date of construction from circa 1879-1881 (Macky Hall and the Carriage House) to 1992 (the Barclay Simpson Sculpture Studio). Access to the site is located on Broadway and Clifton Streets.

GENERAL PLAN ANALYSIS

An amendment is proposed to change from “Institution Land Use” which allows educational facilities, cultural and institutional uses, and residential/mixed uses which serve the permitted institutions, to “Community Commercial Land Use” Designation. This change would allow:

- “Stand alone” residential use that is not associated with an institution, and a wider range of commercial uses. Institutions including education and health facilities would still be allowed
- Change from no residential density to 125 dwelling units per gross acre; and
- Decrease non-residential FAR from 8 to 5.

ENVIRONMENTAL DETERMINATION

A Draft Environmental Impact Report (DEIR) is currently being prepared and will be available for public review at a future date.

KEY ISSUES AND IMPACTS

City staff requested site-specific design guidelines to provide documentation of how characteristics of the existing Campus and the surrounding neighborhood could be incorporated into redevelopment of the site and to identify how the existing Landmark properties could be rehabilitated and integrated into the new development. This information is needed to evaluate

whether the ultimate project design can be consistent with mandatory findings relating to the design quality of the replacement project and character of the district.

Findings Required for API Demolition and Future Development

Planning Code Section 17.153.075 c.3 requires that projects proposing demolition within an API meet the following findings.

a. *The design quality of the replacement structure is equal/superior to that of the existing structure; and*

b. *The design of the replacement project is compatible with the character of the district, and there is no erosion of design quality at the replacement project site and in the surrounding area. This includes, but is not necessarily limited to, the following additional findings:*

i. *The replacement project is compatible with the district in terms of massing, siting, rhythm, composition, patterns of openings, quality of material, and intensity of detailing*

ii. *New street frontage includes forms that reflect the widths and rhythm of the facades on the street and entrances that reflect the patterns on the street*

iii. *The replacement project provides high visual interest that either reflects the level and quality of visual interest of the district contributors or otherwise enhances the visual interest of the district*

iv. *If the design contrasts the new to the historic character, the replacement project enriches the historic character of the district*

v. *The replacement project is consistent with the visual cohesiveness of the district.*

vi. *The replacement project will not cause the district to lose its current historic status.*

Summary of Design Guidelines Proposed to Meet Required Findings

Staff and the applicant team are actively working on the requested guidelines which remain under review because the applicant team is still responding to staff comments. Two sections, which are important building blocks for the entire document, are presented for LAPB review and comment.

The first section is the *Summary of Design Response to Historical and Contextual Elements, (Design Response)* excerpted from Chapter 1 Vision. (Attachment 1) This section identifies:

- The features of the existing campus, Treadwell Estate, and the Broadway corridor/Rockridge neighborhood identified by the design consultant as essential characteristics of the district.
- A summary of design response for new construction.

The second section is the *Chapter 2 Buildings Design Guidelines Part 1.* (Attachment 2) This section identifies:

- Guidelines for preservation of Landmark properties and
- Preservation priorities for other buildings on the CCA site with historic resource ratings when or if proposed for retention.

Staff Analysis of Section 1 Design Response Summary and Section 2 Buildings Design Guidelines Part 1

Section 1 *Design Response* Summary (Attachment 1)

Staff evaluated the *Design Response* to evaluate whether site features and neighborhood features were clearly and adequately identified to provide a foundation for more detailed guidelines. The applicant’s draft (Attachment 1) compresses the existing site and neighborhood features into one design response for new construction. For this analysis they were separated, revealing topics that require clarification because the features referenced in some design strategies are not clear.

