

PARK CITY MUNICIPAL CORPORATION
ADMINISTRATIVE PUBLIC MEETING MINUTES
PLANNING DEPARTMENT
<https://us02web.zoom.us/j/88167820277>
November 7, 2024

STAFF:

Elissa Martin, Assistant Planning Director; Virgil Lund, Planner II; Jaron Ehlers, Planner I; Jacob Klopfenstein, Planner I, E. Roman, Planning Administrative Assistant.

PUBLIC:

Molly Guinan, Lyndsey Heck, Justin Keys (virtual).

=====

The Assistant Planning Director called the meeting to order at 12:00 PM.

REGULAR AGENDA/PUBLIC HEARINGS/POSSIBLE ACTION

3981 Kearns Boulevard – Administrative Conditional Use Permit – PL-24-06283 – Proposing Phase II of the Studio Crossing Master Planned Development.

Planner Virgil Lund presented the application and provided some background information. Planner Lund also gave an overview of the Conditions of Approval and clarified that not all Uses would require an ACUP, only some of them, which is outlined in the Development Agreement.

At 12:08 PM, the Assistant Planning Director opened a public hearing. There was no public input.

At 12:08 PM, the Assistant Planning Director closed the public hearing.

MOTION: The Assistant Planning Director **APPROVED** the Administrative Conditional Use Permit in accordance with the Findings of Fact, Conclusions of Law, and Conditions of Approval.

Findings of Fact

1. The Studio Crossing MPD is located at 3981 Kearns Boulevard on 20.46 acres and is part of the Park City Film Studios First Amended Subdivision.
2. On November 9, 2022, the Planning Commission approved the Studio Crossing MPD. On the same day the Planning Commission forwarded a recommendation to the City Council to amend the Quinn's Junction Partnership Annexation Master Planned Development Agreement to allow for Studio Crossing and amend the Zoning Ordinance for exceptions to the Zone Height for the Studio Crossing development at 3981 Kearns Boulevard.
3. On December 15, 2022, the City Council approved Ordinance No. 2022-47 amending the Annexation and Zoning Ordinance for the Studio Crossing property.
4. On December 15, 2022, the City Council approved the Housing Mitigation Plan for Studio Crossing which requires the Applicant to construct 185 on-site affordable dwelling units.
5. On October 25, 2023 the Planning Commission ratified the Development Agreement.
6. On January 17, 2024, the Development Agreement for the Studio Crossing MPD was recorded with Summit County, Recorder Entry No. 01214657.
7. On April 19, 2024, the Studio Crossing Subdivision Plat was recorded with Summit County, Recorder Entry No. 1218425.
8. Section 2.1 of the Studio Crossing Development Agreement requires an Administrative Conditional Use Permit prior to any construction in connection with the project.
9. On June 13, 2024, the Planning Director approved an Administrative Conditional Use Permit for Phase I of the Studio Crossing MPD.
10. On September 19, 2024, an Administrative Conditional Use Permit application was submitted to the Planning Department for Phase II of the Studio Crossing MPD.
11. On October 16, 2024, a complete application notice was sent to the Applicant.
12. For the Phase II development, the Applicant proposes two approximately 15,000-square-foot retail buildings to be located at 3958 and 3952 Front Street.
13. The Applicant proposes 131 surface-level Parking Spaces to be constructed in Phase II.
14. The Application complies with the Studio Crossing Subdivision Plat.
 - a. The proposed retail buildings will be located within the platted building Pod 1 and 4.

