(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06)

Response Summary

The proposal by the applicant, Christopher Staggs, was for (6) six cottage homes on a 20,000 SF property in the Canemah Historic District. The proposal was reviewed in a Type III exhaustive and deliberate procedure with a unanimous decision of approval with conditions by the Oregon City Historic Review Board (HRB) on August 22, 2017. One of the conditions of approval removed a house from the site plan, resulting in a 5-unit development. The decision was appealed by the Friends of Canemah, and the appeal is now being heard by the Oregon City Commission.

- The applicant carefully studied the context of the Historic District and provided a study of the existing houses (both contributing to the Historic District and newer) to the City. The applicant will demonstrate that the proposed homes are planned, sited, and designed in harmony with the Canemah Historic District. The planned multi-family development will benefit the district with new, small, affordable homes, compliment the historic character of the neighborhood, and enhance the Canemah District's livability, walkability, and property values.
- The applicant has presented the development to the Canemah Neighborhood Association (CNA) and discussed the project in detail. The proposal represents a substantial commitment of time and effort on the part of the HRB, the applicant, staff, and the CNA. The process included several HRB hearings and "working" sessions, iterations and adjustments, a new application which reduced the number of homes from (7) to (6) and eventually (5), several CNA meetings resulting in majority support of the development as demonstrated orally and in writing (also demonstrated by the fact that the CNA did not appeal the HRB approval).
- Below is a response to the Friends of Canemah/ Mr. Paul Edgar appeal. The appeal language is largely focused on the criteria used by the Historic Review Board in reaching its decision on the certificate of appropriateness for development in Canemah, as well as Oregon City Comprehensive Plan Goal 5.3 Historic Resources. Much of the appeal language is repetitive and difficult to follow, but the primary objections are refuted point by point as much as possible by the applicant. The quoted appeal language in this response is not exhaustive.
- The applicant concurs with the findings in the Notice of Decision by the HRB which
 approved the development, including conditions of approval by the HRB which will reduce
 the number of homes to 5 and ensure that the approval criteria are met in other details. The
 appellant appears not to have taken into account the findings of the decision nor the
 conditions of approval.
- Guidelines for new construction in a historic district were adopted by the city in 2006.
- The residential use proposed is consistent with a majority of uses within the district. The proposed homes are modestly sized (cottages similar in scale to the original Canemah

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06) homes) and designed in a contemporary vernacular style to complement the historic context.

- The area of nearly one lot of record, 4,200 Square feet of wetland, will be preserved as open space on site. This preservation will protect the natural water flow and native plant species on site, particularly important in Canemah with its geological conditions.
- The development is converting a vacant lot covered in invasive plant species and used as a dumping ground into a "place" for people to live and grow, be a part of the Canemah community, enhance the Oregon City economy.
- The cottages will be visually buffered from the adjacent historic Casady House and Right of way, with setbacks and landscaping.
- The appeal seems to be seeking a replication of the historic houses in the district, but that type of development is neither required by the approval criteria nor necessarily good for the district, which should have its historic resources highlighted and visually understood as the original development. The applicant's objective is to preserve and accentuate the surrounding historic resources, while also providing modest housing that defers to the qualities of the original resources.

APPEAL RESPONSES BELOW

1. **Appeal** (17.40.060) "...proposed development alters in a manner where it changes the exterior appearance with of the historic District detracting densities, parking lots, designs, and building lot coverages with surfaces not ever before duplicated in the National Historic District...". "Therefore it is inappropriate and detracting and not in compliance".

Response: The applicant has completed exhaustive studies of the Canemah Historic District, received productive feedback from Canemah Residences, and worked closely with city staff to develop a cottage home response that is compatible, complimentary, which meets the city guidelines for building in a historic district and the purpose of having a historic district. The proposed cottages complement the district by matching the scale, proportion, arrangement, color, texture, and materiality as determined by the Historic Review Board Decision, Canemah community response and support, historic planning staff, and professionals who specialize in new development in historic districts. Applicant suggests this section of the appeal is misdirected and ignores the previous findings, hearings, and the OCMC intent. 17.40.060 defines new construction vs exterior alterations. The proposal meets the definition of new construction. REFERENCE CODE SECTION (OCMC 17.40.010)

2. **Appeal**: (17.40.060B). "...There is no way to make that this proposed development to be altered in a manner that could mitigated houses sited ten feet apart to where it fits the totality of the Oregon City Historic District Building Guidelines in its current form."

