STAFF REPORT CONDITIONAL USE PERMIT FOR A PLACE OF ASSEMBLY (CUP-19-01)

TO: City of Wenatchee Hearing Examiner

FROM: City of Wenatchee Community Development Department

RE: Public hearing for CUP-19-01

DATE: March 5, 2019

I. REQUESTED ACTION

<u>Requested Action:</u> Conduct a public hearing on an application for a Conditional Use Permit submitted by Mercantile to allow a place of assembly in association with the permitted coworking business located at 14 N. Wenatchee Avenue.

II. SITE INFORMATION

Applicant: Heather Ostenson, Mercantile

Owner: Hub and Spoke Holdings, LLC

Location: The proposed place of assembly is located at 14 N. Wenatchee Avenue,

Wenatchee, WA 98801; and identified by Assessor's Parcel No.: 22-20-03-

590-440.

Zoning District: Central Business District (CBD) and Historic Entertainment Overlay

(HEO)

Comprehensive

Plan Designation: CBD and HEO

<u>Project Description:</u> The City of Wenatchee received a Conditional Use Permit (CUP) application on January 25, 2019 to allow Mercantile, a coworking business, to operate a meeting space. The meeting space is considered to be a "place of assembly" in the Wenatchee City Code (WCC) and requires a CUP in the Central Business District (WCC Section 10.10.020, District Use Chart).

Mercantile is located at 14 N. Wenatchee Avenue in the Ellis-Forde Building, which is on the Wenatchee Register of Historic Places and is a contributing structure to the Downtown Wenatchee Historic District. A building permit (BPC-18-236) has been issued by the City of Wenatchee for tenant improvements and renovations of the building to facilitate the coworking business, which is an allowed use in the CBD and HEO under the business office use category in WCC Section 10.10.020. The coworking business occupies the basement and main floor of the two-story building.

The purpose of the Conditional Use Permit application is to allow activities such as meetings, conferences, lectures, presentations, workshops, team-building events, socials, and exhibitions in existing spaces within the coworking office area. Depending on the needs or scale of the event, meeting spaces may include the lobbies, flexible desk areas, and conference rooms. The

overall maximum building occupancy permitted by BPC-18-236 is 244 persons on the main floor and 49 persons in the basement and is not proposed to be exceeded as a part of this application. Potential hours of operation for the assembly use are 4:00am to 11:00pm, seven days a week. Noise is limited by the Wenatchee City Code, Chapter 6A.40, Public Disturbance Noises. There is a small, non-commercial kitchen for use by the coworking business membership, which may not be used for catering purposes for meetings or events. The application has been included in this report as Attachment A.

<u>Site Characteristics and Surrounding Properties:</u> The property is located within the Central Business District (CBD) and Historic Entertainment Overlay (HEO), in the historic downtown core of the City of Wenatchee. The existing building, the historic Ellis-Forde Building, is located on N. Wenatchee Avenue, between the intersections with 1st Street and Palouse Street. Adjacent buildings are currently occupied by retail and office uses. Additional restaurant, retail, and office uses are located across the street.

This application proposes no exterior changes to the structure. Refer to the Site Permitting History section, below, for related applications and modifications to the building.



Figure 1. Aerial image of proposed project

<u>Site Permitting History:</u> The building was purchased by the property owner, Hub and Spoke Holdings, LLC in October 2018. On November 7, 2018, the Historic Preservation Board approved a Certificate of Appropriateness (HP-18-12) for interior and exterior maintenance, remodeling, and signage. A building permit associated with the previous Certificate of Appropriateness was issued on February 7, 2019 and construction is ongoing. A second

Certificate of Appropriateness will be reviewed by the Historic Preservation Board on March 6 to allow additional exterior improvements, exterior modifications to the Wenatchee Avenue and alley facades of the Ellis-Forde Building, including window and door replacements and a recessed alley door.

III. APPLICABLE POLICIES AND DEVELOPMENT REGULATIONS

The proposed action is subject to land use policies and provisions of the City of Wenatchee Urban Area Comprehensive Plan and zoning and development regulations of the Wenatchee City Code.

Wenatchee Urban Area Comprehensive Plan

In addition to the general goals and policies of the Growth Management Act and Wenatchee Urban Area Comprehensive Plan which state growth shall take place where adequate public facilities exist and are able to serve existing and future growth, the following goals and policies are relevant to this application:

Land Use / Urban Growth Area Element

Goal 8: Downtown – Strengthen the vitality of downtown.

