MIAMIBEACH

PLANNING DEPARTMENT

Staff First Submittal Review Comments Design Review Board

SUBJECT: DRB19-0407 | 7145 Carlyle Avenue Comments Issued: 06/28/19 | 06/28 JGM, FSC 06/25

Final CAP/PAPER Submittal: 1:00 PM on 07/08/19

Notice to Proceed: 07/15/19
Tentative Board Meeting Date: 09/03/19

PERTINENT INFO

The CAP <u>and</u> Paper Final submittal deadline is 1:00 PM on 07/08/19 for the September 03, 2019 meeting.

- Fifteen (15) 11x17 drawing sets (in color) labeled Final Submittal, including one
 (1) original set of 11x17 architectural plans dated, signed and sealed.
- A cd/dvd containing a digital version of the documents and plans submitted.
 The CD must be in the proper format specified by the Planning Department.
- All other associated fees due 07/17/2019

DRAFT NOTICE:

DRB19-0407, **7145** Carlyle Avenue. An application has been filed requesting Design Review Approval for the construction of a new multistory mixed-use residential and retail development, including one or more waivers and variances, to replace multiple existing buildings. This project is proposed to take place in two (2) phases as a phased development project.

1. GENERALLY

a. Identify intended compliance with <u>Section 142-747 North Beach Public</u> Benefits Fund.

Fee per unit public fund benefit. Contribution to public benefits fund. A contribution to the public benefits fund, in the amount identified in appendix A shall be required for each square foot of floor area located above the 125 feet. Provide information and details of how the project will satisfy this requirement. Applicant will satisfy pursuant to Section 142-747(g)

2. DEFICENCIES IN ARCHITECTURAL PRESENTATION

- a. SURVEY: NOTE: 10'-0" (5'-0" x2) utility easement at middle of property (running north-south) must be maintained free of structures. If permitted to construct in easement show documentation from PWD and utility companies allowing such. There are no existing overhead utility lines. Per meeting with PW staff, Applicant will reroute utilities and easements prior to construction permitting.
- Indicate how the 10'-0" utility easement will be rerouted. Per meeting with PW staff, Applicant will reroute utilities and easements prior to construction permitting.
- c. Based on survey, the building does not comply with required setback. Provide evidence from the Public Works department that the configuration of the street in the near future match what is shown on plans. Per Section 141-744 required Class A Setback of min. 20'-0" from back of curb and no less than 5'-0"

ACTIVE 44500750v1

- from P.L. Provided: 25'-8" and 7'-4" respectively.
- d. A-0-06 Zoning legend. Lot area is 43,440 SF (vs 75,147SF), as such height is limited to 165'-0" clarify. Property Site equals 75,156 SF >50,000 SF allowing for maximum height of 220'-0" via waiver and additional 3'-0" height increase per variance (Refer to revised Sheets A0-03)
- e. A-0-06 Zoning legend. Clarify maximum building height (see above lot size). Add waiver notation if seeking extra height. Property Site equals 75,156 SF > 50,000 SF allowing for maximum height of 220'-0" via waiver and additional 3'-0" height increase per variance (Refer to revised Sheets A0-03)
- f. A-0-06 Zoning legend. FAR. Add Gross square footage. Add square footage by use (parking, residential, retail). Add Density/acre. Add # of seats (estimated for concurrency). Add total # of on street parking spaces being removed (break up by three frontages) Complied. Refer to revised Sheets A0-03, A0-04 and A0-9)
- g. A-0-06 Zoning legend. DENSITY. 150 per acre. Site is 75,147SF, max density is 258. PROJECT IS OVER DENSITY 282> 258 Refer to revised Sheet A0-03 and new Sheet A0-04. 125 co-living units will count as only 63 units of density.
- h. A-0-06 Zoning legend. Remove guest parking. NOT REQUIRED in district 8. Refer to revised Sheet A0-03
- i. A-0-06 Zoning legend

Parking District # 8 not #6 CORRECT ZONING LEGEND

Residential Parking requirement: CORRECT ZONING LEGEND DATA BELOW

Unit size: 283 units: between 455-1205 SF

123 units x 0 < 550SF

95 units x $\frac{1}{2}$ space for those units bet 550 and 850SF= 47.5.

65 units x $\frac{3}{4}$ space for those units bet 851 and 1250SF = **48.75**.