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06)

Response: The Code cited, 17.40.060.B, is about process. The proposal has gone through the correct process with HRB review and their conditional approval. Cottage Home development standards clearly state the minimum distance separating dwelling units is ten feet (10 feet). Four of the five proposed cottage homes are separated by more than ten feet. The side yard setback in the underlying R-6 zoning of Canemah is five feet (5 feet), with a total separation of ten feet (10 feet) between homes. The proposed separation of ten feet (10 feet) is the same as any other property in Canemah. Existing houses in the district do not display a uniform street setback or even distance from eachother, and many of these examples date from the period of significance. As little as 10' is historically appropriate as the small end of a compatible range of setbacks in this district. The Casady House itself at 502 4th Avenue is extremely close to another house on the lot; these are perceived as separate homes. Across 4th Avenue, there is a very close separation between 501 and 507 4th Avenue. This pattern is continued moving westward on 4th between 601 and 605; 611 and 615 4th Avenue. REFERENCE CODE SECTION (OCMC 17.62.059 D.12)

3. **Appeal**: (17.40.060E) "...proposal is to override 17.40 Historic District Building Guidelines with Cottage Home Code..."

Response: The code cited, 17.40.060.E, applies to exterior alterations and not new construction. This code reference is therefore not applicable to this development. OCMC 17.62.059 Cottage Housing Development standards are complimentary to the Historic District with the intent to provide a housing type that responds to changing household sizes, encourage creation of more usable open space, build smaller, less visually impacting homes than the typical home sizes, and other goals and intent related to the individual development. These Cottage Home Guidelines and cottage home intent is written to work harmoniously with the Canemah Historic District. Canemah homes are historically smaller. This development preserves a majority of the site for open space. The proposed cottage homes are small in scale and character, and less visually impacting. This application is complimentary with and follows the historic guidelines for development. Applicant suggests this section of the appeal is misdirected and ignores the intent of the city to develop compatible zoning overlays which work in conjunction with one another to create a sustainable, future development where Historic places and new development can develop in harmony. REFERENCE CODE SECTION (OCMC 17.62.059 B.1-6)

4. **Appeal**: (17.40.060F.1) "..."This proposal does not advance public interests of protection, perpetuation, and use of the special character and/or special historic interests....therefore its not in compliance...."

Response: The stated purpose of the historic district includes such language as "Effect and accomplish the protection... of districts," "Complement any Historic districts," and

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06)

"Promote the use of historic districts... for the education, ...housing and public welfare of the city". The proposal meets the stated intent of the historic district by providing new small homes which are not historic but are visually and functionally compatible with the surroundings. The proposed development converts an empty lot into a place with homes, people, activity, and value, achieving all of the stated intent of the cities comprehensive plan and filling a community "gap" in Canemah. The existing site was being used as a dumping ground, was overgrown with invasive plant material, and did not serve the health, prosperity, safety and welfare of the people; all purposes of the historic district as stated in OCMC 17.40.010. (Historic Overlay District -Purpose) The proposed cottage homes transform an empty lot into a place achieving all of these city goals, and improves the livability and value of Canemah.

(4)A. **Appeal**: "...it does not in any way protect architectural history and "rhyme" of National Historic district, it detracts".

Response: Through adopted ordinances in the OCMC the city determined cottage home developments are permissible and can be compatible with the R-6 Residential Zoning of the city and the Canemah Historic District. The New Construction Design Guidelines applicable to Canemah allow for new development. The HRB rigorously followed the approval criteria, including the Historic Design Guidelines and found that, with conditions, the development is compatible with the Canemah neighborhood through its building siting, massing, scale, and architecture. The applicant concurs with their findings and with their conditions of approval. The existing fabric of the Historic district is protected and kept visually primary within the District by careful placement of the new residences and by landscape buffering.

(4)B. **Appeal**: "...it does not Safeguard the City, State, and National interests in aesthetic and cultural heritage as embodied in attempting to stuff 5- houses on two of the four 5,000 SF lots of record. Our 17.40 code calls/allows for only one home on 5,000 SF lot.

