

**TLNA Steering Committee Summary Report
for Gorman and Company's Proposal for 1300 Block of E. Washington
6 October 2018**

This report presents findings of the Tenney-Lapham Neighborhood Association's (TLNA) Steering Committee on the proposal by Gorman and Company for 1314, 1318 and 1326 E. Washington Avenue, also known as the Messner site. These findings reflect committee work and input on the proposal versions that were presented to the committee on or before September 13, 2018. It also includes input on the proposal version that was submitted to the City on September 21, 2018.

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1. Purpose:

The report is provided to the TLNA Council as they prepare to consider the Council's position on the proposal. Prior to any Council Member forming a stance on the proposal the Committee encourages Council Members to carefully read this report and all materials on the TLNA Development Committee's website for the project which can be found here:

<http://www.tenneylapham.org/development.html>

2. Background:

In 2015 Dane County purchased the 19,000 square foot Messner building at 1326 E. Washington Avenue as the future site of a permanent day resource center for the homeless. They also purchased 1314 and 1318 E. Washington. Eventually, the County and City agreed to instead site the resource center at 615 E. Washington Ave. In February 2017 the County approved a resolution to site a residential or mixed-use development on these properties that must include housing for low income and very low income families. The resolution indicated that the site may or may not be owned by the County and outlined a process for soliciting for and choosing a developer for the site. That process included a Tenney-Lapham representative on the Request for Proposals (RFP) selection panel. The resolution also included a provision for the land to be swapped for a similar site elsewhere on the E. Washington corridor should that opportunity arise. Seven developers/entities responded to the RFP with Gorman and Company's proposal for "Valor" chosen as the winner.

3. Steering Committee Membership:

The Committee has considered its members to be any neighbor who has come to one of its meetings, hence does not have fixed membership. We prefer not to hinder input from the

community and recognize that other commitments can prevent perfect attendance, so agreed not to further limit membership.

These Tenney-Lapham neighbors and interested parties attended at least one of the Committee meetings: Patrick Heck (TLNA Development Committee Chair), Patty Prime (TLNA President), Keith Wessel (TLNA Council member), Shawn Kapper, Lori Wessel, Tom Kapper, Pat Kelly, Joey Hoey, Sue Springman, Don Jones, Matt Coogan, and Brad Mullins. Committee members who were unable to attend all meetings were able to stay informed via the TLNA development website.

As is often the case, those who attended most steering committee meetings were nearby neighbors. For this proposal, neighbors from the 1300 block of E. Mifflin and landlords from the 0 block of N. Baldwin were well-represented whereas those from elsewhere in Tenney-Lapham were few. Additionally, the number of committee members was small relative to typical TLNA steering committees.

Gorman and Company representatives who attended at least one meeting were Nicole Solheim (Development Manager), Ben Marshall (Lead Architect), Mark Smith (Project Architect), and Ted Matkom (Wisconsin Market President).

Dane County District 2 Supervisor Heidi Wegleitner and Madison District 2 Alder Ledell Zellers each attended several meetings. Sydney Prusak represented the Planning Division of the Department of Planning and Community and Economic Development.

Many more neighbors and representatives from various city and county entities attended the initial neighborhood meeting on May 8, 2018, but did not attend steering committee meetings. Those opinions also informed the findings in this report. Note that other neighbors were kept informed of the committee's work and were also solicited for input via TLNA's listserv, website and Facebook pages.

The Committee formed after the May 8, 2018, neighborhood meeting called by Alder Zellers and Supervisor Wegleitner. As is typical, attendees were given the opportunity to join the soon-to-form TLNA Steering Committee and other neighbors were invited via the TLNA listserv and Facebook pages. Alder Zellers sent postcard invitations for the neighborhood meeting to Tenney-Lapham (T-L) residences and businesses nearest to the proposal site.

4. Steering Committee Process:

Throughout the process the Committee aimed towards the issuance of this report rather than voting on a level of support for the proposal. In recent years TLNA Development Steering Committees have often not voted on a committee position, but have instead issued summary findings such as these to the full TLNA Council.

The Committee met on May 31, June 25, July 31, and September 13. Depending on the desires and actions of the TLNA Council, as well as the input of the City and the Gorman team, the Committee is prepared to hold additional meetings and provide additional feedback if the developer moves further along in the city process. The Committee anticipates that they will reconvene at least once, prior to the proposal's final consideration by the Urban Design Commission (UDC). That UDC meeting is currently estimated for Spring 2019, after the

proposal's funding is secured and after Plan Commission may have approved the proposal conditional on that final UDC approval.