96.25 = 97 required residential spaces Current Plans reflect updated and corrected parking counts.

Bicycle **CORRECT ZONING LEGEND**

Required Short term: 1.2c +28.3r = 30 required

Required Long term: 5.018c + 283r = **289 required Current Plans reflect**

updated and corrected bicycle parking counts.

LOADING

- c. Over 2,000 but not over 10,000: One space @ each bay = 3 loading spaces. r. Over 100 units but not more than 200 units: 3 spaces + 1 = 4 loading spaces. Total loading: **7 spaces**. Refer to revised Sheet A0-03
- j. In addition to the table provided on page A0-06, provide a breakdown of the residential units, indicating unit area, floor location and number of units with same floor area. Indicate total number of units with same floor area. Number of units shown on table is not consistent with the number of units shown on plans. Revise parking calculations and bike calculations. Refer to new Sheet A0-04
- k. Revise FAR calculations. Calculations on page A0-11 is not consistent with FAR plans and do not match FAR calculations shown on plans. Open stairs count in FAR. Only the top flight if it is not covered can be discounted. Mechanical rooms, FPL room count in FAR at first floor. Refer to revised Sheet A0-10

- I. A0-12 FAR. Pursuant to the minimum requirements for each of the frontages (Class A & Class C), phase 2 of the project should have a minimum of 24,911± SF reserved. Phase II will have sufficient FAR for development in accordance with Code requirements, including open plaza for community engagement on 72 Street. Refer to new Sheets L1-410 and also A1-14 thru A1-16
- m. Provide an enlarged detail of both corners of the building on 72 Street. Indicate setbacks to the columns from the curved property line. Refer to new Sheet A1-
- n. Provide section drawings. Refer to new Sheet A3-00 thru A3-03
- o. Page A1-03, A1-04. Demonstrate how a bicycle racks are accessed; as proposed areas are enclosed and blocked by parked vehicles. Indicate number of bike racks to store on each space. Bike rooms shall have a clear access, not thru the residential corridor (unless they are for the residents of that floor) or thru parking spaces. Clarify on plans short term and long-term parking. Refer to revised sheets A1-03, and A1-05



- p. A0-12 Two (2) Covered stairs count towards FAR (two along south edge of site, adj. To Carlyle and adj. to Byron) Refer to revised sheets A0-10, and A1-03 thru A1-06
- q. A0-13 FAR. Pursuant to the minimum requirements for each of the frontages (Class A & Class C), phase 2 of the project should have a minimum of 24,911± SF reserved. Refer to new Sheets A1-14 thru A1-16
- r. A0-13 Three (3) Covered stairs count towards FAR (two along south edge of site, adj. To Carlyle and adj. to Byron AND one in garage near elevators) Refer to revised sheets A0-10, and A1-03 thru A1-06
 - s. A0-14 FAR. Pursuant to the minimum requirements for each of the frontages (Class A & Class C), phase 2 of the project should have a minimum of 24,911± SF reserved. Phase II will have sufficient FAR for development in accordance with Code requirements, including open plaza for community engagement on

