

HISTORIC LANDMARK COMMISSION STAFF REPORT

Toth Residence Major Alteration/Minor Construction
Petition 470-07-39 located at 167 North "O" Street in
the Avenues Historic District
January 2, 2008



Planning and Zoning
Division
Department of Community
Development

Applicant: Bob Toth

Staff: Nick Norris;
nick.norris@slcgov.com or
535-6173

Tax ID: 09-32-335-011

Current Zone: SR-1A Special
Development Pattern Residential
District

Master Plan Designation:
Low Density Residential

Council District: District 3;
Eric Jergensen

Acreage: 0.13 acres

Current Use: Single family
residential

Applicable City Ordinance:

- City Code Section
21A.34.020

Attachments:

- A. Historic Photo of site
- B. Current Photos of site
- C. Site Plan and Building
Elevations

REQUEST

The applicant is requesting approval of an addition to the single family home located at 167 North "O" Street. The addition consists of the following alterations to the structure:

1. Adding a second story to the home
2. Expanding the basement by excavating underneath the home
3. Addition of new windows to the basement
4. Adding an exterior doorway and stairs to the basement
5. Adding solar panels to the roof on the addition.

PUBLIC NOTICE

A public notice was mailed to all property owners within 85 feet of the property, to the interested parties on the Planning Division's email list serve and posted on the Planning Divisions website.

STAFF RECOMMENDATION:

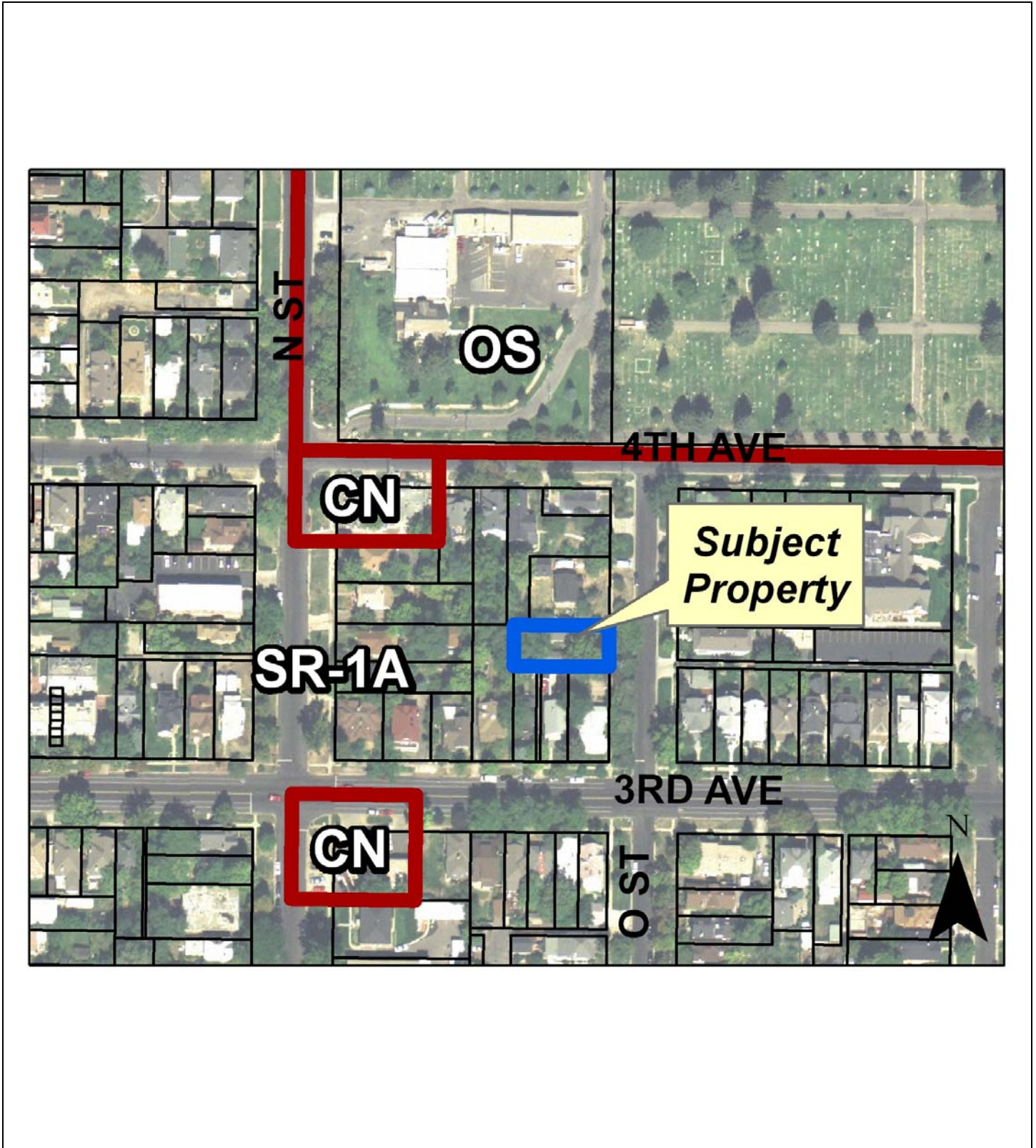
Based on the analysis and findings in this report, Staff finds that the proposed addition to the structure located at 167 North "O" Street does not meet the standards found in Zoning Ordinance 21A.34.020.G "Standards for Certificate of Appropriateness for Alteration of a Landmark Site or Contributing Structure." Specifically, the proposed alteration does not comply with standards 2, 8, 9 and 10. Staff recommends that the Historic Landmark Commission refer the matter to the Architectural Subcommittee for further review of the proposed addition.

