

CITY OF PORTLAND, MAINE

PLANNING BOARD

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March 24th, 2016

Bob and Carrie LeBlanc
Peninsula Property Development
59 Moody Street
Portland, Maine 04101

Will Savage
Acorn Engineering, Inc
158 Danforth Street
Portland, Maine 04102

Project Name: **Construction of new four-unit residential condominium building**
Level III Subdivision and Site Plan
Project #: #2016-005
Address: 31 Fore Street, Portland
CBL: 016 J026001
Applicant: Peninsula Property Development
Planner: Jean Fraser

Dear Bob and Carrie LeBlanc, and Will Savage:

On March 22nd, 2016, the Planning Board considered the Level III Subdivision and Site Plan application for the construction of a new four-unit residential condominium building at 31 Fore Street. The proposal comprises the demolition of the existing three-unit residential building and replacement with a new structure that includes a lower level for covered parking for 6 vehicles, stormwater treatment in a raingarden, and landscape and sidewalk improvements. The Planning Board reviewed the proposal for conformance with the standards of the Subdivision and Site Plan Ordinances, and approved the application with the following waivers and conditions as presented below.

A. WAIVERS

On the basis of the application, plans, reports and other information submitted by the applicant; findings and recommendations contained in the planning board report for the public hearing on March 22, 2016 for application 2016-005 relevant to Portland's technical and design standards and other regulations; and the testimony presented at the planning board hearing:

1. *Distance from corner*

The planning board voted 7-0, based upon the consulting traffic engineer and DPW reviews, that extraordinary conditions exist or undue hardship may result from strict compliance with the *Technical Manual* standard 1.7.1.7 that requires "access driveways to corner lots shall be located a minimum of 35 ft from the intersection of the projection of right-of-way lines to the center line of the driveway", that substantial justice and the public interest are secured with the variation in this standard, and that the variation is consistent with the intent of the ordinance. The planning board waives the *Technical Manual* standard (*Section 1.7.1.7*) to allow the access driveway to be 31.26 feet from the intersection based on an understanding that the driveway location is constrained by the architectural requirements.

2. *Parking Drive Aisle*

The planning board voted 7-0 that based upon the consulting traffic engineer's review, that extraordinary conditions exist or undue hardship may result from strict compliance with the *Technical Manual* standard (*Section 1.14*) which requires that aisle width for right-angle parking be 24 feet per *Figure I-27*, that substantial justice and the public interest are secured with the variation in this standard, and that the variation is consistent with the intent of the ordinance. The planning board waives the *Technical Manual* standard (*Section 1.14*) to allow a 27.75 foot wide aisle in the parking garage.

3. **Street Trees:**

The Planning Board voted 7-0 that the applicant has demonstrated that site constraints prevent the planting of all required street trees in the right-of-way. The planning board waives the site plan standard (*Section 14-526 (b) (iii)*) requiring one street tree per unit for multi-family development and concludes that the applicant shall plant a fourth small "street tree" just within the applicant's site on Waterville Street frontage (species to be agreed with the City Arborist), and if it is determined (in agreement with the City Arborist) that this is not feasible, the applicant shall contribute \$200 for one street tree to Portland's tree fund.

B. SUBDIVISION REVIEW

On the basis of the application, plans, reports and other information submitted by the applicant; findings and recommendations contained in the planning board report the public hearing on March 22, 2016 for application 2016-005 relevant to the subdivision regulations; and the testimony presented at the planning board hearing, the planning board finds that the plan is in conformance with the subdivision standards of the land use code, subject to the following conditions of approval, which must be met prior to the signing of the plat:

1. The applicant shall finalize the subdivision plat for review and approval by Corporation Counsel, the Department of Public Works, and the Planning Authority; and
2. The applicant shall finalize condominium documents for review and approval by Corporation Counsel, the Department of Public Works, and the Planning Authority.

