

City of Portland, Oregon Bureau of Development Services

Land Use Services

Charlie Hales, Mayor Paul L. Scarlett, Director Phone: (503) 823-7300 Fax: (503) 823-5630 TTY: (503) 823-6868 www.portlandoregon.gov/bds

FROM CONCEPT TO CONSTRUCTION

 Date:
 May 7, 2013

 To:
 Interested Person

 From:
 Mark Walhood, City Planner

 503-823-7806 / mark.walhood@portlandoregon.gov

NOTICE OF A TYPE II DECISION ON A REVISED 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 13-109931 HDZ – $1812 \text{ NE } 25^{\text{TH}} \text{ Ave.}$ Alterations General information

Applicant:	Alex Yale / Yale Design Studio 725 NW Flanders St., Unit 306 / Portland, OR 97209
Property Owners:	Tamara Hillier and David Masuda 1812 NE 25th Ave / Portland, OR 97212
Site Address:	1812 NE 25TH AVE
Legal Description: Tax Account No.: State ID No.: Quarter Section: Neighborhood: District Coalition: Zoning:	BLOCK 7 LOT 3, WILD ROSE ADD R910201100 1N1E25CC 06200 2833 Irvington, contact Dean Gisvold at 503-284-3885. NE Coalition of Neighborhoods, Shoshana Cohen at 503-388-5004. R2a (Multi-Dwelling Residential 2,000 base zone with the 'a' or Alternative Design Density overlay zone), Albina Community plan district, Irvington Historic District
Case Type: Procedure:	HDZ (Historic Design Review)Type II, an administrative decision with appeal to the Landmarks Commission.

REVISED PROPOSAL: The owners of a non-contributing home in the Irvington Historic District, located at 1812 NE 25th Avenue, are seeking Historic Design Review approval to repair and replace the home's foundation and make significant changes to the exterior. The proposal involves temporarily lifting the structure and replacing the foundation, correcting on-site drainage issues, replacing the exterior structural masonry walls with new wood walls and siding, and replacing the front entry porch with a new porch structure.

The Irvington Historic District document identifies this home as non-contributing, including notes that the exterior has been modified with 'Victorian' shingles in the gables and a small balcony addition on top of the front porch with new doors. The applicant states that years of neglect for stormwater drainage has led to soil settlement under the home, leading to structural

compromise of the masonry building envelope. The home includes two 'wythes' of brick, or an inner wall and an outer wall, separated by a small air gap. The inner brick wall supports the interior finishes and would be retained, but the outer wall would be removed and replaced with a balloon frame wood system, with both walls resting on a new foundation.

The applicant has revised the proposal in response to staff and neighborhood association concerns. The size of the new basement level windows has been reduced, the new attached concrete planters at the entry stairs have been removed, and the second-floor street-facing french doors and balcony have been replaced by two double-hung windows. Otherwise, the proposal as described in the original notice remains the same.

Specific exterior alterations proposed include the following:

- Demolition of the existing exterior brick walls, front entry porch, and foundation;
- Temporarily lifting the home and constructing a new concrete and wood foundation;
- Constructing new exterior foundation walls and first floor walls with exterior wood lap siding (4" reveal), wood belly band, and wood trim;
- Re-using all the original fixed and hung wood windows on the main/first and upper/attic floor window openings in their original locations;
- Removal of the 'Victorian' shingles at the upper floor and replacement with new wood shake shingle siding;
- Reconstruction of a new front entry porch with boxed craftsman style columns, wood decking, wood railings and guardrail, shed-roofed porch cover with composition shingles, wood stairs with downlights, and four painted concrete stairs at the landing;
- New aluminum-clad wood street-facing double-hung windows at the street-facing gable end on the upper floor where french doors were located previously;
- New aluminum-clad wood windows and new doors and at the foundation/basement level in new locations; and
- Replacement of the existing rear wood deck and deck railing, except where reduced slightly in size to allow for a new basement entry door near the northeast corner.

Because the proposal involves alterations to a primary structure in a historic district, the proposal must receive consideration through the Historic Design Review process. Given the scope and valuation of the project, the request is considered through a Type II procedure.

RELEVANT APPROVAL CRITERIA: In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant criteria are found at **33.846.060.1-10, 'Other' Historic Design Review Approval Criteria**.

