

City of Portland, Oregon Bureau of Development Services

Land Use Services

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FROM CONCEPT TO CONSTRUCTION

Date:March 7, 2014To:Interested PersonFrom:Jennifer Kenny, Land Use Services
503-823-7011 / Jennifer.Kenny@portlandoregon.gov

NOTICE OF A TYPE II DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The reasons for the decision are included in the version located on the BDS website <u>http://www.portlandonline.com/bds/index.cfm?c=46429</u>. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

CASE FILE NUMBER: LU 13-239048 CU HR – ROOFTOP RADIO FREQUENCY ANTENNAS GENERAL INFORMATION

Applicant:	Roy Wily, AT&T Mobility Corporation 19801 SW 72nd Ave / Tualatin, OR 97062
Representative:	George Pierce, Ryka Consulting 918 South Horton St, Suite 1002 / Seattle, WA 98134
Owner:	Richard Singer, Rising Investments LLC 824 NW Albemarble Ter. / Portland, OR 97210
Site Address:	2199 NW EVERETT ST
Legal Description: Tax Account No.: State ID No.: Neighborhood: Business District: District Coalition: Plan District: Other Designations: Zoning:	BLOCK 36 TL 8500, KINGS 2ND ADD R452306260 1N1E33CA 08500 Quarter Section: 3027 Northwest District, contact John Bradley at 503-313-7574. Nob Hill, contact Mike Conklin at 503-226-6126. Neighbors West/Northwest, contact Mark Sieber at 503-823-4212. Northwest A non-contributing resource in the Alphabet Historic District RH, High Density Residential with Historic Resource Protection Overlay
Case Type:	Conditional Use and Historic Resource Review
Procedure:	Type II, an administrative decision with appeal to the Landmarks Commission.

Proposal:

The applicant seeks Historic Resource Review and Conditional Use approval for new radio frequency telecommunications equipment on the rooftop of the apartment building at 2199 NW Everett, a non-contributing resource within the Alphabet Historic District. The application includes removal of six flush mounted antennas, placement of four antennas within a shroud and two antennas flush mounted on the existing penthouse. Because the proposal is for non-exempt exterior alterations at a site within a historic district, approval is required prior to issuance of building permits. The application is also for Conditional Use because the site is within a Residential zone.

The following will occur at each sector:

- East Elevation (Alpha Sector): Antennas relocated from current area will be painted to match conditions in new location on existing penthouse.
- West Elevation (Beta and Gamma Sectors): Four new antennas and a new stealth screen will be installed. The screen will be painted to match the existing building, textured to match the stucco finish.
- South Elevation (Current Alpha Sector): Two antennas to be removed.
- West Elevation: Portion of existing cable tray to be removed.

The antennas will be located 16'-5" above the rooftop.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

- Code Chapter 33.815.225 Conditional Use Approval Criteria
- Code Chapter 33.274 Radio Frequency Transmission Facilities
- Community Design Guidelines
- Alphabet Historic District Community Design Guidelines Addendum

ANALYSIS

Site and Vicinity: The subject site is a non-contributing building, constructed in 1952. The site is within the Alphabet Historic District, an area of Portland significant for its concentration of intact late 19th and early 20th Century middle class housing stock and small-scale commercial buildings. Of special note are the many mid-sized apartment and institutional buildings. Many of these are in the various Period Revival styles, e.g. Tudor, Spanish Colonial, Byzantine, etc. The area is also characterized by a grid work of narrower, tree-lined, residential streets crossed by occasional more robust commercial avenues.

Zoning: The multi-dwelling zones, including RH, are intended to preserve land for urban housing and to provide opportunities for multi-dwelling housing. The RH zone is a high density multi-dwelling zone. Density is not regulated by a maximum number of units per acre. Rather, the maximum size of buildings and intensity of use is regulated by floor area ratio (FAR) limits and other site development standards. Generally the density will range from 80 to 125 units per acre. Allowed housing is characterized by medium to high height and a relatively high percentage of building coverage. The major types of new housing development will be low, medium, and high-rise apartments and condominiums. Generally, RH zones will be well served by transit facilities or be near areas with supportive commercial services.

