

Discussion of New Construction Standards

The agenda reflects new constructions standards are a topic for this meeting. The minutes of the 10/6 LORC meeting reflect Member Rummel as asking about incorporation of BUILD II and that Chair Furman said "that is an overriding question of whether it belongs here or in the zoning code, which he would like as a discussion topic in the future."

Such standards belong in the historic preservation ordinance, not in the zoning code.

1. No conflict would be created by having the standards in Chapter 41. MGO 28.004(3) provides that "the regulations which are more restrictive or which impose higher standards or requirements shall prevail, unless an exception to this provision is specifically noted."

Thus, having those standards in Chapter 41, along with the design details for new construction, would provide a cohesive whole for persons looking for historic district requirements.

2. It is the duty of Landmarks, not the Plan Commission, to ensure protection of historic districts.
 - Two of the purposes of Chapter 41 are: to enhance the visual and aesthetic character of the City by ensuring that new design and construction, when it happens, complements the City's historic resources; and, provide a framework for appropriate reinvestment in the City's landmarks and historic districts that ensures new design and construction, when it happens, complements the City's historic resources and conforms to the standards of the historic district. MGO 41.01 (3) and (4).
 - In granting a CoA, Landmarks needs to find that "the proposed work will not frustrate the public interest expressed in this ordinance for protecting, promoting, conserving, and using the City's historic resources."

Thus, if key standards are left to the zoning code, Landmarks will not be fulfilling its role under the ordinances.

An example of this is 702-706 Williamson, Legistar 32584. The proposed 6-story building was questioned by 4 Commissioners in regard to height. Yet nothing could be done by Landmarks because, as said by staff, "the Landmarks Commission, as part of a larger development review process, is aware of the neighborhood plan, but is only charged with interpreting the words of the Ordinance." And that "the Ordinance language says "visually compatible" not mathematically compatible."

3. It is worth remembering that the Council, in 2004, instructed staff to update the historic ordinance in accordance with BUILD II: "BE IT FURTHER BE RESOLVED that Planning

Unit staff is hereby directed to prepare the necessary ordinance amendments to update the Third Lake Ridge Historic District Ordinance.”

4. There has already been an unsuccessful attempt to codify height maximums in the zoning code. The Plan Commission had a special meeting on December 16, 2020 to focus on better coordination between recommendations in adopted plans and among regulatory policies related to development and redevelopment in historic districts. Most of the proposals were related to height. With respect to Third Lake Ridge, the minutes reflect: “Commissioners reached consensus to move forward on mapping heights in the Zoning Ordinance consistent with both Willy St BUILD I as well as BUILD II.”

Yet the map prepared by staff did not address BUILD I at all, and the heights were not compatible with BUILD II. As just one example, much of Williamson was deemed “Zone 1” under BUILD II which permitted a 2-story building plus livable attic. The draft map upgraded this to 3 stories - so 3 stories plus livable attic space or 3-story flat roofed structure would be allowed anywhere along the 600-1100 blocks. (For a fuller explanation of the shortcomings of this staff proposal, please see my comment letter for the 9/1/21 LORC meeting.)

5. BUILD II is so much more than a maximum height map – yet that was the limit of staff’s proposal for the Plan Commission working group meeting described in Legistar as “Coordinating Zoning and Historic Preservation Policy.”

Examples include:

- A new building shall be no wider than sixty (60) feet.
- Articulation and breaks in the facade must be sufficient to maintain the patterns and rhythm of masses and spaces of existing buildings in the visually related area.
- The setback of street facades for commercial and mixed-use buildings shall be two (2) feet from the property line. Setbacks up to eight (8) feet may be allowed to accommodate design for businesses that require outdoor retail space.
- The front yard setback for residential buildings shall be no less than fifteen (15) feet, except that one-story unenclosed front porches may encroach up to six feet into the minimum setback.
- First floor storefronts shall be broken up into bays of a similar width to those on existing pre-1945 commercial buildings. The general historic pattern of large storefront windows, low kick panels, transom windows, side pilasters and a cornice shall be used in new construction. For corner buildings, angled corner entrances are encouraged.

Attached is a document, *Attachment 3*, submitted by the Alliance for the 1/14/2020 LORC meeting, that details BUILD II standards.