C. SITE PLAN REVIEW

On the basis of the application, plans, reports and other information submitted by the applicant; findings and recommendations contained in the Planning Board Report for the public hearing on March 22, 2016 for application 2016-005 relevant to the site plan regulations; and the testimony presented at the planning board hearing, the planning board finds that the plan is in conformance with the site plan standards of the land use code, subject to the following conditions of approval that must be met prior to the issuance of a building permit, unless otherwise stated:

- i. That the applicant shall confirm which entrance is the main entrance and revise this main entrance to meet the R6 Design standards as outlined in the Design Review comments, and to meet the Site Lighting Standards of the Technical Manual, with the revised proposals submitted to the Planning Authority for review and approval prior to the issuance of a building permit; and
- ii. That the applicant shall prepare a revised Construction Management Plan to address the comments of the Traffic Engineering reviewer Tom Errico dated 3.16.2016, for review and approval by the Planning Authority; and
- iii. That the applicant shall submit plans and associated information the clarify the location and sound levels of all external heating, ventilation and other mechanical equipment and document that they meet the City's Site Plan, Zoning and Technical Standards, for review and approval by the Planning Authority; and
- iv. That the applicant shall take all measures to protect the existing street tree on Fore Street as recommended in the City Arborist comments dated 3.16.2016; and
- v. That in respect of the City's ROW the applicant shall:
 - a. Address the comments of the Department of Public Work David Margolis -Pineo dated 3.16.2016 and the comments of the Peer Engineer Dave Senus dated 3.17.2016;
 - b. Ensure that the bicycle parking hitches in the ROW are designed to meet the Technical Standards; and
 - c. Show that the design of the balconies will direct drainage and ice/snow so that it will not fall on the sidewalk.
- vi. That the applicant shall submit a revised on-street parking layout that takes account of the relocated curb cut for review and approval by the Planning Authority prior to the issuance of a Certificate of

Occupancy. It should be noted that any changes to on-street parking will require City Council action prior to the issuance of a Certificate of Occupancy, and the applicant would be required to assist in preparing council meeting materials; and

- vii. That the applicant shall submit a revised parking layout within the parking garage to show an ADA compliant parking space, for review and approval by the Planning Authority prior to the issuance of a building permit. The applicant may convert up to 2 spaces to be less than standard size and may reduce the number of parking spaces to meet this requirement, subject to meeting zoning requirements and satisfying the Traffic Engineer regarding operation.

The approval is based on the submitted plans and the findings related to site plan and subdivision review standards as contained in Planning Report for application #2016-005 which is attached.

STANDARD CONDITIONS OF APPROVAL

Please note the following standard conditions of approval and requirements for all approved site plans:

1. **Subdivision Recording Plat** A revised recording plat listing all conditions of subdivision approval must be submitted for review and signature prior to the issuance of a performance guarantee. The performance guarantee must be issued prior to the release of the recording plat for recording at the Cumberland County Registry of Deeds.
2. **Subdivision Waivers** Pursuant to 30-A MRSA section 4406(B)(1), any waiver must be specified on the subdivision plan or outlined in a notice and the plan or notice must be recorded in the Cumberland County Registry of Deeds within 90 days of the final subdivision approval).
3. **Develop Site According to Plan** The site shall be developed and maintained as depicted on the site plan and in the written submission of the applicant. Modification of any approved site plan or alteration of a parcel which was the subject of site plan approval after May 20, 1974, shall require the prior approval of a revised site plan by the Planning Board or the Planning Authority pursuant to the terms of Chapter 14, Land Use, of the Portland City Code.
4. **Separate Building Permits Are Required** This approval does not constitute approval of building plans, which must be reviewed and approved by the City of Portland's Inspection Division.
5. **Site Plan Expiration** The site plan approval will be deemed to have expired unless work has commenced within one (1) year of the approval or within a time period up to three (3) years from the approval date as agreed upon in writing by the City and the applicant. Requests to extend approvals must be received before the one (1) year expiration date.
6. **Subdivision Plan Expiration** The subdivision approval is valid for up to three years from the date of Planning Board approval.
7. **Performance Guarantee and Inspection Fees** A performance guarantee covering the site improvements as well as an inspection fee payment of 2.0% of the guarantee amount and six (6) final sets of plans must be submitted to and approved by the Planning Division and Public Services Department prior to the release of a subdivision plat for recording at the Cumberland County of Deeds, and prior to the release of a building permit, street opening permit or certificate of occupancy for site plans. If you need to make any modifications to the approved plans, you must submit a revised site plan application for staff review and approval.
8. **Housing Replacement Performance Guarantee** Please be advised that the performance guarantee must also address the requirements of the ordinance Division 29. *Housing Preservation and Replacement* (copy attached), particularly section 14.483 (j) which requires owners or affiliates to post a performance guarantee equivalent to the amount the applicant would have been required to contribute to the City's Housing Trust Fund if the housing was not replaced. This performance guarantee would be held until the replacement units receive Certificates of Occupancy.
9. **Defect Guarantee** A defect guarantee, consisting of 10% of the performance guarantee, must be posted before the performance guarantee will be released.

