
I. Executive Summary

Pahlisch Homes at Springbrook Limited Partnership (Applicant) is submitting this application for a Type III Modification to the Springbrook Development Standards Matrix and the Collina at Springbrook subdivision phasing plan and phasing schedule. The Collina at Springbrook subdivision and Springbrook Master Plan modification were approved by the City of Newberg City Council on July 3, 2023, through Ordinance No. 2023-2915 Order No. 2023-44. The conditions required a Type III process to modify several aspects following approval of the pr

Development Standards Matrix Revisio

After submittal of the Collina land use application, the Applicant worked with Staff on refinement of the quadplex driveway concept. To accommodate the driveway configuration required for middle housing lots, modifications are needed to the driveway separation and width standards. The base stand require a 20-foot-wide paved surface within a 25-foot-wide easem The revised Pahlisch concept can accommodate utilities and fire access with a 16-foot-wide paved driveway within a 24-foot-wide priva utility and access easement. This has been detailed in Exhibit A

Within a parent lot, two driveways can be provided with greater than 22 feet of separation. In order to provide housing which better meets the needs of a diverse group of people, the requested modification will allow for better lot fit and the greatest preservation of on-street parking. To achieve this alternative design, changes to the dimensions of the Springbrook Development Matrix have been proposed, as shown in Exhibit B.

An additional change has been proposed which would modify the Minimum Lot Dimension requirement within the Development Standards Matrix. That standard currently reads “Minimum lot width shall be 32 feet, except minimum 20 feet for attached dwelling units.” The proposed change would read “Minimum lot width shall be 32 feet, except minimum 20 feet for middle housing dwelling units” (emphasis added). This change is to reflect the changes of Ordinance No. 2021-2880 No. 2021-2889 define qua dwellings as “four dwelling units on one lot or parcel in any configuration.” This definition would include configurations such as those proposed, where the quadplex units are not attached, as well as typical attached configuration

Phasing Plan Revision

The phasing plan for Collina at Springbrook was shown on the preliminary plans for the subdivision and summarized in a table within the land use narrative. After discussion with Staff, the Applicant understands that the text in the narrative was unclear regarding the timing of the Mountainview Drive frontage improvements. Phase 1 and Phase 3 were intended to construct only the E Mountainview Drive frontage improvement adjacent to that phase, resulting in two phases of construction for E Mountainview Drive.

Phasing Schedule Revision

The approved phasing table for the Collina at Springbrook Subdivision contains very specific dates. With the variability of market conditions, the Applicant would like to incorporate more flexibility into the phasing table to include a timeline range for each phase. The table has been updated to reflect these expectations.

The proposed changes would only apply to the areas of the Springbrook District west of Hess Creek approved through Ordinance No. 2023-2915 and Order No. 2023-44 (Collina at Springbrook Tentative

Subdivision). The Springbrook District at large would be subject to the Springbrook Master Plan Development Standards Matrix as last modified th Ordinance No. 2021-2880 No. 2021-2889.

The submittal materials include the City application form, written documentation, and other require information necessary for City staff to review and determine the application’s compliance with the applicable approval criteria. The evidence supports the City’s approval of the application for modification.

II. Site Description/Setting

The site is north of E Mountainview Drive, west of N Aspen Way, and east of N College Street. The eight lots included in this application are within the Springbrook District and were part of the recently approved Collina at Springbrook project (Ordinance No. 2023-2915) The properties comprise a total area of ±97.08 acres. Hess Creek lies east of the subject properties, largely within Assessor’s Map 3 2 08, Tax Lot 5500.

III. Applicable Review Criteria

CITY OF NEWBERG MUNICIPAL CODE

Title 15 – Development Code

Chapter 15.100 Land Use Processes and Procedures

15.100.050 Type III procedure – Quasi-judicial hearing

- A. All Type III decisions shall be heard and decided by the planning commission. The planning commission’s decision shall be final unless the decision is appealed or the decision is a recommendation to the city council.
- B. Type III actions include, but are not limited to:
[...]

Response: The prescribed process for these modifications is a Type III procedure per NMC 15.235.030.D.2 and the Collina at Springbrook Conditions of Approval.

- H. If a Type III application is denied, or if the applicant wishes to make substantive modifications to an approved application, the applicant may modify the application after the planning commission hearing and request a new planning commission hearing to consider the application. An application so modified shall be considered a new application for purposes of the 120-day time limit for processing applications in accordance with NMC 15.100.100 and state statutes. The applicant shall acknowledge in writing that this is a new application for purposes of the 120-day rule. The city council shall establish a fee for such a reconsideration or modification by resolution. Application of this provision is limited to three times during a continuous calendar year.