OPTIONS

The Historic Landmark Commission has the following options regarding this proposal:

1. The Historic Landmark Commission can approve the proposal by finding that the proposal substantially complies with all applicable ordinances and design guidelines;
2. The Historic Landmark Commission can deny the proposal by finding that the proposal does not substantially comply with applicable ordinances and design guidelines; or
3. The Historic Landmark Commission can refer the proposal to the architectural subcommittee for further review of the design of the proposed addition.

VICINITY MAP



COMMENTS

Public Comments: To date, no public comments have been received.

BACKGROUND:

The subject property is reflective of the box style of architecture. The overall goal for the Avenues Historic District is to preserve its historic scale and unique character, while accommodating new construction. The distinctive design characteristics of individual building types and styles should be preserved. New construction should be compatible with its historic context while also reflecting current design (*Design Guidelines for Residential Historic Districts in Salt Lake City*, pg 149).

The structure was constructed in 1940 as a single family dwelling. In 1981, a 252 square foot addition was added to the rear of the home. The Avenues Historic Survey indicates that this building was a contributing structure when the survey was done in 1979. A search of City Records indicated several building permits for the property between 1981 and 1995. With the exception of the 1981 addition, the other permits issued by the city were for plumbing and electrical work. No other land use related applications tied to this property were found.

The structure is located mid block on O Street between Third and Fourth Avenues. The block contains single story residential buildings. There are four primary structures, including the subject property, on the west side of "O" Street between Third and Fourth Avenues. One lot on the block face is T shaped and has frontage on 4th Avenue and "O" Street but is not a corner parcel. The T shaped lot has an accessory structure that faces "O" Street.

The structure is a simple design with a hipped roof with the ridge running parallel to the street. The front elevation of the structure includes a bay window and picture window on each side of a centrally located front door. The windows on the front of the house are white vinyl.

STAFF ANALYSIS AND FINDINGS

Base Zoning Analysis

The subject property is located in the SR-1A Special Development Pattern Zoning District. The SR-1A Zoning district was established after the subject property was constructed. Despite this fact, the structure does meet the minimum requirement of the SR-1A Zoning District. The proposed addition would be approximately nine (9) feet from the north property line. The addition would not impact the side yard setback to the south, which is approximately thirteen (13) feet six (6) inches. The front setback would not be impacted. The rear yard setback is approximately 48 feet. The foot print of the structure would not change. The addition would be on top of existing living space on the main floor. The structure would be approximately twenty two (22) feet seven (7) inches in height measured to the ridge of the roof. The maximum allowed building height in the SR1-A Zoning District is twenty three (23) feet.

