



City of Santa Barbara California

STAFF HEARING OFFICER STAFF REPORT

REPORT DATE: July 18, 2006
AGENDA DATE: August 2, 2006
PROJECT ADDRESS: 1017 EAST HALEY (MST2006-00116)
TO: Staff Hearing Officer
FROM: Planning Division, (805) 564-5470
 Danny Kato, Zoning & Enforcement Supervisor *DK*
 Debbie Hughey, Case Planner *DH*

I. PROJECT DESCRIPTION

The project consists of a proposal to demolish two existing houses and a detached garage, and construct three new apartment units: a two-story duplex totaling approximately 1,580 square feet with each unit consisting of two bedrooms, and a single family unit approximately 1,026 square feet with three-bedrooms. The proposal also includes two, two-car carports and two uncovered parking spaces. One of the units will be a low-income, affordable unit, granted for sixty years through a deed and legal agreement with the City. Additionally, the project is proposed to be designed to the highest Green/Sustainable standards feasible including Built-Green Santa Barbara and County of Santa Barbara IBRC.

II. REQUIRED APPLICATIONS

The discretionary applications required for this project is a lot area Modification to allow the development of an additional affordable two-bedroom unit (SBMC §28.92.026.A). The lot area required for 3 units is 10,500 square feet and the existing lot is 9,056, thus requiring the modification.

DATE APPLICATION ACCEPTED: February 23, 2006

DATE ACTION REQUIRED: August 21, 2006

III. SITE INFORMATION AND PROJECT STATISTICS

A. SITE INFORMATION

Applicant:	Vadim Hsu, A.I.A.	Property Owner:	W.R. Jacobs Marital Trust
Parcel Number:	031-242-020	Lot Area:	9,056 S.F.
General Plan:	12 units per acre	Zoning:	R-2, Two-Family Residence
Existing Use:	Two houses	Topography:	5% Average Slope

Adjacent Land Uses:

North – Two Family Residential (Duplex)	East – One-Family Residential
South – One Family Residential	West – Two Family Residential (Duplex)

B. PROJECT STATISTICS

UNIT SIZE (Proposed):

Unit A:	790 Square Feet
Unit B:	790 Square Feet
Unit C:	1,026 Square Feet

PARKING (Proposed):

4 covered, 2 uncovered

Carport A:	390 square feet, 2-car carport
Carport B:	390 square feet, 2-car carport
Uncovered:	400 square feet (two cars)

LOT COVERAGE (Proposed):

Building:	3,386 square feet/37%
Landscape:	2,374 square feet/27%
Hardscape:	3,296 square feet/36%

OPEN YARD (Proposed):

1,448 square feet

IV. DISCUSSION

The City encourages the construction of affordable housing. Through the City's density bonus program, the City allows development of a greater number of units than would normally be allowed under the existing zoning. In exchange, some of the units on the site are subject to rent restrictions which provide for continued affordability to low income renters.

The applicant is requesting a modification to provide a third unit on a lot whose size (9,056 square feet) is less than required for three units (10,500 square feet). In exchange, the project proposes that one of the duplex units be affordable to low-income renters. This encourages the construction and preservation of housing that will remain affordable for many years pursuant to an agreement recorded against the title.

This project was reviewed by the ABR on two separate occasions (meeting minutes are attached as Exhibit D). Although the project required design changes (i.e., larger front porch, and reconfiguration of the front stairs), the minutes reflect that, in general, the Board found the site design and overall massing of the project supportable. The Board was also appreciative of the use of the central carports as a good location for the solar panels.

V. RECOMMENDATION/FINDING

Staff recommends that the Staff Hearing Officer approve the project, making the finding that the Modification is necessary to construct a housing development which is affordable to low-income households and will provide an affordable rental opportunity for a member of our community.