Lead Paint

The minutes of the 10/6 LORC meeting reflect a discussion of whether anything involving paint should be handled by a lead-safe contractor. “[Bailey] said that it was up to the committee on whether to dictate if people are allowed to do it themselves.”

I disagree. I do not believe LORC can dictate whether people can do it themselves – state law explicitly permits homeowners to remove lead paint.

DHS 163.12(1)(b) A person is not required to be certified as a company when the person is a homeowner who personally performs regulated activities only on the owner’s owner-occupied dwelling unit and the owner-occupied dwelling unit is not occupied by an individual other than the property owner’s immediate family.

See also:

DHS 163.10 (d) A person is not required to be certified under par. (bm), and is not subject to other provisions under this chapter, when any one of the following applies:
5. The work is a renovation activity that is not performed for compensation and no other conditions requiring certification exist.

It is also worth remembering that most lead-painted homes exist outside of historic districts. Why should owners of historic resources need to hire a contractor when other residents do not? Plus, health concerns are not part of the purview of Chapter 41’s purpose, which is to “protect, preserve, promote, conserve and use historic resources.”

As a side note, I strip a section of my house every year and replace/repair the wood as needed. I have seen lead-safe paint contractors at work, and my attention to lead paint containment is *so* much more careful than theirs.

Inconsistencies

This is just a smattering of inconsistencies – it is not an exhaustive list.

EIFS

The draft ordinance says: “Stucco and Concrete shall be repaired by removing the damaged material and patching with new material that duplicates the old in strength, composition, color, and texture.” The guidelines say: “Exterior insulation and finish system (EIFS) is not an acceptable new material unless it is able to replicate historic profiles and textures.”

EIFS does not duplicate stucco in strength or composition: (1) stucco has a stronger finish than EIFS; and (2) the composition of stucco is Portland cement, sand, lime and water that is applied in three coats over metal lath, while EIFS is multilayered, made up of a foam insulation board, a coat of the synthetic stucco, fiberglass mesh and then a top coat. Thus, under the proposed ordinance standards EIFS would not be permitted, yet the guidelines allow EIFS if there is the same profile and texture.

How do you propose to regulate fencing?

Under Standards for Alterations: “Fences and retaining walls in the front yard shall be in character with the style of fences or retaining walls historically found in the district or in keeping with the materials and character of historic resources in the district.” A building permit is not needed for a fence. Chapter 41 does require a Certificate of Appropriateness for a “structure” which is defined as “any building or improvement attached to land” and “improvement” is

defined as “any structure, landscape feature or object intended to enhance the value or utility of a property.” If homeowners now need a CoA for a fence, then that should be explicitly stated. But then “improvement” also includes “landscape feature” which is defined as “any improvement to the natural landscape including plants, gardens, parks, greenways and landscaping around structures.” So will Landmarks also need to issue a CoA for plants? Currently, landscape features are potentially reviewed only in connection with exterior alterations of the building and, supposedly, for new residential in TLR.

Allowing masonry paint to peel.

The guidelines provide: “If approved by the Preservation Planner and Building Inspection Division, or the Landmarks Commission, masonry that was not historically painted may have paint removed by allowing the property owner to remove peeling paint over time or by other nonabrasive means, such as low-pressure water and detergent and natural bristle or other soft-bristle brushes.”

My understanding was that language was needed in the ordinance since City ordinances do not allow paint to peel off. Since the guidelines are not an ordinance, allowing paint to peel off over time under the guidelines does not create an exception to the general maintenance ordinance.

Definitions in the guidelines.

There are a lot of definitions that are not used in the actual text of the guidelines or the ordinance. For example: “vinyl siding”; “water table”; “water blasting”; “window hood”; “tread”; and, “vapor permeable.”

Approvals in the guidelines.

For example: “Deteriorated wood surfaces may be repaired with epoxy, Dutchman repairs, or other methods *as approved by the Preservation Planner.*” Emphasis added – this portion needs to be removed.

Purpose of guidelines

The 10/6 LORC minutes state: “[Bailey] explained that the guidelines should not be used as standards and instead are used to show people how to meet the standards, which is why the guidelines were pulled out of the ordinance into a separate document.”

Much of the guidelines are an abbreviated how-to manual. For example: “Windows and doors should be made weathertight by re-caulking gaps in fixed joints and replacing or installing weather-stripping.”