15. The Application complies with the Development Agreement for the Studio Crossing MPD.
 - a. The proposed plans comply with the Planning Commission's November 9, 2022, approval of the Studio Crossing MPD.
 - b. The Studio Crossing MPD includes "two commercial buildings totaling 30,000 square feet. Each building is 1-story with a Building Height of 25 feet, meeting the zone height. Each building contains 15,000 square feet of 'community focused, small-scale commercial, retail or restaurant' space. A community plaza area connects the Phase 1 and Phase 2 buildings. No residential units are proposed as part of Phase 2."
 - c. The South Retail building contains 14,844 square feet of commercial space and the North Retail building contains 14,875 square feet of commercial space.
16. The Application complies with Land Management Code Chapter 15-3 Off-Street Parking
 - a. LMC § 15-3-6(B) outlines parking requirements for non-residential uses. The Applicant does not have proposed uses for the commercial space in Phase II. Major Retail Commercial and Intensive Office Uses require five Parking Spaces per 1,000 square feet of net leasable floor Area.
 - b. The Parking requirement based on 29,718 square feet of assumed Major Retail Commercial space or Intensive Office space and the proposed residential units is 149 Parking Spaces required for Phase II based on LMC § 15-3-6.
 - c. The Planning Commission reviewed a Parking Analysis submitted by the Applicant on November 9, 2022. According to the Development Agreement, the Applicant is required to construct 566 Parking Spaces for all phases of development. The Applicant proposes 131 Parking Spaces to be constructed for Phase II.
 - d. The Applicant proposes the following phased approach to meet the required 566 Parking Spaces:
 - i. Phase 1 Mixed Use: 190 Parking Spaces
 - ii. Phase 2 Retail: 131 Parking Spaces
 - iii. Phase 3 Apartments: 113 Parking Spaces
 - iv. Phase 4 Townhomes: 60 Parking Spaces
 - v. Phase 5 Condos: 72 Parking Spaces

- e. LMC § 15-3-3(D) requires 20 percent of the Parking Area to be landscaped.
 - i. The Applicant proposes 35,731 square feet of landscaped area, approximately 20 percent of the total Parking Area
 - f. LMC § 15-3-3(E) requires 15 percent of the Parking Area to be Snow Storage
 - i. The Applicant proposes 28,179 square feet, or 15 percent, of the Parking Area for Snow Storage.
17. The Application, as conditioned, complies with the Conditional Use Permit criteria outlined in LMC § 15-1-10(E)
- a. Size and Location of the Site
 - i. The proposed buildings for Phase II comply with the approved Subdivision Plat, and the MPD plans reviewed and approved by the Planning Commission on November 9, 2022.
 - b. Traffic considerations
 - i. The Planning Commission reviewed a Trip Generation Memorandum for the proposed MPD on November 9, 2022, and determined the proposed mix of uses was appropriate for the surrounding streets.
 - c. Utility capacity
 - i. The Development Review Committee reviewed the application on November 5, 2024.
 - d. Emergency vehicle access
 - i. The Park City Fire District approved the proposed project on April 18, 2024 and November 5, 2024.
 - e. Off-Street parking
 - i. LMC § 15-3-6(B) outlines parking requirements for non-residential uses. The Applicant does not have proposed uses for the commercial space in Phase II. Major Retail Commercial and Intensive Office Uses require five Parking Spaces per 1,000 square feet of net leasable floor Area.
 - ii. The Parking requirement based on 29,718 square feet of assumed Major Retail Commercial space or Intensive Office space and the proposed residential units is 149 Parking Spaces required for Phase II based on LMC § 15-3-6.

- iii. The Planning Commission reviewed a Parking Analysis submitted by the Applicant on November 9, 2022. According to the Development Agreement, the Applicant is required to construct 566 Parking Spaces for all phases of development. The Applicant proposes 131 Parking Spaces to be constructed for Phase II.
- iv. The Applicant proposes the following phased approach to meet the required 556 Parking Spaces:
 - 1. Phase 1 Mixed Use: 190 Parking Spaces
 - 2. Phase 2 Retail: 131 Parking Spaces
 - 3. Phase 3 Apartments: 113 Parking Spaces
 - 4. Phase 4 Townhomes: 60 Parking Spaces
 - 5. Phase 5 Condos: 72 Parking Spaces
- f. Internal vehicular and pedestrian circulation system
 - i. Vehicle Access is located off State Route 248 (Kearns Blvd). The Applicant obtained a Conditional Access Permit from UDOT for vehicle access on January 3, 2024.
- g. Fencing, Screening, and landscaping
 - i. There is no fencing proposed, and the Applicant has submitted a Landscape Plan that is compliant with LMC § 15-5-5(N).
- h. Building mass, bulk, and orientation
 - i. The proposed buildings for Phase II are compliant with the MPD site plan reviewed and approved by the Planning Commission November 9, 2022.
- i. Useable Open Space
 - i. MPDs require a minimum of 60% Open Space. However, the previous MPD had no minimum Open Space requirement per the Annexation Agreement. The updated Studio Crossing MPD site plan increases the amount of Open Space over the previously approved MPD.
- j. Signs and lighting
 - i. All proposed signs must be approved through a Sign Permit submitted to the Planning Department prior to installation. A Master Sign Plan must be submitted to the Planning Department prior to any individual sign permit.
 - ii. All outdoor lighting must be down-directed, fully shielded, with bulbs 3000-degree Kelvin or less. A fully shielded light is installed in such