- 72 Street. Refer to new Sheets L1-410 and also A1-14 thru A1-16
- t. A0-14 Two (2) Covered stairs count towards FAR (two along south edge of site, adj. To Carlyle and adj. to Byron) Refer to revised sheets A0-10, and A1-03 thru A1-06
- u. A0-15 Two (2) Covered stairs count towards FAR (two along south edge of site, adj. To Carlyle and adj. to Byron) Refer to revised sheets A0-10, and A1-03 thru A1-06
- v. A0-19 Missing roof plan to determine if additional areas count towards FAR at roof level (i.e. covered terraces) Refer to new sheet A1-12
- w. Add class names to site plans and elevations "A" to 72nd Street, "C" to Carlyle and "C" to Byron Refer to revised sheets A0-11 thru A0-17, A1-03 thru A1-12, A1-14 thru A1-16, A2-00 thru A2-07, and A3-00.
- x. A1-00 Setback notation missing on all plans for Byron. Setback notation incorrect, Carlyle is class "C" street not "B". Refer to revised sheets A0-11 thru A0-17, A1-03 thru A1-12, A1-14 thru A1-16, A2-00 thru A2-07, and A3-00.
- y. A1-00 Zoning legend. DENSITY. 150 per acre. Site is 75,147SF, max density is 258. Project is over density. Refer to revised sheet A0-03
- z. A1-02 Sec. 142-746(b) Notwithstanding the requirements of subsection (a) above, if said nonconforming building has a tenant with a lease that prevents the structure from being made conforming as part of the land use board approval, then the following shall apply:
 - A phased development permit, pursuant to section 118-259, shall be applied for as part of the land use board approval process. The phased development approval shall require the nonconforming building to be redeveloped into a conforming building. The phasing time limit shall be the minimum necessary to allow for the completion of the lease. Requested. See revised letter of intent.
 - A certified copy of the lease shall be provided as part of the Land Use Board application. Provided
- aa. A1-02 Graphically depict setback line along 72nd Street is taken from" back of curb line". Refer to revised sheet A1-01
- bb. A1-02 Add "clear pedestrian path" notation to all ground floor frontages (Sec 142-745(a)(3). Show the path maintaining to all standards listed in subsection. Refer to Sheets A1-18, and L4-100
- cc. A1-02-A1-10 Add slab and ground elevation datum marks to each floor. Refer to revised Sheets A0-11 thru A0-17, A1-03 thru A1-12
- dd. A1-02-A1-04 Columns must be setback minimum 18" from drives. Refer to revised Sheets A0-11 thru A0-17, A1-03 thru A1-12
- ee. A1-02 identify trolley and/or bus stops in area. Refer to new Sheet L1-410
- ff. A1-02 Dimension south driveway off of Byron. Refer to revised Sheet A0-11, A1-03, and A3-00
- gg. A1-03 Turn off/ ghost unnecessary ground floor elements, street, sidewalk, etc. for improved clarity in the drawings. Refer to revised Sheet A0-12 thru A0-17, A1-00, and A1-04 thru A1-12
- hh. A1-04 Dimension depth of residential units/space fronting 72nd Street. Refer to revised Sheets A0-13 thru A0-15, A1-05 thru A1-07

- ii. A1-04 Turn off/ ghost unnecessary ground floor elements, street, sidewalk, etc. for improved clarity in the drawings. Refer to revised Sheet A0-12 thru A0-17, A1-00, and A1-04 thru A1-12
- jj. A1-04-A1-07 Projecting balconies off of unit's unclear details that differ from balcony renderings A4-00, A4-01, A4-02. Refer to revised Sheets A1-05 thru A1-10
- kk. A1-05 Dimension depth of residential units/space fronting 72nd Street. Refer to revised Sheets A0-13 thru A0-15, A1-05 thru A1-07
- II. A1-05 Turn off/ ghost unnecessary ground floor elements, street, sidewalk, etc. for improved clarity in the drawings. Refer to revised Sheet A0-12 thru A0-17, A1-00, and A1-04 thru A1-12
- mm. A1-06 Turn off/ ghost unnecessary ground floor elements, street, sidewalk, etc. for improved clarity in the drawings. Refer to revised Sheet A0-12 thru A0-17, A1-00, and A1-04 thru A1-12
- nn. A1-07 Turn off/ ghost unnecessary ground floor elements, street, sidewalk, etc. for improved clarity in the drawings. Refer to revised Sheet A0-12 thru A0-17, A1-00, and A1-04 thru A1-12
- oo. A1.08 REMOVE "variant" typ. floor plans. Refer to Sheets A1-09 and A1-10
- pp. A1.09 REMOVE "variant" typ. floor plans. Refer to Sheets A1-09 and A1-10
- qq. A1-10 Roof plans do not depict the rooftop encroachments depicted in the elevations. Refer to revised Sheet L1-310 depicting unoccupied planter within side yard encroachment
- rr. A1-10 Turn off/ ghost unnecessary ground floor elements, street, sidewalk, etc. for improved clarity in the drawings. Refer to revised Sheet A0-12 thru A0-17, A1-00, and A1-04 thru A1-12
- ss. A1-11 missing overall roof plan. Refer to new Sheet A1-12
- tt. A2-00 A2-03 ELEVATIONS. Add standard elevation marks. CMB Grade, BFE +5 fb is where the overall height of the building is from this measurement. Add setback distances. Add property lines. Add overall length measurements. Add second floor encroachment measurement (5') taken from BFE +5'. Add non-rendered line drawn elevations. Add mini plan where elevations are taken. Refer to Sheet A2-00 thru A2-09
- uu. A2-00 A2-03 ELEVATIONS. A shade structure that projects for a minimum depth of five (5) feet into the setback beyond the building facade, shall be provided at a height between 15 feet and 25 feet. Said shade structure may consist of an eyebrow or similar structure. Additionally, an allowable habitable encroachment such as balconies or parking deck may take the place of the shade structure. Proposed element is not located 15' from 13' NGVD. Refer to Sheets A2-00 thru A2-09, Detail A-A / A3-01, and Sheet A3-04
- vv. Indicate compliance with section 142-745(a)(1) a. Tower height. Refer to Zoning Data Sheet A0-03
- ww. ADD detail of typical balcony and railings and dividers. Refer to new Sheet A3-
- xx. A3-00 A shade structure that projects for a minimum depth of five (5) feet into the setback beyond the building facade, shall be provided at a height between 15 feet and 25 feet. Said shade structure may consist of an eyebrow