But there are some items that do help interpret and apply the standards. For example:

- The draft ordinance provides: “Historic entrance doors or those dating from the period of significance may be replaced with a door that blends with the character of the structure when the original is beyond repair.”
- The guidelines provide: “Aluminum clad wood, aluminum, and insulated hollow metal entrance doors are an acceptable alternative material if they are similar in design, color, scale, architectural appearance, and other visual qualities of the original doors.”
- This helps the property owner, and the Landmarks Commission, to understand the ordinance’s use of the phrase “a door that blends with the character.”

I suggest that the guidelines be scaled back to reflect only those items that help interpret application of the standards.

A few specific standards.

1. In the 1/13/21 ordinance version: "Re-siding with asbestos-style shingles, wide clapboards over six (6) inches in exposure, and vertical panels with faux wood grain texture, diagonal boards, vertical boards, rough sawn wood, rough split shingles and shakes, and vinyl siding are prohibited."

Now, nothing addresses residing standards except: "Replacement siding shall imitate the original siding within 1 inch of historic exposure/reveal." Much of the prior language is covered by this simple statement (e.g., vertical panels, diagonal boards). But rough sawn wood is not, nor is vinyl siding. Some vinyl siding looks more realistic these days – less like a plastic covering - but not all, and Landmarks would no longer be able to deny vinyl siding.

2. "Storm doors shall be full-light or full-view, in the same color as the entrance door or trim." While main doors are allowed variations (with guidance provided), storm doors are not. Historic storm doors are not full-view. My original storm door (found in the garage rafters) is not full-light. Rather the glass/screen areas match the inset panels of the main door. Had I not already renovated that original door, I would not be able to install it should this ordinance pass. This standard should be changed so that it is comparable to the standard for entrance doors – that the door "blends with the character of the structure" and more explanation provided in the guidance.
3. "Removing a chimney visible from the developed public right-of-way or altering its appearance is prohibited." Not all chimneys are important – particularly in TLR where so many have already been removed (and continue to be removed without a permit). And the cost, especially if an entire chimney needs to be rebuilt, can be very expensive. At a minimum, since economic feasibility is being discussed for windows, economic feasibility should be discussed for chimneys.

The 10/6 LORC minutes reflect that a Landmarks Commissioner requested language be added "to consider whether window repair is economically feasible, something the commission already takes into account through their policy manual." The manual says, in part: "If the windows are historic, the applicant must provide a 3rd party assessment of whether the windows are physically beyond repair and/or are not economically feasible to repair. This assessment must come from a contractor who completes window repair, such as a carpenter, painter, or general contractor."

Other items discussed at the 10/6 LORC meeting

The 10/6 LORC meeting minutes reflect: "Rummel said the ordinance is focused on structures and asked about historic resources that are not buildings, such as landscapes, burials, or parks."

Period Garden Park is not a landmark, nor is BB Clarke Beach, nor Willy Street Park. There are also other items worth preserving – including signs painted on the sides of buildings and carriage stepping stones.

The 10/6 LORC meeting minutes reflect: "Rummel referenced Lehnertz' letter, which made a case that the project from the case study wouldn't meet the standards, and she said that a lot of the interpretation by staff and the Landmarks Commission is subjective."

The draft ordinance only provides factors that Landmarks "shall consider." It provides no standards. When should an application be approved or denied? If a building is 30% taller than the historic resources within 200 feet, should that proposal be denied? Or 9 times the volume? Or if it has a 40% larger front elevation? Shouldn't developers, as well as neighbors, have some idea of what visual compatibility means? Wouldn't the Commission find more substantive guidance useful and time saving?

This is illustrated by Landmarks approval of the 801/803 project. That project, on the corner where buildings were historically often larger, was capped by Landmarks at 33' in height. 817 Williamson, a mid-block project, was approved at a height of 40.64' and an additional foot was approved administratively. Thus, a mid-block project has an additional 8.64 feet, or an increase of 26% in height over the corner project. Why?

The 10/6 LORC meeting minutes reflect: "Rummel asked about combining multiple lots [with respect to 817 Williamson] to build bigger and whether that was addressed in the standards. Bailey said that the standards for a land combination address this; in the case study, combining the two lots met the standards as a 66' lot. She said that with the design of this building, it had two projecting bays to make it read like two structures to link it to the development patterns of the historic district."