Analysis Matrix

Identified Campus Features	Proposed Design Response	Staff Comment
<p>Siting of buildings</p> <ul style="list-style-type: none"> • The existing buildings are located on the north and eastern portions on the site • Vehicular access is from Clifton, • Macky Hall has a defined footprint protected through the Landmark designation • Carriage House has separation from and a different ground elevation from Macky Hall, 	<ul style="list-style-type: none"> • New construction takes place on north and east side of the site, leaving surrounding area landscaped • Vehicular access is limited to Clifton, • Macky Hall to be rehabilitated within its existing footprint and Carriage House to be sited in similar orientation, with separation in keeping with Secretary of the Interior's Standards • In the event other campus building are rehabilitated, their location, siting, and setting are protected 	<ul style="list-style-type: none"> • Project proposal shows new construction on the south part of the site as well as the northern and eastern portions.

<ul style="list-style-type: none"> • Existing campus orientation faces toward the center of the site <ul style="list-style-type: none"> • Primary pedestrian paths lead from Broadway and the northeast part of the campus to the center. • Macky Hall and Macky Lawn are at the center. • Other buildings facades face the center of the site. 	<ul style="list-style-type: none"> •The orientation is retained for new construction • New pedestrian paths would lead to the center • New building facades facing the center would have ground floor and mid-rise rhythms similar to existing buildings 	<ul style="list-style-type: none"> • Macky is located at the center but faces Broadway Simpson Hall faces Broadway
<p>Existing buildings have differentiation in design and spatial relationships</p> <ul style="list-style-type: none"> • Buildings are different from one another in material, color, or fenestration rhythm, depth, and orientation. • Existing buildings are set back from Macky Hall and Carriage House and one another. •The various finished floor and entry elevations on sloped topography limit blank facades 	<p>Differentiation between new buildings proposed through material, color, or fenestration rhythm, depth, or orientation</p> <ul style="list-style-type: none"> • Proposed new construction would mimic existing building setbacks from Macky Hall and Carriage House • New construction would maintain a similar separation between buildings • Finished floor and entry elevations on sloped topography required for new construction • Height reductions required for new buildings surrounding Macky Hall 	<ul style="list-style-type: none"> • Clarification is needed providing examples the existing differentiation • Height variations should be considered throughout not just around Macky Hall.
<p>Design quality of the twelve existing buildings:</p> <ul style="list-style-type: none"> • Two of the buildings, Macky Hall and Carriage House are Landmarks • The existing massing of buildings adjacent to Macky Hall references its width and frames the Landmark building 	<ul style="list-style-type: none"> • New construction demonstrates a similar design quality to the twelve existing buildings and landmark buildings retain their design quality, • Massing adjacent to Macky Hall reference its width and frame the landmark building as the 	<ul style="list-style-type: none"> • Four of the buildings are A1+ rated and eligible for the California Register based on meritorious architecture. This factor needs to be referenced in a design quality discussion to meet the finding: <i>The design quality of the replacement structure is equal/superior to that of the</i>