H Historic Preservation Overlay Zone Analysis

Zoning Ordinance section 21A.34.020 (G) lists the standards for alterations of a Landmark Site or contributing structure. The Historic Landmark Commission is charged with determining if the project substantially complies the following standards and is in the best interest of the city:

1. A property shall be used for its historic purpose or be used for a purpose that requires minimal change to the defining characteristics of the building and its site and environment;

Analysis: The structure was built in 1940 as a single family dwelling. Under this proposal, the use of the property as a single family dwelling would not change. The proposed addition on the rear of the home could expand and alter the structure for the purpose of increasing the living area of the home.

Finding: The property has historically been used as a single family dwelling. This proposal would maintain the use of the property as a single family dwelling and complies with this standard.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided;

Analysis: The front façade provides the defining characteristics of the property. The rear half of the roof would be removed from the structure to accommodate a second level addition. Although the addition is to the rear half of the home, it will alter how the structure appears from the street due to the height of the addition. According to the Design Guidelines for Residential Historic Districts in Salt Lake City, additions that are taller than the historic building should be set back substantially or include a “connector” space to link the addition to the historic building. The existing ridge line of the home is approximately seventeen feet in height. The proposed addition would extend approximately five (5) feet above the existing ridge line. The front half of the roof and original outline of the roof would remain.

The existing roof is symmetrical in nature while the roof on the addition as seen from the street is asymmetrical. The pitch of the proposed roof is flatter than the existing roof in order to comply with the maximum height in the SR1-A Zoning District. If the roof pitch on the addition were increased to match the pitch on the existing house, the structure would exceed the height limit in the SR-1A Zoning District. The eaves on the addition are similar to the eaves on the historic building. Maintaining the characteristics of the eaves is an important aspect of creating a compatible roof design.

The proposal includes adding two different types of siding to the structure. The proposal includes cedar shingles and hardieplank siding. This would be in addition to the existing wood siding. Introducing multiple types of siding to the addition draws attention away from the materials on the historic building.

At some point in time, the original windows were replaced with vinyl windows. The photographs that are available clearly show different windows over the years. The photograph attached in Exhibit (A) was taken in the mid 1990’s and indicates a different type of window than what is there now. Certificates of Appropriateness were required at that time and a search of City records did not indicate that a Certificate was issued to replace the windows. The basis for the windows on the addition is the vinyl windows that are on the structure now. Vinyl windows have been approved on additions and on new construction in the past provided they have a profile and reveal that is consistent with a historic window. The windows on the primary façade, including the addition should be compatible with the applicable design guidelines.

Design Guidelines for Windows:

3.5 Match a replacement window to the original in its design.

3.6 Match the profile of the sash and its components, as closely as possible to that of the original window.

3.7 In a replacement window use materials that appear similar to the original.

8.10 Use windows in the addition that are similar in character to those of the historic building or structure.

8.16 On primary facades of an addition use a solid-to-void ratio that is similar to that of the historic building.

Design Guidelines for Roofs:

7.1 Preserve the original roof form.

7.2 Preserve original roof materials where feasible.

7.3 Preserve the original historic eave depth.

7.5 When planning a roof-top addition, preserve the overall appearance of the original roof.

8.13 The roof form and slope of the addition must be in character with the historic building.

8.15 Roof forms shall be similar to those of the historic building.

Design Guidelines for Additions

8.1 Design an addition to a historic structure such that it will not destroy or obscure historically important architectural features.

8.2 Design an addition to be compatible in size and scale with the main building.

8.3 Place an addition at the rear of a building or set it back from the front to minimize the visual impact on the historic structure and to allow the original proportions and character to remain prominent.

8.5 Design a new addition to preserve the established massing and orientation of the historic building.

8.6 Do not construct a new addition or alteration that will hinder one's ability to interpret the historic character of the building or structure.

8.7 When planning an addition to a building, preserve historic alignments that may exist on the street.

8.11 Design an addition to a historic structure such that it will not destroy or obscure historically important architectural features.