Response: This Type III application is a new application for the purposes of the 120-day time limit for processing applications. The modification application is the first such application submitted within the calendar year.

15.100.200 Compliance required.

Notice on all Type I through Type IV actions, including appeals, shall be conducted in accordance with this article.

15.100.210 Mailed notice.

Mailed notice shall be provided as follows:

- A. Type I Actions. No public notice is required.

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- B. Type II and Type III Actions. The applicant shall provide public notice to:
1. The owner of the site for which the application is made; and
 2. Owners of property within 500 feet of the entire site for which the application is made. The list shall be compiled from the most recent property tax assessment roll. For purposes of review, this requirement shall be deemed met when the applicant can provide an affidavit or other certification that such notice was deposited in the mail or personally delivered.
 3. To the owner of a public use airport, subject to the provisions of ORS 215.416 or 227.175.
- C. The director may request that the applicant provide notice to people other than those required in this section if the director believes they are affected or otherwise represent an interest that may be affected by the proposed development. This includes, but is not limited to, neighborhood associations, other governmental agencies, or other parties the director believes may be affected by the decision.
- D. The director shall provide the applicant with the following information regarding the mailing of notice:
1. The latest date by which the notice must be mailed;
 2. An affidavit of mailing (to be signed and returned) certifying that the notice was mailed, acknowledging that a failure to mail the notice in a timely manner constitutes an agreement by the applicant to defer the 120-day process limit and acknowledging that failure to mail will result in the automatic postponement of a decision on the application; and
 3. A sample notice.
- E. The notice of a Type II and Type III development application shall be reasonably calculated to give actual notice and shall:
1. Set forth the street address or other easily understood geographical reference to the subject property;
 2. List, by commonly used citation, the applicable criteria for the decision;
 3. Include the name and phone number of a local government contact person, the telephone number where additional information may be obtained and where information may be examined;
 4. Explain the nature of the application and the proposed use or uses which could be authorized;
 5. State that a copy of the application, all documents and evidence relied upon by the applicant and applicable criteria are available for inspection at no cost and will be provided at a reasonable cost.
- F. Prior to mailing or posting any notice required by this code, the applicant shall submit a copy of the notice to the director.
- G. The applicant shall mail the notice for Type II actions at least 14 days before a decision is rendered. The applicant shall file with the director an affidavit of mailing as identified in subsection (D) of this section within two business days after notice is mailed.
- H. The applicant shall mail the notice for Type III actions at least 20 days before the first new hearing, or if two or more new hearings are allowed, 10 days

before the first new hearing. The applicant shall file with the director an affidavit of mailing as identified in subsection (D) of this section within two business days after notice is mailed.

- I. All public notices shall be deemed to have been provided or received upon the date the notice is deposited in the mail or personally delivered, whichever occurs first. The failure of a property owner to receive notice shall not invalidate an action if a good faith attempt was made to notify all persons entitled to notice. An affidavit of mailing issued by the person conducting the mailing shall be conclusive evidence of a good faith attempt to contact all persons listed in the affidavit.
- J. Failure to mail the notice and affirm that the mailing was completed in conformance with the code shall result in:
 - 1. Postponement of a decision until the mailing requirements have been met; or
 - 2. Postponement of the hearing to the next regularly scheduled meeting or to such other meeting as may be available for the hearing; or
 - 3. The entire process being invalidated; or
 - 4. Denial of the application.

Response: The required mailed notice will meet the above criteria. A sample is provided as part of Exhibit G.

15.100.260 Procedure for posted notice for Type II and III procedures.

- A. Posted Notice Required. Posted notice is required for all Type II and III procedures. The notice shall be posted on the subject property by the applicant.
- B. Notice Information Provided by City. The director shall provide the applicant with the following information regarding the posting of notice:
 - 1. The number of notices required;
 - 2. The latest date by which the notice must be posted;
 - 3. An affidavit of posting (to be signed and returned) certifying that the notice was posted on site, acknowledging that a failure to post the notice in a timely manner constitutes an agreement by the applicant to defer the 120-day process limit and acknowledging that failure to post will result in the automatic postponement of a decision on the application; and
 - 4. A sample notice.
- C. Submission of Notice. Prior to posting any notice required by this section, the applicant shall submit a copy of the notice to the director for review.
- D. Size, Number and Location Requirements. A waterproof notice which measures a minimum of two feet by three feet shall be placed on each frontage of the site. If a frontage is over 600 feet long, a notice is required for each 600 feet, or fraction of 600 feet. If possible, notices shall be posted within 10 feet of a street lot line and shall be visible to pedestrians and motorists in clear view from a public right-of-way. Notices shall not be posted in a public right-of-way or on trees.
- E. Contents of Notice. The posted notice shall only contain the following information: planning action number, brief description of the proposal, phone