5. TLNA Council Process:

Prior to TLNA Council Members forming a stance on the proposal, the Steering Committee encourages a careful consideration of this report, its appendices, and website materials, but also recommends that they contact the Committee with any questions. The Steering Committee can be contacted via its Chair, Patrick Heck, and if a Council Member so desires, she can be included in any subsequent email dialogues with committee members. Additionally, the Gorman team is expected to present at the Oct. 11 TLNA special meeting where additional questions can be posed and input can be obtained from the development team.

6. Summary Findings:

The Steering Committee appreciates the developer's willingness to meet multiple times with the neighborhood and the Steering Committee to listen to concerns. The Gorman team provided information, building renderings, shadow studies, and perspectives in a timely manner when the Committee made a request. They presented several versions of their proposal as it evolved and were in some cases willing to alter its orientation and massing when responding to neighborhood feedback.

Initial Neighborhood Meeting

The Gorman team's preliminary proposal concepts were presented at the May 8, 2018 neighborhood meeting. Discussions included guidelines for building within Urban Design District-8 (UDD-8), as well as allowable uses and structures under the Tenney-Lapham Neighborhood Plan, the Capitol Gateway Corridor Plan and the city's Comprehensive Plan, which are mostly in alignment. The proposal included 64 apartments targeted for veteran-led families. The apartments would be on floors 2 through 5 with the first floor consisting of commercial and common space for the tenants and Dryhooch, a veterans service organization that was included in Gorman's proposal to the County. The entire building would be known as Valor. The mouth of the u-shaped building faced E. Washington. Parking would be in a 2-story rear enclosed garage containing 77 spaces with about 12 more in a surface lot to the west side. Input from attendees was mixed with most supportive of the concept, but nearby neighbors expressed concerns about the massing, the number of units, and the manner in which the building presents itself to the N. Baldwin and E. Mifflin residential properties, as well as the Tenney Nursery. The plans for green space and concerns about the lack of green/open space were also discussed, as were impacts on neighborhood street parking.

Initial Steering Committee Meeting

At the first Steering Committee meeting on May 31, 2018, the development team showed revised renderings. The orientation of the u-shaped building was changed so that the mouth was facing towards N. Baldwin. The number of apartments was reduced from 64 to 60. The surface parking lot on the west side was changed to an enclosed lot. It was estimated that 20 to 30% of the units will have a 30% County Median Income (CMI) cap and the remainder of the affordable units would have 50 to 60% CMI caps. As many as 15% of the apartments would be market rate. The exterior features of the building were not presented as Gorman anticipates that those will not be detailed until after prospective Plan Commission approval. That approval would be conditional on final UDC approval of the exterior features/design and UDD-8 compliance. Plan Commission will review the massing, conditional uses, etc., but can approve those without the fine exterior details.

Discussion focused primarily on the massing to the rear with E. Mifflin neighbors contending that the building was too tall (5 stories and approximately 68' to 70' tall) in the rear where it would face primarily modest single-family homes and small rental properties, as well as the Tenney Nursery. The number of apartments remained a concern for most, as that was seen as a contributing factor to the massing. A few committee members were supportive of the proposed density, but expressed reservations about the massing/bulk. Concerns about the lack of green/open space were reiterated, and the lack of activation for the rear 20'-wide strip extending along the rear of the 2-story parking garage. Security concerns for that area were also registered. Some felt that the residents of the new building would be physically isolated from the neighborhood due to the site's location and that residents would not easily feel part of Tenney-Lapham. More shadow studies were requested to judge the impact on the nursery and nearby residential properties. A conclusion was reached that the 1300 block of E. Mifflin is not particularly parking-stressed, so small overflow from the development would not likely be problem in the evenings. If the Mullins properties to the east are developed, parking could become a bigger issue.

The committee discussed the option proposed by Gorman and by Supervisor Wegleitner to have a permanent set-aside of some number of the 30% CMI-capped units for non-veteran families who are on the housing priority list that are identified by service providers for the homeless. Opinions of having a permanent set-aside were mixed.

