

# BRAND

## **(Revised 5.28.25) Incomplete Application Response**

25-105629-PLN | 4900 Block of 27th Avenue SE

This letter shall serve as the applicant's response to an incomplete application notice received on April 9<sup>th</sup>, 2025. This response is organized by item in the same order as the incomplete letter.

### **Completeness Items:**

#### Item 1: LLC Members

**Applicant's Response:** *The applicant understands the city is not only requiring the articles of organization for the property owner but also all articles for applicants. The applicant has now provided the articles for Mosaic Development Services, LLC. This item is resolved.*

#### Item 2: CFEC Tree Plan

**Applicant's Response:** *The requirements of SRC 806.035(n) are not applicable to the proposed development because the total area of new off-street surface parking does not exceed one-half acre. Pursuant to SRC Chapter 806, parking area calculations are based on the combined area of all new surface parking stalls, drive aisles, and related maneuvering areas proposed on the development site. As demonstrated by the new dashed line labeled CFEC Bounds on the revised site plan prepared by the project architect, the total area of new off-street surface parking has been measured in accordance with SRC 806.015 and associated definitions. The cumulative area of new surface parking improvements is below the one-half acre (21,780 square feet) threshold. Therefore, the supplemental tree planting and canopy coverage standards outlined in SRC 806.035(n) are not triggered for this project. This item is resolved.*

### **Advisory Items:**

#### Item 1: Class 2 Adjustment(s)

**Applicant's Response:** *The applicant is seeking approval of six (6) class 2 adjustments. In accordance with the incomplete application notice, the city states there is not enough evidence provided that the application still meets*

the intent of the standard being adjusted and revisions to the narrative and plans are required to obtain approval. In an effort to keep the record clear, the applicant is including both the original adjustment narrative language and the revised language below.

Original Narrative for Adjustment 1:

1. SRC 535.015(c) Setback requirement for a vehicle use area abutting an interior side property line abutting a property zoned for Mixed-Use. The application includes an adjustment request to eliminate the five-foot interior landscape strip required abutting the future interior property line. This request is justified because Kuebler Village is planned as a cohesive development with shared parking and internal connections between uses. Eliminating the perimeter landscaping in this location is necessary to allow the site to function efficiently as an integrated development as the shared driveway is located along this property line. This adjustment meets approval criterion (ii) for equally meeting the purpose of the standard.

Revised Narrative for Adjustment 1:

1. The applicant is requesting an adjustment to SRC 535.015(c) to eliminate the required five-foot-wide interior side setback for vehicle use areas abutting a Mixed-Use (MU) zone. This standard typically ensures visual screening, separation of uses, and integration of landscaping into site design. However, in this case, the proposed adjustment continues to meet those purposes through alternative means and in a manner more consistent with the overall design intent of the site.

While the adjustment will displace approximately 306 square feet of required perimeter landscaping, the submitted site plan demonstrates that the overall site provides approximately 1,046 square feet more landscaping than is otherwise required. This surplus ensures that the visual and environmental benefits typically provided by the required landscape strip are maintained elsewhere on the site. All landscaped areas will meet or exceed the fueling station landscape standard of 1 plant unit (PU) per 16 square feet, ensuring dense, high-quality planting throughout the development. This level of landscaping exceeds minimum planting density requirements in many other commercial contexts and continues to provide aesthetic and environmental benefits consistent with the intent of the code.

Additionally, the area in question abuts a future interior property line within the Kuebler Village development, which is planned as a cohesive, master-planned commercial center with shared access and internal circulation. The adjustment supports the internal function of the overall development by

preserving critical vehicle access and internal driveway connections. A landscape strip in this location would interfere with the shared driveway that provides necessary connectivity and circulation between commercial tenants, which is a key planning objective of the site's overall development plan. For these reasons, the adjustment equally meets the purpose of the underlying standard by preserving high-quality landscaping across the site and supporting internal site function and connectivity within the master-planned commercial center. Therefore, the adjustment satisfies SRC 250.005(d)(2)(B)(ii).

