

Public Comments - Titles 14, 15, and 16						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
13	10/27/2021	Scanned PDF letter	Bruce Emery	16.09.020(l), Unit lot subdivision applications	Under RCW 58.17.165 a final plat or short plat must be accompanied by a title report. Platting requirements significant time and expense to meet infrastructure, surveying, and other requirements. With respect to demonstrating ownership, a deed to the property should be sufficient. Requiring a full title report upfront for a preliminary application puts the cart before the horse and adds additional unnecessary expense. This section should be amended accordingly and match the RCW.	The title report requirement has been removed from the draft.
14	10/29/2021	Scanned PDF letter	Tracy Gudgel	Chapter 16.04	Expanding short plats from 4 to 9 lots will help the housing crisis in our area.	Comment acknowledged
15	10/29/2021	PDF letter	Annie O'Rourke	14.40.020(A)(9)	14.40.020 A9 states that an assessment "may be done by the applicant..." but 14.40.050 B states that they "...shall be prepared by either a professional engineer..." - which is it?	Existing code language that the project team recommends be updated in the next phase of code work in the near future.
16	10/29/2021	PDF letter	Annie O'Rourke	14.40.030(A)	"Quantity. The number of required parking spaces shall be determined either by reference to the number of required parking spaces per Table 14.40-1." This statement specifically uses the word EITHER – where's the OR? Needs to be rewritten. What is the intent?	Words "either by" removed.
17	10/29/2021	PDF letter	Annie O'Rourke	14.40.030(C)	Subsection A states that the number of parking spaces shall be determined by the table. According to 14.40.020 shall means the "statement is mandatory and ministerial, and the action so stated is required to be done without discretion by decision makers." How can the alternative methods in C occur with subsection A written as it is? The charging language in subsection A should be re-written to allow for exceptions and alternatives.	Existing code language that the project team recommends be updated in the next phase of code work in the near future.
18	10/29/2021	PDF letter	Annie O'Rourke	14.30.030	New subsection E should be labeled as D because the old D was deleted in its entirety. New subsection F should be labeled as E.	Typos corrected.
19	10/29/2021	PDF letter	Annie O'Rourke	14.30.030	Subsection E references PAMC 17.22.430 it should be 17.22.440.	Corrected
20	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	Do the references to floor area mean net or gross?	Net; a clarification was already proposed in 14.40.030(A).
21	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	What is the rationale for reducing the parking requirements for a small lot single household dwelling and not the single household dwellings when the definition of the two has nothing to do with the size of the home, just the size of the lot? Why would there be less parking required for a 3000sf 4 BR house on a 5000sf lot than for a 3000sf 4 BR house on a 7000sf lot?	See response to similar comment #5 above.
22	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	Interior townhouses, for the most part, will always be located on lots less than 5000sf in size. Why would there be a requirement for 2 parking spaces for a 3-bedroom townhouse on a 2800sf lot and only 1 for a small lot single household dwelling on a 5000sf lot?	The project team recommends reducing minimum town parking to 1 space per unit.
23	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	What is the motivation to require only 1 parking space for each unit in a duplex? There should be a focus on who uses the unit, how many bedrooms are in the unit, if transit is close by, if taxi services are available, etc. it should not be dictated by the size of the lot.	Similar to small-lot single households developments, duplexes are part of the strategy to create more housing choices and lower-cost housing, and so the project team is motivated to reduce development costs for households that own less vehicles. Duplexes will be required to provide alley access parking, when available, and given the depths of the lots Port Angeles, some duplex projects may opt to use available space to provide additional parking.
24	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	Multi-family dwelling units – there is no need to add "(three or more dwelling units)" to the Land Use category as it is clearly defined in the definitions section.	Multifamily is defined in the separate Title 17, where the definitions do not apply to Title 14. This parenthetical is considered temporary until the parking regulations can be consolidated with the other Title 17 development regulations (anticipated for the next phase of code work).
25	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	Multi-family dwelling units – thank you for recognizing the importance of the size of the unit, therefore the number of potential occupants, in determining the number of required parking spaces!	Comment acknowledged.
26	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	If the motivation is to move away from using spelled out numbers (two, three, etc) to actual numbers (2, 3, etc) or vice versa - be consistent through the code proposal	Comment acknowledged.
27	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	What is the definition of "sleeping unit"?	Changed to "guest room" to use a more common term
28	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	Nursing & convalescent homes land use category - rather than "for each" it should read "for every" as noted in the Hospital land use category.	Change made.
29	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	What does the asterisk in the Libraries Parking Space Requirements category reference?	Unknown, this is why it is proposed for deletion.
30	10/29/2021	PDF letter	Annie O'Rourke	Parking Requirement Table "14.40-1"	If there is a desire to add residential units downtown, how will parking for those new dwelling units meet the requirements of Table 14.40-1?	Code section 14.40.035 exempt Downtown from minimum parking requirements.

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31	10/29/2021	PDF letter	Annie O'Rourke	14.40.045(B), transit parking reduction	It seems logical to give a credit greater than 10% if a building is on a transit line. There is also logic to reducing the parking requirements if the lot is within walking distance to grocery stores, medical facilities, public spaces, etc.	Given the other parking reductions proposed, the project team feels this code draft has done enough work to reduce the cost of parking for this project. However, adjusting the specific percentage here will be recommended for examination in the future code work.
32	10/29/2021	PDF letter	Annie O'Rourke	14.40.045(C), cooperative parking	This should reference 14.40.070 rather than 14.40.080	Corrected.
33	10/29/2021	PDF letter	Annie O'Rourke	14.40.045(D), LID facilities	What does a reduction in parking spaces have to do with the type of parking surface? This should be directly related to the need for parking not the materials you are parking on.	This is an existing code section not proposed for changes at this time. It does not reference materials (e.g. pervious concrete) specifically.
34	10/29/2021	PDF letter	Annie O'Rourke	14.40.045(E), on-street parking	This reduction allowance should only be permitted where there is no time limit on parking.	This is already in place with the phrase "unrestricted" on-street parking.
35	10/29/2021	PDF letter	Annie O'Rourke	14.40.046(A), EV parking applicability	Should read "This section applies to all new off-street parking facilities in residential and commercial zones, except for RTP and affordable housing projects"	See response to similar comment #1 above. In addition, adding the word "new" is not recommended because there are provisions that apply EV parking requirements to some expansions of existing parking lots.
36	10/29/2021	PDF letter	Annie O'Rourke	14.40.046(C)(6), EV parking	WAC 51-50-0427 is currently "reserved" with no text. Should this be WAC 51-50-0429? If it is the intent to reference this WAC, why would Table 14.40-2 not reflect the required percentages of EV parking in state law?	Thank you for bringing this to the project team's attention - section 0427 was withdrawn by the office of the code reviser earlier this year so subsection (6) will be removed.
37	10/29/2021	PDF letter	Annie O'Rourke	14.40.046, EV parking	Affordable housing has an extremely limited need for EV and EV capable parking spaces. Do not require it until the State mandates it and only in the quantities they dictate.	See response to similar comment #1 above.
38	10/29/2021	PDF letter	Annie O'Rourke	14.40.100(C)	Clarify if the floor area net or gross.	Existing code language that the project team recommends be updated in the next phase of code work in the near future.
39	10/29/2021	PDF letter	Annie O'Rourke	16.02.020, Subdivision definitions	Sketch" should be numbered 42	Corrected.
40	10/29/2021	PDF letter	Annie O'Rourke	16.02.020, Subdivision definitions	Subdivision – should reflect the revised Short Plat provisions and read "The division...of land into ten or more lots..."	Corrected.
41	10/29/2021	PDF letter	Annie O'Rourke	16.02.020, Subdivision definitions	Unit Lot Subdivision -Does the parent parcel remain after the subdivision? How is this different than a subdivision? Are individual sellable lots the same as a fee simple lots? These questions should be understood by reading the definition.	The definition will be clarified.
42	10/29/2021	PDF letter	Annie O'Rourke	16.04, Short plat subdivision regulations	increasing the number of units from 4 to 9 is very fruitful and conducive to development. Thank you!	Comment acknowledged.
43	10/29/2021	PDF letter	Annie O'Rourke	16.04.070(B)(6), Panhandle or flag lots	Creating a separate section for pan handle lots implies they now may be used without limitation. Is that the intent?	This is an existing code section not proposed for changes at this time.
44	10/29/2021	PDF letter	Annie O'Rourke	16.09.010, Unit lot subdivision purpose	This purpose statement does not provide clarity on how a unit lot subdivision is different than a regular subdivision unless it is only permits a small number of building types – duplexes, townhouses and cottage housing.	The interpretation is correct, unit lot subdivisions can only be used for the housing types listed in the purpose statement. No change recommended.
45	10/29/2021	PDF letter	Annie O'Rourke	16.09.020(F), Unit lot subdivision application	Does notice impact only the adjacent or contiguous neighbors or neighbors within a certain number of feet (for example 300)?	Only adjacent property owners (with land abutting the proposed unit lot subdivision).
46	10/29/2021	PDF letter	Annie O'Rourke	16.09.020(I), Unit lot subdivision application	A title report can only be obtained when a financial transaction occurs therefore if land proposed for development has been owned by a party for a while, a title report is not possible. Will a Limited Liability Certificate suffice?	See response to similar comment #13 above. The title report requirement has been removed from the draft.