number and address for contact at the Newberg planning and building department.

- F. Standards and Timing, Type II Actions. The applicant shall post the notice at least 14 days before a decision is rendered. The applicant shall file with the director an affidavit of posting as identified in subsection (B) of this section within two business days after notice is posted.
- G. Standards and Timing, Type III Actions. The applicant shall post the notice at least 10 days before the first scheduled hearing. The applicant shall file with the director an affidavit of posting as identified in subsection (B) of this section within two business days after notice is posted.
- H. Removal of Notice. The applicant shall not remove the notice before the final decision. All posted notice shall be removed by the applicant within 10 days following the date of the final decision on the request.
- I. Failure to Post Notice. The failure of the posted notice to remain on the property shall not invalidate the proceedings. Failure by the applicant to post a notice and affirm that the posting was completed in conformance with the code shall result in:
 - 1. Postponement of a decision until the mailing requirements have been met; or
 - 2. Postponement of the hearing to the next regularly scheduled meeting or to such other meeting as may be available for the hearing; or
 - 3. The entire process being invalidated; or
 - 4. Denial of the application.

Response: The required posted notice will meet the above criteria. A sample is provided as part of Exhibit G.

15.100.270 Procedure for published notice on Type III and Type IV procedures.

- A. Notice shall be provided within a newspaper of general circulation within the city at least 10 days prior to the first public hearing on the action.
- B. The notice shall reasonably describe:
 - 1. Type III Proceedings. The proposed development permit request, location, file number, the name and phone number of a local government contact person and the location where information may be examined.
 - 2. Type IV Proceedings. The nature of the proposed final action of an amendment to the Newberg comprehensive plan, code or new land use regulation.
- C. The notice shall include a statement that all interested persons may appear and provide testimony and that only those persons who participate either orally or in writing in the hearing proceedings leading to the adoption of the action may appeal the decision.
- D. The notice shall state the place, date and time of the hearing.
- E. See NMC 15.100.240 for Type III notice for annexations.

Response: These standards are understood and these criteria will be met.

15.235.030 Preliminary plat approval process.

- D. Modifications to Approved Preliminary Plats. The applicant may request changes to the approved preliminary plat or conditions of approval. Modification requests may either be deemed minor modifications or major modifications, according to the following criteria and at the determination of the director:
1. Minor Modifications. Minor modifications are reviewed through the Type I procedure, pursuant to NMC 15.100.020. Minor modifications retain consistency with the general layout and pattern of the approved plan and do not modify an element of the approved plan by a quantifiable standard of greater than 10 percent. Minor modifications may include the following:
 - a. Relocations of property lines, streets, walkways, and alleys;
 - b. Changes to the site utilities;
 - c. Changes which increase or decrease the number of lots; and
 - d. Modifications to the conditions of approval where an alternate method will derive the same result intended by the condition, or where a condition is deemed to be met in a different way than specified in the staff report.
 2. Major Modifications. Major modifications are reviewed through the same procedure as the original approval procedure. Major modifications are any proposed changes to elements of the approved plan or conditions of approval not meeting the thresholds in subsection (D)(1) of this section.

Response: These applications for modification are subject to a Type III process, the same as the original approval procedure, per the code above and Conditions of Approval.

- E. Phased Subdivision. The city may approve a phased subdivision, provided the applicant proposes a phasing schedule that meets all of the following criteria:
1. In no case shall the construction time period (i.e., for required public improvements, utilities, streets) for the first subdivision phase be more than one year;
 2. Public facilities shall be constructed in conjunction with or prior to each phase;
 3. The phased development shall not result in requiring the city or a third party (e.g., owners of lots) to construct public facilities that are required as part of the approved development proposal;
 4. The proposed time schedule for phased development approval shall be reviewed concurrently with the preliminary subdivision plat application; and
 5. Modifications to the phasing schedule or phasing elements will be processed in accordance with subsection (D) of this section.