Second Steering Committee Meeting

At the second Steering Committee meeting on June 25, 2018, the development team showed another iteration of revised renderings. The orientation of the u-shaped building was changed so that the mouth was facing to the rear, towards E. Mifflin. This was done in response to the previous concerns about the building's rear massing being too large and imposing to the E. Mifflin neighborhood. Two levels of parking remained in the rear, but the first level was pushed into the ground, i.e., underneath the first floor. The side parking garage reverted back to a surface lot with about 12 spaces. The new underground garage lowered the entire building by as much as 8' resulting in an aboveground height of about 62' rather than 68' to 70'. The number of apartments was reduced from 60 to 59. A few more shadow renderings were shown. The option for having a set-aside number of units for non-veteran families from the housing priority list that are identified by homeless service providers was dropped, although those families would be able to rent any of the affordable 3-bedroom units that are not taken by veterans.

Committee members were pleased by the overall height reduction, but the nearest neighbors in particular remained concerned about the blocky appearance facing the neighborhood and the massing compared to the nearby residential structures and the Tenney Nursery. Some still felt that the number of units was too large. Comprehensive shadow studies over the entire day were requested to judge the full impact on the nursery and nearby residential properties. The various sources of funds (WHEDA, City, County, private) were discussed and contingencies for any denials were considered.

Concerns remained about the lack of a larger green or open space for children and to compliment the nearby backyards.

Third Steering Committee Meeting

On July 31 the proposal remained mostly similar, but did evolve in a manner that was more acceptable to committee members. The mouth of the u-shaped upper floors continued to face E. Mifflin, but four apartments were removed from the 5th floor facing Mifflin and placed on the rear ground floor. This was seen as a positive step because it reduced the rear height, reduced the blocky appearance, and activated the long, relatively narrow rear open space along the Tenney Nursery Fence. Some concerns about the building's size and the number of units remained, but all meeting attendees expressed appreciation for the rear height reduction. The ability to place four apartments in the rear, thereby reducing the ground floor common areas devoted to Dryhooch services, were seen by all as positives. The development team noted that Dryhooch's space was more carefully allocated in this iteration and they did not see it as any type of hindrance to their provision of services/programs.

All agreed that the committee should see the proposal's exterior design elements prior to its final consideration by Urban Design Commission. The proposal is likely to seek Plan Commission approval in mid-October and that approval would be conditional on final UDC approval. Committee members agreed to issue a steering committee report to TLNA Council.

Shadow studies in the form of movies were shown by Gorman. Attendees agreed that these movies were very helpful in evaluating the proposed building's impacts. While concerns about height remained, most agreed that the shadow impacts on neighboring homes and the nursery were mostly acceptable with winter shadows being a lingering concern.

Note: In early September, Gorman and Co. conveyed their concerns about the late summer flooding problems on Madison's isthmus. As a result, they asked for another TLNA steering committee meeting to discuss proposal alterations that addressed the potential for future flooding. The issuance of the Steering Committee report was delayed.

Fourth Steering Committee Meeting

On September 13 the proposal changed to a 6-floor building rather than 5 stories. Gorman stated that their concerns about future flooding in the underground parking level led them to raise that level above ground. Their rationale included the need to protect what will be a 99-year commitment on the project and that the long-term potential for flooding is too risky. The below ground parking level was effectively moved between the ground floor and former 2nd floor, so the then 2nd through 5th floors of apartments became floors 3 through 6. The ground floor remained similar to the previous version, including the 4 rear ground floor apartments that will be 2-story units. The other changes involved a required 15' setback above the 5th floor in the front and a reduction in the size of the rear setbacks on the top floor that were shown at the previous meeting.

Committee members expressed concerns primarily about (1) the increased height of the building and (2) the reduction of the rear top-floor setbacks. The reappearance of the blocky characteristic of the rear top floor and increased height were noted as negatives to the nearby neighbors. Some committee members expressed disagreement with Gorman's rationale concerning future flooding since (1) the County is likely to lower the lake levels due to political pressure, and (2) access to the building will likely be impossible if future drastic flooding is realized, hence making their investment less attractive anyway.

Sydney Prusak from City Planning noted that there were still some massing tweaks to be made before the Sept. 21 deadline for Gorman to submit in order to make the Urban Design

Commission agenda for Oct 3 (note that UDC consideration has since been delayed to Oct. 24). Committee members agreed to issue a steering committee report to TLNA Council, pending comments on any revisions that Gorman and Co. said they would email to the committee via Patrick Heck. All agreed that the committee should still see the proposal's exterior design elements prior to its final consideration by UDC.