Original Narrative for Adjustment 2:

2. SRC 535.015(g)(4) Building entrances. For buildings within the maximum setback abutting a street, a primary building entrance for each building facade facing a street shall be facing the street. If a building has frontage on more than one street, a single primary building entrance on the ground floor may be provided at the corner of the building where the streets intersect. The applicant is requesting an adjustment to eliminate this standard. During the subdivision process, the City has expressed support for designating the private street within Kuebler Village subdivision to be the primary street. The north side of the building is not a primary facade and is not visible at street level off of Kuebler Boulevard. A primary building entrance has been provided to 27th Avenue as close to the intersection of Kuebler Boulevard as possible with the significant grade. This primary entrance includes stairs due to the significant grade. The applicant has included multiple pedestrian connections to 27th Avenue and the private street to ensure plenty of connectivity to the primary building entrance. This adjustment meets approval criterion (ii) for equally meeting the purpose of the standard.

Revised Narrative for Adjustment 2:

2. The applicant is requesting an adjustment to SRC 535.015(g)(4) to allow the primary building entrance to be oriented toward 27th Avenue and the internal private street rather than toward Kuebler Boulevard. This standard is intended to activate street-facing facades and promote pedestrian-friendly design by orienting building entrances to public streets. In this case, however, due to the unique site conditions and integrated design of Kuebler Village, the purpose of the standard is equally met through alternative means.

First, during the subdivision review process, the City expressed support for treating the internal private street within the Kuebler Village development as the primary street frontage for purposes of site design. The building's primary entrance has been located accordingly—facing 27th Avenue and in close proximity to the intersection with Kuebler Boulevard. Due to a significant

grade change along this frontage, stairs are necessary at the entrance, but multiple pedestrian pathways are provided from both 27th Avenue and the private street to ensure accessibility and connectivity to the building's main entrance. Second, while the north elevation of the building faces Kuebler Boulevard, it is not visible from the sidewalk at street level. The building is set back approximately 95.5 feet from the public sidewalk and separated by a 6-foot elevation change as well as mature riparian vegetation and trees located adjacent to the creek that runs along the northern edge of the site. This natural buffer substantially screens the building façade from Kuebler Boulevard and diminishes the visibility or functional value of a street-facing entrance in that location.

To enhance visual interest and meet the intent of the standard through architectural quality, the project architect has revised the elevation drawings for the north façade to incorporate dark gray Hardie plank paneling, which mimics window paneling and provides the appearance of fenestration. Additional material changes and architectural detailing have been added to the elevation to ensure it avoids blank walls and contributes to an attractive streetscape, even if partially obscured by distance and vegetation. Given the substantial separation from the public sidewalk, limited visibility, significant grade change, and enhanced architectural treatment, the north façade cannot function as a practical location for a primary entrance. The applicant's revised site design and building orientation still promote pedestrian access and façade articulation consistent with the purpose of SRC 535.015(g)(4). Therefore, the request satisfies the adjustment approval criterion under SRC 250.005(d)(2)(B)(ii) because the purpose of the standard is equally met.

#### Original Narrative for Adjustment 3:

3. SRC 535.015(g)(5) Ground-floor windows. For buildings within the maximum setback abutting a street, ground floor building facades facing that street shall include transparent windows on a minimum of 50 percent of the ground floor facade. The windows shall not be mirrored or treated in such a way as to block visibility into the building. The windows shall have a minimum visible transmittance (VT) of 37 percent. The applicant requests to eliminate the standard along Kuebler Boulevard as the grade of the site puts the building at a taller point than the street view along Kuebler Boulevard. No windows are being provided on this façade as it is the back of the building. The applicant has created a visually appealing façade that will be cohesive with other buildings located at the intersection of Kuebler Boulevard and Battle Creek Road. These buildings are actually closer to the grade level of the street than the building proposed with this application. Elevation drawings have been submitted that demonstrate the differentiating materials to be

used on this façade, demonstrating how the intent of the standard is being met with the proposed design. This adjustment meets approval criterion (ii) for equally meeting the purpose of the standard.

Revised Narrative for Adjustment 3:

3. The applicant is requesting an adjustment to SRC 535.015(g)(5), which requires ground floor façades within the maximum setback and facing a street to include transparent windows on at least 50 percent of the façade. The standard further requires that those windows not be mirrored or treated to block visibility into the building and that they have a minimum visible transmittance (VT) of 37 percent. The building's west elevation fronts 27th Avenue and is located within the maximum setback. The project architect has revised the elevation to provide ground floor windows across 55.86 percent of the façade, using the measurement methodology allowed under SRC Chapter 111. This exceeds the minimum percentage requirement, and the windows are strategically located to maintain architectural rhythm and visual interest.