47	10/29/2021	PDF letter	Annie O'Rourke	16.09.030(B), Unit lot subdivision procedures	This implies a ULS can be done administratively for a project of 70 lots if the parent parcel is less than 5 acres. Is that the intent?	Correct. The number of lots does not determine whether the review is conducted by administrative or the Hearing Examiner.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
1	9/24/2021	Email	Emily Glassock	17.21.020(B)(2), ADU density	Why only one ADU? Why wouldn't a lot be able to have an attached ADU - like in a basement - if fully conforming to codes, and also a detached ADU at the same time on the same lot? Why is the ADU limited to less than 50% of the main house or maximum of 600 square feet and maximum of a one bedroom? Other communities do not have these limitations - and these limitations limit the uses of the structure and frankly are arbitrary and encourage short-term vacation rental type units rather than primary long-term housing that is needed. I propose instead a restriction of 75% of the square footage of the primary home, or a maximum of 800 square feet - and no mention of number of bedrooms.	This project is focused on larger-scale building capacity opportunities. Reviewing ADU regulations is a potential topic for the next phase of code update work that is planned for the near-future.
2	9/24/2021	Email	Emily Glassock	17.21.020(B)(8), ADU utility cost	The utility charges are the same for the ADU and the main home = separate connections. The basic monthly cost is the same. The size limitation for the ADU, costs of fees/construction/hassle, plus the full charge for the utility is a huge barrier and disincentive to development. I propose a rate reduction for ADU for utilities of 75% of the cost compared to primary homes, for basic utilities	Comment acknowledged. Utility rate changes are outside the scope of this residential capacity project.
3	9/24/2021	Email	Emily Glassock	17.21.020, ADU standards and design	I also believe it would be extraordinarily helpful to have a set of approved ADU designs, waive or reduce fees for homeowners that are dedicated to long-term rentals, and develop a way to "fast-track" the permitting process. Here is a link to Portland, Oregon's residential infill program, that includes ADU = 2 per lot (min 5,000 sq feet) allowed https://www.portland.gov/bds/zoning-land-use/residential-infill-project/residential-infilloptions	Comment acknowledged.
4	9/28/2021	Email	John Ralston	17.10.020, small lots in R7 zone	2. 25' R7 lots should be available to all R7 lots and not limited to the proposed areas.	Small lots are proposed only for a limited portion of the R7 zone at this time in areas near transit and in relative walking distance to commercial services and amenities.
5	9/28/2021	Email	John Ralston	17.14.050 and 17.15.050, RMD and RHD zone lot width	3. 25' lots should be permitted in all commercial zones as well to include MD and HD residential zones.	At 10/27 meeting, PC came to consensus on reducing the minimum lot width in these zones to 25-feet. The project team is now recommending to remove the standard from these zones. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
6	9/28/2021	Email	John Ralston	Table 17.20.040, Commercial zone dimensional standards	4. Taller buildings should be allowed on both sides of Lincoln and not just the west side.	At 10/27 meeting, PC came to consensus on reducing the minimum lot width in these zones to 25-feet. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
7	9/28/2021	Email	John Ralston	Table 17.20.020, Principal uses permitted in commercial zones	9. Duplexes should be Permitted in all commercial zones and if not permitted at least Conditional. Duplexes fall under the more simplified residential building code as opposed to the more cumbersome commercial building code. Financing for Duplexes is also less expensive, with better terms and conditions. (happy to further elaborate)	The project team is recommending changes to where duplexes and cottage housing are allowed. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
8	10/13/2021	PDF Letter	Erik Marks	Chapter 17.22	The Draft Code Amendments you have before you are well done, reflecting the focus and hard work by City Staff and outside consultants. But there is one bad apple, in the form of Chapter 17.22 - Commercial Design Standards, that threatens to spoil the bunch. I strongly encourage you (actually, implore you) to give yourself the time, space and resources to figure out if I am right. Because if I am right, and if Chapter 17.22 proceeds to be adopted as Code, then Port Angeles will be harmed. Chapter 17.22 will not increase residential capacity in Port Angeles. In fact quite the opposite is true. Rather than facilitating more residential development, Chapter 17.22 imposes costly design criteria on all development in commercial zones, which will chill the creation new housing in Port Angeles.	General policy guidance in the Comprehensive Plan calls for improved designed outcomes, and the grant the City was awarded is specifically for the purpose of implementing form-based design standards. In addition: (1) the new design standards will help offset impacts from the significant upzoning proposed in the multifamily zones and the commercial zones (increased building height, removed density and lot coverage limits, etc.); (2) Port Angeles is one of the largest cities in Washington that does not contain similar commercial and multifamily site and building design standards; (3) MAKERS has crafted over 65 sets of similar design standards throughout the country, based on numerous discussions with local architects, developers, and real estate professionals, and crafted the draft Port Angeles standards to minimize increase costs to construction by allowing design options in many cases, allowing the most commonly used exterior materials, and avoiding requirements for expensive design treatments.
9	10/13/2021	PDF Letter	Erik Marks	Chapter 17.22	I encourage you to discuss this with the consultants at Makers, and ask them for examples of communities that have adopted similar complex design criteria and no Design Review Board - how is it working out?	Most of the communities that MAKERS has crafted design standards for have administrative design review and no separate design review board.
10	10/13/2021	Email	Lindsey Schromen-Wawrin	17.22.020(B) Relationship to other codes	That is the sort of provision that we shouldn't need if our municipal code is internally consistent. I realize that this is coming from the MAKERS section of the work, and that stitching together what MAKERS and Madrona do is definitely a balance.	This subsection is recommended as a fallback in case of either current or future conflicts. The current scope of work cannot address all inconsistencies; however, Phase 2 of land use updates are to implement a full code audit of Titles 14, 16, and 17.
11	10/13/2021	PC Public Hearing, verbal	Annie O'Rourke	Table 17.22.120(B). Storefront block frontage standards	70% storefront transparency is too high in a high seismic zone.	The 70% transparency standard for portion of the ground level of select streets is a very common standard for communities up and down the entire west coast, all with seismic issues.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
12	10/13/2021	PC Public Hearing, verbal	Annie O'Rourke	Commercial and multifamily design standards	The design standards abolish certain forms of architecture and doesn't mention what happens to historic buildings.	The design standards intentionally do not reference any particular style of architecture. The commenter is correct that historic buildings are not specifically referenced; generally, existing buildings of any age are not affected by the proposed design standards unless they propose major expansions. Further, the project team is recommending changes in applicability of Chapter 17.22 in response to public comments. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
13	10/13/2021	PC Public Hearing, verbal	Erik Marks	Commercial and multifamily design standards	This is an extensive modification of the code. I have a deep concern with chapter 17.22 which stands out as substantially different than the rest of the draft. It increases the cost and the design criteria are not needed. Port Angeles is a transitional economy. The problem is not ugly buildings, but the real problem is that buildings are not being built at all.	See response to similar comment #8 above. Design costs are not the only component of project costs. The proposed code would provide allowances to increase capacity and help to balance potential design cost.
14	10/13/2021	PC Public Hearing, verbal	Seth Rodman	Commercial and multifamily design standards	I have concerns with the design section of the code. I appreciate the need for increased density and housing options. How that is implemented has difficulty, especially the site design. Specifically the parking restrictions and parking buffers. It can be a showstopper.	See response to similar comments #150-152 below.
15	10/13/2021	PC Public Hearing, verbal	Michael Peters	17.22.110, Block frontage designation maps	I will specifically speak to the Elwha Hotel and the surface parking lot moratorium. It appears the parking standards do not address specific needs of hotel projects, and we reject structured parking. North Laurel should be Mixed and not Storefront. We are concerned about the transition from current code to new code. The hotel site plan was accepted by City personnel to proceed, and the new code will result in long delays of our project. We completed a cleanup costing millions and are not in a position to develop the westerly parcel. The code does not seem to accommodate short-term variances.	Comment acknowledged. The storefront designation was proposed on that block of Laurel to continue the historic storefront pattern on the street within the CBD.
16	10/13/2021	PC Public Hearing, verbal	Christian Hampp	17.22.110, Block frontage designation maps	My property on Front Street has a multifamily building and also a single-family building. The multifamily building is required to have a commercial tenant and it is currently empty. I could find a residential tenant within a week. Consider relaxing the zoning criteria.	Unclear which location on the designated block-frontage maps is being referred. If the location is anything other than a Storefront designation, the updated code will allow residential uses on the ground floor of the building (in the CBD zone, this is more permissive than the current code which requires ground floor commercial use next to the main entrance on all properties in the zone).
17	10/13/2021	PC Public Hearing, verbal	John Ralston	17.10.020, small lots in R7 zone	Small lots should be available through all of the R7 zone.	See response to similar comment #4 above.
18	10/13/2021	PC Public Hearing, verbal	John Ralston	17.14.050 and 17.15.050, RMD and RHD zone lot width	25-foot wide lots should be allowed in all commercial zones and the RMD and RHD zones.	See response to similar comment #5 above.
19	10/13/2021	PC Public Hearing, verbal	John Ralston	Table 17.20.040, Commercial zone dimensional standards	Taller buildings should be allowed on both sides of Lincoln Street.	See response to similar comment #6 above.