Policy 1: Promote activity at the street level through appropriate uses in buildings, art and street amenities, and encourage offices and residential development in upper floors.

<u>Cultural and Historic Resources Element</u>

Goal 3: Historic Preservation – Preserve, maintain and honor the City's significant historic resources.

Policy 4: Discourage the demolition of historic properties by facilitating their adaptive reuse.

Goal 4: Facilities and Infrastructure – Support the development of facilities and infrastructure that further enhance Wenatchee's innovative and creative climate.

Policy 1: Recruit and support facilities that provide places for cultural and civic dialogue.

Policy 3: Develop public spaces that foster neighborhood identity and provide community gathering places.

Wenatchee City Code

Definitions

Wenatchee City Code (WCC) Section 10.08.115, "P," defines a "place of assembly" to mean a building used in whole or in part for the gathering together of persons for such purposes as deliberation, entertainment, amusement, or awaiting transportation.

District Use Chart

WCC Section 10.10.020, District Use Chart, requires a Conditional Use Permit for places of assembly in the Central Business District and Historic Entertainment Overlay.

Conditional Use Permit Requirements and Criteria

All conditional use permit applications must meet the general requirements in WCC 10.65.050 and be evaluated by WCC 10.65.060 "General Criteria." Additionally, the following specific provisions of WCC Section 10.65.080, Auditoriums / places of public assembly and places of worship, are applicable. However, the criteria listed in this section addresses standards that apply when this use is proposed within a residential zoning district. The subject property is within a commercial and historic overlay district; therefore the development standards for the applicable zoning districts are more appropriate for analysis.

Shorelines: The subject site is outside of the 200' shoreline jurisdiction.

Resource Lands and Critical Areas: The subject site is not identified within the current critical area maps used by the City.

IV. PUBLIC NOTICE AND ENVIRONMENTAL REVIEW

Application Submitted:	January 25, 2019
Determination of Completeness issued:	February 1, 2019
Notice of Application:	Notice was mailed to property owners/taxpayers within 350 feet of the subject property, posted on the subject property, and referred to relevant agencies on February 8, 2019.
Notice of Public Hearing:	Notice was mailed to property owners/taxpayers within 350 feet of the subject property on February 8, 2019 and published in the Wenatchee World newspaper on February 22, 2019.
Public Hearing:	The public hearing is scheduled for March 12, 2019 at 3:00 p.m. at Wenatchee City Hall, Council Chambers, located at 301 Yakima Street, Wenatchee, WA.

The public and relevant agencies have been given an opportunity to comment on the proposal and no comments have been received as of the publication of this staff report.

<u>Environmental Review includes State Environmental Policy Act (SEPA):</u> The proposed development is categorically exempt from the State Environmental Policy Act (SEPA) pursuant to WAC 197-11-800(6)(b)(i), which exempts land use decisions for activities conducted within an existing building.

VI. PROJECT ANALYSIS

In review of this proposal it is important to consider the goals and policies of the Comprehensive Plan, applicable codes, public and agency comments, any identified environmental concerns,

and state and federal requirements. Identified below is planning staff's analysis and consistency review for the subject application.

Comprehensive Plan consistency analysis:

This application proposes to allow a place of assembly, or meeting space, within an existing building occupied by a coworking business. The Comprehensive Plan encourages similar activities which promote street level activity and interest, reuse of historic buildings, and locations for community gatherings in the commercial zoning districts and in the historic downtown corridor. The use is compatible with adjacent commercial businesses on N. Wenatchee Avenue, including restaurant, retail, and office uses.

Wenatchee City Code consistency analysis:

The general criteria for conditional use permits requires that the proposal is compatible with adjacent uses and will protect the character of the surrounding area, will not result in the creation of nuisances to the public and/or nearby properties and existing uses, and will not result in undue adverse impacts affecting the public health, safety, and welfare.

WCC Section 10.65.060, Conditional use permit criteria:

(1) All requirements of a specified use can be satisfied;

Project compliance: The specific provisions of WCC Section 10.65.080, Auditoriums / places of public assembly and places of worship, are applicable when this use is proposed within a residential zoning district. However, the subject property is within a commercial zoning district and historic overlay district; therefore the development standards for the applicable zoning districts are more appropriate for analysis.