However, the applicant is requesting an adjustment specifically to the VT requirement of SRC 535.015(g)(5), because one of the windows along this elevation will be a faux window that does not permit visibility into the building and therefore does not meet the required VT minimum. The faux window is placed in a section of the building used for back-of-house operations where interior visibility is not functionally feasible. Despite not meeting the literal transmittance requirement, the faux window mimics the scale, proportion, and appearance of a true transparent window, thereby preserving the visual continuity of the façade and supporting the pedestrian-oriented design intent of the standard.

The project architect has revised the west elevation, which faces 27th Avenue and is within the maximum setback, to more closely comply with the standard. The updated design includes a series of transparent windows and one faux window to maintain visual rhythm and architectural consistency. The faux window is located in a "back-of-house" area where interior operations do not support visibility into the building due to functional constraints. However, the faux window mimics the appearance of a true window in size, proportion, and placement, contributing to an active and articulated streetscape. Using the alternative ground floor measurement methodology permitted under SRC Chapter 111, the revised west elevation provides 55.86 percent window coverage, exceeding the minimum 50 percent threshold. This demonstrates clear compliance with the standard's intent, while allowing a minor flexibility in treatment to accommodate the building's interior

programming.

The remaining windows on the west elevation are transparent and contribute to the building's engagement with the street. Together, the window design creates an articulated, human-scaled façade that avoids blank walls and supports an active streetscape. By achieving the required window coverage, reinforcing rhythm and architectural detailing, and including a limited faux window only where interior function requires it, the proposal meets the purpose of the ground-floor window standard, even though one window does not meet the specific VT requirement. Therefore, the adjustment satisfies SRC 250.005(d)(2)(B)(ii) because the overall design equally meets the intent of the standard—to provide transparency, interest, and pedestrian-scale design on street-facing façades.

Original Narrative for Adjustment 4:

4. SRC 535.015(g)(5) Ground-floor windows. For buildings within the maximum setback abutting a street, ground floor building facades facing that street shall include transparent windows on a minimum of 50 percent of the ground floor facade. The windows shall not be mirrored or treated in such a way as to block visibility into the building. The windows shall have a minimum visible transmittance (VT) of 37 percent. The purpose of SRC 535.015(g)(5) is to ensure that ground-floor facades facing a street maintain a high level of transparency, promoting visibility into the building, pedestrian engagement, and an active streetscape. The standard requires that at least 50 percent of the ground-floor facade be composed of transparent windows with a minimum visible transmittance (VT) of 37 percent.

The applicant proposes an adjustment to reduce the required window coverage from 50 percent to 43 percent along the 27th Avenue frontage. The submitted elevation drawings provide detailed measurements and materials demonstrating that the proposed windows meet the minimum VT requirement and are not mirrored or treated in a way that obstructs visibility into the building.

Despite the reduced window area, the design maintains the intent of the standard by ensuring significant transparency along the street-facing facade. The provided windows allow for visual connectivity between the interior and exterior, fostering an engaging streetscape. Additionally, the proposed design incorporates architectural features and pedestrian-oriented elements that complement the transparency provided, maintaining an active and inviting frontage. This adjustment meets approval criterion (ii) because it equally meets the purpose of the standard by preserving visibility, pedestrian interaction, and the overall intent of the ground-floor transparency

requirement.

Revised Narrative for Adjustment 4:

4. The applicant is requesting an adjustment to SRC 535.015(g)(5) to eliminate the requirement for ground-floor transparent windows along the north elevation, which faces Kuebler Boulevard. This standard is intended to create pedestrian-oriented street frontages by requiring windows that provide visibility into the building, enhance safety, and promote active architectural design. In this case, the proposed development equally meets the purpose of the standard through site-specific conditions and enhanced design features that render transparent windows along the north elevation functionally unnecessary and visually redundant.

The building's north elevation does not function as a primary façade, and no pedestrian access or public entrances are provided along this side. The elevation is located approximately 95.5 feet from the public sidewalk along Kuebler Boulevard and is separated from the street by a 6-foot elevation change. Additionally, mature vegetation and trees associated with the adjacent creek corridor further screen the building from public view. These topographic and vegetative buffers significantly diminish the visual prominence of the north façade, thereby reducing the relevance of the window requirement in achieving pedestrian activation or street-level transparency. Although no windows are proposed on this elevation, the project architect has incorporated high-quality design treatments to ensure the building remains visually interesting. The revised elevation includes a mix of materials, including dark gray Hardie plank paneling designed to mimic the scale and appearance of window openings. These elements provide architectural articulation and rhythm, preventing the façade from appearing blank or monotonous. The result is a visually appealing and cohesive elevation that aligns with the character of nearby development at the intersection of Kuebler Boulevard and Battle Creek Road.