20	10/13/2021	PC Public Hearing, verbal	John Ralston	Table 17.20.020, Principal uses permitted in commercial zones	I believe duplexes should be permitted in all commercial zones, or if not, at least conditionally permitted. Duplexes fall under a more simplified residential building code and financing is generally easier.	See response to similar comment #7 above.
21	10/13/2021	PDF letter	Michael A. Peters	17.22.110, Block frontage designation maps	We recommend that North Laurel be Mixed rather than Storefront.	See response to similar comment #15 above.
22	10/13/2021	Email	Tom Curry	Commercial and multifamily design standards	I am in agreement and support Erik Marks letter to the Planning Commission dated October 12, 2021 regarding Chapter 17.22. It is not the right move for Port Angeles at this time.	Comment acknowledged.
23	10/13/2021	Email	Sam Grello	Commercial and multifamily design standards	I am writing in support of the comment letter from Erik Marks dated October 12, 2021. I believe that it is a mistake for the City to adopt Chapter 17.22 as it is written at this time. Please separate the residential building capacity code from Chapter 17.22 "Commercial and Multifamily Design Standards." I believe they should be separate. I wholeheartedly endorse increasing housing density. That is an issue that needs to be addressed now. But I don't agree with Chapter 17.22 as it is written. The barrier for entry to business is low in Port Angeles. I worry that some of the provisions in Chapter 17.22 will INCREASE the cost and complexity to do business in Port Angeles and raise the barrier for entry to business ownership. Thank you for taking the time to read my comment about your hard work. Thank you for trying to fix our housing issue.	Comment acknowledged.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
24	10/14/2021	Email	Sheila Stewart	Commercial and multifamily design standards	Chapter 17.22, as written puts a hardship on my selling the Bushwhacker property, (that has sat vacant for the past 6+ years), so I am writing in support of the comment letter from Erik Marks dated October 12, 2021. I believe that it is a mistake for the city to adopt Chapter 17.22 as written at this time.	Comment acknowledged.
25	10/19/2021	Scanned letter	Melissa Williams	Table 17.20.040, Commercial zone dimensional standards	Feiro Marine Life Center is in the conceptual planning stages located on the west end of the Port Angeles waterfront. The project would qualify as a civic use and would not be subject to the 3-story minimum height in the CBD zone. We are in support of the exemption for civic uses.	This interpretation is correct.
26	10/21/2021	Email	Julia Taylor	17.08.010(B), ADU definition	"An ARU is distinguishable from a duplex..." Should be RDU to be consistent with other changes?	It appears the commenter meant to type ADU instead of RDU; in which case, yes, the abbreviation here will be updated for consistency.
27	10/21/2021	Email	Julia Taylor	17.08.010(C), Adult family home definition	Neither "adult family home" nor "one household" home make any sense to me. It's "family" and "household" that make it confusing. Saying "Adult home" then defined as "one household" (not "a one household") makes more sense to me and doesn't imply "family" among strangers, with all implications and effects of that patronizing, social work lingo.	Thank you for the comment. It is recommended to simply remove the term "family" or "household" from the definition text to avoid any overlaps or connotations. The actual term needs to remain "adult family home" due to the state law reference.
28	10/21/2021	Email	Julia Taylor	17.08.010(I), Animal husbandry, non-commercial definition	My neighbor was breeding and selling Akitas, which became "an issue" for all nearby -- the noise, the front yard sales events, and most of all the cruelty of breeding the adult female over and over and over. This part not only doesn't flow coherently with the mention of horse stables and kennels but doesn't even cover what she was doing. The dogs all were or were intended to be pets. And Akitas aren't exactly Yorkies.	This issue is outside the scope of this project. It is recommended to further discuss this issue with Planning Division staff and review the provisions of Title 7 - Animals.
29	10/21/2021	Email	Julia Taylor	17.21.030(J), Cottage housing common open space standards	I didn't read every word to find out how the "common area" works, but 400 sf for that is laughable. It's a courtyard. The idea of these, from my perspective as an older person, is to foster a sense of community, not just pack people in small spaces for max use of the land. They need indoor gathering spaces with small kitchens to use for potlucks or parties and such. They need meeting spaces, board game spaces, places to watch streaming movies or other presentations and maybe hold discussions afterward.	The 400 square feet (sf) requirement applies per cottage. There is a minimum of four cottages in a cottage development, so the minimum common open space that is required will be 1,200sf. Some cottage developments provide larger than the minimum space required, depending on the shape and size of the lot and the target demographics of residents. The 400sf requirement is a very typical common area requirement for cottage developments throughout Washington. The draft code also specifically allows and encourages cottage developments to contain shared indoor community spaces such as a kitchen or recreation room; see subsection (K).
30	10/21/2021	Email	Julia Taylor	17.21.030(G), Cottage housing size standards	My 2 BR house is 832 sf. 600 sf is standard for 1 BR. Most cottages are 2 BRs, but they do NOT need to be 1200 sf. You're thinking of the developers' priorities, not the dwellers', and you seem to be forgetting that the developers are selling multiples so the cost per sf is not apples-to-apples as for not crammed-together single-family houses.	The 1,200sf "maximum" is a very typical standard for cottages in cities around the state and is still much smaller than the typical new detached single family home. No changes recommended.
31	10/22/2021	Email	Kasi O'Leary	Setbacks for residential development	Reduce setbacks and allow for zero lot lines for both SFR and Multifamily developments. Particularly for lots within the core of the City (i.e. along C St. throughout the Cherry Hill Area, and anywhere from Front St up to Lauridsen BLVD). This will allow for higher density options within this core area to allow for home additions, ADU's, and as our housing stock ages, to allow for older homes to be torn down and replaced with at least 2-4 units.	Such options are allowed internal to individual developments via unit lot subdivisions in residential zones.
32	10/24/2021	Email	Allisa Imming	17.21.020(B)(7), ADU parking	I feel it is detrimental to neighborhood aesthetics and surrounding property values to not require ADU parking. Port Angeles already has 'issues' with non-compliant ADU's and the clogged alleys and narrow streets with parking on both sides, disallowing two-way traffic in some areas.	The project team does not recommend any change to the proposed parking requirements for ADU's (which is to say, none) to minimize the cost of developing a new ADU on-site and to minimize the addition of more pavement to lots. The availability of on-street parking in most residential zones was also a factor in the recommendation.
33	10/24/2021	Email	Allisa Imming	17.10.020, small lots in R7 zone	I spent some time reading about lot size changes as well and I think it will be a detriment. My own lot size (I live near 6th and Chambers) is 6,970 sq ft, as are most of the lots on my street. In my opinion, this size should be the minimum in this city for a single dwelling. I have a small back yard area, a small front yard and a two-storey 1738 sq ft home. I would wish you not to consider reducing lot sizes to 3,500 sq ft.	The proposal for allowing smaller lots in part of the R7 zone arose of community interest in developing more affordable single-household dwellings, and many Washington communities allow such lots. The new design standards for small lots are proposed to ensure these lots set aside space for a back yard and have well-designed front facing the street.
34	10/24/2021	Email	Allisa Imming	Multifamily tax exemption	Providing a 12 year tax relief plan to entice multi-family development is a detriment to the existing community of tax-payers. I understand the need for development; I also understand that there are many ways to entice developers. But Port Angeles already gives the appearance of being economically depressed. We are economically depressed. We have a very large non-working sector of residents. This tax abatement will unfairly place the burden of city services of "multiple families" onto the assessments of other property owners for a very long period of time. I would ask that the city not make more provisions, other than what is already available, with the purpose of increasing our financially challenged citizenry.	The MFTE provisions was added as one of three options for new developments to achieve available bonus heights in select commercial zones. The provision is very common in other cities and given the importance of affordable housing and the limited assumed extent of its use, the tradeoffs were considered worthwhile by the project team.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
35	10/24/2021	Email	Sharon Cork	17.10.020, small lots in R7 zone	I am greatly opposed to the proposed change in lot size from 50 feet to 25 feet. That reminds me of Bremerton and driving on its streets. Seeing houses SO close to each other just makes me sick. You can just imagine leaning out of a window at your neighbor and handing them through their window a cup of sugar or whatever. Don't do this change to lot	See response to similar comment #33 above.
36	10/25/2021	Email	Erik Marks	17.20.020, Commercial zone supportive housing uses	Cities such as Bellevue, DesMoines and others have made those types of shelters and housing into "Conditional" uses that require a CUP. May I please ask you to revisit the source of your conclusion that such uses must be made into "Permitted" uses? If in fact I am correct, and such uses may continue to require a CUP, then I don't think that Port Angeles would be well served by making those uses "Permitted." If they were made into "permitted uses, then a facility intended to house 30-day-clean drug addicts could be located "as a matter of right" next door to a child care facility, retirement home, or other vulnerable population. And from another angle of concern, a drug-addict facility, a facility for homeless, and housing for mentally ill could all be grouped together on the same city block as a restaurant, bookstore and coffee shop - with the predictable result that the valuable small businesses, which are paying taxes and serving the community, which were founded with hard earned capital and are run by dedicated hard working citizens, would be killed off. Yes, PA must follow state law, but it should do so while being as careful as possible to protect its contributing citizens, operating businesses and tax base.	A mix of Permitted and Conditional uses are recommended to match the existing permissions for hotels (a lodging use), with some adjustments to encourage supportive housing where the project team considers it to be an appropriate use based on the land use/neighborhood context.
