

MEMORANDUM

DATE: March 2, 2023
TO: McMinnville Planning Commission
FROM: Heather Richards, Community Development Director
SUBJECT: Supplemental Materials for the Public Record, Gwendolyn Hotel

Commissioners,

We have received a couple of questions from commissioners that we wanted to share with everyone.

- 1) For the three properties, what would require seismic upgrades?

Answer: Please see attached email from Stuart Ramsing, McMinnville Building Official

- 2) Why is the criteria focused on the exterior of the buildings?

Answer: Chapter 17.65 is applicable to the McMinnville Historic Resources Inventory (which includes the McMinnville Downtown Historic District that is on the National Register of Historic Places. None of the properties on the McMinnville Historic Resources Inventory were classified based on their interior historic integrity – therefore we do not regulate or review alterations to interiors. If you feel that the condition of the interior (either from a perspective of historic integrity, historic significance, or physical condition) warrants a finding for one of the criteria of review and there is evidence in the record to support that finding, then you can provide that information as part of your deliberations and final decision.

- 3) Is the stucco application over the exterior brick permanent?

Answer: This was a dialogue at the Historic Landmarks Committee. The public record does not have any evidence of test spots on any of the buildings to see if

Memorandum

Date: March 2, 2023

Re: Gwendolyn Hotel – Supplemental Information for the Public Record

Page 2

the exterior stucco application over the original brick can be removed. All agreed that this was possible to do

We also have a few more items that we need to enter into the public record:

- 1) Public testimony from Daniel Kiser references a February 17 article from the News Register. That article (February 16, 2023) and other articles since January 26, 2023, (January 30, 2023) are attached to this memorandum for the public record.
- 2) Sidonie Winfield commented on a facebook thread discussion about this project on A screenshot of that comment is attached to this memorandum to be entered into the record.
- 3) Planning Commissioner Gary Langenwalter has asked that a table he created relative to the public testimony received be provided to planning commissioners. His email with that direction and the referenced table are attached to this memorandum to be entered into the record.

And lastly, some of you have requested some help in creating a matrix identifying what criteria that the HLC felt were not satisfied and what the applicant alleged was wrong with those particular findings. Attached is a matrix provided by contract legal counsel, Carrie Richter, from Bateman Seidel.

From: [Stuart Ramsing](#)
To: [Heather Richards](#)
Subject: RE: Gwendolyn Appeal
Date: Wednesday, March 1, 2023 10:31:20 PM
Attachments: [image001.png](#)
[image004.png](#)

Heather,

For context, the building code administered in McMinnville is delegated for local administration by the State. The code is based on the International Building Code and the International Existing Building Code. The State makes amendments and adopts a consolidated code statewide as the Oregon Structural Specialty Code, referred to as the OSSC. The City of McMinnville has no local building code nor is there local authority to administer anything other than the OSSC.

To the question of what may require a seismic upgrade, there are several variables depending on the work that may occur. In any case, work must occur for an upgrade to be required. Without an alteration or addition occurring, there is no "trigger" to require a seismic upgrade of any type for any of the three buildings.

If an alteration or addition is to occur, the OSSC may require a building upgrade*** for seismic safety in several scenarios:

- When a change of use or occupancy occurs that places the building in an increased seismic risk category (this is unlikely to occur). For example, the occupant load for any of the three buildings increasing to more than 300 total occupants would result in an increased seismic risk categorization.
- Where a change increases the live load (e.g., weight of people and furnishings). For example, changing from office to an performance venue with a higher concentration of people (i.e., weight on the structure). This could occur without increasing the seismic risk category.
- If an addition is physically attached, then the existing structure plus the addition must be evaluated. Upgrading is avoided by separating any adjacent addition by several inches per story height. The building and addition could be "bridged" with seismic joints and exterior weather protection to functionally perform as a connected building without upgrading the existing building..

- If the building is altered in a manner creating structural irregularities (e.g., removing interior floors to create a large atrium).