The Historic Resource Protection chapter protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties.

Land Use History: City records indicate the following prior land use reviews for this site:

• LU97-014289 Rooftop Antennas and Related Equipment:

Approval of the conditional use to mount the proposed nine antennas on the roof of this apartment building, in accordance with Exhibits C-3,4 and 5, dated and approved April 18, 1997, subject to the following conditions: A. The antennas, mounting hardware, any equipment cabinets, and all visible cables and/or cable shrouds will be painted to match the color of the building surface to which they are mounted. Any future change in color of the building's surfaces must be matched by a matching change of color to

this antenna installation. B. The applicant must include a completed registration form for this wireless communications facility with the final plans submitted for the building permit review. No building permit will be issued without a completed registration form. Registration forms may be obtained from the Bureau of Planning.

• LU07-183555 ROOFTOP ANTENNAS AND RELATED EQUIPMENT:

Historic design review approval for the addition of radio frequency transmission facilities, including five (5) panel antennas, three (3) microwave dishes, five (5) DAP head units, two (2) equipment cabinets, and a screen enclosure, to the roof of an existing multi-story apartment building in the Alphabet Historic District. The equipment is to be located on the exterior face of two existing rooftop penthouses. Two equipment cabinets and five DAP head units, each measuring approximately 0'-6" deep, 0'-8" wide and 1'-8" tall, are to be installed on the east façade of the southernmost existing penthouse. A screen enclosure made of radio frequency transparent material with architectural details to match the existing penthouse is proposed to screen the new equipment cabinets. On the northernmost existing penthouse, two panel antennas are proposed for the west face, two panel antennas for the south face, and one panel antenna is to be located on the east face of the northernmost penthouse. One microwave antenna is proposed for the north face of the northernmost penthouse, and two microwave antennas are to be located on either side of the southeast corner of the penthouse.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **February 4, 2014**. No written responses were received.

Neighborhood Review: A "Notice of Proposal in Your Neighborhood" was mailed on February 4, 2014. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

1) CONDITIONAL USE REVIEW

Staff has considered all guidelines and addressed only those applicable to this proposal.

Section 33.815.010 Purpose

Certain uses are conditional uses instead of being allowed outright, although they may have beneficial effects and serve important public interests. They are subject to the conditional use regulations because they may, but do not necessarily, have significant adverse effects on the environment, overburden public services, change the desired character of an area, or create major nuisances. A review of these uses is necessary due to the potential individual or cumulative impacts they may have on the surrounding area or neighborhood. The conditional use review provides an opportunity to allow the use when there are minimal impacts, to allow the use but impose mitigation measures to address identified concerns, or to deny the use if the concerns cannot be resolved.

Section 33.815.225 Radio Frequency Transmission Facilities

These approval criteria allow Radio Frequency Transmission Facilities in locations where there are few impacts on nearby properties. The approval criteria are:

- **A. Approval criteria** for facilities operating at 1,000 watts ERP or less, proposing to locate on an existing building or other non-broadcast structure in an OS or R zone or in a C, E, or I zone within 50 feet of an R zone:
 - **1. The visual impact of an antenna must be minimized.** For instance, it can be hidden behind a compatible building feature such as a dormer, mounted flush to the facade of the building and painted to match, mounted on a structure designed with minimal bulk and painted to fade into the background, or mounted by other technique that equally minimizes the visual impact of the antenna.

2. Accessory equipment associated with the facility must be adequately screened. If a new structure will be built to store the accessory equipment, the new structure must be designed to be compatible with the desired character of the surrounding area and be adequately screened.

Findings for A-1 and 2: The visual impact of the proposed antennas is minimized by placing them inside radio frequency-transparent shrouds. The finish, texture, and color of the shrouds will match the finish, texture, and color of the building façade and existing shrouds on the building's rooftop. The two flush mounted antennas will be painted to match as well, thus the visual impact will be minimized. All other accessory equipment will be located on the interior of the building. *Therefore these criteria are met.*

2) RADIO FREQUENCY TRANSMISSION FACILITIES DEVELOPMENT STANDARDS

Staff has considered all guidelines and addressed only those applicable to this proposal.