37	10/25/2021	Email	Jeff Schreck	17.10.020, small lots in R7 zone	I am not in favor of decreasing lot sizes in R7 districts. There is already potential for two houses per lot. The fact that it is not being utilized is evidence that increased density in this area is not desired	See response to similar comment #33 above.
38	10/27/2021	Scanned PDF letter	Bruce Emery	Table 17.10.050-1, site coverage exemption for onsite stormwater management (all residential zones)	We applaud the change and feel it will provide improvements to the regulatory program. It will increase flexibility and assist the development community with designing future projects and improve the likelihood of expanding residential capacity.	This is actually an existing provision but with text edits recommended to clarify how it is implemented.
39	10/27/2021	Scanned PDF letter	Bruce Emery	Table 17.20.020, maximum townhouse units in CO zone	We applaud the change and feel it will provide improvements to the regulatory program. It will increase flexibility and assist the development community with designing future projects and improve the likelihood of expanding residential capacity.	Comment acknowledged.
40	10/29/2021	Scanned PDF letter	Tracy Gudgel	17.22.320, Building massing and articulation	The cost for construction will increase significantly with the requirements for façade articulation. Building modulation as well as changes in roofline and changing building materials or siding styles all increase the cost of a project.	Project team is recommending several changes to 17.22.320. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
41	10/29/2021	Scanned PDF letter	Tracy Gudgel	17.22.340(B)(4), Quality building materials	The code dictates the use of stone, brick, or tile masonry on the first floor of cladding on nonresidential or mixed-use buildings and for the first two feet of residential buildings. These types of cladding all significantly increase costs. The recently constructed Performing Arts Building would not comply with this requirement.	The project team recommends deleting subsection (B)(4) as a way to reduce construction costs and acknowledging the community's willingness to allow for creative building materials.
42	10/29/2021	Scanned PDF letter	Tracy Gudgel	17.22.440(F), Parking lot landscaping	These standards limit the ability to develop parking lots on existing platted lots which are typically 50'x140'. By the time landscaping is placed between the parking and lot lines and additional landscaping is installed between the building and parking lot, a 50' wide lot may not be wide enough to even have a parking lot to serve the building.	Comment acknowledged. Parking lot landscaping is one of the basic design measures to mitigate the visual impacts of parking lots on the streetscape. Such landscaping also provides stormwater management and other environmental benefits. But in recognition of the cost of providing for vehicular parking, this code is recommending decreases in the minimum amount of parking spaces required, which can largely off-set the space needed to accommodate minimum parking requirements.
43	10/29/2021	Scanned PDF letter	Tracy Gudgel	17.22.440(F)(2), Parking lot landscaping	The proposed standards add additional landscaping along with the requirement of either a raised planting bed or wall. This proposed wall will not only allow the homeless to hide items more easily but will also allow them to easily construct a shelter.	The referenced walls are not required and only an option for voluntary departures. However, the departure languages for subsections F.1 and F.2 should be swapped, as the low wall options are intended to apply to street front areas rather than internal lot lines.
44	10/29/2021	Scanned PDF letter	Tracy Gudgel	17.22.400s, Landscaping standards	I appreciate appropriate landscaping to add beautification and improve visual impacts, but it can also cause unintended issues. My office's five-foot landscape strip gets used by the homeless to hide things as well as dispose of trash, hypodermic needles along with many other disgusting items.	The project team acknowledges the challenges of homelessness but do not believe it should guide design decisions for developments that will benefit the community for the long-term. Landscaping can be designed to avoid dense areas that may become hiding places. The addition of landscaping is to reduce the large percentage of hard surfaces within commercial corridors. The landscaping standards do not affect existing parking lots except for major expansion projects.
	10/29/2021	PDF letter	Annie O'Rourke	Definitions	Multiple comments split into separate rows as reflected below	
45				17.08.010, Definitions	Accessory Dwelling Units (ADU) – not all the references to accessory residential units have been eliminated - see 17.31.030 as an example?	Chapter 17.31 is outside the scope of this project. A temporary clarifying sentence noting that ARUs are the same thing as ADUs has been added to the definition. Other chapters will be revised in a future code update.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
46				17.08.010, Definitions	Dwelling, Multifamily – with the added text, how would live/work units (IBC 419) be regulated as they may not accommodate multiple families? The allowance of this type of use should be encouraged.	The code currently defines "work/live studio" which is allowed in some industrial zones. The project team discussed this type of use early in draft development, and also would like to encourage it, but recommend reserving it for the next phase of code updates in the near future.
47				17.08.010, Definitions	It appears that there is an effort to remove "family" from all definitions and yet there are still 81 references to "family" in the proposed draft. Either allow the term or expunge it completely.	Some of the instances found be deletions, the term "adult family home", or the term multifamily. Other chapters outside of the scope of this project will also retain the term "single-family". An update to the "household" definition has been added as a temporary bridge until these remaining instances can be updated in a future code work phase.
48				17.08.010, Definitions	Clarify the correct alphabetic label for Household. The current proposal reflects X – it should be C and subsequent definitions be re-alphabetized.	Corrected.
49				17.08.010, Definitions	Why is "convalescent home" removed? It is referenced specifically in the parking standards in Chapter 14.	Title 17 definitions do not apply to Title 14.
50				17.08.010, Definitions	The Open Space definition should be broadened to include the private open space required for buildings in the new design standards. The current definition only speaks to public spaces.	The existing definition refers to natural landscape features and public facilities. The project team recommends not including project-level private open space in this definition because the term would then be overly broad. Whenever introduced in the design standards, the term is usually preceded by "private", "useable", or other phrasing to indicate it is different than the default definition. It is also referred to as "amenity space" for multifamily development.
51				17.08.010, Definitions	Recreational Camps –Where are these permitted? Are these truly recreational in nature or is it a euphemism? This definition should be stricken until such a time as it can be adequately defined and the definition applied appropriately throughout the code.	This new simplified term replaces "Recreational vehicles, vacation trailers, and campers courts and parks" currently used in the CA zone list of permitted uses. Note that this use relates to formal commercial facilities and does not regulate ad-hoc RV camping or living. See 17.20.020 for proposed updates to permitted uses.
52				17.08.010, Definitions	The definition of "story" should be consistent with the IBC, IEBC and IRC.	Existing code language that the project team recommends to be updated in the next phase of code work in the near future.
53				17.08.010, Definitions	The definition of "townhouse" should be consistent with the IBC and IRC.	The project team has discussed this internally and believes there are methods to allow 2-unit attached townhouses, as this design is common in other communities.
	10/29/2021	PDF letter	Annie O'Rourke	Zoning	Multiple comments split into separate rows as reflected below	
54				17.14.020(j), RMD zone permitted uses	Thank you for increasing the number of townhouse units from 4 to 6 in the RMD zone! This is a gentle increase to a higher density.	Comment acknowledged.
55				17.14.050 and 17.15.050, minimum density	Doubling the minimum density in RMD/RHD zones is concerning. There should be an incremental approach to density and a recognition that there are current locations of RMD/RHD zones that occurred as a result of spot zoning without appropriate consideration given to the neighborhood impacts.	The Planning Commission expressed consensus at their 10/27 meeting to revert back to current minimum densities in those zones. Change made.
56				17.14.020 and 17.15.020, permitted uses	The proposal prohibits the construction of single household dwellings in zones RMD & RHD. It must be recognized that ADUs, Adult Family Homes, Bed & Breakfasts, Short Term Rentals, townhouses and group living facilities are all single household dwellings in the building code. Is a conflict created?	The prohibition only concerns the construction of new detached single household dwellings. Such uses could continue to operate out of existing structures that look like houses.
57				Table 17.20.020, uses permitted in commercial zones	There are 4 rows -titled Single Household Dwelling, Impound Yards, Self-Service Storage and Recreational Camps- that are not allowed in any of the commercial zones. They should be removed from this table.	These are shown in the table to make them clearly prohibited, rather than relying on an interpretation of an unclassified use. This a common practice by cities.
58				Table 17.20.020, uses permitted in commercial zones	There is a Condition/Reference in several use types that reads "Must be designed as one of the dwelling unit types permitted in the zone." There does not appear to be reference to that information elsewhere in the code.	This reference refers to the dwelling units category in the table immediately above the supportive housing category.
59				17.10.020, small lots in R7 zone	I am in agreement with the R7 zone allowing 3500sf lots throughout city.	See response to similar comment #4 above.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
60				17.14.050 and 17.15.050, RMD and RHD zone lot width	Reason escapes me when I ponder the proposal of allowing RMD and RHD lots down to 25' in width. On the face of it, I would support the smaller lots but you simply cannot build a multifamily dwelling (3+ units) on a 25' wide lot. The building code requires 10' setback to property lines for fire protection. A 25' wide lot with a 10' set back from each side yields a 5' wide building. The most practical use of a 25' wide lot would be a single family dwelling that is 15' wide but that dwelling type is no longer allowed on an RMD or RHD lot. Clearly, there is a significant disconnect between the planning/zoning requirements and the fire/life safety requirements of the building code. Adding provisions like this imply opportunity but the building code or other off site development standards limit it. The building department or Public Works then becomes the bad guy. There is no need to create city codes in which one department negates the provisions of another. Please consider the ramifications to other departmental codes especially those codes where the city is not at liberty to modify. Have Public Works and the Building Department weighed in on this proposal? It would seem that all departments would want to work toward a conflict free document. If the codes are misaligned, it provides uncertainty to developers and uncertain developers don't develop.	See response to similar comment #5 above.