- or similar structure. Additionally, an allowable habitable encroachment such as balconies or parking deck may take the place of the shade structure. Proposed element is not located 15' from 13' NGVD. Refer to Sheets A2-00 thru A2-09, Detail A-A / A3-01, and Sheet A3-04
- yy. A3-01 Add building edge, add second floor and encroachments, add standard elevation datum marks, add setback from edge of curb, Revise location of clear pedestrian path. Refer to Sheets A0-11 thru A0-17, A1-03 thru A1-12
- zz. Bathrooms above the main roof are allowable height exception, only if it is required by the Florida Building Code. Provide evidence that the bathroom proposed is required (letter or email from the building department). The Roof Terrace being categorized as A-2 Occupancy under FBC Chapter 10, required restroom facilities per Table 403.1
- aaa. Accessible roof deck above the main roof cannot exceed 50% of the floor area below. Provide a diagram showing area calculations. The project as proposed does not comply. Refer to Sheet L1-310 depicting < 50% unoccupied assembly area
- bbb. Deck and parapet as allowable height exception are not allowable encroachments in required yards. Refer to new Sheet A3-04 and L1-310 depicting unoccupied continuous planter within required side yard encroachment. Also, variance requested for yard encroachment for vertical continuation of façade on 72 Street and Carlyle Avenue.
- ccc. Covered terrace at the roof level must be 50% open or counts in FAR. Revise drawings and provide details of the structure. Trellis is 50% open. Refer to new Sheets A1-13 and A3-04
- ddd. Identify if counter at the roof is an outdoor bar counter. Outdoor bar counter shall be accessory to an outdoor cafe with a minimum of 30 chairs or as an accessory use to a hotel pool deck. Outdoor bar is not an allowable height exception and shall be removed from roof. Noted. Outdoor bar has been removed from plans.
- eee. A waiver from DRB is required to exceed the maximum building height of 200'-0". Waiver requested. See letter of intent.
- fff. MISSING: diagram showing <u>Commercial</u>, <u>Hotel</u>, <u>and Access to Upper Level Frontages</u> compliance with Section 142-745(a)(8)(b) Such frontages shall contain a minimum of 70 percent clear glass windows with views into the habitable space. Show in plan and elevation (A1-02 and A2-00) for lobby access area at ground level. Refer to Sheets A2-00 thru A2-09 showing full height glazing at said locations
- ggg. MISSING: Diagram depicting No more than 35 percent of required habitable space frontages shall be utilized for access to upper levels per section 142-745(a)(8) d., unless waived by the DRB. Please demonstrate that residential entrance lobbies and stairs comply with this requirement. Refer to Sheets A0-11, and A1-03 showing Level 01 Main Lobby Frontage as < 35% of 72nd Street Frontage
- hhh. MISSING enlarged section of each street class include cl of roadway, curb, sidewalk width, PLs, setbacks, and encroachments. Indicate height with

- standard elevation datum marks. Refer to Sheets L3-000 L3-001 for enlarged street sections.
- iii. MISSING diagram/notation depicting that 20% of the gross floor area of the building consisting of amenity space (ground floor restaurant 50% of area) for co-living units. Refer to new Sheet A1-17
- jiji. MISSING: graphically show existing and proposed street conditions of 72nd Street, including location of existing curb, parking spaces, cl of street, and proposed curb, drop off cut out and cl of street. Refer to Sheet L3-000 for existing and proposed street sections of 72ND street.
- kkk. MISSING signage details, height, location and method of installation, size, style, etc. Refer to Sheet A2-09
- III. MISSING shared amenity space diagram: Provide diagram and calculations complying with section 142-743(c)(1) d. Provide a diagram showing the areas counted. Indicate gross area of the building (including trash room). Refer to new Sheet A1-17 and Diagram on Sheet A0-05
- mmm. Add "FINAL SUBMITTAL" to front cover title for heightened clarity of reference for next deadline. Also, drawings need to be dated. Noted. Refer to revised Sheet A0-00
- nnn. Add narrative response sheet. Noted