Section 33.274.040 Purpose.

- Ensure that Radio Frequency Transmission Facilities will be compatible with adjacent uses;
- Reduce the visual impact of towers and accessory equipment in residential and open space zones whenever possible;
- Protect adjacent populated areas from excessive radio frequency emission levels; and
- Protect adjacent property from tower failure, falling ice, and other safety hazards.

C. General requirements

- **5. Radio frequency emission levels**. All existing and proposed Radio Frequency Transmission Facilities are prohibited from exceeding or causing other facilities to exceed the radio frequency emission standards specified in Table 274-1,_except as superseded by Part 1, Practice and Procedure, Title 47 of the Code of Federal Regulations, Section 1.1310, Radio Frequency Radiation Exposure Limits.
- **6. Antenna requirements**. The antenna on any tower or support structure must meet the minimum siting distances to habitable areas of structures shown in Table 274-2. Measurements are made from points A and B on the antenna to the nearest habitable area of a structure normally occupied on a regular basis by someone other than the immediate family or employees of the owner/operator of the antenna. Point A is measured from the highest point of the antenna (not the tower) to the structure, and Point B is measured from the closest point of the antenna to the structure.
- **11. Mounting device**. The device or structure used to mount facilities operating at 1000 watts ERP or less to an existing building or other non-broadcast structure may not project more than 10 feet above the roof of the building or other non-broadcast structure.

Findings for C-5, 6, and 11:

- As part of Exhibit C, the applicant has submitted an engineer's letter documenting that, with the proposed antennas, the telecommunications facility complies with the radio frequency emissions standards of Table 274-1 in Chapter 33.274.
- The attached narrative states that the facility is in compliance with the minimum siting distance to habitable areas (per Table 274-2 in Chapter 33.274).
- The flush mounted antennas and shroud will not exceed 6'5" and are thus under the 10' limit.

Therefore these criteria are met.

	Table 274 Radio Frequency Emissi	=	
Frequency Range	Mean Squared	Mean Squared	Equivalent
	Electric (E ²)	Magnetic (H ²)	Plane-Wave
	Field Strength	Field Strength	Power Density
	(V ² /m ²) [2] [.]	(A ² /m ²) [3]·	(mW/cm ²) [4]
100 KHz - 3 MHz	80,000	0.5	20
3 MHz - 30 MHz	4,000 (180/f ²) [5]	0.025 (180/f ²)	180/f ²
30 MHz - 300 MHz	800	0.005	0.2
300 MHz - 1500 MHz	4,000 (f/1500)	0.025 (f/1500)	f/1500
1500 MHz - 300 GHz	4,000	0.025	1.0

Notes:

[1] All standards refer to root mean square (rms) measurements gathered by an approved method.

[2] $V^2/m^2 =$ Volts squared per meter squared.

[3] $A^2/m^2 =$ Amperes squared per meter squared.

[4] $mW/cm^2 = Milliwatts$ per centimeter squared.

[5] f = Frequency in megahertz (MHz).

Table 274-2 Distance Between Antenna and Habitable Area of Structure (Where f is frequency in megahertz.)					
Effective Radiated Power	Frequency (MHz)	Point A: Minimum Distance From Highest Point of Antenna To Habitable Area of Structure (feet)	Point B: Minimum Distance From Closest Portion Of Antenna To Habitable Area of Structure (feet)		
< 100 watts		10	3		
100 watts to 999 watts		15	6		
1,000 watts to 9.999 Kw	< 7 7 - 30 30 - 300 300 - 1500 > 1500	11 f/0.67 45 780/vf 20	5 f/1.5 20 364/vf 10		
10 Kw plus	< 7 7 - 30 30 - 300 300 - 1500 1500	17.5 f/0.4 75 1300/vf 34	8 f/0.91 33 572/vf 15		