ANALYSIS

Site and Vicinity: The site is a standard 5,000 square-foot lot in the easterly portion of the Irvington neighborhood, with frontage on the east side of NE 25th Avenue between NE Broadway and NE Hancock Street. The area is developed primarily with large, vintage single-family homes from the early twentieth century, as found at this site and the immediately abutting sites to the north, south and east. The neighborhood does feature some infill apartment buildings, including one directly across NE 25th Avenue to the west. Commercial services are located nearby one block to the south, along the east-west Broadway/Weidler corridor.

The home on the site was originally constructed in 1913, is two stories in height with a gable roof and front porch, and has a brick and shingled exterior. A driveway and detached garage are located on the north side of the house, with the garage at the interior rear corner. Established street trees and front yard landscaping create a sense of buffering from the sidewalk for passersby, especially those in vehicles. The home and those in the immediate vicinity appear to be generally well-maintained.

Zoning: The Residential 2,000 (R2) base zone is a low-density multi-dwelling zone, where new development is typically characterized by duplexes, townhouses, and low-density garden apartments. The zone allows one dwelling unit per 2,000 square feet of site area, with some options for increased density if specific amenities are provided. Typically, as occurs in this instance, R2 zoning serves as a buffer between a commercial corridor and a single-family-zoned residential area. Development standards of the R2 zone appear to be met at this site.

The Alternative Design Density overlay zone provides limited opportunities for increased residential density for some projects, provided additional design standards are met. The 'a' overlay zone has no bearing on the current proposal.

The Irvington Historic District designation results in applying the regulations of the Historic Resource Protection overlay zone to the site. Most exterior alterations in historic districts, including this proposal, trigger Historic Design Review. The Albina Community plan district implements portions of the Albina Community Plan, but there are no mandatory regulations that impact this site: the only provision that applies would allow new development at the site to eliminate parking for up to five dwelling units.

Land Use History: City records indicate there are no prior land use reviews for this site.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **February 26, 2013**. The following Bureaus have responded with no issues or concerns:

The *Bureau of Environmental Services* (BES) has reviewed the proposal and cannot recommend approval at this time because the applicant has not addressed the new stormwater discharge point and whether a new connection will be required. The BES acknowledges that there are no stormwater-related approval criteria for this Historic Design Review. The BES is primarily informing the applicant of regulatory requirements that will apply during permitting, and seeking to eliminate the potential that site plan changes resulting from meeting those regulations would trigger a subsequent historic design review.

There is a public combination sewer located in NE 25th Avenue that serves the site. All development and redevelopment proposals are subject to the requirements of the City of Portland Stormwater Management Manual, however the proposal appears not to be either development or redevelopment. If the existing house currently discharges stormwater to the combination sewer then BES would not object to continuing to do so. If the existing house discharges on-property or to the right-of-way and proposes to discharge to the combination sewer then the applicant will be required to proceed through the Stormwater Hierarchy. The Hierarchy requires evaluation of on-site infiltration to the maximum extent feasible prior to offsite discharge. Where off-site discharge is necessary, BES requires Pollution Reduction and Flow Control (vegetated planter or basin). The BES has requested that the applicant submit further information regarding the existing and proposed stormwater management system. If a new connection is proposed then BES also requests a Simplified Approach Storm Report. A revised site plan would also be necessary to address any change in the discharge point.

Staff has discussed this issue with the applicant, and the applicant states that there is no change proposed to the existing stormwater management system, which discharges to the combination sewer through standpipes. Additional information will be provided by the applicant during the building permit review process. Because no changes to stormwater management are proposed, and because no new connections are proposed to the combination sewer, staff is proceeding with the Historic Design Review decision at the applicant's request without the supplemental site plan information. Also, unlike a new development or building expansion, the size and location of unbuilt land for potential future stormwater facilities (which appear not to be necessary at this time) is not changing. In this situation, even if additional stormwater facilities were required to be provided, such as new flow control planters or basins, these could be accomplished as detached landscape features in the existing yard, which would not be subject to Historic Design Review. The applicant will be required to provide additional

information as requested during the building permit review process. Exhibit E.1 contains staff contact and additional information.

The *Development Review Section of Portland Transportation* has responded that the site's existing frontage improvements exceed current City standards: there will be no property dedication or frontage improvements required in association with the proposed project. As there are no transportation-related approval criteria for this Historic Design Review, Portland Transportation has no objections to approval. Exhibit E.2 contains staff contact information.

The *Water Bureau* has reviewed the proposal and offered informational comments, but no objections or recommendations regarding this land use review. The site is provided water through a metered connection to the water main in NE 25th Avenue. Exhibit E.3 contains staff contact and additional information.