(2) The requirements of the zoning district within which the lot is located can be met;

Project compliance: The building is existing and all requirements of the zoning district have been satisfied through previous applications to the Historic Preservation Board and through the issuance of a building permit. This includes interior and exterior modifications, including signage and lighting. The building is not proposed to be further modified as a result of this application. Off-street parking, which could be required as a result of the proposed use, is exempt for all buildings in existence on or before January 15, 2018.

(3) All applicable requirements and regulations found within the WCC, as amended, can be satisfied:

Project compliance: The previously issued approvals and the Conditions of Approvals recommended herein will ensure that the place of assembly meets the applicable requirements and regulations in the Wenatchee City Code.

(4) The proposal is compatible with adjacent uses and will protect the character of the surrounding area;

Project compliance: The subject property is positioned mid-block on the west side of N. Wenatchee Avenue between First Street and Palouse Street in the CBD and HEO. Surrounding uses include a wide range of commercial and professional uses similarly situated on ground floors such as restaurant, retail, merchandising, office, and service related uses. There are residential uses on upper floors in nonadjacent buildings on N. Wenatchee Avenue. The Wenatchee Convention Center and the Performing Arts Center are approximately one and a half blocks from the subject property.

The project narrative indicates that "the mission of Mercantile is to provide a vibrant and productive work environment for entrepreneurs, small businesses, creatives and professionals alike." The proposed public assembly use provides an opportunity to the general public to utilize the existing spaces for meetings, conferring, convening, sharing ideas, presenting and exhibiting work. The use is consistent with the character described in the Comprehensive Plan for commercial and historic areas in the City.

(5) The proposal will not result in the creation of nuisances to the public and/or nearby properties and existing uses;

Project compliance: The proposed use will not create a nuisance as defined in WCC Section 6A.14.010 Public nuisance defined. Potential hours of operation for the assembly use are 4:00am to 11:00pm, seven days a week. Noise is limited by the Wenatchee City Code, Chapter 6A.40, Public disturbance noises.

(6) The proposed use will not result in undue adverse impacts affecting the public health, safety, and welfare; and

Project compliance: The proposed use will not result in undue adverse impacts affecting the public health, safety, and welfare.

(7) The proposed use is consistent and compatible with the comprehensive plan and any implementing regulation.

Project compliance: The use is consistent with the character described in the Comprehensive Plan for commercial and historic areas in the City and related goals and policies. The Comprehensive Plan encourages adaptive reuse of historic structures and gathering locations for community assembly and tourism-related purposes.

VII. RECOMMENDATION

As conditioned below, this application does not appear to be detrimental to the general public health, safety or welfare and meets the basic intent and criteria associated with Title 10 of the Wenatchee City Code. Staff recommends approval of CUP-19-01 subject to the following findings of fact, conclusions of law, and suggested conditions:

This recommendation is based on the following findings of fact:

- An application was submitted by Mercantile, on behalf of property owner Hub and Spoke Holdings, LLC, on January 25, 2019 for a Conditional Use Permit to allow a place of assembly.
- 2. The application is for the purpose allowing assembly activities such as meetings, conferences, lectures, presentations, workshops, team-building events, socials, and exhibitions within an existing building occupied by a coworking business.
- 3. The application has been processed as a Type III quasi-judicial review for conditional use permits pursuant to WCC Section 13.09.050; a public hearing is required for the application and is scheduled to occur on March 12, 2019.
- 4. The subject property is located within the Central Business District (CBD) and the Historic Entertainment Overlay (HEO).
- 5. The Wenatchee Urban Area Comprehensive Plan land use designation is CBD and HEO.
- 6. The project is located at 14 N. Wenatchee Avenue, Wenatchee, WA 98801; and identified by Assessor's Parcel No.: 22-20-03-590-440.
- 7. The subject property is approximately 0.21 acres in size.
- 8. The applicant is Heather Ostenson, of Mercantile, 15 Orondo Street, Wenatchee, WA 98801.
- 9. The property owner is Hub and Spoke Holdings, LLC, 15 Orondo Street, Wenatchee, WA 98801.
- 10. Places of assembly are permitted as a Conditional Use in the CBD and HEO.
- 11. The proposal is consistent with the goals and policies of the Wenatchee Urban Area Comprehensive Plan.
- 12. The proposal is consistent with the provisions of Wenatchee City Code Title 10, Zoning.
- 13. The conditional use permit shall run with the land and is transferable to future property owners.
- 14. The proposal is categorically exempt from the State Environmental Policy Act (SEPA) pursuant to WAC 197-11-800(6)(b)(i), which exempts land use decisions for activities conducted within an existing building.
- 15. The Wenatchee Hearing Examiner conducted a public hearing on March 12, 2019.
- 16. Any Conclusion of Law that is more correctly a Finding of Fact is hereby incorporated as such by this reference.