Last Proposal Version (evaluated via email)

Gorman and Co. submitted a proposal version to the City on about Sept. 21 and this was forwarded to steering committee members. The proposal was similar to the Sept. 13 version, but with a small increase in the top floor rear stepback on the east side. The front 5th floor stepback was extended across the entire front façade, per UDD-8 requirements. As required by city planning, more details were included, e.g., landscaping plans, but Gorman indicated that some details could change as the proposal goes through the city process.

Those committee members who commented via email on this version continued to express concerns about the blocky massing of the building and its height, although some thought that the benefits of the affordable housing for veterans component outweighed the massing/height problems. Some committee members expressed concern about the dark color palette chosen for the upper floor exterior, but understand that exterior details may change.

Summary of Committee Opinions

A **majority** of the committee and non-committee neighbors **supported the overall proposal concept** – a focus on bona fide affordable housing for veteran-led families with the inclusion of a service provider specific to the tenant population. **Some**, however, felt that due to the **lack of physical connection** to the nearby homes and apartments, the site was **inappropriate** for housing already marginalized families with children.

A **strong majority** of the committee felt that the overall **massing** of the building was **too block-like** and that additional articulation, including **larger stepbacks**, was needed in the rear. The **previous proposal version** that had larger stepbacks along the entire rear top floor was **strongly preferred**.

That **majority** also felt that the **increase from 5 to 6 stories** in the last iteration was a **determent to nearby neighbors**. **Some** felt that although the number of stories was large, **the benefits of the affordable housing outweighed the height concerns**.

A **majority** of the committee is **skeptical** of the developer's assertion that flooding potential drove the decision to raise the building above grade, instead suggesting that **lowering construction costs is the developer's primary consideration**.

Most committee members remained concerned that the number of apartments was **too large** given the existing nearby small-scale homes. Similarly, some of that same group felt that the building's **height and mass was out of context** for the existing nearby area, particularly given that the adjacent smaller lot on E. Washington between the site and Pasqual's is likely the only other site for a tall building on this block.

The inclusion of four apartments on the **rear ground floor** was seen as a **large positive** by all due to activating the green space, yet concerns remain about the relatively **small amount of**

functional green space for children and gardens, particularly since the development is targeting families.

Side-yard neighbors along N. Baldwin St. have concerns about the interface between their backyards and the surface parking area. **Appropriate walls, fencing, drainage**, and whenever possible, vegetation should minimize the impact of the proposal to those adjacent neighbors.

Some committee members were concerned about an **increase in traffic on E. Mifflin** due to eastbound cars on E. Washington needing to turn at Baldwin to go around the block to enter the development. Similarly, those leaving the site who want to travel east on E. Washington will likely drive on N. Baldwin and perhaps E. Mifflin to turn around and get to a stoplight. **Other committee members** noted that **u-turns at Dickinson are currently allowed**, so that could mitigate some incursions into the neighborhood.

The committee generally **supported the rezoning** of the three parcels from Community Corridor – Transitional (CC-T), Traditional Residential – Varied 1 (TR-V1), and Traditional Employment (TE) and their combination to one TE parcel. The committee recognized that TE zoning was appropriate given that Dryhootch’s operation could possibly include some employment and that residential uses were allowed as conditional uses in TE zoning districts.

The committee found that the proposal **generally followed the T-L Neighborhood Plan, Capitol Gateway Corridor Plan, the city’s Comprehensive Plan, and the UDD-8 guidelines**. While the proposed land usage is not in exact alignment with the Neighborhood Plan, the site effectively straddles several land use areas that include recommendations for mixed use, residential, and employment. In the Capital Gateway Corridor Plan and Comprehensive Plan, the site is primarily in a mixed-use land usage category that envisions residential and commercial uses.

Many remained concerned that the proposed building’s **massing and height were too large** for the existing context despite its following UDD-8 and zoning height guidelines. The committee recognized that a building of up to 8 stories is allowable on the site, but most felt that **allowable is not the same as desirable**. Also, the **design guidelines of UDD-8** seemed to be **appropriately considered** by the developer, but the **exterior design elements** need to be presented to the committee prior to final city approval.