Design Guidelines for Materials

8.8 Use exterior materials that are similar to the historic materials of the primary building on a new addition.

Guidelines for the Avenues Historic District

13.8 Design new buildings to be similar in scale to the scale that was seen traditionally on the block.

13.9 Use primary building materials on a building that are similar to those used historically.

Finding: The proposed addition alters the historic character of the property by using a roof shape that is not consistent in outline or pitch to the existing roof, by using incompatible materials, and by altering how the property addresses the street. Therefore, the proposal does not comply with this standard.

3. All sites, structures and objects shall be recognized as products of their own time. Alterations that have no historical basis and which seek to create a false sense of history or architecture are not allowed;

Analysis: The primary façade of the structure is a simple design with a central door flanked on each side by a bay window and a picture window. As discussed on page 4, the windows have been replaced within the last 10-15 years.

The proposed addition would be faced with exterior building materials that differ from the original materials of the home. The historical siding on the building consists of horizontal wood siding. The siding on the 1981 addition is a similar horizontal wood siding. The proposed second level addition would be faced with cedar shake shingles and horizontal hardieplank siding. The plank siding is a modern material that is similar in dimension to the existing wood siding. The use of multiple materials changes the historic character of the home, which utilized a single siding material.

The original footprint and exterior walls of the structure would be readily visible from the outside. The original roof line would be wrapped around the sides of the structure. A vertical trim piece of wood on the north elevation represents where the original rear wall of the structure was prior to the 1981 addition.

The roofs on the historic house and on the proposed addition have different pitches, eave depths and symmetry. According to the applicable design guidelines, roofs on additions should have similar characteristics.

Applicable Design Guidelines

7.1 Preserve the original roof form.

7.5 When planning a roof-top addition, preserve the overall appearance of the original roof.

7.5 When planning a roof-top addition, preserve the overall appearance of the original roof.

8.1 Design an addition to a historic structure such that it will not destroy or obscure historically important architectural features.

8.2 Design an addition to be compatible in size and scale with the main building.

8.6 Do not construct a new addition or alteration that will hinder one's ability to interpret the historic character of the building or structure.

8.11 Design an addition to a historic structure such that it will not destroy or obscure historically important architectural features.

8.13 The roof form and slope of the addition must be in character with the historic building.

8.3 Place an addition at the rear of a building or set it back from the front to minimize the visual impact on the historic structure and to allow the original proportions and character to remain prominent.

8.4 Design a new addition to be recognized as a product of its own time.

8.8 Use exterior materials that are similar to the historic materials of the primary building on a new addition.

8.12 Set a rooftop addition back from the front of the building

Finding: The design of the proposed addition is different than the design of the historic structure because the proposed addition uses different materials than the original house and incorporates different roof pitches. The original structure would be readily visible because the original roof line wraps around the addition and vertical trim will indicate where the location of the original rear wall of the structure. The proposal complies with this standard.

4. Alterations or additions that have acquired historic significance in their own right shall be retained and preserved;

Analysis: The proposal would not remove any additions or alterations that have acquired significance on their own. The addition would be placed on the rear half of the existing home and on the 1981 addition.

Finding: The proposal would not remove an alteration or addition that has acquired historic significance and complies with this standard.

5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved;

Analysis: The structure is defined by the modified hipped roof and central doorway with windows flanking each side. The proposed addition would maintain the outline and slope of the existing roof, but would alter how the structure is viewed from the street. The rear half of the roof would be removed to accommodate the addition. The design of the addition creates a valley where the existing roof line meets the addition. If not sloped to provide for proper drainage, the valley could result in damage to the roof structure and to the interior of the home. The valley should be eliminated by the use of a cricket or some other design feature that would provide adequate drainage and snow melt.

Applicable Design Guidelines

2.1 Preserve the historic appearance of original materials.

8.9 Minimize negative technical effects to original features when designing an addition.

7.3 Preserve the original historic eave depth.

Finding: The design of the proposed addition includes a valley between the existing roof line and the east wall of the addition which could be susceptible to water and ice damage from improper drainage. The damage could jeopardize the historical integrity of the structure. Proper roof drainage should be included to address the interface between the historic building and the addition. The proposal does not comply with this standard. However, if the interface between the existing structure and the addition is altered to provide adequate drainage, the proposal would comply with this standard.

