HISTORIC LANDMARK COMMISSION STAFF REPORT

Carleton Garage PLNHLC2011-00057 219 E. 4th Avenue

Meeting Date: December 1, 2011



Applicant: David Richardson, Capitol Hill Construction

Staff: Michaela Oktay, (801) 535-6003, michaela.oktay@slcgov.com

Tax ID: 09-31-335-021-0000

<u>Current Zone</u>: SR-1A (Special Development Pattern Residential District)

Master Plan Designation:

Avenues Master Plan

Council District:

District 3 – Stan Penfold

Community Council:

Greater Avenues-Chair, Dave Van Langerveld

Lot Size:

Approximately 0.15 acres or 6,534 Sq. Ft. in area

Current Use:

Single-Family Residential

Applicable Land Use Regulations:

■ 21A.34.020 (G)

Notification:

- Notice mailed 11/18/11
- Sign posted 11/21/11
- Posted to Planning Dept and Utah State Public Meeting websites 11/18/11

Attachments:

- A. Application
- B. Site & Building Plans
- C. Photos surrounding area

Request

This is a request by David Richardson, architect and builder, representing Jeff Carleton, property owner, for major alterations to construct a new garage at approximately 219 E. 4th Avenue. The request is before the Historic Landmark Commission because the garage is over one story in height, and the applicant is requesting approval for additional wall and building height over the maximum accessory height requirement in the SR-1A zoning district. The proposed project will also require a routine and uncontested special exception for grade changes over two feet, which can be administratively approved through another application.

Staff Recommendation

Based on the analysis and findings of this staff report, it is Planning Staff's opinion that the proposed new accessory structure generally meets the intent of the Standards for the Historic Overlay and for Special Exceptions.

If the Commission, in its consideration of the proposal, concurs with these conclusions, then Staff recommends that the proposed accessory structure with additional height, be approved as proposed with a condition that the applicant apply for a routine and uncontested special exception for grade changes over two feet.

VICINITY MAP



Background

Project Description

The subject property is located at 219 E. 4th Avenue in the Avenues Historic District and is approximately 6,361 square feet in area. There is a contributing structure on the site, a two-story bungalow with a rooftop addition. The single-family home has an approximate 1,530 square foot footprint. Currently there is no parking area or garage on the site but potential exists to place a garage at the northwest corner of the lot. As the photographs and plans illustrate, the subject property has a lengthy rear yard, which drops off steeply from the right of way, and the rear yard continuously slopes down towards the residence. Currently, there are wooden stairs which lead from the easement into the rear yard of the subject property.

The applicant is proposing to remove those stairs and build a new two-story garage at the rear of the property adjacent to the right of way which provides access to multiple surrounding properties. The proposed garage is over height for the SR-1A zoning district because in order to have the entry façade appear similar in height to other existing accessory structures on the right of way, the garage needs additional height. The north façade of

the garage will be 14 feet in height after proposed grade changes so that its overall height and massing would be compatible with other structures located adjacent to the right of way.

Grade changes & over height garage:

In order to construct a two story garage accessible off the right-of-way, the applicant proposes grade changes greater than two feet to accommodate for the construction because of sharp grade changes at the rear of the property. Often times over height and grade change special exception request go hand in hand when there is a matter of sloping topography, the wall height will be over height to allow the existing grade to remain as unchanged as possible while utilizing a lower level utility/storage area on the garage. The main purpose of the lower level of the garage is to utilize obvious accessible storage space for lawn and garden supplies with a retaining wall and patio area to allow for proper drainage.

Subject to the approval of the Historic Landmark Commission for a Certificate of Appropriateness and approval of the over height garage request, the applicant will have to apply for a separate special exception for a grade change exceeding two feet to construct this project as proposed. This special exception for the grade change can be administratively approved.

Materials:

The garage's proposed materials have been specifically chosen to match the materials used on the residence in composition, scale and finishing details. The garage would have painted shingle siding and trim and details to match the house. All trim will painted in wood with colors to match the residence.

Project Details

The following table is a summary of Zoning Ordinance requirements:

Ordinance Requirement	Proposed	Comply
Maximum Accessory Building Height:	Maximum height of the proposed garage 14 feet	No
14 feet for pitched roofs, measured from	on the north side but the south side is	
roof pitch to finished grade.	approximately 22' 6" in height. The HLC has	
	authority to grant this additional height.	
Interior Side & Rear yards : 1 foot from	Site plan shows that the garage meets minimum	Yes
property lines	dimensions, but needs to be setback at least 7'	
	3" per Transportation/Engineering Division	
	requirements for the radius and entry.	
Rear Yard coverage: No more than 50%	Site plan shows approximately 14% rear yard	Yes
of area in rear yard can be covered	coverage.	
Maximum Building Coverage: The	Proposed overall building coverage is	Yes
surface coverage of all principal and	approximately 31% of site.	
accessory buildings shall not exceed		
forty-five percent (40%) of the lot area.		
For lots with buildings legally existing on		
April 12, 1995.		
Accessory Buildings (garages):	Proposed 480 square foot garage footprint.	Yes
A detached garage has only maximum		
footprint of 480 square feet in SR-1A.		