	10/29/2021	PDF letter	Annie O'Rourke	Residential standards	Multiple comments split into separate rows as reflected below	
61				Chapter 17.21 Residential Infill Design Standards	New SLSH dwellings, duplexes and townhouses are required to have vehicle access exclusively from an alley if served by such. The current alley system is: In poor condition and not regularly maintained; Much narrower than city streets and will potentially see a greater amount of traffic over time; Cluttered with cars, buildings and fences limiting vision, garbage cans, etc.; Traveled on once a week by garbage trucks. These factors would seem to make the exclusive alley access requirement imprudent.	Comments acknowledged. Residents can form an LID to improve alleys.
62				Chapter 17.21 Residential Infill Design Standards	Entry standards – it is unfortunate that an architectural feature (a porch) is now required on structures needing to comply with design standards. This eliminates certain housing styles such as colonial architecture. Why would the city proclaim that this type of architecture is no longer permitted? [Note: Commenter provided photo examples of colonial architecture.]	Comment acknowledged. The proposed entry standard is a very basic livability provision that adds integrity to a dwelling unit. Also note that a standard image search illustrates that most examples of colonial architecture include covered entries.
63				17.21.010(D)(1), Small lot open space standards	Adding a 10'x10' rear/side covered porch on all new homes is costly. It will likely not be seen by anyone but the homeowners. It seems like we have lost sight of the fact that not all structures are planned and built by developers. Private land owners are planning and building for themselves or their families. Please let the homeowner decide if this is a fruitful use of their money.	Comment acknowledged. This is a very basic livability issue and should be workable on typical PA lot dimensions.
64				Figure 17.21.010(A)(1)	The 5000sf lot site plan example implies that a garage can be 5' off the alley. All other code references show a 20' min setback to garages. This figure adds confusion.	The intent was to allow detached garages within 5' of an alley - charts for the residential zones will be updated to reflect that design. The 20' setback only applies when the garages is attached to the primary dwelling structure. NOTE that 17.21.010(B)(2) allows 5-foot long driveways.
65				Figure 17.21.010(A)(1)	The photo labeled as "Acceptable Example" should be removed and replaced with an appropriate photo showing the intent of the code...not people standing around on what appears to be a concrete slab without capturing the adjacent structures to point out the code requirements.	The project team will replace the photo with birds eye view of model shown in Figure 17.21.010(A)(1) that clearly shows acceptable open space example.
66				17.21.010, Small lot standards	Thank you for clarifying that the front door does not need to be visible from the street.	Comment acknowledged.
67				17.21.020, ADU standards	The reference to "moderate-income people" in (A)(1) is inappropriate. The purpose statement should read "Add affordable units to existing housing stock and make housing units available to people who might otherwise have difficulty finding homes within the city." The remaining 3 purpose statements are well written.	Change made.
68				17.21.020(B)(4), ADU standards	Why are ADUs limited to 1 bedroom? All but one zone (R11) allows for duplexes and the number of bedrooms in that form of dwelling unit is not limited. What is the difference between a duplex and an attached ADU?	The 1-bedroom limitation has been discussed by the project team, who recommend considering a change in the next phase of code work. The difference between a duplex and attached ADU is noted in the ADU definition: "ADU is distinguishable from a duplex in that, unlike a duplex, it is clearly incidental to a detached primary single-household dwelling both in use and appearance." For example the ADU may be accessed by an interior stairway or hallway all occupants of the building use, or the ADU takes up only half of a floor.
69				17.21.030(E)(2), Cottage housing standards	17.21.030 (E)(2) requires all cottage housing to be separated by 6' but then allows for projections into those side yards. 17.94.120 allows for projections into side yards up to 3' not including eaves overhangs. There are life safety implications of creating covered space so close to an adjacent home. Including provisions in this proposal that conflict with other codes creates confusion.	No change recommended, as the fire code has provisions for buildings in close proximity. Since cottage developments are typically built all at once, a design issue such as bay windows on neighboring buildings making a side setback unusable and unmarketable is not anticipated.
70				17.21.030(H)(2-3), Cottage housing standards	Including both porch/entry requirements is confusing. Where is one used instead of the other? If the code requires all entrances to have covered porches, the requirement should be more clearly stated.	A porch could meet both requirements of (2) and (3). However (2) also applies to any entrance that is not facing a common open space. However, the project team will look at clarifying the language - perhaps deleting (2) and updating (3) to emphasize that all cottages will include a porch.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
71				17.21.030(I) and (J), Cottage housing standards	The common and private open space requirements in this chapter are confusing and appear to overlap.	The project team feels there is enough distinction in the two sections along with the photo example in Figure 17.21.030(A)(1). For example subsection (J)(2) says the two spaces may not be double-counted, and (I)(3) says the private space is encouraged to be located adjacent to the common space.
72				17.21.040(B)(4), Duplex standards	All the design details in add cost to the project. If the goal of this proposal is to increase residential capacity, adding to the cost of construction will impact the motivation to develop.	These details are only required where an applicant proposes a garage that exceeds 50% of the ground floor facade width and are reasonable standards to ensure the design of duplexes facing a street avoid a "garage-scape" appearance and fit in with existing low-density neighborhoods. The design details available to increase the garage width have minimal cost impact compared to the overall cost of development, e.g. windows in a garage door are readily available.
73				17.21.050, Townhouse standards	With the City's financial assistance, the housing authority purchased a parcel of land (actually 6 city lots) to showcase townhouse construction utilizing our Self-Help Program. These provisions would require building articulation, building material changes, and transparency adding cost to the construction of these future landowner's homes, costs these families may not be able to afford.	Comment acknowledged.
74				17.21.050(E), Townhouse standards	This provision requires open space to equal 10% of the floor area. There is an additional requirement in subsection(I) of a minimum area of 12'x12'. The math doesn't add up, for example, a 1200sf townhouse would then be required to have 144sf of open space – 20% more than that required in the charging statement requiring 120sf.	This interpretation is correct. Townhouse developments could provide less open space by using the other options available.
75				17.21.050(F), Townhouse standards	Building Articulation – this increases the cost of construction and depends on the interpretation of individual city employees. It should be removed.	These provisions refer to the standards for articulating multifamily facades in 17.22.320 which requires at least two treatments from a list of 5 options plus "other" options that meet the intent. These are basic provisions that add to the integrity of townhouses and will help such developments fit into the context of Port Angeles' neighborhoods. It appears that the townhome design for the housing authority would meet the townhouse articulation requirements.
76				17.21.050(G)(3), Townhouse standards	Please reference which sections of PAMC 17.22 apply. Just stating PAMC 17.22 is too general.	Updated to refer to the specific landscaping sections, 400-460. This change was made in all the housing type sections.
	10/29/2021	PDF letter	Annie O'Rourke	Commercial and multifamily design standards applicability	Multiple comments split into separate rows as reflected below	
77				17.22.020(I), Multifamily and commercial design standards applicability	It is stated that "These provisions do not apply to townhouses unless otherwise noted in this chapter." There is a conflict with this language as there are several locations outside of this chapter that direct townhouses to comply with these requirements.	Good point. We changed "chapter" to "title" to accommodate the articulation and landscaping requirements that apply to townhouses.
	10/29/2021	PDF letter	Annie O'Rourke	Block frontage standards	Multiple comments split into separate rows as reflected below	
78				Table 17.22.105, Summary of block frontage standards	Storefront Block Frontage requires construction of weather protection in the ROW. Is there a permitting program in place to allow construction of structure in the ROW?	Yes, this would require a right-of-way permit by the City.
79				Table 17.22.120(A), Storefront block frontage standards	Transparency requirements in the Storefront Block Frontage dictate 70% glazing on the first floor. In addition, the ceiling height is to be set at 13' minimum. As of January 2022, the city of Port Angeles will be in the most restrictive Seismic Design Category possible. Increasing the height of stories and narrowing the amount of possible structure to resolve the design forces needs to be considered. This could have a dramatic impact on the structural system. Please consult the professionals before these 2 changes are made!	For transparency - response to similar comment #11 above. For ceiling height - similarly, minimum ceiling heights are common across Western Washington communities which are also in high seismic zones. Some communities require much taller ceilings (up to 16' or more) but the project team recommends the modest 13' requirement to ensure ground-floor retail spaces are versatile, comfortable, and well-lit by daylight.
80				Chapter 17.22, Block frontage standards	Block Frontage requirements have been advertised as impacting a limited area in the city – the downtown core and major arterials. Yet anything that isn't labeled as Storefront, Landscaped or Mixed is Basic and must comply with section 17.22.150 with its transparency, landscaping, weather protection and building placement requirements. 17.22.110(C), 17.22.150 and 17.22.250(C)(2) should be deleted in their entirety. Sections 17.22.320(D)(2) and (E)(4)(b) should have references to Basic Block Frontages removed.	Comment acknowledged.