Exhibits:

- A. Conditions of Approval
- B. Site Plan, Elevations, Floor Plan
- C. Applicant Letter dated February 15, 2006
- D. ABR Minutes summary

Case Planner: Debbie Hughey
(dhughey@SantaBarbaraCA.gov)
630 Garden Street, Santa Barbara, CA 93101
Phone: (805)564-5470

STAFF HEARING OFFICER CONDITIONS OF APPROVAL

1017 E. HALEY
MODIFICATION
AUGUST 2, 2006

I. In consideration of the project approval granted by the Staff Hearing Officer and for the benefit of the owner(s) and occupant(s) of the Real Property, the owners and occupants of adjacent real property and the public generally, the following terms and conditions are imposed on the use, possession and enjoyment of the Real Property:

A. **Recorded Agreement.** Prior to the issuance of any Public Works permit or Building permit for the project on the Real Property, the following conditions shall be imposed on the use, possession and enjoying of the Real Property, shall be executed by the Owner in a written instrument, which shall be reviewed as to form and content by the City Attorney, Community Development Director and Public Works Director, recorded in the Office of the County Recorder, and shall include the following:

Uninterrupted Water Flow. The Owner shall provide for the uninterrupted flow of water through the Real Property including, but not limited to, swales, natural water courses, conduits and any access road, as appropriate. The Owner is responsible for the adequacy of any project-related drainage facilities and for the continued maintenance thereof in a manner that will preclude any hazard to life, health or damage to the Real Property or any adjoining property.

Landscape Plan Compliance. The Owner shall comply with the Landscape Plan approved by the (Architectural Board of Review (ABR)). Such plan shall not be modified unless prior written approval is obtained from the ABR. The landscaping on the Real Property shall be provided and maintained in accordance with said landscape plan.

1. **Rental Housing Restrictions.** The two-bedroom dwelling unit that fronts on Haley Street (designated as Unit A on the plans) shall be subject to the City's affordable rental and occupancy restrictions (Affordable Unit). The rent will not exceed the rent limit specified in the City's Affordable Housing Policies and Procedures (AHP&P) for low income units targeted to seventy percent (70%) of Area Median Income (AMI). [Currently the AMI is \$65,800 and the maximum rent for a two bedroom unit targeted to 70% of AMI is \$940 per month if the tenant pays all utilities].

The Affordable Unit shall be occupied only by an eligible low income household in conformance with the City's adopted AHP&P. The rental rates and tenant selection process for the Affordable Unit shall be controlled by means of a recorded City-approved affordability covenant executed by Owner and the City to assure continued affordability for at least ninety (90) years from the initial occupancy of the project. [Currently the maximum income for a two-person household to qualify as low income is \$42,100 per year]. For one of the dwelling units, the rent will not exceed the rent limit specified in the City's Affordable Housing Policies and Procedures (AHP&P) for low income units targeted to sixty percent (60%) of Area Median Income (AMI).

2. **Approved Development.** The development of the Real Property approved by the Staff Hearing Officer on August 2, 2006 is limited to 3 dwelling units and the improvements shown on the Development Plan signed by the Staff Hearing Officer on said date and on file at the City of Santa Barbara.
3. **Street Tree Protection.** The street trees within the City's right-of-way shall be preserved and protected.

B. Public Works Submittal Prior to Issuance of Permits. The Owner shall submit the following, or evidence of completion of the following, to the Public Works Department for review and approval, prior to processing issuance of permits for the project:

1. **Water Rights Assignment Agreement.** The Owner shall assign to the City of Santa Barbara the exclusive right to extract ground water from under the Real Property. Said agreement will be prepared by Engineering Division Staff for the Owner's signature.
2. **Recordation of Agreements.** After City Council approval, the Owner shall provide evidence of recordation to the Public Works Department.
3. **Approved Public Improvement Plans and Concurrent Issuance of Public Works Permit.** Upon acceptance of the approved public improvement plans, a Public Works permit shall be issued concurrently with a Building permit.

C. Community Development Requirements Prior to Building or Public Works Permit Application/Issuance. The following shall be finalized prior to, and/or submitted with, the application for any Building or Public Works permit:

1. **Recorded Affordability Covenant.** Submit to the Staff Hearing officer a copy of an affordability control covenant that has been approved as to form and content by the City Attorney and Community Development Director, and recorded in the Office of the County Recorder, which includes the following:
2. **Rental Housing Restrictions.** The two-bedroom dwelling unit that fronts on Haley Street (designated as Unit A on the plans) shall be subject to the City's affordable rental and occupancy restrictions (Affordable Unit). The rent will not exceed the rent limit specified in the City's Affordable Housing Policies and Procedures (AHP&P) for low income units targeted to seventy percent (70%) of Area Median Income (AMI). [Currently the AMI is \$65,800 and the maximum rent for a two bedroom unit targeted to 70% of AMI is \$940 per month if the tenant pays all utilities].