***Upgrade for seismic safety may be to a lesser standard than for new construction, based on a number of variables.

In any scenario, an Oregon licensed engineer would be leading any design effort for any seismic upgrade. There are many options to consider starting with soils, then foundations, and then into bracing and securing the above-grade structure.



Stuart Ramsing
Building Official
503.474.7504

From: Brian Randall <Brian.Randall@mcminnvilleoregon.gov>
Sent: Tuesday, February 28, 2023 8:37 PM
To: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>
Subject: RE: Gwendolyn Appeal

For the three properties, what would require seismic upgrades?

From: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>
Sent: Tuesday, February 28, 2023 2:52 PM
To: Brian Randall <Brian.Randall@mcminnvilleoregon.gov>
Subject: RE: Gwendolyn Appeal

You might ask them that. I think they looked at the history of decision-making in McMinnville and the HLC has never denied a demo request in the past, including a couple of significant resources (an original dormitory – Mac Hall – on Linfield’s campus, and a primary contributing structure in the

downtown historic district across the street from this site).

Have a great day!

Heather



Heather Richards

Community Development Director

503-474-5107 (phone)

971-287-8322 (cell)

www.mcminnvilleoregon.gov

From: Brian Randall <Brian.Randall@mcminnvilleoregon.gov>

Sent: Tuesday, February 28, 2023 2:20 PM

To: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>

Subject: Gwendolyn Appeal

Just curious- why did the applicant not first apply to remove the buildings from the historic district and/or their designation as secondary contributing structures?

By [Scott Unger](#) • Of the News-Register • February 16, 2023 

Appeal filed for Gwendolyn hotel project

Developers for the proposed \$60 million Gwendolyn Hotel are appealing the Historic Landmark Committee's decision to deny demolition applications needed for the planned Third Street project.

The HLC voted last month to deny three demolition applications for buildings at 609, 611 and 619 N.E. Third St. and a downtown design review plan for the proposed 92-room boutique hotel following four months of hearings and extensions.

Applicant Hugh Development wants to replace the three buildings with a five-story hotel, with plans including a first-floor restaurant and retail space, underground parking and a rooftop bar and spa area.

The decision to deny reflected HLC member's feelings that designs for the building's height and mass were too large for the area and the developers didn't make a strong enough argument for demolition over preservation.

Hugh Development Owner Andrew Clarke maintains the demolitions should be allowed to proceed because the HLC ignored precedence from other projects, potentially infringed on property owner's rights and ignored evidence that the buildings in question aren't historically significant to the downtown corridor.

“HLC (members) who voted against ignored concrete evidence provided to them by many consultants who stated that there is no historic significance left of these buildings other than its location within the broader designated historic area,” he said.

Clarke also pointed out that city staff recommended approval with conditions of the applications.

“(The HLC) seemed to think that they can make decisions for landowners and not take into account their financial situations, age, ability and desire to restore a property they own,” Clarke said. “This seems to be dangerously close to infringing on property owners' rights.”

In explaining the committee's reasons for denial, HLC Chair John Mead pointed to findings that state the buildings are safe to occupy and are able to generate an economic use in their current state.

“The applicant's desire for greater profit does not make the existing economic use in its historic condition unreasonable,” the findings state.

Clarke argues other projects in the immediate vicinity were allowed to proceed without taking the historic identity or economic needs of the corridor into account and said HLC members didn't give the project a fair shake.


"HLC members who voted against demolition seemed to have other alternative reasons for doing so and seemed to have their minds made up prior to our discussion," he said.

Despite the denial, Clarke said his team is undeterred and believes the location is the right fit for the project.

"We look forward to continuing our discussions with the city of McMinnville and getting to know many great people in the community along the way," Clarke said.

"I have been spending time meeting with people almost weekly and it confirms that we made the correct decision to invest our time and resources in bringing something special to an already special place."