81				17.22.160, High visibility street corner standards	Have the 29 land owners than would be impacted by the high visibility corner standards been contacted for their input?	Not specifically, just as the owners of every property that would be affected by zoning changes or the new design standards have not been contacted.
82				17.22.170(C), Ground floor residential standards	This dictates that, if within a certain distance of the street, the units need to be elevated 3-5' above the street level. This could possibly be a challenge in that ADA requirements require access via ramps for wheelchair accessible units.	This only applies where the developer opts to build the structure within 10' of the street ROW.
	10/29/2021	PDF letter	Annie O'Rourke	Site planning standards	Multiple comments split into separate rows as reflected below	

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
83				17.22.260(B), Location of ground-level service areas and mechanical equipment	The landowner has control over placement of private service areas and equipment. Will utility companies, the city included, be required to place their equipment (electrical transformers, communication boxes, etc) according to these provisions? Currently this non-private equipment is placed in front yards close to the right of way.	This provision applies to commercial and multifamily development, and not transmission equipment normally placed in the public right-of-way. If a new transformer is required to serve a large private development, for example, and it must be located on the ground on the private development site, then yes these requirement would also apply.
84				17.22.260(B)(5), Location of ground-level service areas and mechanical equipment	This requires weather protection over loading docks. Why and how is this possible? Has the Solid Waste department reviewed this proposal for consistency with their requirements trash enclosure requirements?	The text "all service areas including but not limited to" will be removed.
85				17.22.260(C)(6), Screening of ground-level service areas and mechanical equipment	There is a reference to Type II landscaping – should this be Type B?	Yes, corrected.
	10/29/2021	PDF letter	Annie O'Rourke	Building design standards	Multiple comments split into separate rows as reflected below	
86				17.22.320(C), Residential articulation standards	This section dictates that at least 2 features be employed in residential buildings. One option is the use of windows and/or entries. There is no clarifying language that provides guidance or indicates what is allowed and what is not. Please clarify in the document what is expected in the use of windows and/or entries for this articulation requirement. This comment also applies to several of the other options listed but not adequately clarified.	The project team suggests updating the language to say: Use of window patterns and/or entry designs that reinforce the articulation pattern. Otherwise the graphics clarify such patterns. Project team is recommending several changes to 17.22.320. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
87				17.22.330(D), Window design standards	Window Design Standards is incorrectly alphabetized	Corrected.
88				17.22.330(E), Articulated building entires	Delete "apartment buildings" from the 2nd line as the definition was deleted.	Updated to "multi-family building" for consistency, and added parenthetical (when provided) to acknowledge that some styles of multifamily development do not have a primary entry.
	10/29/2021	PDF letter	Annie O'Rourke	Landscaping standards	Multiple comments split into separate rows as reflected below	
89				17.22.400s, Landscaping standards	Landscaping provides a nice buffer between the natural environment and the built environment. But the city needs to get control of the illegal activity that occurs in landscaping today before requiring greater quantities of it. Landscaping types A, B, and E should be reconsidered in light of this problem.	See response to similar comment #44 above.
	10/29/2021	PDF letter	Erik Marks	Permitted use standards	Multiple comments split into separate rows as reflected below	
90				17.20.020(F)(2), Keys to the use table	I am not finding any provision in ccode the explains CUP process for commercial Conditional Uses. PAMC 17.94.065 governs only conditional uses in residential zones. Further, 17.94.065 does not reference many of the uses in the 17.20 table that are labeled C.	We will correct the cross-reference to 17.96.050, which is the more relevant section to explain how applications for CUPs are processed.
91				17.20.020(F)(5)(b), Keys to the use table	The meaning of this is a mystery. Perhaps it is intended to say, "The character of uses that are designated in Table 17.20.020 as permitted, conditional and prohibited within each zone."	Yes, this is closer to the intent and the language will be updated.
92				17.20.020(F)(5)(e), Keys to the use table	I recommend removing this catchall. While it's purpose is clear, it seems likely to be messy and in many instances unconstitutional. For example, what if the impact is blocking the view of the Director's ex mother in law? Or if the impact is the siting of an abortion clinic and the Director is pro-life. Etc	The line will be deleted.
93				Table 17.20.020, Principal uses permitted in commercial zones	I recommend making Cottage Housing a Permitted use in CA and CN zones. Because of some of the unique characteristics of Port Angeles, I think there is a good chance that Cottage Housing is a substantial part of the solution to PA housing shortage, through the installation of high quality modular homes that will become available in the next 5 years.	The project team is recommending changes in response to this concept. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
94				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Supportive Housing category] The terms inserted here go beyond what is required by the new state law, and are detrimental. Each P in this table represents an instance where a clinic for drug addicts, or a mental health crisis center, might be located right next door to a preschool, day care, retirement home, church or other location with great potential conflict. The new State law requires Cities to accomodate these types of services; the new law does NOT require that the City make these uses outright "Permitted" in any zone whatsoever. Also see similar comment below regarding Chemical Treatment under Medical.	A mix of Permitted and Conditional uses are proposed to match the existing permissions for hotels (a lodging use), with some adjustments to encourage supportive housing where it is an appropriate use based on the land use context. The research on the impacts of low-income and supportive housing on neighborhoods and businesses tends to be inconclusive or find little impact. Further, the conditional use process can be notoriously unpredictable for these types of developments.
95				Table 17.20.020, Principal uses permitted in commercial zones	Why is a brewery/distillery held to a different standard? If I make alcoholic Beer I can use 10,000 sf; but if I take the alcohol out of it, then I can only use 3,500? Also, brewery and distillery are not defined terms.	Further clarification will be made in future code work updates. This particular section not being considered for a revision. The City wishes to encourage these uses in specific neighborhoods and acknowledges they typically require larger footprints than most types of artisan manufacturing that would locate in an urban/central area.
96				Table 17.20.020, Principal uses permitted in commercial zones	Impound Yard is not a defined term, and not listed in 17.94.040. Just delete "impound yard" from this table.	It is recommended to retain in the table, even if not permitted in any zone, to make the use unambiguously prohibited.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
97				Table 17.20.020, Principal uses permitted in commercial zones	I recommend keeping "Interior Warehousing" as Permitted in the CA zone. Warehousing is a good use for dated buildings, as an alternative to having them empty. Just cap the building size to avoid big distribution centers.	The project team had discussion on this issue and recommends prohibiting warehousing due to truck, pollution, and noise impacts. Warehousing is allowed in the city's industrial zones.
98				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Chemical dependency treatment and detoxification centers] This ties into my comment on Supportive Housing. It should ALWAYS be a conditional use, so that proximity to uses like child care, preschool, retirement home and similar can be taken into account. You also need to provide for minimum spacing between "problem uses" like drug treatment, mental illness, etc, so that the harm from these necessary facilities is spread out and diluted, to prevent the toxic environment that results if they are grouped closely together.	Comment acknowledged.
99				Table 17.20.020, Principal uses permitted in commercial zones	[Refers to Private educational services in the CO zone] Should this be a P? Private schools and offices seem very compatible.	Comment acknowledged.
100				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Bed and breakfasts] This is unclear. Is intended to be restrictive on the baseline rule? Or expansive on the baseline rule? And why is it needed anyway? A single household dwelling that existing on ordinance adoption date is P; B&B is P. The comment can simply be deleted.	The note will be removed because "existing single-household dwelling" is already listed in the residential category of the permitted use table.
101				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to retail sales 50,000-100,000 square feet] Need to clarify meaning of "minor". Is it in comparison to the building, to nearby buildings? How about "... additions that do not increase the NFA of the subject building by more than 20% in any 5 year period."	Clarification will be added that a minor addition is less than 10% of existing net floor area, consistent with other Conditional Use Permit standards.
102				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Ferry, seaplane, and helicopter facilities] Recommend rethinking this. Helipads can be very disruptive and should be C in all zones other than industrial.	Comment acknowledged.
103				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Parking lots and garages (as a principle use)] The structured parking requirement for CBD is too early for Port Angeles. The economy does not support high enough commercial rental rates to support the cost of building structured parking. So this requirement will be a block to new commercial development.	This use is only for standalone, principle use parking. Accessory parking associated with a building can be surface parking if it meets the block frontage standards.
104				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Parking lots and garages (as a principle use)] I don't see why parking is a Conditional Use. Parking is low impact - why not just make it a permitted use - what's necessary to condition?	Comment acknowledged. Since the proposed code is now mitigating parking with lower minimums and substantial landscaping requirements, as well as design requirements introduced in the block frontage standards, parking will be changed to a "permitted" use or "P" on the table.
105				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Parking lots and garages (as a principle use)] Why such fear around parking lots, as evidenced here and in the moritorium? Parking is a good "holding use" for land, until the economy justifies the construction of a building. If you prohibit the operation of a parking lot, then empty lots, or lots with buildings that age out of their useful lives, will set empty, weedy, garbage filled and just gross. Parking is a good holding use for such lots and having a lot incentivizes the property owner to maintain their property so it looks attractive (and God knows, attractive is a huge element of this Code Amendment).	Comment acknowledged. Proposed code does not required existing Downtown parking lots from continuing. And it is agreed that parking is an important function of a commercial area. However, the project team strongly differs on the commentor's suggestion that CBD zoned land is best used as surface parking storage. The City does not wish to see buildings torn down and turned into surface parking lots, nor do they want to see all vacant land turned into surface parking lots. With such an approach, the downtown area becomes a place for people to store cars rather than encourage vibrant pedestrian activity. A vacant building is considered a better holding use because it preserves the opportunity for re-occupation in the interim time before redevelopment (typically helping to reduce start up costs for first-time businesses and entrepreneurs).