10. **Preconstruction Meeting** Prior to the release of a building permit or site construction, a pre-construction meeting shall be held at the project site. This meeting will be held with the contractor, Development Review Coordinator, Public Service's representative and owner to review the construction schedule and critical aspects of the site work. At that time, the Development Review Coordinator will confirm that the contractor is working from the approved site plan. The site/building contractor shall provide three (3) copies of a detailed construction schedule to the attending City representatives. It shall be the contractor's responsibility to arrange a mutually agreeable time for the pre-construction meeting.
11. **Stormwater Management Agreement** The owner/operator of the approved stormwater management system should note the requirements of Chapter 32 Stormwater including Article III, Post Construction Stormwater Management, which specifies the annual inspections and reporting requirements. A maintenance agreement for the stormwater drainage system, as attached (#8), or in substantially the same form with any changes to be approved by Corporation Counsel, shall be submitted, signed and recorded prior to the issuance of a building permit with a copy to the Planning Division and Department of Public Services.
12. **Department of Public Services Permits** If work will occur within the public right-of-way such as utilities, curb, sidewalk and driveway construction, a street opening permit(s) is required for your site. Please contact Carol Merritt at 874-8300, ext. 8828. (Only excavators licensed by the City of Portland are eligible.
13. **As-Built Final Plans** Final sets of as-built plans shall be submitted digitally to the Planning Division, on a CD or DVD, in AutoCAD format (*.dwg), release AutoCAD 2005 or greater.
14. **Mylar Copies** Mylar copies of the as-built drawings for the public streets and other public infrastructure in the subdivision must be submitted to the Public Services Dept. prior to the issuance of a certificate of occupancy.

The Development Review Coordinator must be notified five (5) working days prior to date required for final site inspection. The Development Review Coordinator can be reached at the Planning Division at 874-8632. All site plan requirements must be completed and approved by the Development Review Coordinator prior to issuance of a Certificate of Occupancy. Please schedule any property closing with these requirements in mind.

If there are any questions, please contact Jean Fraser at 874-8728.

Sincerely,



Elizabeth Boepple, Chair
Portland Planning Board

Attachments:

1. Final Design Review comments dated 3.11.2016
2. Traffic engineer Review comments 3.16.2016
3. City Arborist comments 3.16.2016
4. DPW comments 3.16.2016
5. Peer Engineer reviewer comments 3.17.2016
6. Planning Board Report for #2016-005 31 Fore Street
7. City Code Chapter 32
8. Stormwater Management Agreement Template (subdivisions)
9. Performance Guarantee Packet
10. Ordinance Division 29. *Housing Preservation and Replacement*

Electronic Distribution:

CC: Jeff Levine, AICP, Director of Planning and Urban Development
Stuart G. O'Brien, City Planning Director
Barbara Barhydt, Development Review Services Manager
Jean Fraser, Planner
Philip DiPierro, Development Review Coordinator, Planning

Ann Machado, Zoning Administrator, Inspections Division
Tammy Munson, Inspections Division Director
Jonathan Rioux, Inspections Division Deputy Director
Jeanie Bourke, Plan Reviewer/CEO, Inspections Division
Brad Saucier, Administration, Inspections Division
Katherine Earley, Engineering Services Manager, Public Services
Bill Clark, Project Engineer, Public Services
David Margolis-Pineo, Deputy City Engineer, Public Services
Doug Roncarati, Stormwater Coordinator, Public Services
Greg Vining, Associate Engineer, Public Services
Michelle Sweeney, Associate Engineer
John Low, Associate Engineer, Public Services
Rhonda Zazzara, Field Inspection Coordinator, Public Services
Mike Farmer, Project Engineer, Public Services
Jane Ward, Administration, Public Services
Jeff Tarling, City Arborist, Public Services
Jeremiah Bartlett, Public Services
Keith Gautreau, Fire Department
Jennifer Thompson, Corporation Counsel
Thomas Errico, P.E., TY Lin Associates
David Senus, P.E., Woodard and Curran
Rick Blackburn, Assessor's Department
Approval Letter File