7. Additional Concerns and Suggested Conditions:

Should the development proposal move forward, several additional concerns and conditions that were either explicitly mentioned in committee process or are common in TLNA’s evaluation of similar development proposals are listed below. We encourage Plan Commission to include these in any Conditional Use Permits whenever possible and/or for City staff to evaluate their applicability to reviews and permitting:

- The developer should explore the usage of solar panels as a power source for common area utilities. Additional green features, e.g., rain barrels to decrease runoff and green roofs should be considered whenever possible.
- Gardening opportunities and green space for tenants should be maximized on the rooftop of the 2nd floor parking level, any green areas at grade, and on any patios and decks.

- Indoor and outdoor bicycle parking should greatly exceed City requirements.
- The developer should install electric car charging stations in a parking level.
- Any outdoor smoking areas should be placed at least 25 feet from any neighboring properties, including the Tenney Nursery.
- The developer should underground all utility wiring.
- Retain all street trees and any yard trees, if possible. Canopy-sized trees should be used for the street terrace since any utility undergrounding will allow the planting of larger tree species. Wherever possible, the development should include canopy trees in the rear yard areas to provide shade and a visual buffer for neighbors.
- The committee should have input on landscaping plans.
- Assure proper drainage away from neighbors' backyards and side yards on all sides of the development.
- Assure adequate fencing and landscaping on borders with all residential neighbors and in coordination with the Tenney Nursery.
- HVAC systems for new apartment buildings should create minimal noise and exterior venting/input for the apartments should be flush mounted. Usage of wall packs should be discouraged and if used should not face neighboring buildings on any side.
- Any noise and fumes from rooftop HVAC systems and parking exhaust systems should not impact nearby residences, businesses, or Tenney Nursery.
- TLNA Council should be made aware of the plan for residential and commercial garbage, as well as any commercial deliveries.
- Should dogs be allowed, a station for the collection of dog waste should be included in the project so as to discourage dog waste from collecting on nearby streets.
- If the ground floor service provider should have an outdoor space, it should close by 9:00pm at the latest. The committee realizes that this condition is likely not to be addressed until the service provider files for any city permits, but we want to assure this concern be addressed at that time.

9. Appendices:

Appendix A: Excerpts from Neighborhood and City Plans

The most pertinent excerpts from the T-L Neighborhood Plan and Capitol Gateway Corridor Plan are below. Key phrases/terms are **highlighted in red**. Most excerpts from the Plans support the proposed development.

Tenney-Lapham Neighborhood Plan

Goal 8: Plan for redevelopment of the 1300 and 1400 blocks of East Washington Avenue and the 1400 block of East Mifflin Street (the Trachte property).

Discussion: ... Because of its frontage on the river and the north side of East Washington Avenue, it is the most visible face of the Capitol Gateway that inbound visitors will see as they cross the bridge at the Yahara. It is, of course, also the welcoming face of the Tenney-Lapham Neighborhood. **Redevelopment of this area should be of the highest architectural merit and should convey the best impression of central Madison and, in particular, Tenney-Lapham.** Major design elements should draw from the vernacular tradition of the neighborhood and central city. This does not preclude high-quality contemporary styles...

Action Steps/Projects (for Goal 8)

1. Designate the 1300 block of East Washington Avenue, as **Community Mixed Use (CMU), Employment (E) and Medium Density Residential 1 (MDR1)**... **Redevelop vacant and underutilized sites.**

MDR1 Medium Density Residential 1 - 16 to 25 units per acre. While density is slightly higher than LDR, acceptable housing types and design standards are the same as LDR.

CMU Community Mixed Use - Average net density of 41 to 60 units per acre. Design standards are discussed in the neighborhood plan. Uses are retail, residential, service, professional, office, institutional and civic. Big Box retail is not appropriate for this area.

E Employment - Non-residential. No fixed limit on size but should be compatible with scale of surrounding uses. Recommended predominantly as office, research and specialized employment areas. Does not include retail and consumer services.

Note: CMU is perhaps an applicable land use category from the Neighborhood Plan for this site given the details of the Gorman proposal and the site straddling several of these land use categories.

Design Standards (for Goal 8)

... Uses along East Washington Avenue should be reserved for commercial purposes consistent with the Employment and Community Mixed-Use (CMU) designation. Desired businesses could include business incubators, design firms, software, advertising, research or other specialized employers... Retail, including "Big Box" scale retail, is not acceptable for this area...

... The maximum internal building height in the 1300 block of East Washington Avenue is 8 stories and the maximum facade height is 5 stories.