a manner that all light emitted either directly from the bulb, or indirectly by reflection or refraction, is below the horizontal plane through the fixture's lowest light-emitting part. The top and sides of a Fully Shielded fixture are made of completely opaque material such that light only escapes through the bottom of the fixture. Final lighting details shall show compliance with this condition and shall be reviewed by the Planning Staff prior to installation.

- k. Physical design and Compatibility with surrounding Structures in mass, scale, style, design, and architectural detailing
 - i. The proposed buildings for Phase II are compliant with the MPD site plan and elevation drawings reviewed and approved by the Planning Commission November 9, 2022.
 - ii. The proposed retail buildings comply with the Architectural Design Guidelines for the Film Studio MPD.
- l. Noise, vibration, odors, steam, or other mechanical factors
 - i. Any proposed commercial uses must comply with the City Noise Ordinance.
- m. Control of delivery and service vehicles, loading and unloading zones, and Screening of trash and recycling pickup Areas
 - i. The Applicant proposes to screen the trash and recycling areas with metal panel enclosures with standing seam metal roofs and heavy-duty metal gates. The trash and recycling areas will not be visible from Kearns Blvd and comply with all property Setbacks.
- n. Expected ownership
 - i. The owner of record for Studio Crossing is Quinn Capital Partners, LLC, and has signed off on this application.
- o. Within and adjoining the Site, Environmentally Sensitive Lands, Physical Mine Hazards, Historic Mine Waste and Park City Soils Ordinance, Steep Slopes, and appropriateness of the proposed Structure to the existing topography of the Site
 - i. The Site does not contain any mine hazards or mine waste, is not within the Soils Ordinance boundary, and does not contain and Steep Slopes.
- p. Review for consistency with the goals and objectives of the Park City General Plan

- i. Goal 7 of the Park City General Plan is to create a diversity of primary housing opportunities. This project adds to the affordable rental stock of Park City, increasing housing opportunities for Park City residents and workers.

Conclusions of Law

1. The proposal complies with the Land Management Code requirements, Studio Crossing MPD, and LMC Section 15-1-10(E) Conditional Use Permits.
2. The Use will be compatible with surroundings Structures in use, scale, mass, and circulation.
3. The effects of any differences in use or scale have been mitigated through careful planning.

Conditions of Approval

1. Any changes, modifications, or deviations from the approved plans that have not been approved in advance by the Planning Department may result in a stop work order.
2. The Applicant is responsible for notifying the Planning Department prior to making any changes to the approved plans.
3. Any changes, modifications, or deviations from the approved scope of work shall be submitted in writing for review and approval/denial in accordance with the applicable standards by the Planning Director or designee prior to construction.
4. The majority of the 60,000 square feet of Commercial Uses in the project shall be limited to smaller-scale community oriented commercial Uses set forth in the Application and Final Plan Set dated October 26, 2022, and the applicant shall not be required to return to the Planning Commission for a CUP unless noted herein. Any Conditional Use that requires a CUP in the Regional Commercial Overlay and has a parking requirement of 5 stalls per 1,000 square feet or greater, shall require a CUP except for Restaurants, Bars, or Child Care Centers. A detailed parking analysis shall be submitted at the time of CUP application to allow Planning Staff to calculate the parking demand in relation to the parking supply. Telecom Antennas, Office Intensive, Retail/Service Intensive, and Medical Office/Clinic shall require a CUP.
5. The Planning Department shall complete an Administrative CUP for any Child Care Center, Intensive Office, and/or Major Retail or Major Service Use, to ensure that most of the Commercial Uses are smaller-scale and community oriented, and that there is sufficient parking and/or drop off/pick-up areas for the

proposed mix of uses. A detailed parking analysis shall be submitted at the time of Administrative CUP application to allow Planning Staff to calculate the parking demand in relation to the parking supply.