The appeal will be heard by the Planning Commission at 6:30 p.m. on March 2 at Kent Taylor Civic Hall. If the denial is upheld by the Planning Commission, the applicants can appeal the decision to city council and then the Oregon Land Use Board of Appeals.

By [Scott Unger](#) • Of the News-Register • January 30, 2023 

Gwendolyn project denied by HLC

After four months of hearings and extensions, McMinnville's Historic Landmarks Committee (HLC) voted Thursday to deny applications to demolish three Third Street buildings to make way for a proposed \$60 million hotel.

The committee voted 3-2 against applications to demolish the buildings at 609, 611 and 619 N.E. Third St. and 4-1 against a downtown design review plan for the proposed 92-room boutique hotel.

Applicant Hugh Development wants to replace the three buildings with a five-story hotel named the Gwendolyn, with plans including a first-floor restaurant and retail space, underground parking and a rooftop bar and spa area.

Developers argued renovating the buildings (which are in McMinnville's Downtown Historic District) is not

financially feasible and the new hotel would fit the neighborhood aesthetic.

Committee members Mary Beth Branch, Christopher Knapp and Eve Dewan voted against all four applications; Board Chair John Mead voted in support of the demolition but against the design plan, and Mark Cooley supported the applications with each vote.

Despite supporting some of the applications, Mead highlighted portions of the findings for denial in the 310 page staff report that he said best reflected the committee's discussions and opinion. Namely, that designs for the building's height and mass were too large for the area and the developers didn't make a strong enough argument for demolition over preservation.

Mead pointed out a passage focusing on whether the demolition is "reasonable" given the properties' current and projected economic use.

"Although it would not be 'reasonable' to put money into improvements that are unlikely to realize a return, the Historic Landmarks Commission disagrees with the applicant's assumptions that serve to foreclose other preservation options."

The findings state the buildings are safe to occupy and are able to generate an economic use "just as it has for generations."

“The applicant’s desire for greater profit does not make the existing economic use in its historic condition unreasonable,” the findings state.

Further, the findings make the argument that the popularity of Third Street in recent years is making the properties more valuable, increasing rent prices and leading to successful renovations of surrounding properties.

“The fact that owners are making choices to rehabilitate their Third Street historic structures, particularly properties that are adjacent to this property, suggests that such restoration is profitable and therefore, ‘reasonable.’

“I feel like this is a segment that speaks to the deliberations that the committee took,” Mead said.

Mead also highlighted a finding concerning the importance of the existing buildings as historic resources.

“Although the applicant relies on expert consultants to downplay the importance of the resource, the commission findings that determining what is the ‘best interests of a majority of the citizens of the City’ is best represented by the testimony of those who testified which overwhelmingly favored denying this application,” the document states.

Branch motioned to amend the final decision documents to reflect the public testimony of Ernie Munch, who

discussed the former use of 609 N.E. Third Street as an Overland car dealership. Munch suggested incorporating aspects of the former dealership into the design of the new hotel to tell the story of the beginning of McMinnville's automobile era.

Cooley cited further findings to deny the design review plan for the project which state the proposed hotel wouldn't fit the area's size and massing.

Despite the planned hotel being 79 feet at its tallest point (one foot below the area height limit), developers argued 10-foot setbacks on the upper floors and design features on the facade will make the structure look like a two-story building from the corner of Third and Ford streets.

“The Historic Landmarks Committee finds that the massing of this building overwhelms the adjacent and nearby historic buildings on the same block and does not ‘appear’ to be two stories at the corner,” the findings state.

The applicants will have until February 15 to file an appeal on the decision, which would be heard by the city's Planning Commission. Although the applicant hasn't officially appealed, a hearing is tentatively scheduled for March 2.

The buildings proposed for demolition are 609 N.E. Third, owned by Oregon Lithoprint Inc. (parent company of the News-Register) and occupied by Alt Coworking; 611 N.E. Third, owned by the Bladine Family Limited Partnership

and occupied by the News-Register; and the front half of the adjacent Bennette Building, owned by Wild Haven LLC.