3. DESIGN/APPROPRIATENESS COMMENTS

- a. Ground floor vehicular circulation shall be further explored and refined, including the elimination of the multiple (2 on each C class street) driveways. Noted
- b. Design details lacking
- c. Signage details lacking. Refer to Sheet A2-09 and A3-05
- d. Phase 2 must be shown in more depiction than ghosted building outline. Provide in rendering, or elevations, those Phase 2 portions for architectural review. Full drawings are not required for Phase 2. Refer to revised Sheets A1-14 thru A1-16, A2-02 thru A2-07, and A4-03
- e. **Street trees**. In addition, the requirements of Chapter 126, street trees shall require the installation of an advanced structural soil cells system (Silva Cells or approved equal) and other amenities (irrigation, up lighting, porous aggregate tree place finish) in tree pits. Refer to Sheets L1-110 and L5-120 for proposed extents and details of structural soil for all canopy shade trees. Structural soil is proposed from back of curb to building façade along all building frontages to provide for canopy shade trees rooting space.

4. VARIANCE/ZONING COMMENTS

- a. 72nd Street is a "Class A" street.
 - Enlarge dimensions or place them in a manner that is clear. Setback to property line is not clear. Refer to sheet A1-01
 - In addition to the requirements of section 126-6(a)(1), street trees shall have a minimum clear trunk of eight (8) feet, an overall height of 22 feet, and a minimum caliper of six (6) inches at time of planting. Additionally, the following shall apply:

- Street trees shall be up-lit.
- If such street trees cannot be planted the applicant/property owner shall contribute double the sum required in Section 126-7(2) into the city's Tree Trust Fund. Street trees along 72nd Street have been revised to meet all additional requirements.
- b. Carlyle Avenue is a "Class C" street.
 - Driveway is limited to 24'-0" width. Complied.
 - Depict the Facades shall have a minimum of height of 35 feet from BFE +5.
 Refer to elevations.
 - Depict the frontage shall contain habitable space for residential, hotel, or commercial, with a minimum depth of 20 feet from the building façade for a length equivalent to 85% of the setback line, except for the purposes of driveways and utilities. Complied; Refer to floor plans.
 - Ground floor and surface parking shall be setback a minimum of 20 feet from the building facade and shall be concealed from view from the Clear Pedestrian Path. Complied; Refer to floor plans.
 - Such frontages shall contain a minimum of 70 percent clear glass windows with views into the habitable space. Show in plan and elevation (A1-02 and A2-00) for lobby access area at ground level. Complied; Refer to elevation drawings.
 - Driveways shall be spaced no closer than 30 feet apart, unless waived by the Design Review Board. Complied.
- c. Byron Avenue is a "Class C" street.
 - Driveway is limited to 24'-0" width. Complied
 - Depict the Facades shall have a minimum of height of 35 feet from BFE +5.
 Complied
 - Depict the frontage shall contain habitable space for residential, hotel, or commercial, with a minimum depth of 20 feet from the building façade for a length equivalent to 85% of the setback line, except for the purposes of driveways and utilities. Complied; Refer to floor plans.
 - Ground floor and surface parking shall be setback a minimum of 20 feet from the building facade and shall be concealed from view from the Clear Pedestrian Path. Complied; Refer to floor plans.
 - Such frontages shall contain a minimum of 70 percent clear glass windows with views into the habitable space. Show in plan and elevation (A1-02 and A2-00) for lobby access area at ground level. Complied; Refer to elevation drawings.
- d. LOADING
 - All loading will comply with Section 142-745(a)(12) Loading and to all standards listed therein. Complied.
- e. GENERAL
 - Provide a complete operational plan for the building, including delivery and trash pickup times, sizes of delivery trucks (length & width), scheduling

- of various tenants and deliveries, garbage truck (length & width) information, store hours, number of employees. Provide maneuvering plan for loading within the existing/proposed conditions if applicable. See enclosed Operations Plan and maneuvering details on Plan Sheets A1-19 through A1-23.
- Comply with section 142-745(a)(3). Provide a site plan showing clear pedestrian path (10'-0") on all frontages. An easement to the city providing for perpetual public access shall be provided. Complied. Easement will be provided as needed.
- Comply with section 142-745(a)(5). Façade articulation. complied
- Comply with section 142-745(a)(6). Windows. Complied
- Comply with section 142-745(a)(8)d. No more than 35% of habitable space shall be for access to upper levels. Provide drawings. Complied.