Response: The proposed modification to the phasing plan for Collina at Springbrook subdivision does not result in the need for the City or others to construct public facilities required as part of the approved project. This application for modification to the phasing schedule is submitted in accordance with subsection D and the Conditions of Approval.

The modified phasing schedule is as follows

Table 1: Collina at Springbrook Modified Phasing

Collina at Springbrook Anticipated Phasing		
Phase	Phase Details	Approximate Construction Start Date
1	50 homes – 42 detached single-family, 8 detached quadplex Stormwater facility: Tract F Open space: Tracts A, B, C, D, E E Mountainview bike/ped bridge, widening, and intersection improvements adjacent to Phase 1	2024
2	37 homes – 29 detached single-family, 8 detached quadplex Homeowner’s association (HOA) amenity: Tract H Open space area: Tract G	2025-2026
3	55 homes – 37 detached single-family, 18 detached quadplex Open space: Tracts I, K, L, M Stormwater facility: Tract J E Mountainview improvements adjacent to Phase 3	2026-2028
4	45 homes – 29 detached single-family, 16 detached quadplex Open Space: Tracts N, O, P E Henry Road traffic circle, improvements adjacent to Phase 4	2027-2029
5	61 homes – 43 detached single-family, 18 detached quadplex E Henry Road improvements adjacent to Phase 5	2029-2031
6	52 detached single-family Open space areas: Tract Q, R, S N Aldersgate improvements adjacent to Phase 6	2030-2032
7	65 detached single-family Open space area: Tract T N Aldersgate improvements adjacent to Phase 7	2031-2033
8	38 detached single-family Open space area: Tract U, V N Aldersgate improvements adjacent to Phase 8	2033-203
Total	±403 homes	2034

The requested modification to the phasing schedule meets these criteria.

Chapter 15.326 Springbrook (SD) District

15.326.060 Modifications to the master plan.

- A. The following modifications to the master plan shall follow the Type I administrative procedure identified in NMC 15.100.020:
 - 1. Land use district boundary modifications prior to development within that phase of no more than one acre that adjust a boundary no more than 50 feet.

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- B. The following modifications to the master plan shall follow a Type II procedure identified in NMC 15.100.03
 - 1. Land use district boundary modifications prior to development within that phase greater than one acre and less than five acres that adjust a boundary no more than 100 feet.
 - 2. Modifications to the “Trip Cap” established with approval of the master plan.

Response: The requested modifications do not meet the threshold for a Type I or II procedure.

- C. The following modifications to the master plan shall follow a Type III procedure identified in NMC 15.100.05
 - 1. Modifications other than those noted above.
 - 2. Modifications to the Springbrook district boundary.

Response: The requested modification is unlisted within NMC 15.326.060; therefore, the Type III procedure applies.

Chapter 15.405 Lot Requirements

15.405.03 Lot Dimensions and Frontage

- D. Frontage.
 - 1. No lot or development site shall have less than the following lot frontage standards:
 - a. Each lot or development site shall have either frontage on a public street for a distance of at least 25 feet or have access to a public street through an easement that is at least 25 feet wide. No new private streets, as defined in NMC 15.05.030, shall be created to provide frontage or access except as allowed by NMC 15.240.020(L)(2).

Response: As provided by Ordinance No. 2023-2915, modification to the lot frontage width is a Type III process. The proposed access easement width would be 24 feet rather than 25 feet and would allow appropriate placement of all underground utilities and vehicular access a required.

Chapter 15.505 Public Improvements Standards

15.505.030 Street standards.

R. Vehicular Access Standards.

[...]

- 4. Driveways. More than one driveway is permitted on a lot accessed from either a minor collector or local street as long as there is at least 40 feet of lot frontage separating each driveway approach. More than one driveway is permitted on a lot accessed from a major collector as long as there is at least 100 feet of lot frontage separating each driveway approach.

Response: The lots planned as part of Collina at Springbrook are not anticipated to provide driveway access onto a major collector (N Villa Road) except as outlined within the approval for the Collina at Springbrook subdivisio Other than lots for middle housing, as outlined below, lots have not been anticipated to provide greater than one driveway approach

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- a. For a duplex, triplex or quadplex dwelling or a cottage cluster project, more than one driveway is permitted on a lot accessed from either a minor collector or local street as long as there is at least 22 feet of lot frontage separating each driveway approach.