6. Deteriorated architectural features shall be repaired rather than replaced wherever feasible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, texture and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplications of features, substantiated by historic, physical or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other structures or objects;

Analysis: The proposal would not remove architectural features of the home. The proposed building materials are similar in dimension to the existing siding on the home. The materials on the proposed

addition include Hardieplank siding, cedar shingle siding, vinyl windows, and asphalt shingles on the roof. The materials are not intended to replace historic materials.

Applicable Design Guidelines

2.8 Match the original material in composition, scale and finish when replacing materials on primary surfaces.

7.1 Preserve the original roof form.

7.5 When planning a roof-top addition, preserve the overall appearance of the original roof.

Finding: The proposed addition does not remove architectural features of the structure and does not include replacing historic materials with new materials. Therefore, the proposal complies with this standard.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible;

Analysis: The proposal does not include any sort of chemical or physical treatments. If any surface needs to be cleaned, it shall be done using the gentlest means necessary. Zoning Ordinance Section 21A.34.020.D.3 states that a Certificate of Appropriateness is required for any masonry work, including sandblasting and chemical cleaning.

Applicable Design Guidelines

2.7 Use the gentlest means possible to clean the surface of a structure.

Finding: Cleaning of any exterior material or surface should be done utilizing the gentlest means necessary. Sandblasting or other power washing is prohibited. The proposal would comply with this standard if an Administrative Certificate of Appropriateness specifically for the cleaning or surface treatment of historic materials is required prior to any work being performed.

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

Analysis: The defining characteristics of the subject property are the front façade of the building and the general form of the house and its location. The proposed addition alters the appearance of the structure from the street, modifies the primary façade of the home and changes the form of the structure. The proposed addition is stepped back approximately fourteen (14) feet from the original front façade. The applicable design guidelines do recommend placing additions to the rear of a historic building. While the proposal is consistent with this guideline, the overall scale of the addition alters the defining characteristics of the home. The proposal will preserve the original roof line of the historic building but introduce a new roof shape for the addition. As discussed on page 4 of this report, the roof on the proposed addition is not compatible with the roof on the historic building.

Windows add to the overall character of a historic structure. The proposed windows include adding vinyl windows in the primary elevation of the addition. The decision to use vinyl was based on the fact that vinyl

windows are in place on the original home. As discussed, these windows were replaced within the last 10-15 years, apparently without a certificate of appropriateness being issued. Using vinyl windows on the addition may be appropriate if the window profile is consistent with historic window profiles and includes a reveal that is consistent with historic windows.

The proposed addition complies with all of the standards of the SR-1A Zoning District, including yard, height, and coverage requirements. The block face primarily consists of single story structures. The additional height would make the subject property taller than the other structures on the block face, but within the allowed height in the underlying zoning district. The structure does increase the overall mass and scale of the property and impacts the historical development pattern on the block face.

Applicable Design Guidelines

2.8 Match the original material in composition, scale and finish when replacing materials on primary surfaces.

3.7 In a replacement window use materials that appear similar to the original.

7.3 Preserve the original historic eave depth.

7.4 Minimize the visual impact of skylights and other rooftop devices.

8.1 Design an addition to a historic structure such that it will not destroy or obscure historically important architectural features.

8.2 Design an addition to be compatible in size and scale with the main building.

8.3 Place an addition at the rear of a building or set it back from the front to minimize the visual impact on the historic structure and to allow the original proportions and character to remain prominent. 8.4 Design a new addition to be recognized as a product of its own time.

8.5 Design a new addition to preserve the established massing and orientation of the historic building.

8.6 Do not construct a new addition or alteration that will hinder one's ability to interpret the historic character of the building or structure.