The Affordable Unit shall be occupied only by an eligible low income household in conformance with the City's adopted AHP&P. The rental rates and tenant selection process for the Affordable Unit shall be controlled by means of a recorded City-approved affordability covenant executed by Owner and the City to assure continued affordability for at least ninety (90) years from the initial occupancy of the project. [Currently the maximum income for a two-person household to qualify as low income is \$42,100 per year].

3. **Construction Best Management Practices (BMPs).** Construction activities shall address water quality through the use of BMPs, as approved by the Building and Safety Division.
4. **Conditions on Plans/Signatures.** The final Staff Hearing Officer Resolution shall be provided on a full size drawing sheet as part of the drawing sets. Each condition shall have a sheet and/or note reference to verify condition compliance. If the condition relates to a document submittal, indicate the status of the submittal (e.g., Final Map submitted to Public Works Department for review). A statement shall also be placed on the above sheet as follows: The undersigned have read and understand the above conditions, and agree to abide by any and all conditions which is their usual and customary responsibility to perform, and which are within their authority to perform.

Signed:

Property Owner

Date

Contractor

Date

License No.

Architect

Date

License No.

Engineer

Date

License No.

D. Prior to Certificate of Occupancy. Prior to issuance of the Certificate of Occupancy, the Owner of the Real Property shall complete the following:

1. **Repair Damaged Public Improvements.** Repair any damaged public improvements (curbs, gutters, sidewalks, etc.) subject to the review and approval of the Public Works Department. Where tree roots are the cause of the damage, the roots shall be pruned under the direction of a qualified arborist.
2. **Complete Public Improvements.** Public improvements, as shown in the improvement/building plans, including utility undergrounding and installation of street trees.

NOTICE OF APPROVAL TIME LIMITS:

The Staff Hearing Officer's action approving the Modification shall terminate two (2) years from the date of the approval, per Santa Barbara Municipal Code §28.87.360, unless:

1. A Building Permit for the use authorized by the approval is issued within twenty-four (24) months of granting the approval. An extension may be granted by the Community Development Director, if the construction authorized by the permit is being diligently pursued to completion and issuance of a Certificate of Occupancy.

2. The approval has not been discontinued, abandoned or unused for a period of six months following the earlier of (a) an Issuance of a Certificate of Occupancy for the use, or (b) two (2) years from granting the approval.
3. The project also includes approval of a Development Plan, Tentative Subdivision Map or a Coastal Development Permit, in which case the longer approval period shall prevail.

A R C H I T E C T
VADIM MENSTELL HSU/A. I. A.
I N C O R P O R A T E D



ARCHITECTURE, PLANNING, CONSTRUCTION MANAGEMENT
3023 SERENA ROAD - SANTA BARBARA - CALIFORNIA - 93105
805.682.0025 - telephone 805.682.7625 - facsimile www.bigv-arch.com

To: Bettie Weiss, City Planner and Staff Hearing Officer
Roxanne Milazzo, Modification Hearing Officer
City of Santa Barbara

From: Vadim M. Hsu, AIA (for) Architect Vadim M. Hsu, AIA, Inc.

Re: 1017 East Haley Street, Santa Barbara, CA APN: 031-242-020 Zone: R-2

Date: February 15, 2006 (Revised July 25, 2006) CHANGES UNDERLINED

Dear Ms. Weiss and Milazzo-

This letter will serve as our revised formal request for a Modification at the above-referenced property as part of our DART resubmittal. Pursuant to comments received by City Staff through the original DART submittal, the project has been redesigned to allow for all the required 6 parking spaces, and include the (3) proposed units, including the one affordable 2-bedroom unit. (The (2) 2-Bedroom units are stacked directly upon one another in the form of a 2-story building, freeing up significantly more common open space and on-site retention of storm drainage). Additionally, the project is proposed to be designed to the highest green/sustainable standards feasible including Built-Green Santa Barbara and County of Santa Barbara IBRC standards.

MODIFICATION REQUEST:

1). A Lot Area Modification to allow (3) apartment units instead of the allowed (2) units for the 9,056 square foot lot (10,500 s.f. required for 3 units). After conversations with Jan Hubble and Steven Faulstich, it is agreed that one of the units would be Affordable in perpetuity through deed and legal agreement with the City.