The lot, as approved, is not 66' wide. The building is 66' wide and the lot is 97.5' in width. Historically, lots were 66' in width, then often subdivided to 33' in width. However, the ordinance addresses lot size, not street frontage.

MGO 41.18(4) provides: "The commission shall approve a certificate of appropriateness for land divisions, combinations, and subdivision plats of landmark sites and properties in historic districts, unless it finds that the proposed lot sizes adversely impact the historic character or significance of a landmark, are incompatible with adjacent lot sizes, or fail to maintain the general lot size pattern of the historic district."

The staff report said: "While there were originally two buildings on this parcel (one on each lot), those were torn down due to their deteriorated condition in 1966 and 1978. The current building was constructed so that it crossed the lot line and the rest of the property functioned as a surface parking lot. The result is that the parcel has functioned as a single lot and the current proposal is more of a platting process to address an unresolved underlying lot line." And the analysis said: "The proposed combination of the two underlying lots would not adversely impact the character of the Third Lake Ridge Historic District. There are a variety of lot sizes adjacent to the property, one of which (800 Jenifer) is of a comparable size. There is a varied lot size pattern in this district, including several that are of a similar configuration and size on this block as the proposed combined lot."

The applicant claimed the lot would "not be out of place with the irregularly sized lots in this block and also within the nearby blocks in Third Lake Ridge." Lots may be irregular

sizes, but large lots are rare (except for the north side of Williamson in the 600-900 blocks) – most lots are ½ or less of the original lot.

Williamson, lot sizes on the south side of the 800 block

803: 2,178, frontage 33

805: 8,712, frontage 66

811: 4,356, frontage 33

813: 4,356, frontage 33

817: 12,870, frontage 97.5

825: 4,356, frontage 33

831: 13,068 (1 ½ lots, with a structure only in the center third of the lot), frontage 99

839: 17,160 (Ridge Side Coop, 9 units in 4 houses), frontage 130

851: 8,976, frontage 68

Williamson, south side, entire district, additional lots over 8,712 (the standard size of original lots).

1001: 15,246 (Common Wealth Development, 4 buildings redeveloped, built 1890-1909), frontage 132

1217: 12,408 (fire department), frontage 94

1221: 56,628 (Willy Coop, first building constructed in 1953), frontage 231

1525: 13,219 (the old Hans Sewing, now MadCat, built in 1972), frontage 92.5

Whether or not a property has crossed lot lines and functioned as a single lot should be irrelevant to the Landmarks Commission's decision. If the combination of lots for the 817 project would (1) be incompatible with adjacent lot sizes or (2) fail to maintain the general lot size pattern of the historic district, the Landmarks Commission should not approve a combination. The 817 lot combination was incompatible with adjacent lot sizes and did not maintain the "general lot size pattern."

Adjacent lot sizes:

4,356 (813 and 825 Williamson) and 8,712 (814 Jenifer) and 4,356 (820 and 824 Jenifer).

The general lot size pattern of the historic district:

Of the approximate 678 properties in TLR, 60 are greater than 8,712 sq.ft., or about 9%.

The general lot size pattern of Williamson Street:

Excluding the 600 block and the 700 and 800 north blocks (13 lots which were historically larger), there are 181 properties. Of those, 17 are larger than the historic standard lot size of 8,712 sq.ft., or 9%. (Including all Williamson addresses, 25 of 194 are over 8,712 sq.ft, or 13%)

The 10/6 LORC meeting minutes reflect: "[Bailey] said her approach has been that good preservation practice is good preservation practice, and if dealing with a component, one should go about it the same way in all historic districts, and the historic resources in the 200' context will set the tone for shaping the actual form and character."

Good preservation practice is good preservation practice for landmarked properties. For historic districts, there are character defining features that should be preserved, and others that do not really matter. Yet the proposed ordinance will regulate historic district resources more tightly than landmarks are regulated.

One example is chimneys. TLR did not deem chimneys significant to the character of the district and many have been removed – some with approval, some not. Marquette Bungalows and First Settlement – both relatively small districts with 2-3 blocks of historic resources - deemed chimneys significant.

Another example is front porches. A second story front porch is not unusual in TLR and many have been added. Yet the proposed ordinance prohibits new additions on the front of the principal structure – a second story porch could be added only if it is a missing feature than can be documented.