Response: The Canemah Historic district does have small homes, some constructed close to each other and sometimes with more than one home on a lot. The development proposal is compatible with this more organic pattern as discussed above under the Appeal point #2. The proposed development places (5) cottage homes on (4) 5,000 SF lots. Every lot has a cottage. One lot has two cottages. The cottage home code (17.62.059 C) allows for (2) cottage homes on each lot of record in the R-6 zoning. On this property, the Cottage Home zoning and underlying R-6 zoning standards allow (8) cottage homes. Further, the R-6 zoning by itself, allows a single family home with an Accessory Dwelling Unit (ADU). This approved application is for only (5) cottage homes (living units). Further, this appeal point does not apply to the historic appropriateness of the development, but rather to the land use \density, which the HRB stated many times in the public hearings.

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06)

(4)C. **Appeal**: "...These are new type designs of what is an has been Vernacular House Designs in Historic Canemah where there are 3 basic designs and 2 clone duplicates with minor differences, and that is not allowable and/or not compatible and thus detracts.

Response: the proposed architectural style and language will be a contemporary Vernacular to be in harmony with the adjacent historic "Casady" Home and those nearby. The roof pitch and simplicity (no dormers; gabled forms) will echo that of the older buildings. A condition of approval allowing "no roof cutouts" will further simplify the roof appearance of the new homes. No exterior ornamentation has been used. Lapped horizontal painted siding is used throughout. Windows are to be operable (single- or double-hung or casement as specified in Conditions of approval) and vertical in proportion (2:1). The massing, scale, siting, and architectural articulation are in harmony with the Canemah Historic District. Building siting is facing street fronts formally, massing is similar in scale to historic homes, scale of homes are proportional and similar in dimension to homes directly adjacent to property and nearby historic homes. The applicant understands the importance of harmonious and compatible new construction and the General Design Principles of Design Guidelines for New Construction in Historic Canemah. The proposed homes will be a simple, contemporary design in order to reflect the time in history they will be built. They are also new construction that meets the design guidelines of the city code and historic compatibility guidelines. While some may be considered "clones," no two cottages are identical, and this does not reflect any less compatibility to a neighborhood. Each cottage home design responds to its immediate context to be compatible with the larger Canemah Historic District character.

(4) D. **Appeal**: "... This proposed development will de-stabilize property values by degrading the historic importance of the Canemah National Register Historic District."

Response: No evidence of how or why this development might destabilize property values has been submitted. Typically, new, compatible construction and new homes in a historic district would tend to improve the district, leading potentially to higher home values. The historic importance of Canemah will be enhanced by this development, by developing a vacant, overgrown lot, improving the economic development of Canemah, and increasing the historic profile of Canemah through an increase in historically compatible structures articulating the importance of old and new structures living side by side harmoniously.

(4)E. **Appeal**: "...This proposed planned Development does not engender/foster "Civic Pride" of the reasons of having a National Register Historic District with Historic Places status.

Response: This point seems to be a personal, subjective opinion and has no relevance to the notice of decision by the Historic Review Board. Further, the Canemah Neighborhood Association, those people living in the Canemah community, are largely

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06) in support of this development. The proposal strongly supports the Historic District and its retention by complementing and highlighting the older contributing structures. For instance, the slightly lower siting of the new cottages in comparison to the older structures will tend to keep a higher visibility on the historic homes. The deliberately simple forms and volumes of the new development will also tend to make them appear more as background to the original historic structures.

(4)F. **Appeal**: "...This proposed Planned Development will lesson and detract from tourism and visitors coming into Oregon City looking to see Historic Representations of what and why Canemah has National Register Historic District and National Register Historic Places status..."

Response: Again, this point of the appeal is a personal, subjective opinion and has no relevance to the notice of decision by the Historic Review Board. Further, harmonious and thoughtfully designed infill development tends to improve the livability of the neighborhood. Tourists and visitors wishing to experience the Canemah Historic District will still see the same streets, neighborhood pattern, historic architecture, and "rural" feel because no historic elements of the district are to be removed, replaced, or visually intruded on.

(4) G. **Appeal**: "... This weakens the City's - First City Historic Story and importance and results in negative effects of economic aspects in all investments to promote its history.

Response: The meaning of "Negative effects of economic aspects in all investments" is difficult to follow and no evidence has been presented. The promotion of and purpose of Oregon City's historic districts is stated under OCMC 17.40.010 and addressed under Appeal point #4, above. The addition of (5) new cottage homes on an empty lot will support and enhance the city's historic "story," provide needed housing, and strengthen the local economy.

