

Leslie Hamilton, LO Planner
City of Lake Oswego
380 A Avenue, Third Floor
PO Box 369
Lake Oswego, OR 97034

Re: NEW EVIDENCE PA 16-0026, 15948 Quarry Road, LO 97035 for 10 unit multi-family live work development

Applicant: Rob Matthews/Tracey Peterson, Blue Dog Properties

Development standard LOC 50.06.002

The Letter from the City Deputy Attorney (November 22, 2016), in the record, finds that live/work is not specifically called you in Table 50.06.002-3. The “most similar” approach is one approach but I believe that the City erred in not including all uses in the minimum parking required. Since the work portion of the development does not require living at the site the commercial component must be included in the total parking required. The City’s position is that “A live/work use is not either a mixed use or a conditional use...”, but in reality “mixed use” is likely most similar and therefore additional parking is in fact required. I find no square feet of “work” space in the record but testimony that there was approximately 1200 square feet. Applying 3.3 spaces per 1000 square feet from the table 4 additional spaces are needed, making a total of 18 spaces.

The argument by the applicant that reducing the impact is not economically feasible is not a code provision.

Development Standard LOC 55.08.020 Tree Protection Plan Required

There are several trees within the 15-foot perimeter of the site and specifically in the northwesterly corner. Tree 17 is identified as being 1-foot from the property line and a significant portion of the dripline as shown on exhibit 8 extends into a significant improvement area. The arborist report states to “protect” but no specific protection measures were provided and no assessment to the effects of this development and or survival expeditions were provided. It appears that approximately 25% of the total dripline will be impacted.

Respectfully,

Bruce Goldson

PO Box 1335 Lake Oswego

EXHIBIT G-204 LU 16-0063