6. Commercial Uses shall not include Hotels of any kind, any business with a Drive-Up window, or Gasoline Service Station.
7. Signs for commercial uses must receive a sign permit from the Planning Department. A Master Sign Plan must be submitted to the Planning Department prior to any individual sign permit.
8. Rooftop mechanical equipment shall be architecturally screened from public view.
9. All prior Conditions of Approval for the Studio Crossing MPD and Plat Amendment continue to apply.

1300 Snow Creek Drive – Modification to Administrative Conditional Use Permit – PL-24-06217 – Proposing a Modification to the 2008 Administrative Conditional Use Permit for Outdoor Dining for Wasatch Bread and Bagel in the Snow Creek Master Planned Development and Recreation Commercial Overlay and Residential Development – Medium Density Zoning District.

Planner Jaron Ehlers stated that staff needed more time to analyze this proposal and recommended this item be continued to November 21, 2024.

At 12:10 PM, the Planning Director opened a public hearing. There was no public input.

At 12:10 PM, the Planning Director closed the public hearing.

MOTION: The Assistant Planning Director **CONTINUED** the Modification to Administrative Conditional Use Permit to November 21, 2024.

218 Sandridge Road – Historic District Design Review – PL-23-05692 – Proposing a New Detached Accessory Building and New Addition to a Historic Structure in the Historic Residential – 1 Zoning District.

Planner Jacob Klopfenstein presented the application and noted that the proposal complies with the Lot Size requirements, Building Height and Interior Building Height requirements of the Land Management Code. Planner Klopfenstein also gave an overview of the Conditions of Approval and recommended that Finding of Fact #9 be amended to indicate that the plat was recorded on October 29, 2024.

At 12:20 PM, the Assistant Planning Director opened a public hearing. There was no public input.

At 12:21 PM, the Assistant Planning Director closed the public hearing.

MOTION: The Assistant Planning Director **APPROVED** the Historic District Design Review in accordance with the Findings of Fact, Conclusions of Law, and Amended Conditions of Approval.

Findings of Fact

1. 218 Sandridge Road is a Single-Family Dwelling in the Historic Residential – 1 (HR-1) Zoning District.
2. The Site is designated a Significant Historic Site on Park City's Historic Sites Inventory.
3. The house first appears on the 1889 Sanborn Fire Insurance Map as a simple, hall-parlor style house with a half-width front porch facing north.
4. On May 31, 2023, the applicant submitted a complete Historic District Design Review (HDDR) application to the Planning Department for modifications to and the construction of an addition to the Significant Historic Structure.
5. The proposed removal of the 1941 addition's roof restores the roofline of the 1907 addition.
6. The proposed modification of 64 square feet of 1889 roof does not negatively impact the historic Roof Form.
7. Following a public hearing held on November 1, 2023, the Historic Preservation Board approved the Material Deconstruction of the 1941 addition's roof form.
8. Following a public hearing held on February 7, 2024, the Historic Preservation Board approved the Material Deconstruction of 48 square feet of 1940s siding from the southern facade and denied the Material Deconstruction of 64 square feet of the 1889 roof form.
9. On June 26, 2024 the Planning Commission conducted a public hearing and approved the Plat Amendment request for 218 Sandridge Road. The plat has not yet been recorded with Summit County.
10. On August 14, 2024, the Planning Commission conducted a public hearing and approved the Steep Slope Conditional Use Permit for 218 Sandridge Road.
11. Additions and renovations to Historic Residential Sites are reviewed for compliance with Land Management Code Section 15-13-2 *Regulations For Historic Residential Sites*.