Planning and Urban Development Department

Planning Division



Subject: R-6 Small Infill Design Review – 31 Fore Street

Written by: Caitlin Cameron, Urban Designer

Date of Review: Friday, March 11, 2016

A design review according to the *City of Portland Design Manual* Standards was performed for the proposed new construction of a multi-family dwelling at 31 Fore Street. The review was performed by Caitlin Cameron, Urban Designer, Jean Fraser, Planner, and Shukria Wiar, Planner, all within the Planning Division of the Department of Planning & Urban Development. The project was reviewed against the *R-6 Small Infill Development Design Principles & Standards* (Appendix 7 of the Design Manual).

Design Review Criteria:

The project was reviewed with the Alternative Design Review which has the following criteria:

- A. Proposed design is consistent with all of the Principle Statements
- B. The majority of the Standards within each Principle are met
- C. The guiding principle for new construction under the alternative design review is to be compatible with the surrounding buildings in a two-block radius in terms of size, scale, materials, and siting, as well as the general character of the established neighborhood, thus Standards A-1 through A-3 shall be met.
- D. The design plan is prepared by an architect registered in the State of Maine.

Design Review Comments (*red text denotes principles or standards that are not met*):

Principle A Overall Context –Met – see below.

- *A-1 Scale and Form:* The scale the project is larger than most buildings on this small street, but the height is three stories and does not overshadow the neighboring 2.5 or 3 story residential buildings. The form is defined by rectilinear masses in keeping with typical multifamily buildings in the neighborhood, the roof line is flat with expressed cornice lines. On Waterville Street, the building length is mitigated by breaking it into two masses.
- *A-2 Composition of Principal Facades:* The building overall takes its cues from the surrounding forms, materials, and façade composition but combines them in a contemporary way. The composition of the Fore Street façade is generally well balanced and provides much visual interest. As noted above, the overall composition of the facades meets the standard in terms of rhythm, size, orientation, and proportion of window and door openings except for the garage level which is lacking articulation.
- *A-3 Relationship to the Street:* The building placement is consistent with the spacing of the residential fabric on Fore and Waterville Streets. The ground floor is raised

consistent with residential development patterns. The street wall is maintained except right at the corner where the building is slightly setback but this pattern is consistent with the previous residential building on-site.

Principle B Massing – Met – The roof lines and building forms are a contemporary version of the traditional building character of the neighborhood; all other aspects of the building reflect the principle and the majority of the Standards are met by the proposed design.

- *B-1 Massing:* The proposed mass is wider on the street than the typical building context but the composition of the façade, the front yard setback, and the L-shaped massing mitigate the scale at the corner. The building placement and massing is similar to the existing residential building on-site.
- *B-2 Roof Forms:* The proposed roof form is flat – most multi-family buildings in the context have a flat roof with an overhang.
- *B-3 Main Roofs and Subsidiary Roofs:* There is a clear main roof form.
- *B-4 Roof Pitch:* The roof is flat which is found in the context.
- *B-5 Façade Articulation:* The project employs a canopy at the entry (but not at the façade) and balconies.
- *B-6 Garages:* The garage door is on the side façade, standard does not apply.

Principle C Orientation to the Street – Met– The project appropriately reflects the private/public relationship of residential buildings in this neighborhood except for the position and visibility of the main entrance.

- **C-1 Entrances:** It is not clear which of the two entries is considered the main entry – indicate which entry will be the main entry and then make that entry comply with the standards. *Emphasize and orient the main entrance to the street. The main entrance of the structure shall either face the street . . . or be located on the side and be accessed by a covered porch that extends to the front of the building, at the primary street frontage.*
- *C-2 Visual Privacy:* Not applicable
- *C-3 Transition Spaces:* The project uses a side entry, canopy, and a vestibule for transition space.

Principle D Proportion and Scale – Met – The proportion and scale of the building overall are harmonious and human-scaled.

- *D-1 Windows:* The majority of windows are rectangular with a vertical proportion.
- *D-2 Fenestration:* The project appears to meet the 12% fenestration requirement and appropriately scaled to the massing of the building.
- **D-3 Porches:** The balconies appear to meet the standard (though dimensions are not provided in the drawing). *If the side entry is to be considered the main entry, then the porch must be designed to meet the standard C-1 above as well as the dimensional standards of D-3 (minimum area of 48 square feet, at least 6 feet deep).*

Principle E Balance – Met – The building façade composition creates a sense of balance with good use of overall and local symmetry and articulation of façade materials.