PROJECT DESCRIPTION:

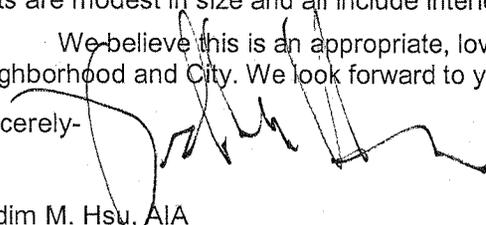
The property currently has two apartment units on it, and a detached Garage that has been used illegally as a third unit for some time (at this point the owner has removed the illegal use and restored the existing Garage). All are proposed to be demolished and the Site cleared completely in preparation for the proposed 3 new units, and 2 carports. This work would include soils preparation, under-grounding and separating all Utilities, and minor grading to allow for the development and Sitework (including setting a significant portion of the front (2) story unit into grade to reduce the appearance of size, bulk, and scale).

The project will consist of (1) 3-bedroom, 1-1/2 bath unit, and (2) 2-bedroom, 1-1/2 bath units, one of which will be Affordable, and (2) 2-carports with the required storage. As mentioned above, the project will be built to the highest Green/Sustainable standards feasible, designed for the maximum environmental benefits feasible, including potential photovoltaic creation of free electricity for the affordable unit and site, high-efficiency heating and water heating, high-value insulation, recycled and sustainable building products, and on-site water retention with actually reduced drainage to off-site City storm sewers.

The project is designed to be compatible with the more historic character of the neighborhood, and has received positive ABR review, continued to Final Approval on Consent. At 790-1,026 square feet, the units are modest in size and all include interior laundry and storage.

We believe this is an appropriate, low-impact proposal, beneficial and compatible with the neighborhood and City. We look forward to your comments and a positive review process.

Sincerely-


Vadim M. Hsu, AIA
Architect

cc: Priscilla Jacobs, Ken Smith, file

EXHIBIT C



DESIGN REVIEW ACTIVITIES SUMMARY

1017 E HALEY ST

MST2006-00116

R-APTS

Proposal to demolish two existing apartment units and detached garage and construct three new apartment units. The project consists of a duplex with two 719 square foot two-bedroom units and attached 232 square foot two-car carport, and a 935 square foot three-bedroom unit. Four additional parking spaces will be provided consisting of a 300 square foot two-car carport and two uncovered parking spaces. There will be approximately 150 cubic yards of cut grading outside the building footprints on the 9,056 square foot lot. One of the two-bedroom units is an affordable unit and a modification is required to allow bonus density for lot area to be less than required for three units.

Status: Pending

DISP

Date 3

ABR-Concept Review (New) - PH

CONT

05/22/06

(COMMENTS ONLY; PROJECT REQUIRES ENVIRONMENTAL ASSESSMENT AND STAFF HEARING OFFICER ACTION.)

(4:39)

Vadim Hsu, Architect, present.

Public comment opened at 4:57 p.m. and, as no one wished to speak, closed at 4:58 p.m.

Motion: Continued three weeks to the Full Board with the following comments: 1) The Board finds the site design and overall massing of the project supportable. 2) The Board supports the lot area modification to gain the affordable unit at the front of the site, but does not support the requested interior yard modification for the stair encroachment. 3) The Board would prefer to see the central parking and the front building moved back approximately five feet to allow for: a) a larger front porch; b) the opportunity for a different stair configuration located at the northeast corner of the proposed front building, and c) better pedestrian access for the second floor unit. 4) The proposed wall at the front public sidewalk should be stone to match the adjacent side wall. 5) As to the Landscaping: There is further opportunity for landscaping at the westerly side yard adjacent to the existing stone wall, so that it buffers the building from the adjacent driveway and provides landscaping and privacy for the ground floor unit. 6) Utilize larger trees of a different species to replace the two pine trees to be removed from the front yard. 7) Provide vine pockets along the driveway that abuts the proposed front structure. 8) Refine the details, especially of the front porch and railing components. 9) Study refining the proposed attic vents and the juncture of the plaster wainscot where it meets the wood siding above. 10) The applicant shall return with quality detailing for the doors and windows. 11) The Board appreciates the integration of the solar panels at the central carports as a good location for that usage. 12) The Board finds acceptable the delineated paving at the driveway for pedestrian access to the rear unit.

Action: LeCron/Romano, 8/0/0.

** THE BOARD RECESSED FROM 5:22 P.M. UNTIL 5:54 P.M. *
(SCHEDULED BREAK 5:00 - 5:20)

ABR-Concept Review (Continued)

CONT

06/12/06

(Second Concept Review.)