From: [Sidonie Winfield](#)
To: [Heather Richards](#)
Subject: Screenshots for legal RE the Gwendolyn Hotel.
Date: Thursday, February 16, 2023 3:32:54 PM
Attachments: [IMG_6920.PNG](#)
[IMG_6921.PNG](#)
[IMG_6922.PNG](#)
[IMG_6923.PNG](#)
[IMG_6924.PNG](#)

This message originated outside of the City of McMinnville.

Hi Heather and City attorney,
Attached are screenshots of, I believe, my only interaction with the Hotel project. It is a post redirecting the ire of the original postee from our Planning Director to other resources. I carefully did not make any reference towards the merits of the project itself as I knew it might come before the Planning Commission.

Let me know if you need anything else.
-Sid

1:36



Aly's post



up to groups of people, like VISIT McMinnville, in which THEIR vision has now become their own private show that they are running. THE COMMUNITY DOES NOT KNOW WHAT IS HAPPENING. The shop owners being effect... See more

20w Like Reply



Sidonie Winfield

[Aly Winstead](#) Heather Richards is our Planning Director.

As Chair of the Planning Commission, I believe she is doing an amazing job of bringing our codes up to standard while being, for the most part, short staffed, and also calmly communicating to our citizens about upcoming issues.

The Planning Department, the Historical Review Committee, and The Planning Commission have a limited impact on property rights. To put that burden on our Planning Director is misguided.

The Historic Review Committee has published the issues, rules etc. in the time required by law to do so. Taking out your frustration on Di... See more

20w Like Reply

2 



Heather Miller

[Aly Winstead](#) I was incorrect on the

Rules



Write a comment...



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Notifications



Menu

1:36



Aly's post



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speaking issues.

The Planning Department, the Historical Review Committee, and The Planning Commission have a limited impact on property rights. To put that burden on our Planning Director is misguided.

The Historic Review Committee has published the issues, rules etc. in the time required by law to do so. Taking out your frustration on Director Richards is not the best use of your time and unfair to her. Your concern is best directed to our local state representatives asking them to change the laws on public notice. Regarding the other issues, this is a land use and zoning issue. Director Richards kindly gave you the links that the review is based on. The additional issues you have brought up are best directed towards the tourism board, city council, the school district, the police and the organization that brings businesses into our town.

The historical review board is limited by law regarding their criteria on what they can base their decision on. The additional issues you brought up, while absolutely vitally incredibly



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Notifications



Menu

1:37



Aly's post



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up, while absolutely vitally incredibly important to Mac, are outside their purview.

To best make your case for this issue, focus your concerns on the rules by which the Historical Review Committee has to review the project and if the project has met those criteria. That is what each committee, commission and council are required to do by law.

20w Like Reply

2 



Heather Miller

[Aly Winstead](#) I was incorrect on the

Rules



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1:37



Aly's post



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20w Like Reply

2 



Heather Miller

[Aly Winstead](#) I was incorrect on the exact process and I apologize for my misunderstanding. That said there is

Rules



Write a comment...



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1:37



Aly's post



ATTENTION:

THIS IS HOW WE GET INVOLVED IN THE LOCALS
HAVING AN IMPACT ON THE FUTURE OF
DOWNTOWN !

The historical buildings, the tunnels underneath, luxury hotels and parking, and the influx of locals not being provided what they need to survive and thrive due to the imbalance between them and the hospitality / wine industry monopolizers.

BE THERE. SHARE. TELL OTHERS!

Sept 29th, 2022 3PM

That's NEXT THURSDAY.