Response: The Typical Quadplex Utility Layout (Exhibit C) outlines how the lots can be developed to provide the intended needed middle housing. A modification is required for the design, which accommodates utilities and fire access within an alternative reduced-width driveway, can aid in reducing home costs through the reduction of unnecessary paved surface and lot width, while better grouping driveways to better preserve on-street parking and prevent vehicle backing conflicts.

As planned, the homes would access the adjacent street via a 3-1 configuration, where three homes access the street via a shared driveway and the remaining home accesses the street via an individual private driveway. This configuration preserves at least 40 feet of frontage per lot. When combined with the adjacent lot (arranged as shown within Exhibit C), up to 80 feet of on-street parking can be preserved. Here, the driveways provide 10 feet minimum of separation (between driveways on two individual parent lots) and 21 feet of separation between driveways on the same lot. The applicable standard requires 22 feet separating each driveway approach on the same lot.

ORDINANCE 2023-2915 CONDITIONS OF APPROVAL

Exhibit “E” Order No. 2023-44 and Ordinance No. 2023-2915 Conditions of Approval

A. Springbrook Master Plan (Order No. 2023-44)

[...]

3. To comply with Ordinance No. 2007-2678: Utility lines shall be extended within the planned right-of-ways to the edge of the development and along the frontage of the development, unless such extensions would not serve the Springbrook or other properties (in some cases, such as south of Henry Road, it appears that the proposed lines stop short of the extensions needed). (Note: Detailed engineering may require additional or different utility improvements than those shown on the master plan).

[...]

9. To comply with Ordinance No. 2007-2678 the Applicant shall meet the following:
 - a. Utility lines shall be extended within the public right-of-ways as much as is practical.
 - b. Utility lines shall be extended within the planned right-of-ways to the edge of the development and along the frontage of the development, unless such extensions would not serve the Springbrook or other properties.
 - c. Water quality swales and basins shall be maintained by the homeowners association. Facilities to be constructed with the stream corridor shall be replanted per the approved stream corridor mitigation plan.

Response: The modification of improvement timing will not affect the final construction of E Mountainview Drive west of N Villa Road. Construction of the street frontage adjacent to each phase (Phases 1 and 3) is appropriate and logical. The line between these phases is the high point in site grading, where Phase 1 storm and sanitary sewer naturally flow

towards N Villa Road and Phase 3 storm and sanitary sewer flow towards N Center Street. The direction of flow is anticipated to continue in these directions following grading of the site.

Construction of the entire E Mountainview Drive frontage prior to construction of Phase 3 utilities is impractical prior to construction of other associated Phase 3 improvements such as the Tract J stormwater facility. These in turn require grading of Phase 3 prior to the scheduled subdivision construction commencement date. Construction of this section of E Mountainview Drive will require the premature completion of construction for many of the Phase 3 improvements to ensure proper function of the roadway facilities.

C. Subdivision (Order No. 2023-44)

[...]

1. The applicant is conditioned to complete construction (i.e. required public improvements, utilities, streets) for the subdivision phase per the approved phasing plan.

Response: Per Condition C.4.d. below, both the phasing plan and phasing schedule are proposed for modification to clarify the public improvement construction schedule.

[...]

4. The Applicant must provide the following information for review and approval prior to construction of any improvements:

[...]

d. Phasing

1. The Applicant is proposing a phased subdivision, the phasing shall comply with NMC 15.235.030E to include:

[...]

- e. Modifications to the phasing schedule or phasing elements will be processed per NMC 15.235.030(D) and (E) as a Type III application.

Response: A modification has been requested to clarify the phasing plan for planned public frontage improvements as well as the phasing schedule. This modification will permit E Mountainview Drive frontage improvements to be constructed concurrent with the adjacent development phase; E Mountainview Drive will be constructed in two segments.

h. Lot Requirements/Size/Frontage

5. The Applicant shall revise the quadplex lots to identify a 25 foot-wide access easement, or request a Type III modification to the Springbrook Master Plan Development Standards Matrix per NMC 15.326.060 to establish an alternative access easement width that differs from 15.405.030(D)(1)(a).

Response: The applicant requests a Type III modification to the Springbrook Master Plan Development Standards Matrix for proposed quadplex lot frontage standards. The proposed typical quadplex layout provides a 16-foot-wide paved driveway within a 24 foot-wide access easement. Additional details regarding the planned layout are available

as Exhibit C. Type III Modification application is required per Newberg Municipal Code (NMC) 15.326.060 and the outlined sections are reviewed below.