The *Fire Bureau* has reviewed the proposal and responded with no concerns. Exhibit E.4 is a hard copy printout of their electronic 'no concerns' response.

The Site Development Section of the Bureau of Development Services has reviewed the proposal and responded with technical details about decommissioning an historic cesspool on the property. City records indicate that the on-site sewage disposal facility was not decommissioned at the time the 1913-era residence was connected to the public sewer system on September 27, 2013. Prior to the (building permit) approval of the repair of the foundation of the residence, the applicant must decommission the cesspool. Historic plumbing records indicate that the cesspool (connected 1/29/13) is located 10 ft. west of the residence. To decommission a cesspool, the applicant must obtain a Sanitary Evaluation permit. Because the decommissioning activity is not tied to the approval criteria for Historic Design Review, and because the work will not have any impact on the exterior of the home itself and occurs underground, this information is related to the building permit process, and not the land use review. Exhibit E.5 contains additional technical details, as well as staff contact information.

The Urban Forestry Division of Portland Parks and Recreation has reviewed the proposal and responded that City code Title 20.40 requires a street tree review for new construction projects, improvements to existing structures that exceed \$25,000 in value, and to all land divisions. There is one mature street tree located adjacent to this property on NE 25th Ave. All existing street trees will be protected and preserved. A written permit from the City Forester is required to remove, destroy, cut, break, or injure any tree of any size in or upon any street, park, or public area as detailed in Title 20.40.090.D. The regulations of Title 20.40 do not apply to the on-site private property in this case, as the lot has an existing home and cannot be further subdivided under current zoning (20.42.010). Portland Parks and Recreation has no objections to this land use review if all tree cutting codes are met. Exhibit E.6 contains staff contact information.

The *Life Safety Section of the Bureau of Development Services* has reviewed the proposal and provided some preliminary Building Codes information, A separate building permit is required for the project, and the proposal must be designed to meet all applicable building codes and ordinances. Eaves less than three feet to a property line must be protected on the underside as required for one-hour fire-rated construction. The eave on the south side of the home is approximately 2'-6" from the south lot line, and therefore must have a fire-protected underside: with a simple flat boxed eave design, this is achievable without impacts to the exterior appearance of design of the home versus the existing and proposed conditions. Exhibit E.7 contains staff contact and additional information.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on February 26, 2013. One written response was received from the Irvington Community Association (ICA). The ICA has reviewed the proposal, but has not heard from any neighbors or from any other community members. The ICA has no objection to this application. However, the ICA requests that the applicant give consideration to removal of the french doors on the second story front

gable and replacement of such doors with a configuration featuring windows comparable to those on similar houses in the district. NOTE: The applicant did make some final revisions to the project, including replacing the noted french doors and balcony railing with a pair of double-hung wood windows in the same location, in response to the ICA concerns.

ZONING CODE APPROVAL CRITERIA

Chapter 33.846.060 - Historic Design Review

Purpose of Historic Design Review

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

Historic Design Review Approval Criteria

Requests for historic design 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 within the Irvington Historic District and the proposal is for nonexempt treatment. Therefore Historic Design Review approval is required. The approval criteria are those listed in 33.846.060 G – Other Approval Criteria.

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

33.846.060 G - Other Approval Criteria

1. Historic character. The historic character of the property will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the property's historic significance will be avoided.

Findings: Although the subject house was built in 1913, within the 1891-1948 period of significance for the Irvington Historic District, it is deemed noncontributing due to several exterior modifications to the original design. Under the Zoning Code this means that it does not possess historic character. *This criterion is not applicable.*

2. Record of its time. The historic resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.

Findings: By definition, this noncontributing resource is not a historic resource. *This criterion is not applicable.*

3. Historic changes. Most properties change over time. Those changes that have acquired historic significance will be preserved.

Findings: As noted in the first finding, the alterations to the subject house have resulted in its classification as noncontributing, and therefore they are not historically significant. *This criterion is not applicable*.

7. Differentiate new from old. New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a property. New work will be differentiated from the old.

8. Architectural compatibility. New additions, exterior alterations, or related new construction will be compatible with the resource's massing, size, scale, and architectural features. When retrofitting buildings or sites to improve accessibility for persons with disabilities, design solutions will not compromise the architectural integrity of the historic resource.

10. 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.