8.7 When planning an addition to a building, preserve historic alignments that may exist on the street.

8.8 Use exterior materials that are similar to the historic materials of the primary building on a new addition.

8.9 Minimize negative technical effects to original features when designing an addition.

8.10 Use windows in the addition that are similar in character to those of the historic building or structure.

8.13 The roof form and slope of the addition must be in character with the historic building.

8.16 On primary facades of an addition use a solid-to-void ratio that is similar to that of the historic building.

13.8 Design new buildings to be similar in scale to the scale that was seen traditionally on the block.

13.9 Use primary materials on a building that are similar to those used historically.

Finding: The proposed addition is not compatible with the character of the property because it introduces a new roof shape to the structure, alters how the structure appears from the street and increases the mass and

scale of the structure. With modifications to the roof and by using windows that comply with the design guidelines, the proposal could comply with this standard.

9. Additions or alterations to structures and objects shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired. The new work shall be differentiated from the old and shall be compatible in massing, size, scale and architectural features to protect the historic integrity of the property and its environment;

Analysis: The addition on the rear of the home would be located on top of an area where a previous addition was added to the home. This area would be altered in a manner that would make it difficult to remove in the future. The essential form and integrity of the structure would be impaired by the addition and is readily visible from the public right of way. However, the design guidelines do recommend that roof top additions be set back from the front of an existing structure.

The proposed addition would change the overall scale of the structure because the height of the structure will increase. The other structures on the block face are all single story structures that appear to be similar in terms of height as the existing property. The addition would add approximately five (5) feet to the overall height of the structure. The existing building is approximately seventeen (17) feet tall. The proposed addition would be approximately twenty two (22) feet tall measured to the peak of the roof. The underlying zoning designation encourages compatible infill by limiting building heights, lot coverages, etc. The maximum building height in the SR-1A Zone is twenty three (23) feet.

The proposed addition would be covered in materials that would differentiate it from the original materials of the home. The original outline of the home would be preserved by maintaining the original roof line, wrapping the roof around the proposed addition and with trim work that indicates where the original rear wall of the structure was prior to the 1981 addition.

Applicable Design Guidelines

- 8.1 Design an addition to a historic structure such that it will not destroy or obscure historically important architectural features.**
- 8.2 Design an addition to be compatible in size and scale with the main building.**
- 8.3 Place an addition at the rear of a building or set it back from the front to minimize the visual impact on the historic structure and to allow the original proportions and character to remain prominent.**
- 8.4 Design a new addition to be recognized as a product of its own time.**
- 8.5 Design a new addition to preserve the established massing and orientation of the historic building.**
- 8.6 Do not construct a new addition or alteration that will hinder one's ability to interpret the historic character of the building or structure.**
- 8.7 When planning an addition to a building, preserve historic alignments that may exist on the street.**
- 8.8 Use exterior materials that are similar to the historic materials of the primary building on a new addition.**
- 8.9 Minimize negative technical effects to original features when designing an addition.**
- 8.10 Use windows in the addition that are similar in character to those of the historic building or structure.**

Finding: The proposed addition would be difficult to remove in the future because it would dramatically alter the rear of the home. However, the original roof could be replicated based on existing documentation. The proposal does increase the overall mass of the structure in terms of massing and size in a manner that is not consistent with the development pattern on the block. Therefore, the proposal does not comply with this standard.

10. Certain building materials are prohibited including the following:

- a. Vinyl or aluminum cladding when applied directly to an original or historic material, and**
- b. Any other imitation siding material designed to look like wood siding but fabricated from an imitation material or materials;**

Analysis: The proposal does not include vinyl or aluminum cladding applied directly to an original material. Synthetic materials are proposed for the addition. The proposed siding includes cedar shingles and “Hardieplank” manufactured by James Hardie Industries. The material will be installed horizontally and painted to match the existing color of the house. Each plank is approximately 7 inches wide and has a smooth finish on it that does not make an attempt to replicate wood. The cedar shingles would add a third primary building material to the outside of the home. The design guidelines suggest using building materials that are similar to those found on the home. The cedar shingles are not consistent with the historic building materials on the home.

Windows add to the overall character of a historic structure. The proposed windows include adding vinyl windows in the primary elevation of the addition. The decision to use vinyl was based on the fact that vinyl windows are in place on the original home. As discussed, these windows were replaced within the last 10-15 years, apparently without a certificate of appropriateness being issued. The proposed windows are Jeld-Wen vinyl windows and include fixed and casement type of windows. Vinyl windows may be acceptable if they have a profile that creates a reveal that is consistent with historic windows and are not flush with the exterior wall.