106				Table 17.20.020, Principal uses permitted in commercial zones	[Comment refers to Vessel moorage, marinas, and research vessels] Delete "and research vessels". If all vessels can be moored, then research vessels are included in that already.	Comment acknowledged.
	10/29/2021	PDF letter	Erik Marks	Dimensional standards	Multiple comments split into separate rows as reflected below	
107				Table 17.20.040, Commercial zone dimensional standards.	Have you considered removing the "minimum height" requirement? In my experience it is not common to dictate a minimum height. Why not let the market dictate the minimum height of a building, as a low height building does not create negative externalities? Removing the minimum building height requirement would absolutely reduce the cost and thereby encourage new development in the CBD.	Comment acknowledged.
108				Table 17.20.040, Commercial zone dimensional standards.	[Comment refers to rear setback standards] Based on 17.22.210, it looks like these cells should all say 0-15 in them.	Technically, the change isn't necessary, but functionally, it's a good idea: Change CBD, CA, and CSD zone cells to say 0-15 along with their existing footnote(s).

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
109				17.20.070 – Building height bonus standards	This Section is not harmful, but it does in my mind evidence a misunderstanding about Port Angeles. Allowing increased residential heights in places like Seattle does drive new residential unit construction, because the marginal cost of additional floors, once you are into highrise-type construction (steel/concrete) is lower than the marginal cost of the initial floors of the structure. But the cost per sf for highrise type construction is SIGNIFICANTLY greater than the cost/sf for wood or concrete/wood low and midrise construction. The first construction to create new multifamily housing in PA will not be highrise construction, and so the bonus floor concept simply is irrelevant for many years to come. It does no harm to have it here, but boy does it evidence a misunderstanding of the needs of a city like PA.	The commenter is correct that the project team does not expect this bonus height option to be used often, but it is important to plan ahead and offer a mix of incentives to encourage housing development. The City's Housing Action Plan identified a challenge of housing projects being feasible with the current commercial district maximum building heights. The community was also supportive of this approach during the concept development phase.
	10/29/2021	PDF letter	Erik Marks	Residential standards	Multiple comments split into separate rows as reflected below	
110				17.21.030(C), Cottage housing density standard	This is not aggressive enough. Recommend changing 2:1 ratio to 3:1. See Housing Partnership Memo on Cottage Housing (link at end of comment), page 3. Ravenna Cottages in Seattle built at 4.5x base density, very successful development. (I was member of the entity that developed the Ravenna Cottages.) https://mrsc.org/getmedia/d33307b0-2510-4130-a1caa85c70ea78b/chord.pdf.aspx	The 2:1 ratio has been a zoning standard for most communities and was based on suggestion from one of the main cottage housing builders. Keep in mind that this would no longer apply to RMD and RHD zones, as this draft proposes eliminating density standards there. Also note the proposed lot size reduction from 5,000 to 3,500 in the R7 zone - which essentially allows much greater density than existing provisions. No change suggested, but the issue should certainly be monitored with adjustments made in future if found necessary to stimulate more cottage housing, while ensuring compatibility.
	10/29/2021	PDF letter	Erik Marks	Commercial and multifamily design standards applicability	Multiple comments split into separate rows as reflected below	
111				17.22.020(C), Building additions, remodels, and site improvements	These three thresholds seem unworkable. Example: I own a 10,000 sf building. In year 1, I permit and construct 4900 sf of new space; I am clearly in Level 1 and the new space is under Section C1. Then in year 2 I file a permit application to construct a 200 sf addition. That bumps me into C2, but what about the 4,900 sf of improvements I already finished building? Do I have to rebuild those in order to construct my new 200 sf addition? Many, many more similarly problematic scenarios can be conceived. These provisions are simply unworkable and an alternative approach should be worked up. Can Makers provide an alternative approach to handling additions, remodels and site improvements, for consideration? If not, I can come up with something. It should be very clearcut, as this is an area of code that invites disagreement and litigation.	The project team is recommending changes in applicability of Chapter 17.22 in response to public comments. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
112				17.22.040(D), Departures	Are these decisions appealable? If so, provide code reverence here. If not, seems like a concern as it vests too much power in a single person. Secondly, it is necessary to provide for alternative process for review in the instance that the Director is conflicted, or the chair of the director is empty.	Section 17.96.150 allows for appeals to Director decisions. The setup here is similar to most every community MAKERS has worked with using this Departure option.
	10/29/2021	PDF letter	Erik Marks	Block frontage standards	Multiple comments split into separate rows as reflected below	
113				17.22.110 – Block frontage designation maps	I believe the extent of area covered by these regulations may be overreaching by the Planners. Many of the areas placed under 17.22 strike me as economically transitional areas, for which getting a few new businesses up and going is far more important than achieving Planner's Pretty City goals. Port Angeles needs basic growth far more than it needs far-reaching design standards in its transitional commercial areas. Recommendation: Scale back the extent of blocks designated as Storefront, Landscape or Mixed.	Comment acknowledged. Project team is not recommending a change in the proposed block frontage standards designation maps. Rather, there has been several changes proposed to the design requirements that are required in each block frontage standard.
114				Table 17.22.115, Explanation of transparency standards	Make this 30" to 8' for Storefront, to keep cost down.	Comment acknowledged.
115				Table 17.22.115, Explanation of transparency standards	Can mirrored count as transparent? Mirrored seems like a good solution when transparency is not practical, like a conference room or business office space.	Comment acknowledged.
116				17.22.120 – Storefront block frontage standards	I recommend removing the weather protection requirement. It is a costly feature that fits into the "nice to have" category as opposed to the "no ugly stuff" category. This is an example of a design requirement that simply does not fit the town of Port Angeles. Sidewalk weather protection is nice to have, but not at the expense of new development. Let PA grow up a bit, improve its economic vitality, and then start imposing requirements like this.	No change recommended. Weather protection is a critical feature for ensuring pedestrian friendly building design and street environments. A departure opportunity is available for alternative designs.
117				17.22.120 – Storefront block frontage standards	I recommend reducing the windows requirement from 70% to 50%, and to set the elevation range from 30" to 8', to reduce cost. Architectural variety will also increase with a reduced reliance on glass.	No change recommended. 70% transparency is a standard requirement in form based code elements, including communities that have similar seismic requirements as Port Angeles.
118				17.22.120 – Storefront block frontage standards	If I am reading this right, as originally drafted, it would have bizarre and undesirable outcomes. The first few buildings on a block could use 100% of frontage for lobbies, and later buildings could use 0%, effectively blocking any new lobbies after the first half of the block is built out!!!!	The provision/percentages would apply to each project on a limited basis. No change recommended.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
119				17.22.120 – Storefront block frontage standards	[Comment refers to retail space depth] This does not need to be established by legislation. The marketplace is far more adept at determining commercial space depth, than a city government. Setting minimum depth at 20' will keep people from gaming the system, but that's all that should be done. Applying the minimum depth to only a portion of each retail unit allows retail display windows to "wrap" over the front of other uses.	This type of standard is common in many communities to ensure retail space is viable. MAKERS has seen it range from 20 to 60 feet. A departure opportunity is available for alternative designs. No change recommended.
120				17.22.120 – Storefront block frontage standards	References to "public space" worry me and in my opinion should be removed throughout. If a space is "public", then I am concerned that a smelly person with a shopping cart can occupy that space for hours on end, causing great detriment to the businesses fronting on the space. Query: can a person be "trespassed" from a "public space"? I think the answer is no.	Comment acknowledged.
121				17.22.120 – Storefront block frontage standards	[Comment refers to parking location requirement] From 17.22.130. Keeping it simple and allowing flexibility to keep costs down. The original text will (A) render many existing sites incapable of renovation/redevelopment without scraping what is there now and (B) drive massive development cost increases for certain sites. Parking is really not the end of the world, and over time development takes care of it - when the market value of built space exceeds the market value of parking, the parking will be pushed underground, behind, etc.	Comment acknowledged.
122				17.22.120 – Storefront block frontage standards	Do these work the way that CBD streets are layed out now? If so, then this is ok for CBD but not other zones. These sidewalk requirements would produce absurd results at extraordinary cost in other zones.	These standards were developed in collaboration with public works staff and are a common standard to ensure sufficient sidewalk width given development design.
123				17.22.120 – Storefront block frontage standards	Minimize and simplify the Departure Criteria. This code should strive for elegant simplicity, as opposed to complexity of requirements and departures from those requirements. PA does not fit code like that.	Comment acknowledged.