(4) H. **Appeal**: "...detracts from the...story of...Canemah... by altering in a gross way the topology, impacted by wetlands. It proposes to by-pass... setbacks requirements..."

Response: The topology of Canemah has strongly affected its historic development, as noted in the New Construction Design Guidelines applicable to Canemah. The Notice of Decision under findings for 17.040.060.F.2 on p.22 note that "The majority of Canemah is nestled within the side of a hill. Retaining walls are a necessary part of constructability in this context and is evident throughout the entire neighborhood." In order to build a safe site and living environment the proposed cottage homes propose some minimal grading of the north side of the site to provide safe vehicle and pedestrian site access. Conditions of approval related to the proposed retaining walls will ensure that the walls never exceed 3.5 feet in visual exposure at the front of any new residence; and that they are masonry or finished concrete. Existing retaining walls in the districts as noted in

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06) the Guidelines are "stone, mortared or stacked basalt, or concrete south of 3rd Street, especially in proximity to street." The existing wetland will be preserved and enjoyed as a natural amenity by the residences. With regards to "bypassing" setbacks, the setbacks can be altered from code requirements as part of historic preservation incentives. In this case, two of the new homes are using this incentive opportunity in order to keep the wetland area intact and in order to retain more distance between the Casady House and the newer construction.

5. **Appeal**: (17.40.060.F.2). "...This alters in a negative way the provisions of the City's Comprehensive Plan Section 5, Open Spaces, Scenic and Historic Areas and natural resources. The Planned Development request no vegetative setbacks from the delineated wetland...."

Response: Goal 5.3 of the Oregon City Comprehensive Plan Section 5 says "Encourage the preservation and rehabilitation of homes and other buildings of historic or architectural significance in Oregon City." The proposal is not physically altering or visually intruding on any of the existing historic houses in the district. Policies 5.3.1 through 5.3.8 are met as described in the City's original decision of approval with conditions. The proposed cottage home development preserves the existing wetland open space and respects its boundary, which is not included on the City's 1999 wetland maps but was delineated by the efforts of the applicant with the Army Corps of Engineers, a wetlands consultant, and the Dep't of State Lands. Additionally, the city does not regulate this wetland (OCMC 17.49). Setbacks from the wetland are not required, nor is this a part of the OCMC 17.40 review process and not a purview of the HRB.

(5)A. **Appeal:** "...Packing 3 house designs with 2 clone houses negatively alters the understanding of goal 5.3 of encouraging preservation of Canemah Historic District..."

Response: The proposed cottage development does not alter the understanding of Goal 5.3 of the city's comprehensive plan, but rather helps fulfill its goals and objectives by ensuring the preservation of existing resources. Goal 5.3 and its Policies, including Policy 5.3.1 which reads "Encourage architectural design of new structures in local Historic Districts... to be compatible with the historic character of the surrounding area," are met due to the considerations listed in the Findings. These include the size of the homes, the location of the homes on the property, the façade designs and materials of the designs, the parking areas (which meet the cottage home guidelines, (and were found by the historic review process to be compatible with Canemah district), the density and types of plantings, the natural environment of the site, and the proposed retaining walls. Similarities between some of the proposed houses is not a design or historic character compatibility issue.

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06)

(5) B. **Appeal:** "... This Planned Development is not compatible with the Historic character..." "The historic wagon roads cannot be altered..."

Response: See response to A, above. The proposed cottage development does have some features such as small second-floor decks and skylights that are not found on older development, but that does not mean the newer development is not compatible. The parking areas are to be constructed of permeable pavers so will be made up of small units, far more "rural" in appearance than a poured-concrete or asphalt parking area. Parking areas will also be well-buffered by landscaping. Skylights are to be parallel to the roof slopes and (by Condition of approval) located on inconspicuous roof areas. Reference to historic wagon roads is only applicable in that 19th Century settlers to the area did arrive in wagons; however there are no designated historic wagon routes nor approval criteria related to "wagon roads."

(5) C. **Appeal:** "... Cottage houses under OCMC could be allowed in other locations in Oregon City...

Response: The proposed cottage development is allowed on this site and in other historic districts as long as it meets the Historic approval criteria. This is being demonstrated throughout the findings.