This recommendation is based upon the following suggested conclusions:

- 1. The City of Wenatchee Hearing Examiner has been granted the authority to render this decision pursuant to WCC 1.09.070.
- 2. As conditioned, the proposal is consistent with the intent, purposes, and regulations of the Wenatchee City Code and Comprehensive Plan.

- 3. As conditioned, this proposal meets the general and specific conditional use criteria for WCC Section 10.65.080, Auditoriums / places of public assembly and places of worship.
- 4. The conditional use permit will run with the land.
- 5. As conditioned, this proposal is consistent with applicable federal and state laws and regulations.
- 6. Comments from the reviewing agencies have been considered and addressed where appropriate.
- 7. As conditioned, the proposal will not be significantly detrimental to the public health, safety and welfare; diminish the value of nearby property or improvements; or disturb persons in the use of property unless the conditional use is a public necessity.
- 8. As conditioned, the proposal has been designed to minimize adverse effects on neighboring properties, to include at minimum the effects of lighting, transportation, noise, odor, dust, and appearance.
- 9. The conditions of approval are the minimum necessary to ensure the proposal will comply with all applicable laws and regulations.
- 10. All conditions place upon the proposed use are conditions that are measurable and can be enforced and monitored.
- 11. Public use and interests will be served by approval of this proposal.
- 12. Any Finding of Fact that is more correctly a Conclusion of Law is hereby incorporated as such by this reference.

This recommendation is based upon the following suggested Conditions of Approval:

- 1. The project shall proceed in substantial conformance with the plans and application materials on file and submitted on January 25, 2019, except as amended by the conditions herein.
- 2. The applicant is responsible for compliance with all applicable local, state and federal rules and regulations, and must obtain all appropriate permits and approvals.
- 3. The conditional use permit only applies to the basement and main floor of 14 N. Wenatchee Avenue, Wenatchee, WA 98801; Assessor's Parcel No.: 22-20-03-590-440.
- 4. The property owner shall maintain compliance with the standards of WCC Title 10, Zoning and conditions of the conditional use permit at all times. Violation of the terms of the permit and/or requirements of the WCC not expressly modified by the permit shall be processed as a violation pursuant to WCC Chapter 13.13, Enforcement and Penalties.

Attachment A,

Application received January 25, 2019



(509) 888-3200

LAND DEVELOPMENT PERMIT APPLICATION

Date Stamp	Acce	epted By:	Red	eipt No.		File No	0.		
	TYPE	OF PERMIT	r YOU	ARE APPLY	ING F	OR:			
Major Subdivision		Short Plat		Binding S	ite Plan		Variance		
Final Plat	☐ Fi	nal Short Plat		Final Binding S	ite Plan		Conditional Use	√	
Plat/Binding Site Plar	Alteration	Plat/Bin	iding Site	e Plan Vacation		Plan	ned Development		
In addition to this for	m, submit all	applicable item	is on the	corresponding	checklist	for a cor	mplete application	١.	
GENERAL INFOR	MATION								
Applicant: MERCA	NTILE	_							
Mailing Address: 1	5 Orondo St	reet, Wenatch	iee WA	98801					
Contact No.: (509) 679-1245			E-mail Address: heather.ostenson@icloud.com						
Property Owner(s) *If different than applican		ooke Holdings	s, LLC						
Mailing Address: 1		reet, Wenatch	nee WA	98801					
Contact No.: (509) 679-1245 E-mail Address:									
If there is more than	one property	owner, submit	the sup	plemental additi	onal own	er(s) and	l authorization for	m.	
Complete section	if an agent	is acting for	the ap	plicant or owi	ner durii	ng the p	ermit process:		
Authorized Agent:			25						
Mailing Address:_									
Contact No.:			_ E-mai	I Address:					
Surveyor:			Wash	ington Registra	ation #: _		=		
Contact No.:			_ E-mai	l Address:					
Engineer			Washington Pagistration #:						
Contact No.:	ontact No.:			E-mail Address:					