Analysis and Findings

Analysis: The garage is proposed to be approximately 14 feet in height measured from finished grade at the north elevation, which is compliant with the zoning ordinance. However, because of a reduction in grade on the south elevation for a patio with drainage, the south elevation height is proposed to be 22' 6" in height, exceeding the height allowed in the zone by approximately five (5) feet.

The applicant has provided the building height of adjacent garages along the right of way. The proposed garage will be compatible in height to the abutting garages that are approximately 13' 6" in height. Other garages along the right-of-way are as tall as or taller than the proposed garage. The location and scale of the garage would most impact views from right of way, and it is staff's opinion that the garage will be compatible with the surrounding accessory structures, and compliment the various unique designs that are found along that right of way. Staff notes that the proposed garage would not be visible from any public street.

The HLC has the authority to determine if the proposed height is appropriate and decide to approve or deny requests for additional accessory building height.

Findings: The proposed garage addition exceeds the accessory structure height allowed in the SR-1A by approximately 5 feet on one side, but due to topographical constraints, it is an appropriate request given the lot constraints. Staff finds that the garage will be compatible in size and scale with the other accessory buildings on the right of way and will also utilize a lower level storage area so that additional accessory buildings should not be needed in the rear yard. The proposed materials are also compatible with materials on the main structure and are generally appropriate.

Comments

Public Comments

No public comments have been received.

21A.34.020(G) H Historic Preservation Overlay District

G. Standards for Certificate of Appropriateness for Altering of a Landmark Site or Contributing Structure: In considering an application for a Certificate of Appropriateness for alteration of a landmark site or contributing structure, the Historic Landmark Commission shall find that the project substantially complies with all of the general standards that pertain to the application and that the decision is in the best interest of the City.

Standard 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 use of the property will not change. There are no changes proposed to the contributing structure. The applicant has proposed minimal changes to the site to allow for construction of a garage and accessory storage that is not currently provided on the lot.

Findings for Standard 1: The proposal is generally not in conflict with this standard.

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;

Applicable Design Guidelines

- **11.1 Respect historic settlement patterns.** Site new buildings so that they are arranged on their sites in ways similar to historic buildings in the area. This includes consideration of building setbacks, orientation and open space.
- **11.7** Build to heights that appear similar to those found historically in the district. This is an important standard which should be met in all project.
- 11.8 The back side of a building may be taller than the established norm if the change in scale will not be perceived from public ways.

Analysis: Traditionally with regard to this particular area and within the local historic district, garages are detached and sited to the rear of the property. The surrounding lots and unique mix of garages and styles along the right of way indicate that there has been a natural evolution of structures built to shelter transportation. Staff notes that the proposed garage is not visible from a public street and would be a compatible with the other roof forms and materials used on other accessory structures. Although there are grade changes proposed that would make minor alterations to the rear yard on the lot, it should not have a negative impact on the features and spaces that characterize the property nor have a negative effect on any aspect of contributing status.

Findings for Standard 2: Based on the analysis above, staff concludes that proposed garage would result in construction that is both functional and compatible with the historic home and the surrounding right of way accessory structures. The project generally meets this standard.

Standard 3: All sites, structure and objects shall be recognized as products of their own time. Alterations that have not a historical basis and which seek to create a false sense of history or architecture are not allowed.

13.21 Maintain the character and scale of the side streets in the district. Many side streets, particularly the lanes, have a distinct character and scale that should be preserved.

Analysis: The garage maintains the character of the site and building materials proposed make it easily distinguishable from the historic structure and would define it as new garage construction. The proposed height, mass, and roofline appear similar to those found historically in the district and along the private right of way.

Finding for Standard 3: The garage is designed in such a manner as to be clearly recognized as a product of its own time and will not create a false sense of history.

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

Applicable Design Guidelines

- **11.1 Respect historic settlement patterns.** Site new buildings so that they are arranged on their sites in ways similar to historic buildings in the area. This includes consideration of building setbacks, orientation and open space.
- **13.7** Construct and locate secondary structure in a manner similar to those seen historically in the district. Most structures were built along the rear of the lot, accessed by the alley, if one existed. This should be continued. Garages shouldn't dominate the streetscape and should be detached.