Given the significant physical separation, natural screening, lack of pedestrian activity along this frontage, and the enhanced architectural detailing applied to the façade, the purpose of SRC 535.015(g)(5) is equally met. The requested adjustment allows for site-sensitive design while still supporting the broader goals of visual interest, architectural quality, and compatibility with the surrounding area. Accordingly, the applicant has demonstrated that the proposed design satisfies the adjustment approval criterion under SRC 250.005(d)(2)(B)(ii).

Original Narrative for Adjustment 5:

5. SRC 800.065(a)(1)(A) Pedestrian connection between building entrances and streets. As demonstrated on the submitted plans, the primary building entrances are connected by a single pedestrian connection. The primary building entrances are connected to 27th Avenue and the private street within the Kuebler Village subdivision. The applicant is requesting an adjustment to eliminate a pedestrian connection to Kuebler Boulevard as there are site constraints and right-of-way constraints, including grade and a drainage ditch, that make a direct pedestrian connection infeasible. Additionally, as the back of the building is along Kuebler Boulevard, a pedestrian connection to the back side of the building is not appropriate. The applicant has provided a pedestrian connection as close as possible to the intersection of Kuebler Boulevard and 27th Avenue. This connection is approximately 70-feet away from the crosswalk at this intersection. This adjustment meets approval criterion (ii) for equally meeting the purpose of the standard.

Withdraw Request for Adjustment 5:

5. The applicant is withdrawing this adjustment request in accordance with city staff's incomplete application comments. The applicant is demonstrating connections to the east which will eventually provide a complete pedestrian connection to Kuebler Boulevard in compliance with conditions of approval imposed on the subdivision application previously approved.

Original Narrative for Adjustment 6:

6. SRC 806.060(a)(1) Location: Short-term bicycle parking shall be located outside a building within a convenient distance of, and clearly visible from, the primary building entrance. In no event shall bicycle parking be located more than 50 feet from the primary building entrance, as measured along a direct pedestrian access route. The proposed development complies with SRC 806.060(a)(1) by providing short-term bicycle parking within a convenient distance of the primary building entrance. Two bicycle parking spaces are located within 50 feet of the entrance, meeting the standard. However, four additional bicycle parking spaces are located approximately 92 feet from the entrance. To accommodate these spaces, the applicant is requesting an adjustment to allow the additional bicycle parking to exceed the 50-foot maximum distance. The proposed location still provides convenient and accessible bicycle parking while maintaining the functionality and design of the site. To equally meet the intent of the standard, the applicant proposes an 8 foot wide pedestrian connection from the bicycle parking spaces to the closest building entrance. This adjustment meets approval criterion (ii) for



equally meeting the purpose of the standard.

Withdraw Request for Adjustment 6:

6. The applicant is withdrawing this adjustment request as the plans have been revised with new bicycle parking locations moved closer to each main building entrance. With the revised parking locations, no bicycle parking space is proposed to be more than 23 feet from a main entrance, meeting the 50 foot maximum distance standard.

Item 2: Subdivision Plat

**Applicant's Response:** This item is advisory in nature. The applicant understands they may post the bond to pull building permits prior to recordation of the final plat.

Item 3: Setbacks

**Applicant's Response:** The setback between the building and 27<sup>th</sup> Avenue has been revised to meet the pedestrian plaza requirements. As demonstrated on the revised plans, the site plan now includes sidewalk extensions, 100 percent canopy coverage, exceeding the 90 percent coverage requirement, and a bench for use by pedestrians. This item is resolved.

Item 4: Off-Street Parking Location

**Applicant's Response:** The programming for the lot between the subject site and Mosaic Drive has not been completed. Because the development team is not sure at this time if any structures meeting the SRC definition of a building will be placed on the adjacent lot, the applicant is seeking an adjustment to the off-street parking location to remain where it is currently placed.

New Adjustment Narrative (5):

The applicant is requesting an adjustment to SRC 535.015(g)(1), which prohibits new off-street surface parking and vehicle maneuvering areas from being located between a building or structure and a street. The purpose of this standard is to promote an active, pedestrian-oriented street frontage by ensuring that buildings, rather than parking lots, define the public realm.