McMinnville Civic Hall

200 NE 2nd St

McMinnville, OR 97102

MCMINNVILLE, OR 97128

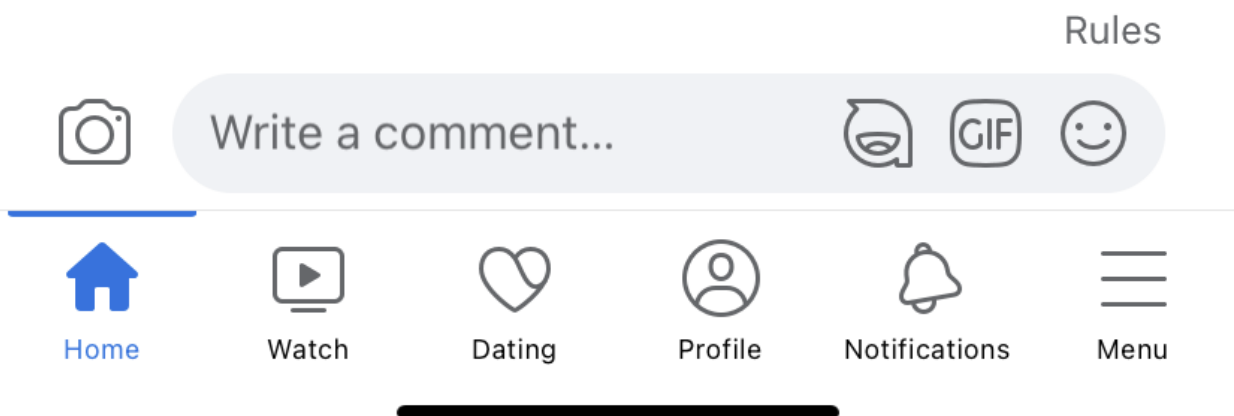
Hybrid so in person and Zoom (zoom link and log in info will be posted in the comments below).

HERE IS THE TOPIC:

Request to DEMOLISH THREE HISTORICAL RESOURCES and build a new FIVE-STORY hotel with ground floor commercial, roof deck and UNDERGROUND parking structure.

This will effect DISPLACING the following local businesses:

🍄 Morning Thunder Cafe (Desiree Chavez / Richie Chavez OG cafe)





Aly Winstead ► McMinnville Oregon Community Discussions

Sep 23, 2022 · 🌐 · ...RESOURCES and build a new FIVE-STORY hotel with ground floor commercial, roof deck and UNDERGROUND parking structure. This will effect DISPLACING...



👍 🤔 ❤️ 68

132 comments

Matching comment



Heather Richards

Aly Winstead my role as the planner is to process the land-use application and staff the public heari...

👍 4

From: [Gary Langenwalter](#)
To: [Heather Richards](#)
Subject: Count of Public Testimony Received
Date: Wednesday, March 1, 2023 8:59:41 PM
Attachments: [Public Testimony Received 230301.xlsx](#)

Heather,

I decided to tabulate the public testimony received; the results are in the attached spreadsheet. Please share this with the rest of the Planning Commission.

See you tomorrow evening,
Gary

Gwendolyn Hotel
Public Testimony Received

	For	Against	Caution	Info	Downtown Business Owners
21-Sep		9	1		3
28-Sep	3	7	1	1	5
30-Sep	1	3			1
1-Dec	2	6		1	2
1-Mar	2	10			
Totals	8	35	2	2	11
For:	18.60%	81.40%			

Gwendolyn Hotel Appeal Issues Matrix
 Prepared by Carrie Richter, contract City Attorney
 March 1, 2023