Analysis: The garage as proposed respects the historic settlement patterns, and is compatible in design and scale with other structures in the area near the site.

Finding for Standard 4: The proposed garage design and siting is complimentary with the characteristics in the neighborhood; the proposal reflects historical development patterns and is in context with the site and environment. The project generally meets this standard.

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

Analysis: There is no proposed change to the construction characterizing the historic home.

Finding for Standard 5: This standard is not applicable for the project.

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: There is no architectural feature proposed to be altered as part of this proposal.

Finding for Standard 6: This standard is not applicable for the project.

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 proposed work does not include any treatments of historic materials.

Finding for Standard 7: This standard is not applicable for the project.

Standard 8: Contemporary designs 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: This building design and orientation, height, scale and material, do not destroy any significant material and the design is compatible with the character of the property and environment.

Finding for Standard 8: The project is generally meets this standard.

Standard 9: Additions or alterations to structures and objects shall be done in such a manner that if such additions or alteration were to be removed in the future, the essential form and integrity of the structure would be unimpaired. The new work shall be differentiate 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: If the proposed garage with additional height and minor grade changes were approved, the possibility of maintaining the original structure/site would be entirely possible. The garage could theoretically be removed and the architectural features of the property and the historic integrity of the property could be reestablished.

Finding for Standard 9: The addition and alterations as proposed, for the most part, preserve the original structure in both form and integrity, and if said additions were built and subsequently removed, the original structure would be unimpaired.

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 applicant is proposing materials for the garage addition that include shake style siding and wood design elements.

Finding for Standard 10: As in previous discussion, the proposed materials are generally consistent with the design guidelines for building materials.

Standard 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, <u>Chapter 21A.46</u> of this title;

Finding for Standard 11: This standard is not applicable for the project.

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

Finding for Standard 12: The Historic Landmark Commission's document, "Design Guidelines for Residential Historic Districts in Salt Lake City" is applicable in this case and has been discussed above.

Attachment A: Application





HLC: Major Alterations, New Construction, Relocation & Appeal of Admin. Decision

Use for: substantial alteration or addition to a landmark site or contributing site; new construction of principal building; relocation; appeal of administrative decisions; and referral by planning director.

Petition No.

Date Received: 2/15/2011

Reviewed By: Thomas Irvin

Address of Subject Property: 219 E. FOULTH A	JEHUE
Project Name: CALLETON CALRIAGE HOW	Canadamana
Name of Applicant: DAVID RUGARDSON	Phone: 533-0204
Address of Applicant: 814 E. 100 South.	,
E-mail Address of Applicant: DSLO CAPHILLON COM	Cell/Fax: 243-0043/539-064
Applicant's Interest in Subject Property: Allentett Build	D&7_
Name of Property Owner: JEFFREY C. CALLETON	Phone: 860-878-4425
E-mail Address of Property Owner: JEFF. CALLETON @ HOT	CHCAMEAS: CO-1.
County Tax ("Sidwell #"):	Zoning: SZ-IA
Legal Description (if different than tax parcel number):	
	We have the same

Please Check Type of Application and submit associated fee

Туре	Application Fee	Additional Fee
Major Alteration	\$27.69	Plus cost of first class postage
New Construction	\$221.48	Plus cost of first class postage
Relocation	\$221.48	Plus cost of first class postage
Appeal of Administrative Decision*	\$221.48	Plus cost of first class postage

Additional information may be required by the project planner to ensure adequate information is provided for staff analysis. All information submitted as part of the application may be copied and made public including professional architectural or engineering drawings which will be made available to decision makers, public and any interested party.

RECEIVED

File the complete application at:

SLC Planning Division 451 S State, Room 215 PO Box 145471

Salt Lake City, UT 84114-5480

Telephone: (801) 535-7700

Signature of Property Owner

Or authorized agent

y a Carleta

Attachment B: Site & Building Plans

	J.
design team	

OWNER: GENERAL CONTRACTOR:

JEFF CARLETON

CAPITOL HILL
CONSTRUCTION

PHONE:

EMAIL:

jeff.carleton@hotmail.com

EMAIL:

SALT LAKE CITY, UT 8

SALT LAKE CITY, UT 84102 PHONE: 801 533-0204 EMAIL: dsr@caphillcon.com CONTACT: DAVID