12. Analysis from the November 7, 2024 Administrative Public Hearing Staff Report is incorporated herein.
13. On October 23, 2024 staff published notice on the City's website and posted notice to the property. Staff mailed courtesy notice to property owners within 100 feet on October 23, 2024.

Conclusions of Law

1. The proposal complies with the Historic Preservation Board's February 7, 2024 Material Deconstruction Findings of Fact, Conclusions of Law and Conditions of Approval.
2. The proposal complies with the Planning Commission's June 26, 2024 Plat Amendment Findings of Fact, Conclusions of Law and Conditions of Approval.
3. The proposal complies with the Planning Commission's August 14, 2024 Steep Slope Conditional Use Permit Findings of Fact, Conclusions of Law and Conditions of Approval.
4. The proposal, as conditioned, complies with Land Management Code Section 15-13-2 *Regulations For Historic Residential Sites*.

Conditions of Approval

1. The Applicant shall protect all vegetation not approved for removal during construction. Any vegetation removed or damaged during construction shall be replaced. Any Significant Vegetation removed or damaged during construction requires replacement on Site and shall comply with Municipal Code of Park City Chapter 11-21 *Utah Wildland -Urban Interface Code*.
2. The Applicant shall submit a detailed landscaping and irrigation plan demonstrating compliance with LMC Section 15-5-5(N) to the Planning Department for review and approval prior to Building Permit issuance.
3. The Applicant shall submit detailed storm water and drainage mitigation plans to the Engineering Department for review and approval prior to Building Permit issuance.
4. The new driveway shall not exceed 10 feet in width. The Applicant shall incorporate additional landscaping adjacent to the proposed driveway to minimize the visual impacts of the new driveway and provide separation between the driveway and other adjacent uses
5. The new driveway shall be constructed out of a textured or pour paving material.
6. Pursuant to LMC Section 15-2.2-3(K), the applicant shall obtain Chief Building Official approval for proposed snow release plans for the Site. The Applicant

- shall provide adequate snow storage for the new driveway on site and shall obtain Engineering Department approval for proposed snow storage areas prior to Building Permit issuance.
7. Drainage infrastructure, including gutters and downspouts, shall be configured so that water drains away from the Historic Structure. New hanging gutters shall be half round, and downspouts shall be located away from architectural features and be visually minimized from the public Right-of Way. Drainage shall also be improved behind retaining walls, so water drains away from the walls to abate retaining wall failure.
 8. Any mechanical, utility, or service equipment shall be fully screened from view from the public right-of-way and shall be located on tertiary facades of the Historic Structure. Building elements of the Historic Structure shall not be removed or obstructed when installing mechanical systems and equipment.
 9. Garage doors shall not exceed 9 feet in width by 9 feet in height. Glazing on garage doors shall be limited to no more than 30% of the garage door.
 10. New decks shall be constructed out of wood and be self-supporting.
 11. Significant Vegetation removed for the proposed Accessory Building shall be replaced on the Site and shall comply with Municipal Code of Park City Chapter 11-21 *Utah Wildland -Urban Interface Code*.
 12. Pursuant to LMC Section 15-4-2, new retaining walls shall not exceed 6 feet within any Rear or Side Setbacks or 4 feet within any Front Setback. New retaining walls shall be constructed out of simple board-formed concrete, stone, or another historic material. Stone or concrete retaining walls shall not be painted, stained, or plastered over.
 13. All new siding shall be wood and shall be painted opaque.
 14. New windows shall be wood or aluminum-clad wood and shall maintain a 2:1 height to width ratio. Any new glazing shall match the visual appearance of historic glazing and/or be clear. Metallic, frosted, tinted, stained, textured and reflective finishes are prohibited.
 15. New decks within the Rear or Side Setback shall be no greater than 30 inches above Final Grade and shall be located at least 1 foot from the property line. Decks within the Front Setback shall be no more than 10 feet wide and shall project no more than 3 feet into the Front Setback.
 16. The landscape terrace on the northwest side of the Historic Structure shall be at-grade and shall not be attached to the Historic Structure. The landscape terrace

shall be constructed of wood, brick, or another compatible historic material and shall be fully screened from public Rights-of-Way.