Respectfully Submitted,
Linda Lehnertz

Attachment 3

THE THIRD LAKE RIDGE EXAMPLE: WHY DISTRICT-SPECIFIC STANDARDS ARE NEEDED

The attached chart compares the city staff's proposed uniform standards for new construction in historic districts (7-30-19) to the BUILD II standards for new commercial construction on Williamson Street (part of the Third Lake Ridge Historic District). BUILD II provides district-specific standards that vary by block and by use. The chart compares these general vs. district-specific standards with respect to 2 key parameters: building size and placement.

BUILD II (formally known as *Design Guidelines & Criteria for Preservation: Williamson Street, 600-1100 Blocks*), was created under Common Council directive through a process that sought broad public input. Because of this broad public input, and because the Council directed that BUILD II recommendations be implemented by ordinance, BUILD II standards provide a useful comparison to the uniform general standards now proposed by city staff.

- The BUILD II land use plan was adopted by the Common Council in 2005. The plan was created, in part, by a Dane County Better Urban Infill Development ("BUILD") grant, matched by funds from the City of Madison, the Marquette Neighborhood Association, and the Greater Williamson Street Business Association. The BUILD program's purpose is:
 "... to **plan and implement infill development** through planning grants. Infill development is defined as the economic use of vacant land, or restoration or rehabilitation of existing structures or infrastructure, in already urbanized areas where water, sewer, and other public services are in place, **that maintains the continuity of the original community fabric**. BUILD grants help pay for planning consultants who assist communities with preparation of infill plans." (emphasis added)
- An advisory committee oversaw the creation of the BUILD II plan. This 12-person advisory committee was made up of 2 Marquette Neighborhood Association representatives, 2 Common Wealth Development representatives, one Greater Williamson Street Business Association representative, one Landmark representative, 5 property owners in the targeted area, 2 residents in the area, and the District Alder. The advisory committee held approximately 30 public meetings, including 5 public forums. Based on this process, the BUILD II advisory committee recommended updated standards for the Third Lake Ridge historic district. The committee recommended specific updated standards for new construction, additions and alterations in that part of the historic district covered by BUILD II. Those standards were included in the BUILD II plan adopted by the Common Council.
- The Common Council resolution adopting BUILD II (RES-05-00074) resolved that:
 "Planning Unit staff is hereby directed to prepare the necessary ordinance amendments to update the Third Lake Ridge Historic District Ordinance." To date, that has not been done.

The attached comparison makes abundantly clear that the district-specific BUILD II standards would give clear, detailed guidance to property owners, developers, contractors, architects and Landmarks Commissioners. By contrast, the uniform standards now proposed by staff are so vague that they are nearly meaningless.

Current staff proposal vs. BUILD II standards for new construction on Williamson Street