...**Solar access to residential housing on Mifflin Street must be protected**... The maximum height on the East Washington Avenue side is 8-stories. **Architectural features should be consistent on all sides of upper stories so that interesting features face the neighborhood as well as East Washington Avenue.**

Capitol Gateway Corridor Plan

The description of Community Mixed-Uses in the Capitol Gateway Corridor Plan is in alignment with the proposal details:

CMU Community Mixed-Uses: Community Mixed-Use areas should be located adjacent to Medium- and High-Density Residential areas whenever possible. **As an alternative when adjacent to Low Density residential areas, the Mixed-Use district should be large enough to include a significant amount of relatively high-density housing within the defined district.** Community Mixed-Use districts should also be located along existing or planned high-capacity public transit routes, and a transit stop should be located at, or very close to, all activity center focal points within the district. ...

Density Considerations

From the Tenney-Lapham Neighborhood Plan:

CMU suggests **average density of 41 to 60 units per acre.**

From the 2018 Comprehensive Plan:

CMU suggests **< 130 units per acre.**

The proposal is about **69 dwelling units/acre.**

Appendix B: Excerpts from City Zoning Code

Current and Requested Zoning

- Current zoning for 1314 E. Washington (a 3-unit rental house) is Commercial Corridor – Transitional (CC-T), a Mixed Use and Commercial District zoning category (*MGO CC-T Zoning, Sec. 28.067*).
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- Current zoning for 1318 E. Washington (a driveway, rear parking lot, and a Messner building addition) is Traditional Residential-Varied 1 (TR-V1), a Residential District zoning category (*MGO TR-V1 Zoning, Sec. 28.047*).
- Current zoning for 1326 E. Washington (the larger Messner building) is Traditional Employment (TE), an Employment District zoning category (*MGO-TE Zoning, Sec. 28.084*).
- Requested zoning for all three parcels is TE, the same as the larger Messner parcel.

From *MGO-TE Zoning, Sec. 28.084*:

Statement of Purpose.

The TE District is established to encourage a broad range of employment activities, taking advantage of the varied transportation options and proximity to urban activities and cultural amenities found in many Traditional Employment locations. **Residential uses are of**

secondary importance. The district is also intended to:

(a) Encourage businesses with the potential to provide significant numbers of living-wage jobs that contribute to a sustainable economy and a strong tax base.

(b) Support the continued use or adaptive re-use of traditional industrial buildings for a variety of purposes.

(c) **Facilitate preservation, development or redevelopment consistent with the adopted goals, objectives, policies, and recommendations of the Comprehensive Plan and adopted neighborhood, corridor or special area plans.**

See Table 28F-1 in MGO Chapter 28 for a complete list of permitted and conditional uses within a TE district.

While **Dryhootch** could possibly have a coffee shop, it is not yet clear if that component would be open to the public or if it would have employees. Regardless, **a coffee shop is a permitted use in a TE district.** If Dryhootch is classified as a **counseling or community services organization, a Conditional Use permit from the Plan Commission** would be necessary.

Dwelling units in a mixed-use building would require a **Conditional Use permit**, as would a multi-family dwelling should there be no mixed uses.

The Valor proposal seems to **meet all dimensional requirements in the TE zoning code**, although if it were to be **6 stories**, it would need a **Conditional Use** permit because it would exceed the TE 5-story limit. The proposal is **not expected to exceed the 68-foot height limit** for TE buildings, but if it did, a Conditional Use permit would be required.

In a TE District, the provision below in the dimensional requirements could apply if the building is not classified as mixed use:

MGO-TE Zoning, Sec. 28.084 (3)

(a) Exclusive Residential Use. Buildings with **exclusively residential uses shall meet the Lot Area, Lot Width, and Side Yard Setback Requirements in the TR-V2 District, Section 28.047**

The Valor building is estimated at **23,980 square feet**, so it is likely **not subject to parking minimum requirements** (see Table below). Currently, they are proposing about **74 indoor parking stalls with 12 outdoor.**

MGO 28.141(3) Parking and Loading Standards, Table 28I-2. Districts with No Minimum Automobile Parking Requirements; Exceptions.

District/Area	Parking Requirement	Exceptions
Traditional Employment (TE)	No minimum	1. Buildings, uses, or additions exceeding twenty-five thousand (25,000) square feet floor area.