Applicable Design Guidelines

- 2.8 Match the original material in composition, scale and finish when replacing materials on primary surfaces.**
- 3.7 In a replacement window use materials that appear similar to the original.**
- 8.8 Use exterior materials that are similar to the historic materials of the primary building on a new addition.**
- 8.10 Use windows in the addition that are similar in character to those of the historic building or structure.**
- 8.16 On primary facades of an addition use a solid-to-void ratio that is similar to that of the historic building.**
- 13.9 Use primary materials on a building that are similar to those used historically.**

Finding: The proposed horizontal plank siding is consistent with the historic building materials on the home. The cedar shingles add an additional primary building material to the home that is not consistent with the historic materials. The proposed vinyl windows on the primary façade could be consistent with the applicable design guidelines for windows if they include a profile and reveal that is consistent with historic windows.

11. Any new sign and any change in the appearance of any existing sign located on a landmark site or within the H historic preservation overlay district, which is visible from any public way or open space shall be consistent with the historic character of the landmark site or H historic preservation overlay district and shall comply with the standards outlined in part IV, [chapter 21A.46](#) of this title;

Analysis: There are no signs associated with this property.

Finding: This standard is not applicable because there are no signs associated with the property.

12. Additional design standards adopted by the Historic Landmark Commission and City Council.

Analysis: This report references the publication “*Design Guidelines for Residential Historic Districts in Salt Lake City*”, including the design guidelines that are specific to the Avenues Historic District. There are no additional design standards adopted by the Historic Landmark Commission or City Council that are applicable to this property.

Finding: If the proposal is consistent with all applicable design standards adopted by the HLC and City Council, then the proposal would be comply with this standard.

In addition to the standards listed above, the Historic Landmark Commission has adopted criteria relating to the installation of solar panels. An analysis of the proposed project to the adopted criteria is listed below.

1. Solar panels should be installed below the ridgeline of a pitched roof, when possible or setback from the edge of a flat roof.

Analysis: The proposed solar panels are located below the ridgeline of the pitched roof.

Finding: The location of the proposed solar panels below the ridge of the roof complies with this criterion.

2. Solar panels should be located so as not to change an historic roofline or obscure the relationship of an historic roof to character-defining features such as dormers and chimneys.

Analysis: The proposed solar panels would be located on the roof of a proposed addition to the subject property. Therefore, the solar panels would not alter the historic roofline or obscure character defining features.

Finding: The proposed location of the solar panels will not alter a historic roofline or obscure character defining features and therefore complies with this standard.

3. Solar panels should be installed in a manner which does not damage or obscure character defining features.

Analysis: The proposed location of the solar panels will not damage or obscure character defining features. The solar panels are located on a proposed addition and therefore will not damage or obscure character defining features.

Finding: The proposed solar panels will not damage or obscure character defining features and therefore complies with this standard.

4. Solar panels should be located on the rear or sides of a pitched roof. Locating solar panes on a front pitched roof of the primary façade is inappropriate.

Analysis: The proposed solar panels will be located on a side of a pitched roof.

Finding: The proposed solar panels will be located on a side of a pitched roof and therefore complies with this standard.

5. Solar panels should be mounted parallel to the plane of a pitched roof and have a low profile.

Analysis: The proposed solar panels will be mounted parallel to the plane of the roof on the proposed addition.

Finding: The proposed solar panels will be mounted parallel to the plane of the roof on the proposed addition and therefore complies with this standard.

6. Solar panels should be installed in a location on the roof so as not to be readily visible from public streets.

Analysis: The solar panels would be located on the south facing roof located on the proposed addition. The proposed addition is to the rear of the historic structure. The solar panels would not be readily visible from a public street.

Finding: The solar panels would not be readily visible from the public street and therefore complies with this standard.

Attachment A
Historic Photo of Site

Attachment B
Current Photos of Site

Attachment C
Site plan and elevations