Standards and Criteria Raised in the Appeal:	Appeal Issue Raised by Appellant / Applicant HLC erred by:	Legal Considerations:	HLC Finding page #s:
Demolition			
OAR 660-023-0200(8)(a) Demolition factors:	1. Incorrectly weighing the factors and should not have considered purpose	City has broad discretion to decide how to balancing the factors	HL 6-22 25 & 43-45 HL 7-22 25-26 & 41-42 HL 8-22 26-27 & 45
- Condition	2. Requiring either unreasonable or infeasible remediation, imminent safety hazard or so deteriorated to require demolition 3. Ignoring the substantial weight of evidence 4. Considering whether structural conditions could have been alleviated through routine maintenance	City can decide to what degree the condition factor tips in favor of demolition Whether a reasonable person could draw the same conclusion given the evidence in the record City can decide to what degree actions or non-actions of an owner might by relevant to existing building condition	HL 6-22 26 HL 7-22 26-27 HL 8-22 27-29
- Historic Integrity	5. Finding that the installation of stucco at the time of designation ignored other evidence in the record and established historic significance at the time of designation rather than the historic periods set forth in the nomination form	City can determine the degree to which the buildings convey historic integrity with reference to inventory, designation documents or if viewed anew today.	HL 6-22 26-34 HL 7-22 28-32 HL 8-22 30-34
- Age	6. Considering impact of demolition on the District as a whole is not responsive to the "age" factor	City can determine how to balance the factors as they relate to individual buildings or the resource as a whole	HL 6-22 34-35 HL 7-22 32-33 HL 8-22 34-35
- Historic Significance	7. Failing to balance the historic significance of each building against the other factors	City can determine how to balance the factors as they relate to individual buildings or the resource as a whole	HL 6-22 35-39 HL 7-22 33-37 HL 8-22 35-40
- Value to the Community	8. Inappropriately determining by level opposition testimony	City can determine how to gauge what value this proposal has to the community	HL 6-22 39-40 HL 7-22 37-39 HL 8-22 41-42

<ul style="list-style-type: none"> - Economic Consequences 	<p>9. A lack of substantial evidence regarding preservation and demand for past building maintenance</p>	<p>Whether a reasonable person could draw the same conclusion given the evidence in the record</p>	<p>HL 6-22 41 HL 7-22 39 HL 8-22 42-43</p>
<ul style="list-style-type: none"> - Design or Construction Rarity 			<p>HL 6-22 41-42 HL 7-22 39-40 HL 8-22 43</p>
<ul style="list-style-type: none"> - Consistency with and consideration of other policy objectives in the acknowledge comprehensive plan 	<p>10. Interpreting plan goals as criteria rather than policies to be weighed</p>	<p>City can determine appropriate weight to give to the various plan policies</p>	<p>HL 6-22 42-43 & 45-56 HL 7-22 40-41 & 43-54 HL 8-22 43-45 & 47-57</p>
<p>MMC 17.65.050(B): The Historic Landmarks Committee shall base its decision on the following criteria:</p>			<p>HL 6-22 59 HL 7-22 57 HL 8-22 60</p>
<p>(1) – This City’s historic policies set forth in the comprehensive plan and the purpose of this ordinance:</p> <ul style="list-style-type: none"> - MCC 17.65.010(D): Purpose: Protect and enhance the City’s attractions for tourists and visitors - Goal III 2: To preserve and protect sites, structures, areas and objects of historical...architectural...significance to the City of McMinnville - Goal IV 2: To encourage the continued growth and diversification of McMinnville’s economy in order to enhance the general well-being of the community and provide employment opportunities for its citizens. 	<p>11. Equating protection of historic resources rather than enhancement of attractions for tourists</p> <p>12. Inappropriately required consistency when impossible when reviewing a demolition</p>	<p>City can determine which attractions to enhance for tourists and visitors</p> <p>City can determine to what degree protection or preservation might be required as mitigation in the case of a demolition request</p>	<p>HL 6-22 59-60, 57 - 58 & 45-56 HL 7-22 58, 55 & 43-54 HL 8-22 61, 59 & 47-57</p>