<ul style="list-style-type: none"> • The exterior and interior architectural designs of Macky Hall and Carriage House meet the Secretary of Interior’s Standards • the majority of existing buildings are 1-2 stories. • Existing buildings have modernist architecture • Existing buildings have openings of increased depth that accentuate building details and generate shadow lines • Existing building façade material is identified as referencing California College of the Arts period but not explained. • Existing buildings have exposed structural elements and material transitions that accentuate design quality 	<p>primary building on site</p> <ul style="list-style-type: none"> • Rehabilitation of the exterior and interior architectural designs of Macky Hall and Carriage House will meet the Secretary of Interior’s Standards • New building elevations create defined building bases similar to the one-to-two story existing buildings through change in planes, horizontal elements, or material change • Fenestration composition is organized in linear grids consistent with the modernist architecture of the California College of the Arts Period architecture • Openings of increased depth to accentuate building details and generate stronger shadow lines consistent with existing buildings. • The preferred facade material palette references California College of the Arts Period architecture. • Exposed structural elements and material transitions accentuate design quality and the beauty in construction assembly, similar to the California College of the Arts Period architecture 	<p><i>existing structure.</i></p> <ul style="list-style-type: none"> • Additional clarification is needed as to how to articulate the façade particularly at the upper levels to address the current architectural mix. In respecting the architectural mix, the building façade should be unified in design. • Only the building bases are clearly addressed. • Variation in mass with uniformity of design across building is desirable • The preferred façade material is not explained
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<ul style="list-style-type: none"> • The existing campus grounds have a slope that includes the Macky Lawn and features such as Stairs with Ceramic Pots, Faun Sculpture, Infinite Faith sculpture, Bell Tower, and Celebration Pole), that are sited in the context of the existing landscaping 	<ul style="list-style-type: none"> • Maintain the slope, planting characteristics, and size of Macky Lawn • Additional retained art and artifacts within the open space are to be sited in a familiar context to their setting as sited in the existing California College of the Arts landscape 	<ul style="list-style-type: none"> • Address the Eucalyptus grove here.
<ul style="list-style-type: none"> • The site has a meandering, informal network of circulation routes site with pedestrian accessibility, • The site has Secondary pedestrian paths the provide alternate routes through the site allowing the discovery of existing buildings, vistas, and contributing landscape features. • The site has a variety of building elevations for building entries 	<ul style="list-style-type: none"> • Provide similar pedestrian paths. • Provide a variety of elevations for building entries across the site consistent with the various levels of building access in the campus 	
<p>Characteristics of the existing campus landscape summarized:</p> <ul style="list-style-type: none"> • The site has long standing heritage trees that contribute to the framing of Macky Hall, Macky Lawn, and Macky View Corridor • The landscape has native heritage trees and native planting palette • The campus has an established scale, orientation, views, materials, and programmatic components 	<ul style="list-style-type: none"> • Retain these characteristics in the new landscaping 	<ul style="list-style-type: none"> • The landscape scale is not clarified

<ul style="list-style-type: none"> • Art and education activities took place on the campus grounds and in the buildings 	<ul style="list-style-type: none"> • Retention and rehabilitation of additional art and artifacts is proposed. • Integrating murals and artwork on facades facing the open spaces is proposed. • The design response proposes commemorating the architecture of the period by representing building footprints and salvaged architectural elements in the landscape and signage. Site histories would be commemorated through installations and signage. 	<ul style="list-style-type: none"> • It is notable that commemoration of architecture is not proposed in building design, only in landscaping and signage.
<p>Treadwell Estate Features</p>		
<ul style="list-style-type: none"> • Macky Hall and Carriage House are Landmark properties. • The Landmark includes contributing landscape features Broadway Wall & Stairs, Carnegie Bricks, and Macky Hall View Corridor 	<ul style="list-style-type: none"> • The exterior and interior architectural design of Macky Hall and Carriage House would be preserved consistent with the Secretary of Interior’s Standards: <ul style="list-style-type: none"> • The integrity of Macky Hall, Carriage House and contributing landscape features would be protected by providing height reductions for portions of new buildings, that correspond to the width of landmark buildings. • New building setbacks would also reference landmark building width. 	

	<ul style="list-style-type: none"> • Retain the contributing landscape features 	
<p>Broadway Commercial Corridor and Rockridge Features</p>		
<ul style="list-style-type: none"> • Building base and rhythm of College Ave are important. • Nearby residential midrise buildings have widths in a range that is not identified. • College Avenue has a lower scale context and a pattern of building openings with ground floor access. • College Avenue has pedestrian activity. • College Avenue and portions of Broadway have a continuous streetwall. 	<ul style="list-style-type: none"> • New construction provides building base rhythm similar to College Avenue • Reduce perceived scale of bulk and massing in mid-rise volumes and design facades to reflect widths of nearby residential mid-rise buildings • Uses horizontal elements along Broadway and Clifton Street in response to lower scale context and articulates a rhythm that is responsive to pedestrian activity similar to College Avenue • Continue streetwall on Broadway and Clifton Street corner with limited setbacks • Continue ground floor commercial activity along Broadway near College Avenue 	<ul style="list-style-type: none"> • What is the width of the existing midrise buildings that sets the context for this transition? • What is the design standard for the lower scale context? • What is the rhythm setting this standard?
<ul style="list-style-type: none"> • The Broadway Wall is a primary edge to the site. • The site is a green terminus at the intersection of Broadway and College Ave. • The existing campus has a network 	<ul style="list-style-type: none"> • Accessible entry at the Broadway Wall would invite access by the community • Dense planting at the southwest corner would continue. 	