RICHARDSON

ARCHITECTURE: STRUCTURAL ENGINEER: HEART HEALTHY DESIGN RICHARDSON QUANN

ASSOCIATES

216 FIFTH AVENUE

SALT LAKE CITY, UT 84103

LICENSE #: 6999234-0301

PHONE: 801 828-0557

EMAIL: bjunge@comcqst.net

SALT LAKE CITY, UT 84102

PHONE: 801 533-0204

EMAIL: dsr@caphillcon.com

CONTACT: BRIAN JUNGE

SHEET INDEX

A-101 FLOOR PLANS A-201 EXTERIOR ELEVATIONS

-102 Proposed site conditions

-103 | Proposed site conditions

EXTERIOR ELEVATIONS

contact: david richardson

PROJECT SCOPE

NEW CONSTRUCTION FOR:

480 GROSS SF MAIN LEVEL TWO CAR GARAGE MADE OF WOOD FRAMING.

480 GROSS SF LOWER LEVEL TO BE FULL HEIGHT AND USED AS UTILITY ROOM AND STORAGE. LOWER LEVEL AND FOUNDATION TO BE BUILT OF POURED IN PLACE CONCRETE.

AREA CALCULATIONS

EXISTING PRIMARY SINGLE FAMILY RESIDENCE FOOTPRINT: 1530 SF

NEW DETATCHED TWO STORY
GARAGE & UTILITY/STORAGE
STRUCTURE
FOOTPRINT: 480 SF

PROPERTY AREA: 6361 SF REAR YARD AREA: 3590 SF

TOTAL PROPERTY AREA
CALCULATION:
1530 SF (EXIST. HOUSE) + 480 SF
(NEW GARAGE)
= 2010 SF (TOTAL)

SO: 2010 SF / 6361 SF = .315 THUS: BUILT STRUCTURE OCCUPIES 31% OF SITE THEREFORE: LESS THAN 40% (ACCEPTABLE)

REAR YARD AREA CALCULATION: 480 SF (NEW GARAGE) / 3590 SF (REAR YD) = .133

THUS GARAGE OCCUPIES 14% OF YEAR YARD
THEREFORE: LESS THAN 50%
(ACCEPTABLE)

CODE COMPLIANCE

ZONING: SR-14 (HISTORIC)
CODE: PER IRC 2009
(SINGLE FAMILY RESIDENTIAL 28'
MAX HEIGHT

CHAPTER 3: USE & OCCUPANCY
CLASSIFICATION:
RESIDENTIAL GROUP R: (PRIVATE
RESIDENCE)

CHAPTER 6: CONSTRUCTION TYPE:
TYPE V: (ALL STRUCTURAL
MEMBERS ARE OF ANY
CONSTRUCTION MATERIAL,
INCLUDING WOOD FRAMING)

FIRE RESISTIVE RATING FOR BLDG.
ELEMENTS:
STRUCTURAL FRAME: O HOUR
WEST WALL: 1 HOUR (PROXIMITY
TO PROP. LINE)
EAST WALL: O HOUR
NORTH WALL: O HOUR
SOUTH WALL: O HOUR

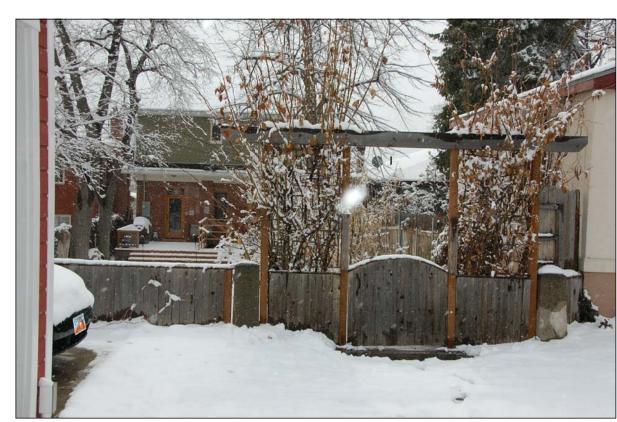
SOUTH WALL: O HOUR
FLOOR CONSTRUCTION: 2 HOUR
(BY DEFAULT)
ROOF CONSTRUCTION: O HOUR

ALLOWABLE AREA: TABLE 503: (NOT APPLICABLE)

OCCUPANT LOAD:
TABLE 1004.1.2 (NOT APPLICABLE)

TABLE 1005.1 (NOT APPLICABLE)





5th. AVE.

4th. AVE.

S.