- Goal IV 4: To promote the downtown as a cultural, administrative, service and retain center of McMinnville			
(2) – The economic use of the historic resources and the reasonableness of the proposed action and their relationship to the historic resource preservation or renovation	13. Incorrectly interpreting standard as requiring no future economic use case	City may decide how broadly or narrowly it wants to view the economic use case i.e. view from just the applicant’s perspective or more broadly considering impacts to or economic responses of other owners.	HL 6-22 60-65 HL 7-22 58-63 HL 8-22 61-66
(3) – The value and significance of the resource	14. Concluding that building will grow in value by virtue of preservation lacks substantial evidence 15. Connection to the automotive industry lacks substantial evidence	Is there is evidence that a reasonable person would rely on to draw this conclusion?	HL 6-22 65-67 HL 7-22 63-64 HL 8-22 66-68
(4) – The physical condition of the historic resource	16. Requiring that the owner take steps to protection the building	City has discretion to interpret this condition and to determine the degree to which it finds the condition of other buildings a relevant gauge	HL 6-22 67-71 HL 7-22 65-68 HL 8-22 68-71
(5) – Whether the historic resource constitutes a hazard to the safety of the public or its occupants			HL 6-22 71 HL 7-22 68 HL 8-22 71
(6) – Whether the historic resource is a deterrent to an improvement program of substantial benefit to the City which overrides the public interest in preservation	17. Whether other sites would be suitable for a hotel is not supported by evidence and instead is based on personal views not in the record	Personal views or knowledge obtained from outside the record is not evidence that a decision-maker can rely on in making a decision.	HL 6-22 71-75 HL 7-22 68-72 HL 8-22 71-76
(7) – Whether retention of the historic resource would cause financial hardship to the owner not outweighed by the public interest in the resource’s preservation	18. Misconstrued the balancing test as requiring a demonstration that the public interest is not served by preserving the buildings.	The City may decide whether the owner has established a financial hardship that outweighs the public’s interest in the resource, either the individual buildings or the district as a whole.	HL 6-22 75-77 HL 7-22 73-74 HL 8-22 76-77
(8) – Whether retention of the historic resource would be in the best interest of a majority of the citizens of the City, as determined by the Historic Landmarks	19. Erroneously equated the “best interests of the majority of the citizens” with the views of those who testified, creating a popularity contest.	The City has discretion to determine what would be in the “best interests of a majority of the citizens” either	HL 6-22 77-78 HL 7-22 74-75 HL 8-22 77-78

<p>Committee, and, if not, whether the historic resource may be preserved by an alternative means such as through photography, item removal, written description, measured drawings, sound retention or other means</p>		<p>preservation or new construction, as proposed.</p>	
<p>New Construction</p>			
<p>MCC 17.59.050(B)(1) – Building should have massing and configuration similar to adjacent or nearby historic buildings on the same block. Buildings situated at street corners or intersections should be or appear to be, two-story in height</p>	<p>20. Incorrectly equated building “height” with “building mass.”</p> <p>21. Failing to account for changes made during the review process.</p> <p>22. Misapplied the word “similar”.</p> <p>23. Erroneously rejected evidence offered showing the building step-back on NE 3rd and Ford.</p> <p>24. Finding that this standard is not met, requiring a waiver when City staff was clear that a waiver was not required.</p>	<p>The City may interpret what elements qualify within the meaning of the term “massing”.</p> <p>City must consider whether changes in design established compliance with this standard.</p> <p>Dictionary defines “similar” as “having characteristics in common” or “alike in substance or essentials”</p> <p>The City should evaluate the evidence and determine if it is sufficient to satisfy the standard.</p> <p>The City decision maker must determine if the standard must be satisfied and if so and the evidence does not establish compliance, a waiver would be the only way to achieve approval.</p>	<p>41-42</p>
<p>(2) – Where buildings will exceed the historical sixty feet in width, the façade should be visually subdivided into proportional bays, similar in scale to other adjacent historic buildings, and as appropriate to reflect the underlying historic property lines. This can be done by varying roof heights or applying</p>	<p>25. Adopting findings with regard to massing that are conclusory and do not identify the findings upon which they rely, particularly with respect to proportional bays.</p>	<p>The City’s findings must identify the evidence relied upon and explain how that evidence indicates that the standard is or is not met.</p>	<p>43</p>

vertical divisions, materials and detailing to the front façade.			