<p>of open spaces and meandering paths that contribute of a landscape of discovery</p>	<ul style="list-style-type: none"> • A network of open spaces and paths would be retained and continue the site’s “landscape of discovery”. 	
<ul style="list-style-type: none"> • The context is alluded to but not referenced • The hills of the East Bay have what characteristics? 	<ul style="list-style-type: none"> • New construction demonstrates similar design characteristics throughout the hills of East Bay: 	<ul style="list-style-type: none"> • Clarify which aspects of the project would be consistent with characteristics of the communities in the East Bay Hills. • The portion along Broadway? The buildings at the interior or rear of the site?
<ul style="list-style-type: none"> • The context is alluded to but not referenced. Primary materials identified as plaster and brick. 	<ul style="list-style-type: none"> • Transitions to context are expressed in new construction through upper-level setbacks, facade rhythm, and residential stoops: • Reducing perceived height near neighboring buildings through upper floor step backs and trellises • The articulated rhythm of new construction at ground floor and mid-rise facades would relate to rhythm and scale along College Ave and Broadway Terrace • Residential stoops and horizontal elements would 	<ul style="list-style-type: none"> • What is the context being transitioned to? • Will upper stories be set back above the base? • What are the elements of façade rhythm referenced here? • What are the elements of rhythm and scale along College and Broadway Terrace?

	be provided at ground level transitions • Encourage building entrances along streets and open spaces	
• Not addressed. • Rockridge architecture includes what features? Plaster and brick referenced as materials.	• Materials and enhanced open depths reference Rockridge architecture	• Explain “enhanced open depth” • Explain what features of Rockridge architecture are referenced.

Additional Staff Comment: The following topics need be added to the list of features of the existing campus and neighborhood and included in the *Design Response* in addition to items included in the preceding matrix.

1. Add the topic of an *emergency access and pedestrian corridor* to the features to be addressed. The existing CCA campus has an internal road which is more than a meandering informal network.
2. Add the topic of *scale and massing*. Although the existing campus has buildings that range from 1-4 stories high, the predominate scale is 2+ to 3 stories given architectural styles. There are 12 separate structures with variation in height, modest footprints and separations between structures. The project is for two new large structures. The design response still does not articulate how they are reflecting the current 2-3 story massing and how it is carried through and reflected in the design of the proposed 9 story new construction.
3. Add the topic of *intensity of detailing*. Review of detailing is one aspect of the mandatory findings:” *The replacement project is compatible with the district in terms of massing, siting, rhythm, composition, patterns of openings, quality of material, and intensity of detailing*”
4. Add the topic of *visual cohesiveness* as defined in Planning Code section 17.135.075. Visual cohesiveness is the architectural character, the sum of all visual aspects, features, and materials that defines the district. A new structure contributes to the visual cohesiveness of a district if it relates to the design characteristics of a historic district. Documentation of visual cohesiveness must be addressed to make one of the required findings: *The replacement project is consistent with the visual cohesiveness of the district.*

Staff Analysis of Section 2 Buildings Design Guidelines Part 1 (Attachment 2)

This section includes proposed guidelines for retention and rehabilitation of Macky Hall and Carriage House and guidelines for the option of preserving other historic resource buildings on the site. It demonstrates how the topics identified in the *Summary of Design Response* to

Historical and Contextual Elements for the Treadwell Estate are developed further and implemented through the guidelines.