Please indicate who should receive								
PROPERTY INFORMATION								
Street Address(es): 14 N. Wenatchee Ave								
Parcel No(s).: 222003590440								
Abbreviated Legal Description:								
Abbreviated Legal Description: Great Northern Amended Block 10 Lot 11-13								
Total site size in acres: 0.21								
Zoning District Designation: Central Business District (CBD)								
Overlay District: Historic/entertainment (HEO)								
Comprehensive Plan Designation: Central Business District (CBD)								
Shoreline Environmental Designation: N/A								
Wildland-Urban Interface: N/A								
Critical Areas: N/A								
ACKNOWLEDGEMENTS AND SIGNATURES								
I (We) acknowledge that:								
1. The information, plans, maps and other materials submitted on and with this application are, to the best of my/our knowledge, a true								
and accurate representation of this proposal;								
This application shall be subject to all additions to and changes in the laws, regulations and ordinances applicable to the proposed								
development until a determination of completeness has been made pursuant to Chapter 13.07 Wenatchee City Code;								
3. City of Wenatchee does not guarantee success of this permit application, and/or the issuance of an affirmative notice of action. The								
City's assistance to the applicant(s)/owner(s) does not preclude the need to address impacts raised by the public or by other federal, state								
or local agencies;								
4. In the event of any legal proceeding to challenge this application, any environmental determination or any other aspect of the proposed								
development, the Applicant(s)/Owner(s) shall be solely responsible to defend such challenge and pay all court costs and attorney's fees								
necessary for such defense;								
5. If the Applicant is not the owner of the real property which is the subject of the permit application, this application and acknowledgment								
shall also be executed by each owner;								
6. All persons executing this acknowledgment in a representative capacity shall be personally liable and hereby personally guarantee								
payment of all fees, expenses and costs required by this application.								
7. If the applicant(s), representative(s) and/or owner(s) fail to respond to a request by the Department to submit necessary application								
materials identified in a Notice of Incomplete Application within 60 days will result in a null and void application, with no refund of the filing								
fees.								
8. This application does not constitute approval of the proposed development activity and it is acknowledged that additional permit								
applications and approvals may be necessary to conduct specific activities.								
10. During the review of this application, it may be necessary for staff to make one or more site visits. By signing this application form, you are giving permission for these visits. If it is rental property, the owner hereby agrees to notify tenants of possible site visits.								
Date: 1/25/19 Applicant Signature: HAMIN COMM								
Date: Agent Signature:								
Date: ///// Owner Signature: ////////////////////////////////////								

Hub and Spoke Holdings, LLC 15 Orondo Street Wenatchee, WA 98801 Contact: Heather Ostenson (509) 679-1245 heather.ostenson@icloud.com

Conditional Use Permit Application

MERCANTILE ELLIS-FORDE BUILDING 14 N. Wenatchee Avenue

NARRATIVE

MERCANTILE is a coworking and meeting and event space located in the historic Ellis-Forde Building circa 1905 in the heart and historic core of Downtown Wenatchee. MERCANTILE's mission is to provide a vibrant and productive work environment for entrepreneurs, small businesses, creatives and professionals alike.

MERCANTILE's first floor and basement space plans include a mix of fixed-furnishing and flexibly-furnished spaces that can be utilized for and by members and tenants, or made available for rent to the non-members/non-tenants for events.

The **vision** for meeting and event use by the general public includes meetings, conferences, lectures, presentations, workshops, seminars, team-building events, professional development and continuing education sessions, business-oriented socials, and exhibitions.

City planning staff notified the applicant at a September 2018 pre-application meeting that the public assembly nature of the event use/spaces requires a conditional use permit.

The **hours of operation** for the public assembly use may occur during MERCANTILE's standard operating hours for its Flex Members, which are Monday through Friday between 7am to 6pm, and may also extend into hours in which the MERCANTILE is available to its other tenants, 4am to 11pm seven days a week.

Given the types of public assembly described above, it is anticipated that *sound amplification* will be utilized in support of certain types of events and number of attendees.

The space plan submitted to the Building Department shows a potential maximum public assembly occupancy of two hundred forty four (244) persons on the first floor, and a maximum of forty-nine (49) persons in the basement. The spaces available for public assembly are proximate to Wenatchee Avenue.