5. OVERALL

- a. Waiver Height for 20' additional feet over 200'-0". Noted
- b. Waiver driveway for loading and parking not combined. Noted
- c. As proposed, the vehicular ground floor plan is not acceptable. Staff recommends the elimination of two separate curb-cuts along both Byron and Carlyle Avenues (C Street) which requires two waivers each in order to be installed. Staff recommend the complete elimination of the all of the internal surface parking spaces in the shell of the building and at minimum, the elimination of one access driveway along each C Street frontage. Noted

6. LANDSCAPE COMMENTS

- a. Provide a written response to comments. Noted
- b. Provide a Tree Survey prepared by a Professional Land Surveyor listing common names, size, and location of existing trees and palms with a DBH of 6" or greater in private property and 3" DBH or greater in the public ROW. Refer to Sheet L0-004 for requested Tree Survey.
- c. Provide a Tree Disposition Plan. Removal of any non-invasive trees with a 3" DBH or greater would require a Tree Removal Permit from CMB Urban Forestry. Please address tree mitigation requirements as part of the proposed landscape plan. Refer to Sheets L1-000 L1-001 for Tree Disposition and Mitigation plans.
- d. The use of Silva Cells or approved equal should be incorporated in conjunction with the installation of canopy shade trees areas where rooting space may be limited. Per CMB Urban Forestry recommendations, a minimum 1,000 CUFT of rooting volume should be provided per canopy shade tree or 500 CUFT when planted in close proximity and sharing rooting volume. Please graphically represent extent of installation under paved area and provide soil volume calculations. Refer to Sheets L1-110 and L5-120 for proposed extents and detail of structural soil for all canopy shade trees. Structural soil is proposed from back of curb to building façade along all building frontages to provide for canopy shade tree rooting space.
- e. While the use of green roofs with trees on roof decks is encouraged, please note that as per CMB Code Chapter 126-6 (c)1, a maximum of 25% of the required

- trees may be provided on roof decks areas. Any required trees not provided may be satisfied as per code section 126-7. Refer to Sheets L1-110 and L5-120 for proposed extents and detail of structural soil for all canopy shade trees. Structural soil is proposed from back of curb to building façade along all building frontages to provide for canopy shade tree rooting space.
- f. Urban Forestry has raised concerns with the use of Sea Grape trees as a street tree. Please consider an alternate tree species. Noted. Specimen Sea Grape trees are only being proposed for two (2) out of all the street trees to provide a design focus at the lobby entrance to the proposed building and will meet all street tree specification requirements. Owner/Management company will provide maintenance and upkeep for the Sea Grape trees to ensure compliance.
- g. Address CMB Code Section 142-745(e)7 as it relates to street tree spacing, size and landscape uplighting lighting minimum requirements. Noted. Refer to Sheet L1-110, and L6-100 for Street Trees Specification and Up lighting
- h. -Standard landscape uplighting fixture for hardscape conditions: KIM LTV 768WF/9L5KUV1 10.8W, 9 LED's, 511K (two fixtures per tree) Noted
- i. -Standard landscape uplighting fixture for above ground conditions: TBD by Public Works (two fixtures per tree) Refer to Sheet L1-110 for required landscape up lighting for street trees.

7. GROUND FLOOR SITEPLAN

a. As proposed, the vehicular ground floor plan is not acceptable. Staff recommends the elimination of two separate curb-cuts along both Byron and Carlyle Avenues (C Street) which requires two waivers each in order to be installed. Staff recommends the complete elimination of the all of the internal surface parking spaces in the shell of the building and at minimum, the elimination of one access driveway along each C Street frontage. Noted

These comments have been provided as a preliminary review of the documents and plans submitted and are subject to additions and/or deletions pending further review.