The current site configuration places off-street surface parking on Lot 1 between the proposed building and Mosaic Drive. This condition arises because Lot 3, located directly between Lot 1 and Mosaic Drive, is currently programmed as a public plaza and does not contain any structure that

meets the definition of a “building” under the SRC. As such, the literal application of the code would treat the parking as located between a building and the street, thereby triggering the standard.

The applicant is seeking an adjustment not because the design undermines the code's intent, but because the timing and nature of improvements on the adjacent lot (Lot 3) are not yet finalized. The development team is still evaluating the ultimate programming for this space, which may or may not include a structure that qualifies as a building. In the interim, the applicant wishes to preserve the current site plan layout, which already includes significant pedestrian-oriented features.

Despite the technical nonconformance, the plan equally meets the purpose of the standard through thoughtful and intentional site design. The plaza between the off-street parking and Mosaic Drive is a highly activated, publicly accessible space that will include pedestrian walkways, gathering areas, landscaping, and amenities designed to draw people in from the street. The design transforms the frontage into a welcoming, usable environment and contributes to a vibrant streetscape, consistent with the purpose of SRC 535.015(g)(1). Moreover, the visual relationship between the parking area and the street is softened and improved through architectural detailing, landscape buffering, and direct pedestrian connections. The plaza design invites public interaction and encourages walking, gathering, and community use in a way that traditional building placement alone may not achieve. Importantly, the location of the building on Lot 1 supports internal site circulation and integration with other uses in the Kuebler Village development, promoting a cohesive site layout that aligns with the master-planned nature of the larger commercial center.

For these reasons, the proposed layout maintains the goals of the code and provides a functionally equivalent and contextually appropriate alternative to locating a building directly along the street frontage. Therefore, the adjustment satisfies SRC 250.005(d)(2)(B)(ii) because the purpose of the standard is equally met through enhanced plaza design and pedestrian activation of the public realm. This item is resolved

#### Item 5: Building Entrances

**Applicant's Response:** This is a duplicate item resolved above.

#### Item 6: Ground Floor Windows

**Applicant's Response:** This is a duplicate item resolved above.

Item 7: Landscape

**Applicant's Response:** The site is being evaluated as the lot it will be in the future when the plat is recorded. The applicant's site plan demonstrates that more than 15 percent of the lot will be occupied by landscaping. This item is resolved.

Item 8: Flag Lot(s)

**Applicant's Response:** The applicant's team has revised the site plan. The parking located on the east side of the proposed building has been revised to compact spaces and the 27' wide easement is now shown correctly and will be maintained free of obstruction. This item is resolved.

Item 9: Pedestrian Connection

**Applicant's Response:** All plans, including the revised plans include a pedestrian connection to the east which will connect to future development and ultimately to Kubler Boulevard. This item is resolved.

Item 10: Boundary Street Improvements

**Applicant's Response:** The bottom stair has been pulled back and out of the right-of-way, in accordance with staff's comments. This item is resolved.

Item 11: Parking Location

**Applicant's Response:** The parking area to the east of the proposed building is required to meet the parking and vehicle use setbacks abutting a street pursuant to SRC Chapter 806. The revised site plans demonstrate a setback of 15'-5", exceeding the minimum setback requirement of 6 feet. In order to maintain vehicular circulation and connection to the property to the east, which has physical constraints due to the abutting wetland, the applicant is seeking an adjustment for the setback to the internal driveway to reduce it from a 6-foot required setback, down to a 5-foot setback.

New Adjustment Narrative (6):

The applicant is requesting an adjustment to SRC 806.035(c)(2)(A), which requires that off-street parking and vehicle use areas be set back a minimum

of ten feet from the street right-of-way. The intent of this standard is to reduce glare and headlight spillover into the public right-of-way and to ensure adequate perimeter landscaping that buffers vehicle use areas from the street.

To preserve internal site circulation and ensure alignment with drive aisles on the adjacent property to the east, the applicant proposes to reduce the required ten-foot setback to four feet six inches along a portion of the internal driveway. This reduction represents a total displaced landscaping area of approximately 28 square feet, which is negligible in scale and fully offset elsewhere on the site. As demonstrated on the submitted landscape plan, the site as a whole exceeds minimum landscaping requirements, and the displaced square footage is accounted for in the surplus provided.