[...]

s. Streets – E Mountainview Drive West of N Villa Road

1. The Applicant shall provide plans for public improvement permits to show construction of required ½ street improvements to E Mountainview Drive, a minor arterial street, conforming to Ordinance No. 2007-2678 consisting of the following; 8-foot meandering sidewalk, partially in and partially out of the right-of-way with a public access easement for any portion of the sidewalk outside of the right-of-way, 10.5-foot planter, 0.5 foot curb, 6-foot bike lane, 12-foot travel lane, 2-foot minimum shy distance between edge of median and 12-foot-wide travel lane, 12-foot turn lane/median, 2-foot minimum shy distance between edge of median and 12-foot-wide travel lane, 12-foot travel lane, 6-foot bike lane, 0.5-foot curb, +/-5-foot planter, +/-5-foot sidewalk, 0.5-foot from back of walk to right-of-way. Alternatively, the applicant has the option to submit a Type II application for modification of street right-of-way and improvement width per NMC 15.505.030(H).
2. The Applicant is required to dedicate sufficient right-of-way to achieve a minimum of 74-feet of right-of-way to construct the required improvements to E Mountainview Drive, minor arterial street. Alternatively, the applicant has the option to submit a Type II application for modification of street right-of-way and improvement width per NMC 15.505.030(H).
3. With public improvement permit submittals the Applicant is to provide documentation clearly justifying the installation of marked crosswalks across E Mountainview Drive at its intersection with N Center Street and for the installation of rectangular rapid flashing beacons at this intersection. This documentation is to include the queuing analysis referenced in the preliminary plans.

Response:

The modification of improvement timing will not affect the final construction of E Mountainview Drive west of N Villa Road. Construction of the street frontage adjacent to each phase (Phases 1 and 3) is appropriate and logical. The line between these phases is the high point in site grading, where Phase 1 storm and sanitary sewer naturally flow towards N Villa Road and Phase 3 storm and sanitary sewer flow towards N Center Street. The direction of flow is anticipated to continue in these directions following grading of the site.

Construction of the entire E Mountainview Drive frontage prior to construction of Phase 3 utilities is impractical prior to construction of other associated Phase 3 improvements such as the Tract J stormwater facility. These in turn require grading of Phase 3 prior to the scheduled subdivision construction commencement date. Construction of this section of E Mountainview Drive will require the premature completion of construction for many of the Phase 3 improvements to ensure proper function of the roadway facilities

[...]

bb. Intersections/Driveways/Alleys

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2. Plans submitted with permit applications shall clearly show the lot frontage separation between driveways associated with each quadplex as a minimum of 22-feet. or submit for a Type III modification of the Springbrook Development Standards Matrix per NMC 15.326.06015.220.020(D).
 3. Plans submitted with permit applications shall clearly show the lot frontage separation between driveways associated with each duplex lot as a minimum of 22-feet.

Response: As shown on the attached Typical Quadplex Utility Layout (Exhibit C), the quadplexes are planned to provide two driveways. Three units are expected to access a central driveway with one unit directly accessing the street. The driveway separation is proposed to be minimum of 20 feet between driveways. As such, a request for modification of driveway separation has been submitted.

[...]

6. To adequately provide emergency vehicle access and separate wastewater, water and stormwater service laterals to each lot served by a shared access driveway, access and utility easements for shared driveways are to be 25-foot wide with a 20-foot-wide paved surface. or submit a Type III modification of the Springbrook Development Standards Matrix per NMC 15.326.060.

Response: The provided typical layout for Collina at Springbrook quadplex units (Exhibit C) allows adequate emergency vehicle access and adequate utility spacing to each lot served by the shared access driveway. The proposed access driveway would have a 16-foot-wide paved surface within a 24-foot-wide private utility and access easement. The proposed access width can provide sufficient width for utility separation and maintenance access for the three units sharing the common driveway. Therefore, this request for a Type III modification of the Springbrook Master Plan Development Standards Matrix has been submitted for review and approval.

IV. Conclusion

The required findings have been made, and this written narrative and accompanying documentation demonstrate that the application is consistent with the applicable provisions of the Newberg Municipal Code. The evidence in the record is substantial and supports approval of the application. Therefore, the Applicant respectfully requests that the City approve these modification applications.