(5) D. **Appeal:** "... Goal 5.3.2 can not. be comply with OCMC 17.40 Historic District Design Guidelines..."

Response: Policy 5.3.2 reads "Evaluate the establishment of Historic... Districts to preserve neighborhoods with significant examples of historic architecture in residential and business structures." The proposed cottage development does uphold the preservation of the Canemah Historic district, because it adds new housing that is respectful of the pattern, scale, and typology of the existing district.

(5)E. **Appeal:** "...Goal 5.3.8...This proposed planned development does not accentuate historic resources..."

Response: Please see discussion of preservation incentives and setbacks below under Appeal point #8. The proposed cottage development does "preserve and accentuate historic resources as part of an urban environment that is being reshaped by new development projects," as Policy 5.3.8 requires. Being a part of an urban environment where housing is in high demand, the project site design will preserve the surrounding character of the historic district by continuing its residential use. The new homes are at a smaller scale than many, if not most, of the houses on nearby lots.

6. **Appeal:** (17.40.060.F.3) "...3 complimentary houses could have the same economic effect and project equal value by not detracting..."

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06)

Response: The underlying or base, R-6 zoning allows for one single family home and ADU on these four (4) parcels.

7. **Appeal:** (17.40.060.F.5) "... There is very little of general compatibility of the exterior designs, arrangement, proportion, detail and scale to what is currently found in Canemah....".

Response:

The designs presented do achieve compatibility with the contributing structures in the Canemah Historic Districts. Specifically, design features and elements of the new houses that are compatible include the overall small, simple rectangular forms with gabled roofs (no "cutouts" per condition of approval); operable wood windows and painted lapped siding; stile-and-rail type wood doors; and a covered one-story porch at each entry. Skylights will not be visible from the rights-of-way and retaining walls are limited in height and will be masonry or finished concrete.

8. **Appeal:** (17.40.060 - I) "... The City Commission has to approve Historic Review Board reasoning and justification fo how the HRB valued out justification for offering preservation incentives to allow for the violation of each of the sections of OCMC code.....".

Response: The use of preservation incentives for setback reductions at the east and south was considered and justified by taking into account the siting of existing structures in the district as well as the considerations of the open space/ wetlands, the scale of the houses, and the landscaping to be added. New Construction Design Guidelines applicable to Canemah note that the District is "platted with alleyways, [but] few are recognized, and in some cases houses intrude." It also notes that "Properties edges [are] often not defined." It is specifically an understanding of this site and the preservation of open space which makes the preservation incentives appropriate and part of the Notice of Decision HRB approval.

- 9. **Appeal:** (17.40.065) "... Applicability of Historic Preservation Incentives.....".
- (9)A. **Appeal:** "... Purpose: This proposed Planned Development does not make Preservation more attractive. It in fact detracts, by allowing non -compatible designs, rhythms to alter in a negative way what represents Historic Canemah.

Response: The incentives as used allow for more open space to be preserved as wetlands. This directly supports the character of the District with its mature landscaping and development which occurred over time and with the area's topography. Indirectly, the incentives also support preservation of the existing historic resources in the neighborhood due to the scale and placement of new development deferring to the older homes.

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06)

(9)B. **Appeal:** "... Eligibility: Does this enhance what are consider important attributes that make up the Canemah National Register Historic District and Help tell the story of the Canemah Historic District this proposed planned development of cottage homes detracts.

Response: The new construction being proposed has gone through the process to receive a certificate of appropriateness from the HRB, and therefore is eligible for the incentives.

(9) C. **Appeal:** "...Incentive Allowed: dimensional standards of contributing Historic House and siting of these houses are incompatible."

Response: The preservation incentives allow setback standards to be waived if, and only if, it results in a compatible design with the district. In Canemah, there is not a strong sense of the property line edge nor is there a uniform side or street setback. The sense of open space is also important and the proposed overall development is noticeably less dense than many of the lots developed during the period of significance. Additionally, the site is surrounded by rights-of-way which will be planted with trees and shrubs as per the HRB conditions of approval, creating a soft, leafy screen between the development and the public.

(9) D. **Appeal:** The HRB and City Commission does not have to accept the use of Preservation incentives or allow them, when they do not advance Historic Preservation."

Response: This is correct. The historic overlay on the site ensures that the Preservation incentives are used only if the resultant development meets the approval criteria for historic compatibility.