(COMMENTS ONLY; PROJECT REQUIRES ENVIRONMENTAL ASSESSMENT AND STAFF HEARING OFFICER APPROVAL FOR A MODIFICATION.)

(3:24)

EXHIBIT D

Vadim Hsu, Architect, present.

Motion: Continued indefinitely to the Staff Hearing Officer and to return to the Consent Calendar for Preliminary Approval with the following comments: (previous comments #1, 2, 9-12 carried forward*) 1) The Board finds the site design and overall massing of the project supportable.* 2) The Board supports the lot area modification to gain the affordable unit at the front of the site.* 3) The porch railing design at the rear unit is to match that of the front unit. 4) Restudy the juncture of the plaster wainscot where it meets the wood siding to include an extended sill similar to the window condition. 5) The applicant shall return with quality detailing for the doors and windows.* 6) The Board supports the integration of the solar panels at the central carports.* 7) The delineated paving at the driveway for pedestrian access to the rear unit.* 8) Study the front stair to further open the railing as it ascends to the second story unit, the use of the 8-inch lap siding for the lower portion of the stair element is acceptable.

Action: Sherry/Romano, 7/0/0.

CONCEPT REVIEW - NEW ITEM: PUBLIC HEARING4. **1017 E HALEY ST**

R-2 Zone

(4:39) Assessor's Parcel Number: 031-242-020

Application Number: MST2006-00116

Owner: Robert Bartlein & Priscilla Jacobs

Architect: Vadim Hsu

Contractor: Ken Smith

(Proposal to demolish two existing apartment units and detached garage and construct three new apartment units. The project consists of a duplex with two 719 square foot two-bedroom units and attached 232 square foot two-car carport, and a 935 square foot three-bedroom unit. The project includes four additional parking spaces consisting of a 300 square foot two-car carport and two uncovered parking spaces. Approximately 150 cubic yards of cut grading is proposed outside the building footprints on the 9,056 square foot lot. One of the two-bedroom units is an affordable unit. A modification is required to allow a bonus density (lot area to be less than required for three units). A second modification is required for an exterior stairway to encroach into the interior yard setback.)

(COMMENTS ONLY; PROJECT REQUIRES ENVIRONMENTAL ASSESSMENT AND STAFF HEARING OFFICER ACTION.)

Vadim Hsu, Architect, present.

Public comment opened at 4:57 p.m. and, as no one wished to speak, closed at 4:58 p.m.

Motion: Continued three weeks to the Full Board with the following comments: 1) The Board finds the site design and overall massing of the project supportable. 2) The Board supports the lot area modification to gain the affordable unit at the front of the site, but does not support the requested interior yard modification for the stair encroachment. 3) The Board would prefer to see the central parking and the front building moved back approximately five feet to allow for: a) a larger front porch; b) the opportunity for a different stair configuration located at the northeast corner of the proposed front building, and c) better pedestrian access for the second floor unit. 4) The proposed wall at the front public sidewalk should be stone to match the adjacent side wall. 5) As to the Landscaping: There is further opportunity for landscaping at the westerly side yard adjacent to the existing stone wall, so that it buffers the building from the adjacent driveway and provides landscaping and privacy for the ground floor unit. 6) Utilize larger trees of a different species to replace the two pine trees to be removed from the front yard. 7) Provide vine pockets along the driveway that abuts the proposed front structure. 8) Refine the details, especially of the front porch and railing components. 9) Study refining the proposed attic vents and the juncture of the plaster wainscot where it meets the wood siding above. 10) The applicant shall return with quality detailing for the doors and windows. 11) The Board appreciates the integration of the solar panels at the central carports as a good location for that usage. 12) The Board finds acceptable the delineated paving at the driveway for pedestrian access to the rear unit.

Action: LeCron/Romano, 8/0/0.

**** THE BOARD RECESSED 5:22 P.M. TO 5:54 P.M. ****

DISCUSSION ITEM

(5:54)

5. SINGLE FAMILY DESIGN GUIDELINES/NEIGHBORHOOD PRESERVATION ORDINANCE (SFDG/NPO) DRAFT UPDATE.

This is the initial review for comments of the Single Family Design Guidelines/Neighborhood Preservation Ordinance (SFDG/NPO) Draft Update Package. The second review with comments and request for final recommendation to City Council is tentatively scheduled for June 12, 2006.

Heather Baker, Project Planner, present.

DRAFT UPDATE PACKETS.