 \Box

PROPOSED SITE (house in background)



PROPOSED SITE (Right of Way in background)



WEST SIDE OF SITE



DETAIL OF EXISTING BRACKET (100% new)



WEST ELEVATION OF RIGHT OF WAY



NORTH ELEVATION OF RIGHT OF WAY



EAST ELEVATION OF RIGHT OF WAY



VIEW LOOKING NORTH UP RIGHT OF WAY



EXISTING CONDITION PHOTOGRAPHS

5

PROJECT INFO.

1/10/2011 SLC STAFF REVIEW

BRIAN 1 216 FIFT SALT L/ 801.828

GE

AS-100

EXISTING SITE PLAN

LEGEND

G GAS LINE

P POWER LINE

S SEWER LINE

WATER LINE

G GAS METER

E POWER METER

WM WATER METER

WM WATER METER

WM WATER METER

EXISTING ROOF

FENCE LINE

NECHBORS GABACE REYOND

NECHBORS GABACE REYOND

SOLUTION

TREST T-CO

TREST T-

AVE. HEART HEALTHY SESIGN 557

BRIAN D. JUNGE A 216 FIFTH AVE. SALT LAKE CITY, U 801.828.0557

CARLETON CARRIAGE HOUS

DATE: STATUS: 01 / 26 / 2011 CONCEPT DOC'S.

02 / 27 / 2011 SLC HLC APPLIC.
09 / 08 / 2011 SLC STAFF REVIEW

11/10/2011 SLC STAFF REVIEW

SLC STAFF REVIEW

EXISTING
SITE INFO.

AS-101

EXISTING NEIGHBOR'S GARAGE WEST PROPERTY LINE T.O. CONC. WALL BLEV. * 97'-2" PATIO NEW 2 CAR GARAGE T.O. EXISTING GRADE ELEV. = 96'-9" LAWN T.O. PROPOSED F.F. ELEV. * 91'-6" T.O.LOWER LEVEL PROPOSED F.F. ELEV. • 92'-0" EXISTING WOOD DECK T.O. FINISH FLOOR ELEV. * 94'-6" SIDEWALK LAWN

LEGEND – g — GAS LINE — p — POWER LINE s — sewer line
—w— water line G GAS METER E POWER METER WM WATER METER

NEW ROOF

EXISTING ROOF

NEW 2 CAR GARAGE existing fence A1 NEW SITE SECTION

1/8" = 1'-0"

STATUS: 01 / 26 / 2011 | CONCEPT DOC'S. 02 / 27 / 2011 SLC HLC APPLIC. 09 / 08 / 2011 | SLC STAFF REVIEW 11/10/2011 SLC STAFF REVIEW