10. **Appeal**: "OCMC 17.40.065 A-D are being used to allow for non-compatible development."

Response: The appeal point #10 appears to be addressed under #9, above. See responses to 9A- 9D.

11. **Appeal:** (17.40.070). "....These designs are far from being compatible to Historic Canemah Vernacular house designs and are therefore detract and are not compatible. They are not sited like anything historically found in the Canemah is a National Register Historic District. Duplicating designs with minimal design changes or changing the direction of how a house is sited is not allowed. Density on two of the lots/parcels exceeds any acceptable understanding with two of lots covered with approximately 80% in surfaces of roofs, concrete, and asphalt ..."

Response: The cited Code Section refers to demolition of existing, historic buildings and is therefore not applicable. Refer to Neighborhood Analysis, illustrating the variety

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06) of historic and non-historic homes adjacent and nearby property. The siting of homes in Canemah is rich in variety. The 4th Ave Home #1 is sited exactly the same as the Casady Home next door. The density of living units (5) is less than that allowed by the underlying R-6 zoning of (8) living units (a single family home and ADU on each lot). Please also refer to responses to Appeal points # 7 and 4C, above, for further discussion of specific compatible features and elements of the proposal.

12. House Designs

(12) A. **Appeal:** "... House #1 cut into bank where it is sited way below and not in line with the two houses/building on the left and right, therefore not compatible and detracting.

Response: House #1 is situated slightly below the houses to the east and west on either side, grading-wise. This siting decision helps to keep the historic houses on this side of the street more visually prominent, as they are situated up on the rise. Like the historic Casady House, the proposed house #1 is side-gabled relative to the street, and 1 ½ stories. House #1 has a front setback of 10 feet, which is closer than that of the Casady house but within the range of setbacks in the historic district. House #1 will use painted wood windows and siding and the exposed foundation will be finished concrete. These materials will echo those used on the older homes in the District.

(12) B. **Appeal:** "... House #2 is to be deleted but there is no design document that reflects what happens to house #1 and #3 to judge impacts, just a blank check, not smart."

Response: House #2 is removed from the proposal by condition of approval. The applicant would be happy to illustrate the result of this, but the appeal rules limit the information presented to information already in the record.

(12) C. Appeal: "... House #3... like no other house in Canemah..."

Response: House #3 is located south of house #1 and oriented north/south. It is a simple, singular volume of 1.5 stories with another smaller one-story volume creating a front porch. The house has a medium-pitch gable roof, painted wood windows and siding, and the majority of its windows are 2:1 vertically proportioned. The roof cut-out originally in the design has been removed by condition of approval and the resultant volume and appearance will be visually very quiet, simple, and respectful of the forms and volumes of the gable-roofed historic homes in the District.

(12) D. Appeal: "... House #4... another non-compatible with upper deck..."

Response: The simple medium pitch and gable form of House #4 ties it to historic vernacular homes in the district. The use of wood windows in a vertical proportion, the horizontal lap siding, and the inclusion of a simple covered porch also are compatible with the contributing houses of the district. House #4 is set back from the street and will

(Application Reference #'s: AP 17-04, MD 17-01, MD 17-02, MD 17-03, MD 17-04, MD 17-05, MD 17-06) face the open space (this by condition of approval requiring that the entry not face the parking). While several of the homes, including this one, have an upper deck, this feature alone is certainly not "disallowed" nor does it detract from the overall compatible nature of the structure.

(12) E. Appeal: "... House #5: Sited right next to House #6..."

Response: House #5 is similar to the other proposed cottages in its modest scale and simple, vernacular form with gabled roof. The design includes operable wood windows, horizontal wood siding, and a minimally visible foundation. While the house is requesting approval for the setback incentive allowing its construction at the front property line, the overall feeling and pattern of the neighborhood is not disrupted by this placement. This is because there is no uniform placement of houses on lots and because the property lines are not strongly delineated or marked on any properties. The placement of this cottage therefore will feel in keeping with the neighborhood.

(12) F. **Appeal:** "... House #6: Sited right next to House #5 and right on the front property line..."

Response: The simple medium pitch and gable form of House #6 ties it to historic vernacular homes in the district. Like House #5, it is small at only 600 sf. The use of wood windows in a vertical proportion, the horizontal lap siding, and the inclusion of a simple covered porch also are compatible with the contributing houses of the district.