124				17.22.120 – Storefront block frontage standards	[Comment refers to sidewalk width departure criteria] PA is not Palm Springs. It is cold in the winter and windy in the summer. Requiring ALL sidewalks to accomodate outdoor seating and dining is absurd, wasteful and damaging to the City.	Comment acknowledged. Sidewalk width requirements are not also requiring outdoor seating or dining areas. Wider sidewalk widths in storefront designated areas are intended to allow for greater commercial pedestrian commerce and to ensure clear paths are still possible when outdoor seating or dining is proposed in front of the building.
	10/29/2021	PDF letter	Erik Marks	Site planning standards	Multiple comments split into separate rows as reflected below	
125				17.22.220 – Public space.	[Comment suggests deleting entire section] Costly to set aside the land. Design constraining. Costly to build. Costly to maintain. Attract vagrants. Not needed to achieve an attractive city.	Based on comments received, the project team is recommending changes in response to this concept. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
126				17.22.230 – Residential amenity space.	These requirements directly and materially increase the cost of residential development. If we want more and cheaper housing in PA, don't require costly expenditures as a hurdle to building residential units.	Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
127				17.22.240(C)(5), Connections to adjacent properties	[Comment suggests deleting subsection] The marketplace will determine if these should be built. Requiring them is unnecessary, drives up cost, and sometimes would be very harmful - think \$1m townhouses built with a required connection through a back property line to Section 8 housing.	No change recommended. This standard is important for encouraging walking and a more functional and convenient built environment. A departure opportunity is available for alternative designs or unique situations.
128				17.22.250(C) – Vehicular circulation and parking	Yes, favor alleys over streets. But beyond that, let developers figure it out!	No change recommended.
129				17.22.260(B)(2), Location of ground-level service areas and mechanical equipment	as originally drafted, this could have forced some VERY expensive service area locations, as opposed to some mere screening measures. Cost MUST be taken into account in all regulations, or you will kill enterprise.	Comment acknowledged. This section of code is specific to location. Will add clarification to the term "Trash and Recycling Enclosures" instead of "Service Areas."
130				17.22.260(B)(5), Location of ground-level service areas and mechanical equipment	As drafted, this would have required a roof over a propane tank or electric transformer.	Refer to similar comment #82 above.
131				17.22.260(C)(4), Screening of ground-level service areas and mechanical equipment	Without this clause, most 0- setback buildings would be impossible to construct.	No change recommended. Zero-setback buildings are likely to have trash in the back along an alley where they won't be subject to section (C).
132				17.22.260(E)(2), Roof-mounted mechanical equipment	Perforated metal (galvanized) is a cost effective weatherproof screening solution.	Prohibition is removed.
133				17.22.270(B), Site lighting applicability	This would have absurd outcomes on existing buildings. I might need to replace one light in a row of 20, and I would not be allowed to match what is already there.	Individual light bulbs do not need to be changed to meet the standard during regular maintenance; see the Level of Improvement Standards in 17.22.020(C).
134				17.22.270(D)(3), Building-mounted lights	This looks like it would prohibit such things as porch lights, patio lighting, rooftop deck lighting! when above the 2d story.	The exception for fully recessed lights provides an avenue for exterior lights higher up on a building (e.g. for apartment balconies). However, the code will be revised to clearly allow rooftop deck lighting provided it is at least 10 feet from the edge of the roof and properly shielded.
135				17.22.270(F), Lighting color	3500k is very yellow, and provides poor color resolution. Generally commercial parking lot lighting is 4500-5,500k.	Comment acknowledged.

Public Comments - Title 17						
#	Date	Form	Name	Section or Topic	Comment (may be paraphrased)	Response / Recommendation
136				17.22.270(H), Prohibited lighting	Not sure where this is coming from. There are lots of instances a critical area might need lighting, like a driveway up a steep slope or a bridge over a ravine that need to be lit. Further, I am finding no definition of "critical area" in PA code.	Language will be changed to "undeveloped environmentally sensitive area", which is defined in code.
	10/29/2021	PDF letter	Erik Marks	Building design standards	Multiple comments split into separate rows as reflected below	
137				17.22.320(B) – Building massing and articulation	[Comment refers to number of articulation features] This is ambiguous and should be revised. Not sure exactly what it is intended to say, but it does need to be cleared up.	Project team is recommending several changes to 17.22.320. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
138				17.22.320(B) – Building massing and articulation	[Comment refers to list of articulation features] Just use a single list. It is more flexible, more elegant and easier for everyone to use.	Project team is recommending several changes to 17.22.320. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
139				17.22.320(C) – Building massing and articulation	Use the same list as the prior section. No reason to use different language here.	Project team is recommending several changes to 17.22.320. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
140				17.22.330 – Building details	[Comment suggests deleting entire section] This section adds substantial design and construction cost, and is deep governmental meddling in the design of SURVEY RESULTS buildings. Let architects and developers do their jobs.	Project team is recommending several changes to 17.22.330. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
141				17.22.340(B)(4) – Building materials on first floor	Concrete can be significant cost savings over masonry.	The project team recommends removing the ground floor cladding requirements.
142				17.22.340 – Building materials.	[Comment suggests deleting subsections for metal, EIFS, and cementitious paneling] Provisions above govern materials used on the first floor, which have by far the largest impact on the streetscape and neighbors. Stop there. Let architects and developers figure the rest out, so as to maximize value.	The project team recommends removing the ground floor cladding requirements (see comment above), but no changes are recommended to the other specific material standards. Note that multiple departure opportunities are available.
143				17.22.350(B), Blank wall definition	15 feet is super short. These treatments are expensive. This is an example of where something that is really problematic (a blank wall over 50 feet) can be regulated, but the rest of it should be left alone.	The project team recommends a sliding scale definition based on building setback (front): 15-feet for setback less than 5' (storefront); 20-feet for setback 5-10"; and 25-feet for buildings with >10' setback..
144				17.22.350(C), Blank wall treatment	blank wall should not require costly treatment just because it can be seen from 100 ft away. Heck, as drafted, this would have triggered treatment requirements if a blank wall were visible from a rooftop deck!!! Vast over-reaching.	Text will be revised to more specifically apply to ground-level residential amenity space.
	10/29/2021	PDF letter	Erik Marks	Landscaping standards	Multiple comments split into separate rows as reflected below	
145				17.22.410 – Applicability.	If this was left in place, a property that had required landscaping, and wanted to replant some of the trees, would have to upgrade to the new standards. Not what we want to require.	Updates will be made to clarify applicability with an emphasis on new development and major site changes. The project team is recommending changes in applicability of Chapter 17.22 in response to public comments. Options are summarized in the "Major Code Changes" appendix of the staff report for the November 10 Planning Commission meeting.
146				17.22.425(A)(2), Type A Landscaping.	Nothing is 100%. Using the term 100% here is inviting litigation [comment suggests changing 100% to "substantially all"]	The project team has recommended this change.
147				Table 17.22.430, Required buffer types	I recommend reducing all buffers in this table, other than the storage-buffers, to 5'. Requiring larger landscape buffers is a direct cost increase on a project, which drives up housing costs and reduces economic vitality. Note that the cost of the additional landscaping is only a minor element; the real cost is incurred due to lost site utility and loss of site efficiency.	No change recommended. These are modest standards as the 10' buffers generally only apply to outdoor storage areas and high intensity commercial uses plus there is a departure opportunity. The code is also substantially reducing parking requirements which are a bigger cost item.
148				17.22.435(B) – Block frontage landscaping.	[Comment suggests deleting subsection] This needs to be clarified, or better yet delete it. Is it supposed to be establishing a requirement for landscaping between a building and parking, on the same site? If so, don't do that. The purpose of the code is to prevent harms to other lots and the public. The code should not dictate to a developer what to do within his/her own site if there are not external impacts. For example, this would require that a small auto body shop install landscaping to shield customer parking from the building - such landscaping is unnecessary, paternalistic and ultimately would just fall into disrepair and fill with garbage.	Comment acknowledged. These standards apply to the public face of developments - requiring some landscaping between streets and buildings or parking areas (except for storefronts).
149				17.22.435(C) – Block frontage landscaping.	[Comment suggests deleting subsection] Code requires street trees. Code requires screening. Leave the developer alone to manage the rest of his site as best suited for the site. Trees are not always desirable.	Comment acknowledged.
150				17.22.440(C), Parking lot landscaping minimum width	Reducing this allows more flexibility in parking lot design, but does not reduce the overall requirement for landscaping, which remains at 5%.	This will be reduced to 7.5 feet to complement the parking code's parking space width of 8.5 feet (accounting for island curbs).
151				17.22.440(F)(1), Parking lot perimeters	[Comment suggests a width of 5 feet] This approach ensures that there is parking lot buffering, without requiring that excessive land be dedicated to such buffers.	The project team recommends reducing this to 7.5 feet (while still allowing departure options to reduce it by 50%) to match the above recommended planter width.
152				17.22.440(F)(2), Parking lot internal lot lines	Recommend reducing to 5'. Land dedicated to screening directly increases development cost, which increases the cost of housing, and negatively impacts economic vitality. 10' buffers are overkill (keep in mind it would apply both sides of the property line, resulting in a 20' landscape strip - a virtual forest!	The project team recommends reducing this to 7.5 feet (while still allowing departure options to reduce it by 50%) to match the above recommended planter width.
153				17.22.445(C), Stormwater detention ponds	Not clear what this means. Is buffer landscaping required? What "type" of landscaping?	The project team recommends deleting this subsection.