The Park City Administrative Public meeting adjourned at 12:21.

Approved by Assistant Planning Director:

A handwritten signature in blue ink, reading "Elissa Martin". The signature is written in a cursive, flowing style.



218 Sandridge Road

Historic District Design Review

Administrative Public Hearing | November 7, 2024
PL-23-05692

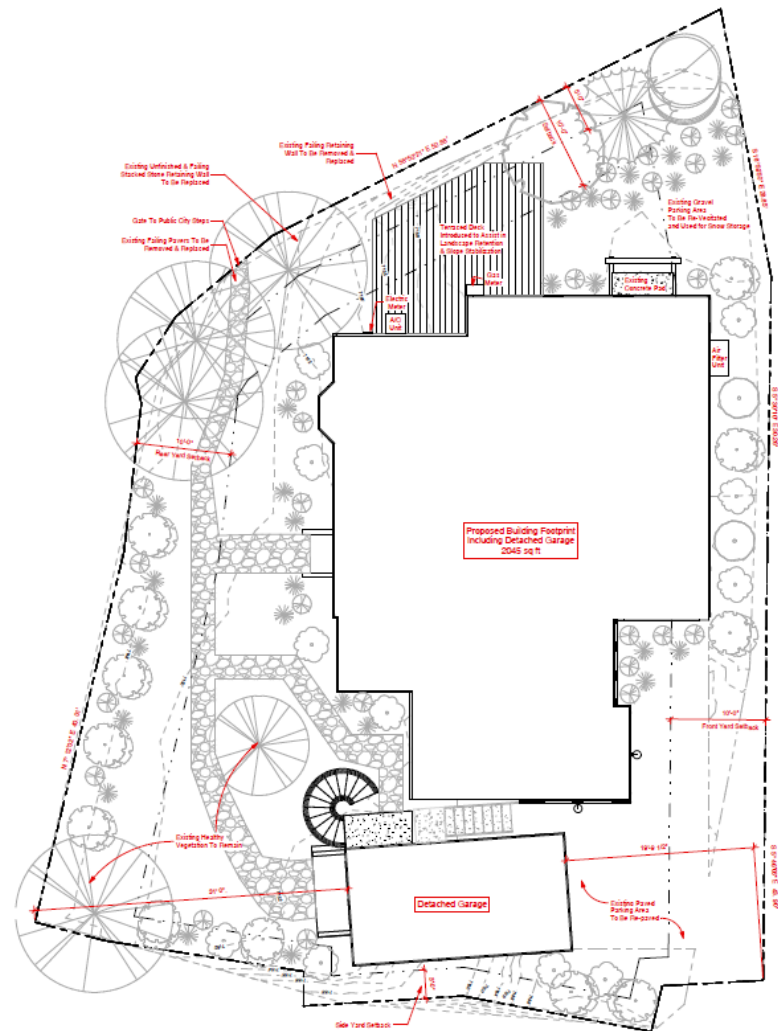
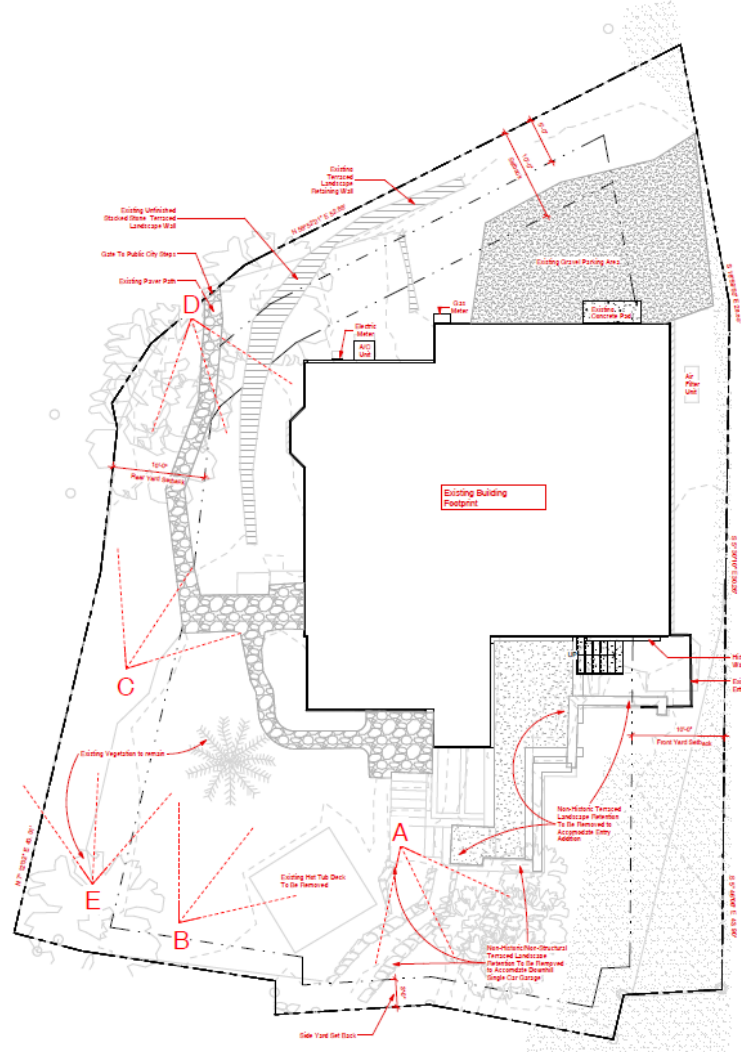