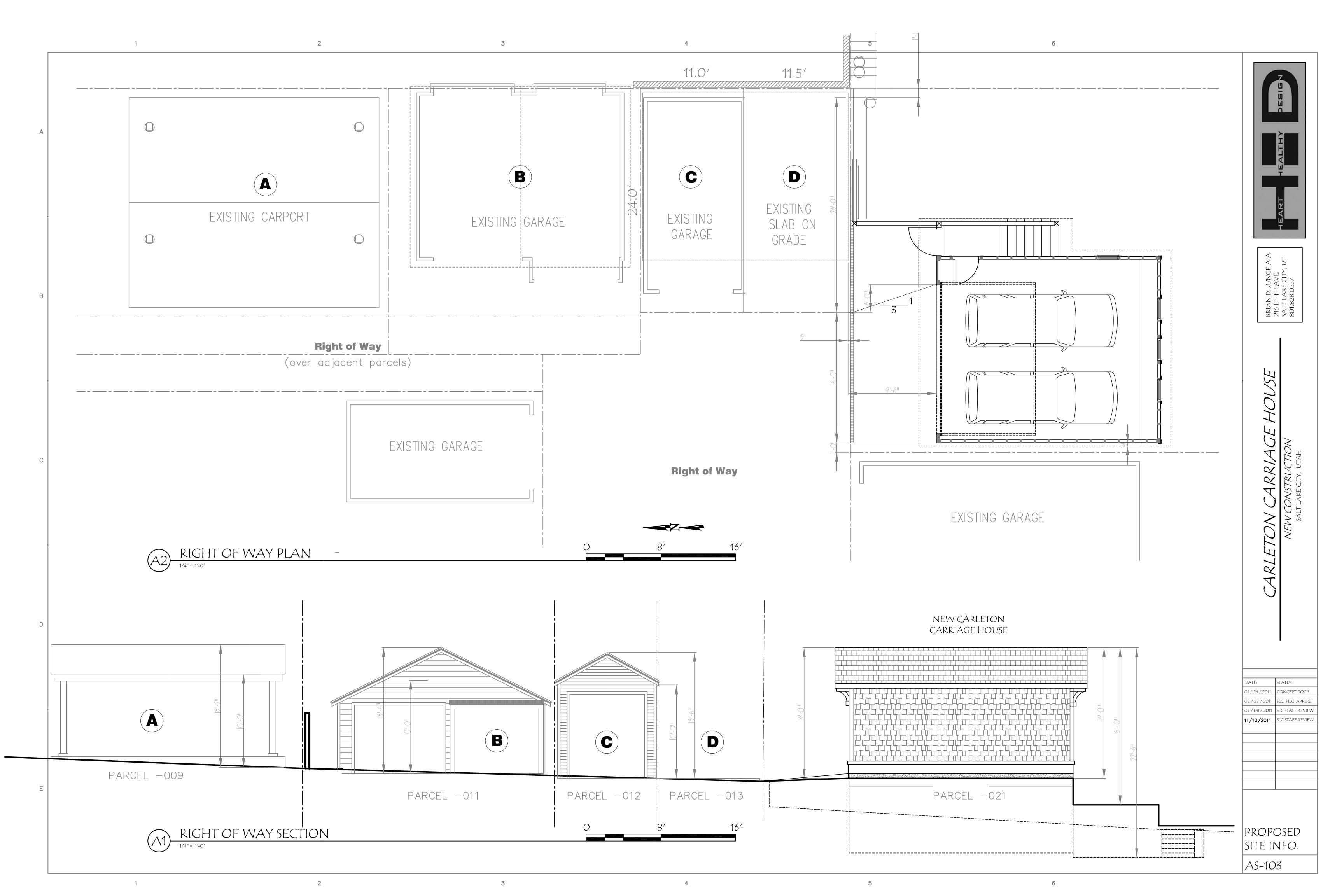
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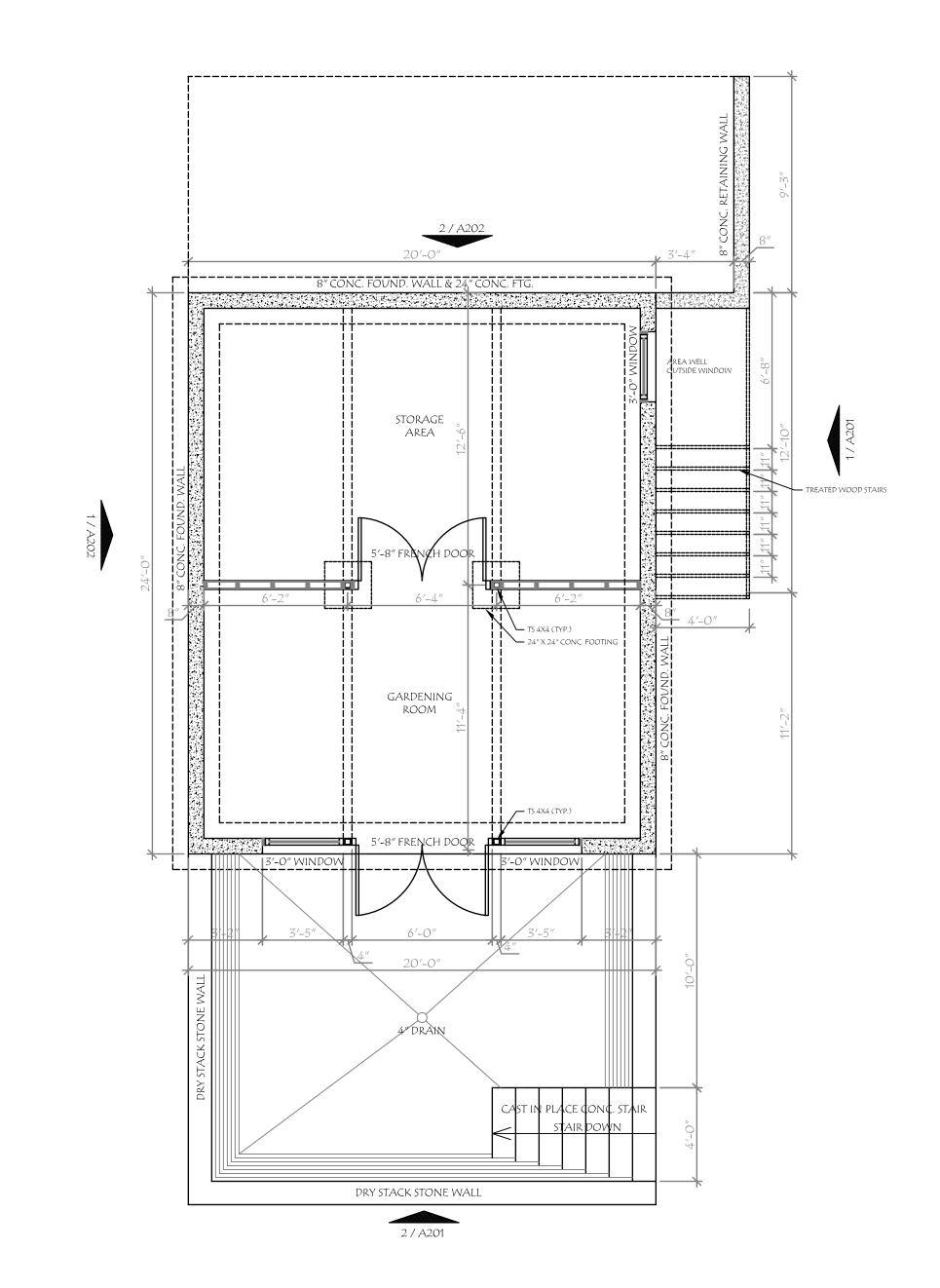
PROPOSED SITE INFO.