| July 30 staff proposal | BUILD II standards |
|---|---|
| <p>Visual Size When determining visual compatibility for visual size, the Landmarks Commission shall consider factors such as massing, building height in feet and stories, the gross area of the front elevation (i.e., all walls facing the street), street presence, and the dominant proportion of width to height in the façade.</p> <p>Architectural Expression When determining visual compatibility for architectural expression, the Landmarks Commission shall consider factors such as the building's modulation, articulation, building planes, proportion of building elements, and rhythm of solids to voids created by openings in the façade.</p> | <p>Height In general, maximum 2½ stories above grade. Exceptions:</p> <ol style="list-style-type: none"> 1. A flat-roofed building on the north side of the 800 or 900 blocks may extend 3 stories above grade. 2. North 600 and 700 blocks, back half (along the bike path) 5 stories/54 feet. <ul style="list-style-type: none"> - 2 bonus stories, up to a maximum of 85 feet/7 stories, for preservation, affordable housing, structured parking 3. North 600 block, front half along Williamson, western approximate 2/3 maximum of 4 stories, eastern approximate 1/3 3 stories (preservation of the Capitol view) 4. North 700 block, front half along Williamson, western approximate 3/4 maximum of 5 stories/54 feet, eastern approximate 1/4 ½ stories <ul style="list-style-type: none"> - 3 stories at mid-block along the Livingston side street, with 1 bonus story for preservation, affordable housing, structured parking 5. North 700 block, back half (along the bike path) 5 stories 6. South 600 block 4 stories 7. South 700 block (Elks Club property), 4 stories. <ul style="list-style-type: none"> - 1 bonus story available for a project that incorporates significant publicly accessible green space along Lake Monona. 8. North 800-1100 blocks back half (along the bike path) 3 stories. <ul style="list-style-type: none"> - 1 bonus story for preservation, affordable housing, structured parking - Bonus story in 800 and 900 blocks (which are closer to Williamson than the 1000 and 1100 blocks) must be stepped back at least 45 feet from the property line for residential structures and 30 feet for mixed use, flat roofed structures. The fourth story must be stepped back from the street such that it cannot be seen at sidewalk level from the opposite side of the street 9. Corner features on corner buildings can be higher if the features are comparable in scale to historically representative corner features on Williamson Street. <p>Street Façades</p> <ol style="list-style-type: none"> 1. Maximum of 60 feet in width <ul style="list-style-type: none"> - A residential street façade more than 25 feet wide shall be divided into visually distinct masses that are no more than 25 feet wide and that are visually separated from each other by at least 5 feet. - Commercial mixed-use articulation and breaks buildings must be sufficient to maintain the rhythm of masses and spaces of existing commercial and mixed-use buildings in the visually related area <p>Residential facades</p> <ol style="list-style-type: none"> 1. Articulated with dormers, bays, porches, recesses, or other architectural features to visually reduce the apparent mass of the new building and to blend with the details of older existing residential buildings within the visually related area. 2. One or more porches and at least one entry door on the main street facade. 3. The main front entrance shall be scaled large enough to be a focal point on the facade. 4. Finished first floor elevation of the street façade shall be at least 18 and not more than 48 inches above grade (does not apply to north 700 block). |

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| | <p>Commercial/Mixed-use facades</p> <ol style="list-style-type: none"> 1. First floor storefronts shall be broken into bays similar in width to those on existing pre-1945 storefronts (does not apply to north 700 block). 2. Storefronts shall have the general historic pattern of large storefront windows, low kick panels, transom windows, side pilasters and cornices. 3. Finished first floor elevation shall be as close to grade as possible, and shall meet ADA requirements for entrances. 4. For corner buildings, angled corner entrances are encouraged. 5. For buildings with multiple commercial tenants, a sign band should be included in the design to maintain consistency in the building design. <ul style="list-style-type: none"> - Internal sign illumination, if any, shall be appropriately subdued and shall illuminate only characters or letters – not background. 6. Parapet caps or cornices should be incorporated to terminate the top of façade 7. The first floor window sill height shall be 18” to 36” above grade. 8. Primary entranceways should be easily identifiable as a focal point of the building. Recessed entrances are encouraged. |
| <p>Street Setback When determining visual compatibility for street setbacks, the Landmarks Commission shall consider factors such as the average setback of historic resources on the same block face within two hundred (200) feet, and the setback of adjacent structures.</p> <p>Building Placement. When determining visual compatibility for building placement, the Landmarks Commission shall consider factors such as lot coverage, setbacks, building orientation, and historic relationships between the building and site.</p> | <p>Street Setbacks</p> <ol style="list-style-type: none"> 1. The street façade of a residential structure, other than a mixed-use structure, shall be located at least 15 feet from the public right-of-way that it faces. <ul style="list-style-type: none"> - A shorter setback of not less than 6 feet is allowed if the setback is not less than the average setback of other residential structures on the block face. - A one-story unenclosed porch, including stairs, may encroach up to 6 feet into the setback but may not be located less than 6 feet from the public right-of-way. 2. Commercial or mixed-use structure shall be located 2 feet from the public right-of-way that it faces, except that a setback of up to 8 feet may be allowed to accommodate outdoor retail space. <p>Side yard setbacks</p> <ol style="list-style-type: none"> 1. Non-corner lots less than 44 feet wide shall have at least 4 feet on each side, with the sum of the side lot setbacks at least 10 feet. 2. Non-corner over 44 feet wide shall have at least 6 feet on each side, with the sum of the side lot setbacks at least 16 feet. 3. Side lots for corner properties is 8 feet for the side facing the street for residential and 2 feet for commercial and mixed-use. <p>Rear yard setbacks</p> <ol style="list-style-type: none"> 1. Minimum 35 feet <ul style="list-style-type: none"> - 16 feet fine if the structure has underground or structured parking - 10 feet for the back half of the 600 block and for the 700 block |
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