218 Sandridge HDDR

Summary

- Significant Historic Structure, constructed c. 1895
- HR-1 Zoning District
- Applicant proposes to:
 1. Construct 556-square-foot detached Accessory Building, with a garage on the upper level and storage space on the lower level
 2. Build a 334-square-foot addition to the Historic Structure that includes an attached entrance foyer and vestibule transitional element that centralizes vertical circulation between floors
 3. Remodel the Single-Family Dwelling and add additional living space on upper and lower levels





218 Sandridge



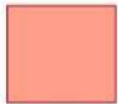
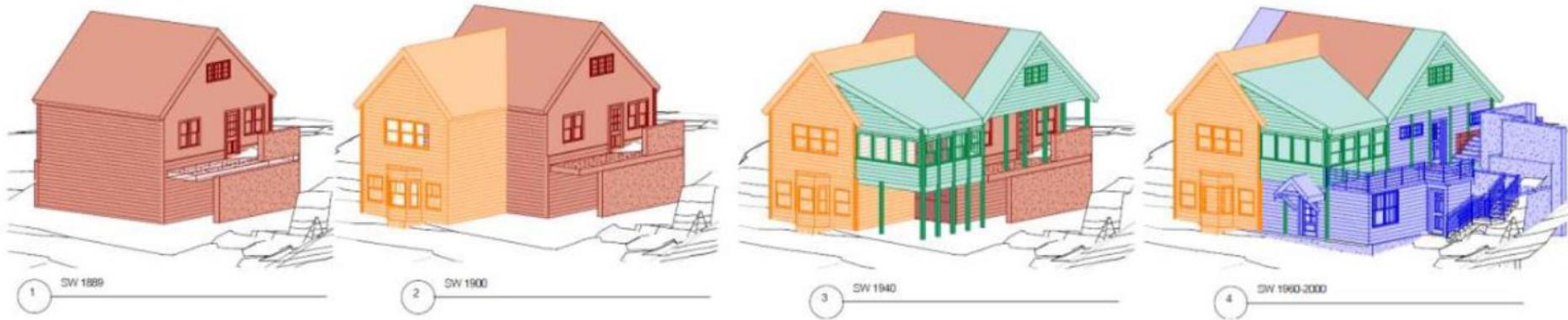
218 Sandridge