5

AS-102



2 4 5



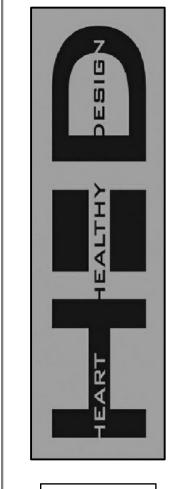
ROPING CONCRETE APRON SUPPLIES CONCRETE APRON OLAP ON GARAGE DOOR

10GO'N 7-0" FOLDING GARAGE DOO

1 LOWER LEVEL PLAN

1/4" = 1'-0"





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CARLETON CARRIAGE HC

CONCEPT DOC'S.
SLC HLC APPLIC.
SLC STAFF REVIEW
SLC STAFF REVIEW

NEW PLANS A-101

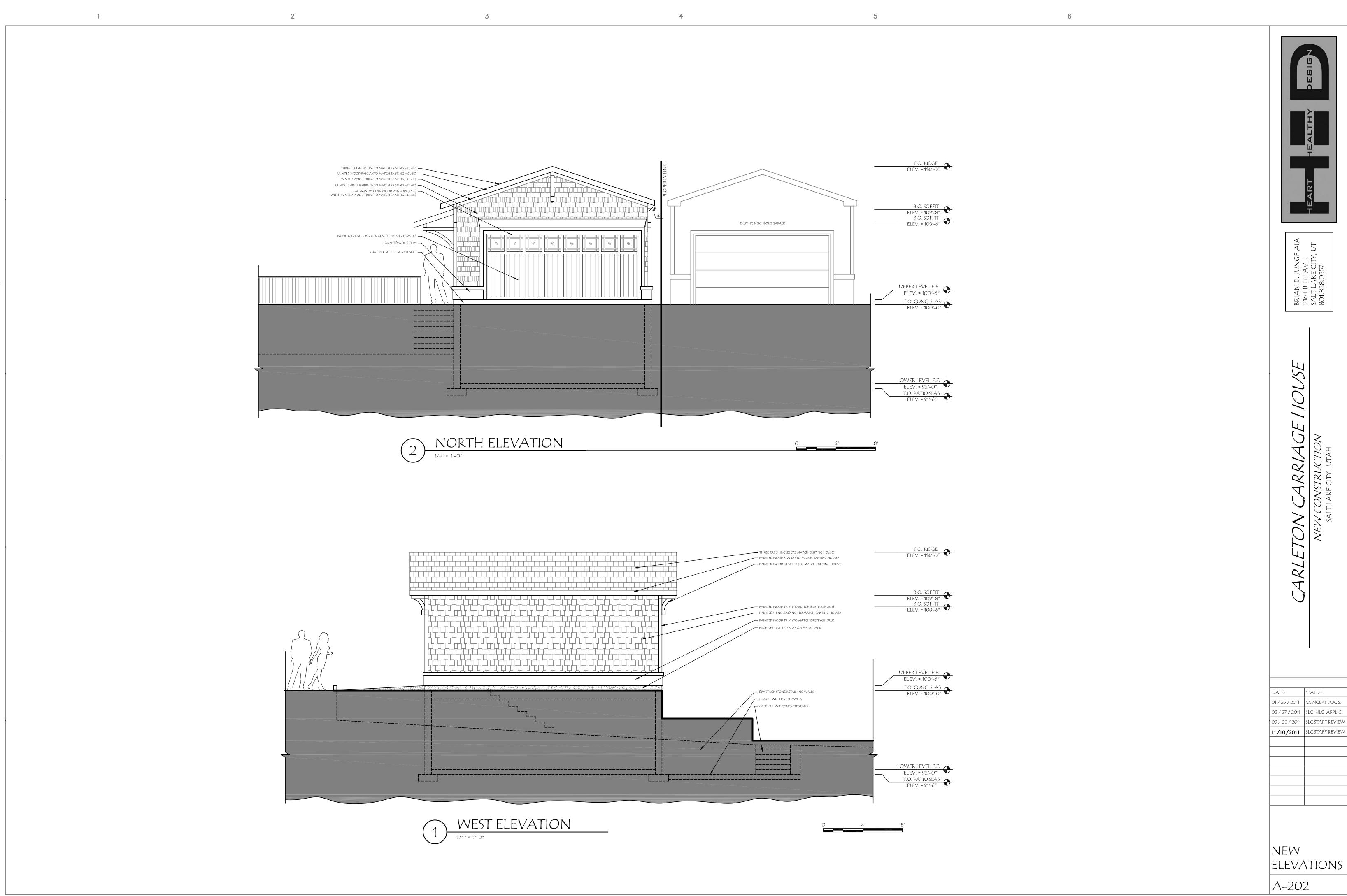
T.O. RIDGE ELEV. = 114'-0" PAINTED WOOD FASCIA (TO MATCH EXISTING HOUSE) PAINTED SHINGLE SIDING (TO MATCH EXISTING HOUSE) ALUMINUM CLAD WOOD WINDOW (TYP.)
WITH PAINTED WOOD TRIM (TO MATCH EXISTING HOUSE) B.O. SOFFIT ELEV. = 109'-8" B.O. SOFFIT existing neighbor's garage ELEV. = 108'-6" PAINTED WOOD TRIM (TO MATCH EXISTING HOUSE) EDGE OF CONCRETE SLAB ON METAL DECK — PARGED CONCRETE WALLS ALUMINUM CLAD WOOD WINDOW & DOOR SYSTEM WITH PAINTED WOOD TRIM GRAVEL WITH PATIO PAVERS ─ WOOD STAIR ASSEMBLY PRY STACK STONE RETAINING WALLS CAST IN PLACE CONCRETE SIDEWALK UPPER LEVEL F.F. ELEV. = 100'-6" T.O. CONC. SLAB ELEV. = 100'-0" LOWER LEVEL F.F. ELEV. = 92'-0" T.O. PATIO SLAB ELEV. = 91'-6" 2) SOUTH ELEVATION