Staff note: The Federal Telecommunications Act of 1996 prohibits a local government from denying a request to construct such facilities based on "harmful radio frequency emissions" as long as the wireless telecommunications facility meets the standards set by the FCC. Furthermore, the Act required the FCC to adopt standards for radio frequency emissions from wireless telecommunications by August 1996. In a rule making procedure, the FCC adopted standards effective August 1, 1996, which are virtually the same as those reflected in Chapter 33.274, Table 274-1. Because this land use review was submitted after those standards took effect, this conditional use review cannot be denied solely on the issue of harmful radio frequency emission levels.

D. Additional requirements in OS, R, C, and EX zones and EG and I zones within 50 feet of an R zone.

Staff has considered all guidelines and addressed only those applicable to this proposal.

2. Standards. In addition to the regulations in Subsection C., above, facilities operating at 1,000 watts ERP or less located in OS, R, C, or EX zones or EG or I zones within 50 feet of an R zone must meet all of the following standards:

b. Antennas mounted on existing buildings or other non-broadcast structures. This standard only applies to facilities located in OS or R zones or within 50 feet of an R zone. The visual impact of antennas that are mounted to existing buildings or other non-broadcast structures must be minimized. For instance, on a pitched roof, an antenna may be hidden behind a false dormer, mounted flush to the facade of the building and painted to match; mounted on a structure designed with minimal bulk and painted to fade into the background; or mounted by other technique that equally minimizes the visual impact of the antenna. The specific technique will be determined by the conditional use review.

Findings for 2-b: The visual impact of the proposed antennas is minimized by placing them inside radio frequency-transparent shrouds. The finish, texture, and color of the shrouds will match the finish, texture, and color of the building façade and existing shrouds on the building's rooftop. The two flush mounted antennas will be painted to match as well, thus the visual impact will be minimized. All other accessory equipment will be located on the interior of the building. *Therefore this criterion is met.*

3) HISTORIC RESOURCE REVIEW

Section 33.846.060 – Purpose

Historic Resource Review ensures the conservation and enhancement of the special characteristics of historic resources.

Historic Resource Review Approval Criteria

Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the approval criteria have been met.

Findings: The site is located within the Alphabet Historic District and the proposal is for a non-exempt treatment. Therefore Historic Resource Review approval is required. The approval criteria are the *Community Design Guidelines* and the *Historic Alphabet District Community Design Guidelines Addendum*.

Staff has considered all guidelines and addressed only those applicable to this proposal.

<u>Historic Alphabet District - Community Design Guidelines Addendum</u>

2. Differentiate New from Old. New additions, exterior alterations, or related new construction will retain historic materials that characterize a property to the extent practicable. Replacement materials should be reasonable facsimiles of the historic materials they replace. The design of new construction will be compatible with the historic qualities of the district as identified in the Historic Context Statement.

3. Hierarchy of Compatibility. Exterior alterations and additions will be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, if located within a historic or conservation district, with the rest of the District. Where practical, compatibility will be pursued on all three levels. New development will seek to incorporate design themes characteristic of similar buildings in the Historic Alphabet District.

Findings for 2 and 3: Four of the antennas will be enclosed within a shroud (stealth screen) and two will be flush mounted on an existing penthouse. No historic materials will be removed. Both additions will be compatible with the existing building in terms of color and finish but do not mimic historic features; thus, they are differentiated from historic resources within the district. Similarly, because the additions will be compatible with the existing non-contributing resource, they will not further impact other resources within the district. *These guidelines are therefore met.*

Community Design Guidelines

Staff has considered all guidelines and addressed only those applicable to this proposal.

D6. Architectural Integrity. Respect the original character of buildings when making modifications that affect the exterior. Make additions compatible in scale, color, details, material proportion, and character with the existing building.