218 Sandridge



218 Sandridge



1889 Original
Build



1900
Addition



1940-1941
Additions



1960-2000
Additions

218 Sandridge HDDR

Background - HPB

- Nov. 1, 2023
 - Approved Material Deconstruction of 1941 roofline
 - Found that removal of 1941 roofline would restore 1907 roofline
- Feb. 7, 2024
 - Approved Material Deconstruction of 48 square feet of 1940s-era siding from southern façade
 - Approved Material Deconstruction of 64 square feet of 1889 roof form
 - Found that removal of the 1889 roof form did not negatively impact the historic roof form



218 Sandridge HDDR

Background - PC

- June 26, 2024
 - Planning Commission approved Plat Amendment for 218 Sandridge
 - Established a Lot size of 5,835 square feet
 - Established maximum building footprint of 2,048 square feet
 - Recorded as of October 29, 2024
- August 14, 2024
 - Planning Commission approved Steep Slope CUP for detached Accessory Building



218 Sandridge HDDR

Lot & Site Requirements

- HR-1 Zoning District
- Complies with Lot size requirements: Plat established Lot size and maximum Building Footprint
- Complies with 27-foot maximum Building Height: Addition and detached Accessory Building are below 27 feet
- Complies with 35-foot maximum Interior Building Height:
 - a) Addition is approximately 28 feet, 3 inches
 - b) Detached Accessory building is 19 feet, 1 inch
- Snow release: COA #6 requires applicant to obtain Chief Building Official approval for snow release plans

218 Sandridge HDDR

Parking

- 2 spaces required for SFDs per LMC § 15-3-6(A)
- Historic Structures that do not comply are considered valid Non-Complying Structures
- Applicant proposes 2 spaces: 1 in single-car garage and 1 in the driveway leading to the garage
 - a) Garage space is 11 feet, 3 inches wide and 22 feet deep
- Cars currently park on a gravel area north of the Historic Structure
 - a) SSCUP approval requires applicant to revegetate this area and limits parking to garage and driveway only

218 Sandridge HDDR

Historic Regulations/COAs

- Proposal complies as conditioned with LMC § 15-13-2 *Regulations for Historic Residential Sites*
- **Conditions of Approval 1 & 2:** Require protection of existing vegetation, replacement of any removed vegetation, and submittal of detailed landscaping plan
- **Conditions of Approval 4 & 5:** Requires additional landscaping for driveway and maximum driveway width of 10 feet; textured/pour paving material

218 Sandridge HDDR

Historic Regulations/COAs

- **Condition of Approval 7:** Requires drainage infrastructure to drain water away from Historic Structure and away from retaining walls; requires gutters to be half-round and visually minimized
- **Condition of Approval 9:** Limits garage doors to 9x9 feet and glazing on garage doors to 30%
- **Condition of Approval 11:** Requires on-site replacement of Significant Vegetation removed for Accessory Building



218 Sandridge HDDR

Historic Regulations/COAs

- **Condition of Approval 12:** Limits retaining wall height to 6 feet in Rear/Side Setbacks and 4 feet in Front Setbacks; requires appropriate material for retaining walls and prohibits painting over stone or concrete
- **Condition of Approval 13:** Requires new siding to be painted opaque
- **Condition of Approval 14:** Requires new windows to be wood or aluminum-clad and maintain 2:1 ratio; prohibits non-clear finishes for windows



218 Sandridge HDDR

Historic Regulations/COAs

- **Condition of Approval 10:** New decks must be wood & self-supporting
- **Condition of Approval 15:** Decks within Rear/Side Setbacks limited to 30 inches from Final Grade; Decks within Front Setbacks limited to 10-foot width and no more than 3 feet into Setback
- **Condition of Approval 16:** Landscape terrace proposed on north side of Historic Structure must be at-grade, not attached to the Historic Structure, constructed of compatible material and fully screened
 - Applicant indicated the design will comply



218 Sandridge HDDR

Historic Regulations/COAs

- Other conditions related to water and drainage, snow release outlined in the draft Final Action Letter



218 Sandridge HDDR

Recommendation

- Amend Finding of Fact #9 to indicate that the 218 Sandridge Plat was recorded on October 29, 2024.
- Review the HDDR, conduct a public hearing, and consider approving the HDDR based on the Findings of Fact, Conclusions of Law, and Conditions of Approval, as amended, in the Draft Final Action Letter.