In addition, the adjustment continues to meet the purpose of the standard due to the existing topography and natural buffering along Kuebler Boulevard. The vehicle use area in question is situated approximately six feet above the grade of the public right-of-way. This elevation change achieves the same visual screening and headlight mitigation outcomes that the 10-foot landscaped setback is intended to provide. A mature vegetative buffer and creek corridor exist between the subject site and Kuebler Boulevard. These features further obscure any views of the vehicle use area from the public realm, ensuring that headlight glare will not reach the right-of-way and preserving the visual quality of the streetscape.

By maintaining the functional performance of the standard through a combination of topographic separation, enhanced landscaping elsewhere on site, and the presence of existing natural buffers, the applicant has demonstrated that the purpose of SRC 806.035(c)(2)(A) is equally met. The proposed setback achieves the same outcomes in terms of visual screening, aesthetic integration, and compatibility with the surrounding environment while enabling necessary internal site connectivity. Accordingly, the request satisfies SRC 250.005(d)(2)(B)(ii) because the proposal equally meets the intent of the standard through alternative but effective means.

#### Item 12: Interior Parking Landscape

**Applicant's Response:** Both the original and revised site plans provided by the project architect include a table outlining the development standards and project calculations. The plans demonstrate adequate interior landscaping is provided. In accordance with the table, the off-street parking areas total 12,087 square feet in size and triggers a minimum of 5 percent landscaping, or

*a total of 604 square feet. The site provides 1,469 square feet of interior landscaping, which is more than double the required minimum. This item is resolved.*

#### Item 13: Climate Mitigation

**Applicant's Response:** *CFEC rules are not triggered. As expressed above, the applicant has provided a dashed CFEC Bounds line on the plan demonstrating the parking area, measured in accordance with the code, does not exceed ½ acre in size. This item is resolved.*

#### Item 14: Bicycle Parking

**Applicant's Response:** *Bicycle parking has been relocated and the applicant has requested to withdraw the original adjustment to bicycle parking location standards. This item is resolved.*

#### Item 15: Off-Street Loading

**Applicant's Response:** *The loading space has been moved and no longer conflicts with the two-way circulation on site. None of the parking on this site terminates into a dead end. This item is resolved.*

#### Item 16: Tree Inventory

**Applicant's Response:** *The tree to be removed is a cherry tree with a 12" DBH and was indicated as a tree that needed to be removed at the time the applicant submitted their subdivision application. To maintain consistency in the record, the applicant is resubmitting the previously submitted tree plans. This item is resolved.*

**Conclusion:** The applicant has revised the plans and modified the written statement as requested by staff. The original adjustments, numbered 5 and 6, in the original application materials, are now requested to be withdrawn and replaced with two new adjustments as described above. The applicant believes all items have been resolved in a manner satisfactory to the city and the application is now complete and supportable. The applicant's team is available to city staff if there are any questions about the revisions provided.

New Item Via Email 5.21.25 from Olivia Dias: The pedestrian amenity (Bike Rack) was removed from the setback abutting Kuebler Blvd. I do recall Staff making this suggestion, but without any amenity an Adjustment is needed to the setback

requirement.

**Applicant's Response:**

New Adjustment Narrative (7): The intent of SRC 535.015(c) is to promote a walkable, pedestrian-friendly environment by requiring pedestrian amenities within the maximum 30-foot setback for buildings abutting major streets in the MU-III zone. This standard aims to enhance the pedestrian experience by encouraging active building frontages and accessible amenities along public streets.

In this case, the building abuts Kuebler Boulevard SE on the north side. However, due to existing site conditions, including a stream corridor, mature vegetation, and significant elevation changes, pedestrian access to the north side of the building from Kuebler Boulevard is not feasible. There are no existing or planned pedestrian connections to that frontage. As a result, placing a pedestrian amenity on the Kuebler side would not serve its intended function. Conversely, the west side of the building, facing 27th Avenue SE, functions as the primary pedestrian interface. This frontage includes direct pedestrian access to the building, an existing sidewalk system, and pedestrian-oriented features. The applicant proposes to install a bench, sidewalk extensions, and bicycle parking along this frontage, which is where pedestrians will actually enter and interact with the site. Providing the required pedestrian amenities in this location better serves the intent of the standard by enhancing the pedestrian experience in the area where it is possible and practical to do so.

Therefore, the adjustment equally meets the purpose of SRC 535.015(c) by enhancing the pedestrian environment along the frontage where pedestrian access will be provided and can be supported.