Findings for D6: The proposal follows the design principle of architectural integrity by integrating the new telecommunications equipment to the extent practicable. This integration is achieved by using a shroud that matches the building in color and finish, and likewise masking two exposed antennas through matching paint. *This guideline is therefore met.*

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

CONCLUSIONS

The proposed rooftop shroud containing antennas and the two flush mounted antennas comprise a relatively minor addition to the subject building that does not detract from the building's architectural integrity or result in visual degradation of the building or surrounding area, given the building's status of non-contributing within the historic district. The proposed equipment meets the approval criteria for this type of radio-frequency transmission facility. Therefore, approval is warranted for the Historic Resource Review and Conditional Use Review.

ADMINISTRATIVE DECISION

Historic Resource Review approval and Conditional Use approval of the following rooftop telecommunications equipment on the rooftop of a non-contributing building in the Alphabet Historic District and Northwest Plan District:

- East Elevation (Alpha Sector): Antennas relocated from current area will be painted to match conditions in new location on existing penthouse.
- West Elevation (Beta and Gamma Sectors): Four new antennas and a new stealth screen will be installed. The screen will be painted to match the existing building, textured to match the stucco finish.
- South Elevation (Current Alpha Sector): Two antennas to be removed.
- West Elevation: Portion of existing cable tray to be removed.

Approval per the approved site plans, Exhibits C-1 through C-5, signed and dated March 3, 2014, subject to the following conditions:

A. As part of the building permit application submittal, the following development-related conditions (B through C) must be noted on each of the 4 required site plans or included as a sheet

in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE - Case File LU 13-239048 CU HR." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."

- B. In perpetuity, the flush mounted antennas and stealth screen will match the building in color and texture.
- C. No field changes allowed.

Staff Planner: Jennifer Kenny

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Decision rendered by:

By authority of the Director of the Bureau of Development Services

Decision mailed: March 7, 2014

About this Decision. This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

Procedural Information. The application for this land use review was submitted on December 17, 2013, and was determined to be complete on January 31, 2014.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on December 17, 2013.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant did not waive or extend the 120-day review period. Unless further extended by the applicant, **the 120 days will expire on:** July 7, 2014.

Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

Conditions of Approval. If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

on March 3, 2014.

Appealing this decision. This decision may be appealed to the Landmarks Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on March 21, 2014** at 1900 SW Fourth Ave. Appeals can be filed Tuesday through Friday on the first floor of the Development Services Center until 3 p.m. After 3 p.m. and Mondays, appeals must be submitted to the receptionist at the front desk on the fifth floor. An appeal fee of \$250 will be charged. The appeal fee will be refunded if the appellant prevails. There is no fee for ONI recognized organizations appealing a land use decision for property within the organization's boundaries. The vote to appeal must be in accordance with the organization's bylaws. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Please see the appeal form for additional information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at www.portlandonline.com.

Attending the hearing. If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Landmarks Commission is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 775 Summer St NE, Suite 330, Salem, Oregon 97301-1283, or phone 1-503-373-1265 for further information.

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Landmarks Commission an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

If this Land Use Review is approved the final decision must be recorded with the Multnomah County Recorder. A few days prior to the last day to appeal, the City will mail instructions to the applicant for recording the documents associated with their final land use decision.

- Unless appealed, the final decision may be recorded on or after March 24, 2014.
- A building or zoning permit will be issued only after the final decision is recorded.

The applicant, builder, or a representative may record the final decision as follows:

- By Mail: Send the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to: Multnomah County Recorder, P.O. Box 5007, Portland OR 97208. The recording fee is identified on the recording sheet. Please include a self-addressed, stamped envelope.
- In Person: Bring the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to the County Recorder's office located at 501 SE Hawthorne Boulevard, #158, Portland OR 97214. The recording fee is identified on the recording sheet.

For further information on recording, please call the County Recorder at 503-988-3034 For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

Expiration of this approval. An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land

use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

Applying for your permits. A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Elevations (attached)
 - 3. Details
 - 4. Roof Plan
 - 5. Memo Describing Proposed Radio Frequency Limits
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses: No responses were received.
- F. Correspondence: No responses were received.
- G. Other:
 - 1. Original LU Application

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).