The Draft Design Guidelines 2.1.1- 2.3.7 address Landmarks:

- 2.1 Location and Setting of Landmark Buildings
 - 2.1.1 Macky Hall Location.
 - 2.1.2 Carriage House Relocation. Carriage
 - 2.1.3 Carriage House Structural Improvements for Relocation
- 2.2 Landmark Building Access
 - 2.2.1 Macky Hall Primary Access.
 - 2.2.2 Carriage House Code Modifications.
- 2.3 Design, Materials, + Workmanship of Landmark Buildings
 - 2.3.1 Macky Hall Design, Materials, And Workmanship
 - 2.3.2 Macky Hall Windows
 - 2.3.3 Macky Hall Exterior Paint
 - 2.3.4 Carriage House Design, Materials, Workmanship
 - 2.3.5 Carriage House New Openings
 - 2.3.6 Carriage House Exterior Paint
 - 2.3.7 Carriage House Interior Partitions.

Draft Guidelines 2.4.1-2.4.4 address other resource buildings:

- 2.4.1 Retention the A1+ and B1+ buildings is identified as the highest priority
- 2.4.2 Relocation of existing buildings
- 2.4.3 Retention of character defining features; and
- 2.4.4 Setbacks from new construction.

Staff Comment:

- The retention and rehabilitation of Macky Hall and Carriage House and associated landscape features are subject to Secretary of the Interior Standards for Rehabilitation. In general, these guidelines are comprehensive and provide required direction on rehabilitation of multiple aspects of the buildings.
- There should be a set of general guidelines that apply to all historic resources remaining on the site. This could be generalized versions of the Macky/Carriage standards or a new set of guidelines that would apply universally to all retained buildings.

General Summary of Remaining Guidelines

The remaining sections of, Chapter 2 part II, address New Construction, and all of Chapter 3, addresses Open Space. Detailed analysis of whether these strategies provide the needed guidance is not completed. The applicant team is still responding to staff comments about these chapters and these sections of the guidelines will be brought forward to the LPAB separately. The preliminary drafts of Chapters 2 and 3 are attached in the appendix and intended to provide the LPAB with context and background.

- Chapter 2 Part II Sections 2.5-2.7 New Construction Summary
 - This section of the Draft Design Guidelines provides:
 - detailed design standards and strategies to integrate design features into the larger proposed replacement buildings on the site.
 - strategies for setbacks and height modification adjacent to Macky Hall and Carriage House,
 - standards for the ground level (base) elements of the new buildings consistent with development along College Ave.

- Chapter 3 Open Space Design Guidelines Summary

This section of the Draft Design Guidelines provides standards to:

- 1) maintain and rehabilitate contributing historic landscape features of the CCA Campus API and Treadwell Estate API and
- 2) develop new Open Space Elements that define character, programming, and design considerations of open space to respond the site in its next evolution as a new type of campus.

RECOMMENDATIONS

Review the issues and staff comments and provide direction for future guideline revision.

Section 1. Summary of *Design Response* (Attachment 1)

Issue 1 Does the list of features identified in the document *Summary of Design Response to Historical and Contextual Elements* (Attachment 1) adequately identify the features of the existing campus, the Treadwell Estate and neighborhood to address in the guidelines?

Issue 2 Does the LPAB agree with staff comments requesting clarification about site features and neighborhood features addressed on the *Design Response* matrix.

Issue 3 Does the LPAB agree with staff comments to add “emergency access and pedestrian corridor”, “scale and massing”, “intensity of detailing” and “visual cohesiveness” to the site features to be addressed in the guidelines?

Section 2 *Buildings Design Guidelines Part 1* (Attachment 2)

Issue 4 Does the LPAB agree with staff comments to provide a set of general guidelines that apply to all historic resources remaining on the site?

Prepared by:

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Reviewed by:

Catherine Payne

Catherine Payne
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Bureau of Planning

ATTACHMENTS

- A. *Summary of Response to Historic and Context.*
- B. Chapter 2 Part II New Construction Design Guidelines
- C. Chapter 3 Open Space Design Guidelines
- D. Project Plans Updated 8/22/22