- *E-1 Window and Door Height:* The majority of window and door head heights align along a common horizontal datum.
- *E-2 Window and Door Alignment:* The majority of windows shall stack so that centerlines of windows are in vertical alignment.

- *E-3 Symmetricality:* Primary window compositions are arranged symmetrically around discernable vertical axes.

Principle F Articulation – Met – Based on the information given, the project employs visually interesting and well composed facades. Improvement could be made at the garage level.

- *F-1 Articulation:* The trim and window details and cornices create shadow lines. The shingle material and panel seams will also provide texture and visual interest. Balconies facing the streets also provide articulation with changes in plane and railing details. Windows were added to the garage level.
- *F-2 Window Types:* Two window types are used, are of the same “family,” and have consistent detailing.
- *F-3 Visual Cohesion:* The visual cohesion of the façade is good.
- *F-4 Delineation between Floors:* The windows, balconies, and material changes delineate the floors.
- ***F-5 Porches, etc.:*** There is no issue with obscuring architectural features – **if the side entry is the main entry then the entry needs to become more of an architectural feature, especially to make it visible from the street.**
- ***F-6 Main Entries:*** **The main entry is not adequately emphasized. A side entry requires indication at the street – improve the visibility of this main entrance with elements such as an extended canopy or porch toward the sidewalk. If the Waterville Street entry is to be considered the main entry, then additional emphasis should be created whether with a canopy, lighting, building signage or other method.**
- *F-7 Articulation Elements:* The rake of the roof meets the 6” requirement; trim is provided at the windows; the panels and corner trim boards add texture to the façade; balconies provide planer offsets; the cornice is pronounced.

Principle G Materials – Met – The material choices reference traditional building materials.

- *G-1 Materials:* The residential context is predominantly clapboards with occasional shingle or brick. The main mass uses shingle and composite trim in reference to this context. Masonry is used at the base of the building.
- *G-2 Material and Façade Design:* The materials for the upper residential floors are appropriately placed. The basement level uses a masonry material, appropriate for the base of the building.
- *G-3 Chimneys:* Not applicable.
- *G-4 Window Types:* Two window types are used.
- *G-5 Patios and Plazas:* Not applicable.



Jean Fraser <jf@portlandmaine.gov>

31 Fore Street - Final Traffic Comments

1 message

Tom Errico <thomas.errico@tylin.com>

Wed, Mar 16, 2016 at 4:17 PM

To: Jean Fraser <JF@portlandmaine.gov>

Cc: David Margolis-Pineo <DMP@portlandmaine.gov>, Katherine Earley <KAS@portlandmaine.gov>, Jeremiah Bartlett <JBartlett@portlandmaine.gov>, Jeff Tarling <JST@portlandmaine.gov>

Jean – The following represents a status update of my preliminary review and represents my final comments.

- The proposed project does not meet City standards as it relates to corner clearance. City standards require 35 feet of clearance, and the project will be providing approximately 31 feet of clearance. Given that the project is providing a driveway on the lower volume street (not on Fore Street), providing increased separation with a nearby driveway, and site design factors, I find the driveway location to be acceptable and I support a waiver from City standards.

Status: I continue to support a waiver given site conditions.

- The aisle width for the parking lot is slightly wider than City standards. I support a waiver from City standards.

Status: I have no further comment.

- The applicant shall provide a construction management plan for review and approval.

Status: Additional detail on the construction plan is required, particularly as it relates to potential sidewalk closures and contractor parking. I suggest that this be a condition of approval with a plan being submitted for review and approval prior to issuance of any City permits.

- On-street parking regulations appear to require changes with the project and will require City Council action. This comment is intended to notify the applicant of this requirement and will need to support City staff in preparation of the City Council packet.

Status: I have no further comment.

If you have any questions, please contact me.