1/4" = 1'-0" T.O. RIDGE ELEV. = 114'-0" THREE TAB SHINGLES (TO MATCH EXISTING HOUSE) PAINTED WOOD FASCIA (TO MATCH EXISTING HOUSE) PAINTED WOOD BRACKET (TO MATCH EXISTING HOUSE) -B.O. SOFFIT ELEV. = 109'-8" B.O. SOFFIT PAINTED WOOD BRACKET (TO MATCH EXISTING HOUSE ALUMINUM CLAD WOOD WINDOW (TYP.) — WITH PAINTED WOOD TRIM (TO MATCH EXISTING HOUSE) PAINTED WOOD TRIM (TO MATCH EXISTING HOUSE) — — ALUMINUM CLAD WOOD DOOR ELEV. = 108'-6" PAINTED SHINGLE SIDING (TO MATCH EXISTING HOUSE) — CAST IN PLACE CONCRETE SLAB PAINTED WOOD TRIM (TO MATCH EXISTING HOUSE) edge of concrete slab on metal deck $\,\longrightarrow\,$ parged concrete walls — UPPER LEVEL F.F. ELEV. = 100'-6" T.O. CONC. SLAB ELEV. = 100'-0" STATUS: 01 / 26 / 2011 | CONCEPT DOC'S. 02 / 27 / 2011 | SLC HLC APPLIC. 09 / 08 / 2011 | SLC STAFF REVIEW 11/10/2011 SLC STAFF REVIEW - EXISTING GRADE LINE LOWER LEVEL F.F.

ELEV. = 92'-0"

T.O. PATIO SLAB

ELEV. = 91'-6" EAST ELEVATION NEW ELEVATIONS A-201



09 / 08 / 2011 | SLC STAFF REVIEW

Attachment C: Photos of Site & Surrounding Area



GARAGES NORTH EAST OF SITE



FACING SOUTH TOWARDS SITE





GARAGES NORTH WEST OF SITE





GARAGES NORTH OF SITE ALONG RIGHT-OF-WAY