The Boards' information packets contained the following:

1. A copy of the May 13, 2006, SFDG/NPO Open House public notice.
2. An attachment packet containing:
 - a) Site visit maps.
 - b) Articles taken from the Microsoft Network (MSN) Web site.
 - c) Various public comment letters received by Staff.
 - d) A draft summary of the SFDG/NPO Proposed Municipal Code Changes (blue) with a draft Floor to Lot Area Ratios (FAR) Chart (Attachment 1), and a Chart of Submittal Requirement Levels of Planning Commission FAR Modification Approvals (Attachment 2).
3. A draft of the ABR Guidelines for Architectural Design Part 1 (pink).
4. A draft of the updated Single Family Residence Guidelines spiral binder (tan).

Prior to the discussion, Ms. Baker summarized the following in response to comments and questions received by Staff at the NPO Update Open House and Workshop on May 13, 2006:

1. (HLC) Request to have horizontal lines drawn on the retaining wall diagram. Adjustments have been made by Staff.
2. (ABR) Request for clarification on the FAR Chart that the 7,500 square foot lots (a Steering Committee recommendation) would not be included in the standards and only be guidelines. Adjustments have been made by Staff with the continued recommendation that 10,000 square foot lots and above be subject to FAR Standards.
3. (ABR) Request for a California State definition of "manufactured homes" into the draft SFDG/NPO Update for basic ordinance review. Staff has complied.
4. Staff corrected an error on Page 5 of the Draft Municipal Code Changes of a need to reference a 4,000 square foot single-story trigger for only ABR review proposals, rather than a 3,000 square foot single-story trigger, and applicable to 15,000 square foot lots and less.
5. Staff corrected an error to state that the review would occur three years after the adoption of the NPO, rather than two years, to give it more of a trial period.

Discussion ensued regarding new questions, suggestions, and requested changes by the Board on specific items in the information packet received from Staff.

PUBLIC COMMENT. Public comment opened at 7:03 p.m.

Ms. Dianne Channing, representative for the NPO Steering Committee, expressed concern that the NPO Update Package is not the product that the Steering Committee undertook to develop. The goal had been to create an ordinance that would be crystal clear to everyone years from now regardless of any personal bias. She stated that the Steering Committee has achieved a lot of good work; however, the original intent of the NPO's vision has not been resolved, which was to clarify for design review boards, applicants, and neighbors what the limits are for households.

CONCEPT REVIEW - CONTINUED ITEM**1. 1017 E HALEY ST**

R-2 Zone

Assessor's Parcel Number: 031-242-020
Application Number: MST2006-00116
Owner: Robert Bartlein & Priscilla Jacobs
Architect: Vadim Hsu
Contractor: Ken Smith

(Proposal to demolish two existing apartment units and detached garage and construct three new apartment units. The project consists of a duplex with two 719 square foot two-bedroom units and attached 232 square foot two-car carport, and a 935 square foot three-bedroom unit. Four additional parking spaces will be provided consisting of a 300 square foot two-car carport and two uncovered parking spaces. There will be approximately 150 cubic yards of cut grading outside the building footprints on the 9,056 square foot lot. One of the two-bedroom units is an affordable unit and a modification is required to allow bonus density for lot area to be less than required for three units.

(Second Concept Review.)

(COMMENTS ONLY; PROJECT REQUIRES ENVIRONMENTAL ASSESSMENT AND STAFF HEARING OFFICER APPROVAL FOR A MODIFICATION.)

(3:24)

Vadim Hsu, Architect, present.

Motion: Continued indefinitely to the Staff Hearing Officer and to return to the Consent Calendar for Preliminary Approval with the following comments: (previous comments #1, 2, 9-12 carried forward*) 1) The Board finds the site design and overall massing of the project supportable.* 2) The Board supports the lot area modification to gain the affordable unit at the front of the site.* 3) The porch railing design at the rear unit is to match that of the front unit. 4) Restudy the juncture of the plaster wainscot where it meets the wood siding to include an extended sill similar to the window condition. 5) The applicant shall return with quality detailing for the doors and windows.* 6) The Board supports the integration of the solar panels at the central carports.* 7) The delineated paving at the driveway for pedestrian access to the rear unit.* 8) Study the front stair to further open the railing as it ascends to the second story unit, the use of the 8-inch lap siding for the lower portion of the stair element is acceptable.

Action: Sherry/Romano, 7/0/0.