Best regards,

Thomas A. Errico, PE

Senior Associate

Traffic Engineering Director

TYLININTERNATIONAL T.Y. Lin International

12 Northbrook Drive

Falmouth, ME 04105

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Jean Fraser <jf@portlandmaine.gov>

Fore Street

1 message

Jeff Tarling <jst@portlandmaine.gov>
To: Jean Fraser <jf@portlandmaine.gov>

Wed, Mar 16, 2016 at 4:54 PM

Jean -

I have inspected the Sweetgum tree on Waterville Street. In review of the proposed plans for the project, given the building location and tree crown width, tree impact would be severe due to construction site work in both the root zone and the crown due to the proposed building wall which is much closer than existing.

The existing Honeylocust on Fore Street which is 15' east or uphill from the fire hydrant is in good condition and will require 'tree protection' during construction. This should include trunk protection and orange construction fencing around the tree rootzone area. (Condition) The next uphill tree is about 25 feet east of the existing tree and no other space along the Fore Street frontage is open for tree planting.

Landscape Plan - I couldn't find the plan on E Plan !

There maybe room to include a smaller ornamental tree near the Waterville Street edge, recommending a tree that will provide basic greening and not compete with view corridor concerns. This could be a Magnolia, Dogwood or Sourwood tree for example.

Thanks

Jeff

--

Jeff Tarling
Portland Public Services – City Arborist
55 Portland Street
Portland, ME. 04101
(207) 874.8820
jst@portlandmaine.gov



Jean Fraser <jf@portlandmaine.gov>

31 Fore St - Final Review Comments

1 message

David Margolis-Pineo <dmp@portlandmaine.gov> Wed, Mar 16, 2016 at 3:58 PM
To: Jean Fraser <jf@portlandmaine.gov>, Barbara Barhydt
<bab@portlandmaine.gov>

March 16, 2016

Memo To: Jean Fraser

Barbara Barhydt

From: David Margolis-Pineo

Re: Final Review Comments for 31 Fore St. – Proposed Four Unit Building

1. Add State Plane Coordinates for the property corners and three foot offset monument to be set.

Done

2. Show the monument to be set on the Site Plan in addition to the Subdivision Plat.

Done

3. The proposed 12'-4" wide driveway on Waterville St. has an approximate 31' separation from the street corner as measured from the center of the drive to the street right of way (corner) of Fore St. Code requires 35'. Please try to make up the additional four feet by reducing the drive cut to 12', reduce the aisle width from 25'-8" to 24' and incorporate compact parking spaces (8' X 15') in an innovative manner.

The applicant is request an approximate 3'-9" waiver of the required 35' driveway setback from the Fore St intersection. This Department is supportive of that waiver request.

4. **The recording Plat is not stamped by a profession surveyor as required. Please submit stamped Plat.**

5. Assure that a note is on the plan set stating: “All work within the street right of way shall meet City of Portland Technical Standards.”

This Department has no further comments.

--

David Margolis-Pineo
Deputy City Engineer
Department of Public Services
55 Portland St.
Portland, ME 04101
Office 207-874-8850
Fax 207-874-8852
Cell 207-400-6695
dmp@portlandmaine.gov

MEMORANDUM



TO: Jean Fraser, Planner
FROM: David Senus, PE
DATE: March 17, 2016
RE: 31 Fore Street, Final Level III Site Plan Application & Response to Comments

Woodard & Curran has reviewed the response to comments and final Level III Site Plan Application submittal for the proposed 4-unit condominium development at 31 Fore Street in Portland, Maine. The project involves the demolition of an existing house structure and the construction of a 4-unit condominium building with ground level parking below the units.

Documents Reviewed by Woodard & Curran

- Cover Letter with additional appended materials for Final Level III Site Plan Application, dated March 1, 2016, prepared by Acorn Engineering, Inc. for Peninsula Property Development, LLC.
- Response to comments letter dated March 1, 2016, prepared by Acorn Engineering, Inc. for Peninsula Property Development, LLC.
- Engineering Plans, Sheets C-1, C-2, EX, C-10, L1, C-20, C-30, C-40, C41, C-42, C-43, C-44, REV dated March 1, 2016 & March 7, 2016, prepared by Acorn Engineering, Inc. for Peninsula Property Development, LLC.

Comments

1. The sewer back water valve is shown within the City Right-of-Way, which is not standard practice for the City of Portland. The location of this valve will need to be reviewed by the Department of Public Works. The valve is located within the driveway of the proposed building; however the detail for the valve riser does not appear to be designed to receive vehicle loads.
2. All other review comments from the Woodard & Curran memorandum dated January 25, 2016 have been adequately addressed.