MERCANTILE has a small non-commercial kitchen primarily for use by its members and tenants. As such, MERCANTILE does not offer in-house catering nor does it have catering or food and beverage service staff.

Revision Date: 1/25/19 Page 1 of 3

Hub and Spoke Holdings, LLC 15 Orondo Street Wenatchee, WA 98801 Contact: Heather Ostenson (509) 679-1245 heather.ostenson@icloud.com

Conditional Use Permit Application

MERCANTILE ELLIS-FORDE BUILDING 14 N. Wenatchee Avenue

10.65.060 Conditional use permit criteria.

The development standards of this title shall be used by the applicant in preparing the conditional use permit application. The applicant has the burden of demonstrating that the proposed use is consistent with the following review criteria:

- (1) All requirements of a specified use can be satisfied;
 The building owner has an active application with the City of Wenatchee Building
 Department for tenant improvements to the interior of the existing structure, which includes
 addressing anticipated International Building Code use-related requirements for the
 proposed public assembly use.
- (2) The requirements of the zoning district within which the lot is located can be met; The existing building is located in the Central Business District. The building owner has been issued a Certificate of Appropriateness for proposed exterior modifications to the building, including exterior signage and lighting. No change to the building's footprint or height are proposed. The tenant improvements application addresses requirements for interior modifications.
- (3) All applicable requirements and regulations found within the WCC, as amended, can be satisfied;

This narrative, accompanying application, the Certificate of Appropriateness and tenant improvements permit application in process address all anticipated applicable requirements and regulations within the WCC.

(4) The proposal is compatible with adjacent uses and will protect the character of the surrounding area;

The Ellis-Forde Building is positioned mid-block on the west side of Wenatchee Avenue between First Street and Palouse Street in the Central Business District (CBD). The CBD is home to a wide range of commercial and professional uses. Many food service establishments on the main floor levels operate throughout the day, including for dinner service and beyond. There are retail, merchandising, office, and service related uses on main floors as well. The two largest structures on the west side of the street closest to first street have or are constructing second floor residential. The Grand Central and Doneen buildings house professional offices in their above-grade floors. Within a block and a half north are the Wenatchee Convention Center and the Performing Arts Center.

The project narrative indicates that "the mission of Mercantile is to provide a vibrant and productive work environment for entrepreneurs, small businesses, creatives and professionals alike." The proposed public assembly use provides an opportunity for non-members/non-tenants to utilize the spaces that are available to members and tenants for meetings, conferring, convening, sharing ideas, presenting and exhibiting work. Making these spaces available to non-members/non-tenants - which may be individuals, small businesses, non-profits, public entities, or larger corporations - supports commerce in our community and supplements existing meeting and event resources for visitors. We think this is entirely consistent with the intent of the CBD.

Revision Date: 1/25/19 Page 2 of 3

Hub and Spoke Holdings, LLC 15 Orondo Street Wenatchee, WA 98801 Contact: Heather Ostenson (509) 679-1245 heather.ostenson@icloud.com

Conditional Use Permit Application

MERCANTILE ELLIS-FORDE BUILDING 14 N. Wenatchee Avenue

Operational hours are similar to these Permitted Uses. The proposed public assembly uses are on limited to the main and basement floors. The proposed public assembly use as described in the project narrative is directly related to and supportive of Permitted uses for the CBD.

(5) The proposal will not result in the creation of nuisances to the public and/or nearby properties and existing uses;

The proposed use does not result in public disturbance noises detailed in 6A.40.030. See the project narrative and all previous responses to these criteria.

- (6) The proposed use will not result in undue adverse impacts affecting the public health, safety, and welfare; and See response to criterion numbers two and three.
- (7) The proposed use is consistent and compatible with the comprehensive plan and any implementing regulation. (Ord. 2013-41 § 1 (Exh. B); Ord. 2010-03 § 1 (Exh. A); Ord. 2007-34 § 2 (Exh. A))

The Wenatchee Comprehensive Plan 2016-2017: Planning To Blossom 2037 envisions ground floors in the CBD to consist primarily of retail, food and beverage, entertainment, and governmental offices. The subject building lies within the Historic/Entertainment Overlay. The CBD Sub-Area Plan 2007 also sets goals and objectives for the CBD.

We believe the proposal to be generally consistent with the goals and objectives of these various documents in that the assembly nature promotes activity and vitality at the street level that is of a commerce and professional nature.

Revision Date: 1/25/19 Page 3 of 3