Findings: Notwithstanding the ambiguous language of Criterion 10, while the proposed alterations will remove the original brick siding and fundamentally alter the appearance of the home, it's categorization as a noncontributing resource relieves the applicant of the requirement to make changes that are compatible with the existing character. However, several aspects of the proposal mimic the extant original features of the home, including retention of the majority of the exterior windows, the roof form, and the height of the structure. The new exterior wood lap siding, front porch columns and stairs, and double-hung windows in the street-facing gable end are typical of neighboring, contributing properties in the district. Taken as an addition to the district, the proposal achieves a balance of compatibility and differentiation by adopting a strategy of imitating the historic context while using non-original siding materials, new basement-level window openings, and a slightly modified front porch design. *Therefore, these criteria are 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.

The Bureau of Environmental Services (stormwater management) and the Site Development Section of the Bureau of Development Services (decommission cesspool) have advised the applicant of issues that must be addressed during the building permit process for this project.

CONCLUSIONS

The proposed exterior alterations to the home, including the removal of original brick siding, is mainly justified by the noncontributing classification of the building. However, there appear to be significant structural issues related to the existing brick material, and a sincere effort is being made to retain original exterior windows and interiors (interiors are not under review). In general, the alterations to the home are in keeping with the materials, proportions, and architectural qualities of nearby contributing structures, and the applicant has made several minor changes in response to neighborhood and staff concerns. The home will still convey a sense of historic significance and be an asset to the district, despite it's official noncontributing status. Therefore, both the intent of the Historic Design Review process and the relevant approval criteria can be met, and the request must be approved.

ADMINISTRATIVE DECISION

Approval of **Historic Design Review** for exterior alterations to the home at 1812 NE 25th Avenue, in the Irvington Historic District, including the following specific changes:

- Demolition of the existing exterior brick walls, front entry porch, and foundation;
- Temporarily lifting the home and constructing a new concrete and wood foundation;
- Constructing new exterior foundation walls and first floor walls with exterior wood lap siding (4" reveal), wood belly band, and wood trim;
- Re-using all the original fixed and hung wood windows on the main/first and upper/attic floor window openings in their original locations;
- Removal of the 'Victorian' shingles at the upper floor and replacement with new wood shake shingle siding;

- Reconstruction of a new front entry porch with boxed craftsman style columns, wood decking, wood railings and guardrail, shed-roofed porch cover with composition shingles, wood stairs with downlights, and four painted concrete stairs at the landing;
- New wood street-facing double-hung windows at the street-facing gable end on the upper floor where french doors were located previously;
- New aluminum-clad wood windows and new doors and at the foundation/basement level in new locations; and
- Replacement of the existing rear wood deck and deck railing, except where reduced slightly in size to allow for a new basement entry door near the northeast corner.

This approval is granted based on the approved plans and drawings, Exhibits C.1 through C.27, all signed and dated May 2, 2013, and subject to the following condition:

A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibits C.1-C.27. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 13-109931 HDZ. No field changes allowed."

Staff Planner: Mark Walhood

Decision rendered by: on May 2, 2013.

By authority of the Director of the Bureau of Development Services

Decision mailed: May 7, 2013

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 January 29, 2013, and was determined to be complete on February 21, 2013.

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 January 29, 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 June 22, 2013.**

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.

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 May 21, 2013** 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 550 Capitol St. NE, Suite 235, Salem, Oregon 97301, 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 **May 22, 2013.**
- 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 Statements
 - 1. Original narrative with photos
 - 2. Engineering letter from Michael Patz, P.E.
 - 3. 4/15/13 memo provided with revised drawing sheets and replaced/outdated drawings
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Cover Sheet
 - 2. Existing/Demo Site Plan
 - 3. Proposed Site Plan (attached)
 - 4. Demo Basement Floor Plan
 - 5. Basement Floor Plan
 - 6. Demo First Floor Plan
 - 7. First Floor Plan
 - 8. Demo Second Floor Plan
 - 9. Second Floor Plan
 - 10. Demo Roof Plan
 - 11. Roof Plan
 - 12. Demo South Elevation
 - 13. South Elevation (attached)
 - 14. Demo North Elevation
 - 15. North Elevation (attached)
 - 16. Demo West Elevation
 - 17. West Elevation (**attached**)
 - 18. Demo East Elevation
 - 19. East Elevation
 - 20. Wall Section
 - 21. Wall Section
 - 22. Enlarged Porch Details
 - 23. Building Details
 - 24. Window and Door Schedule
 - 25. Window Cut Sheets
 - 26. Light Fixture Cut Sheets

- 27. Large, Scalable Plan Set matching C.1-C.24 above
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Bureau of Environmental Services
 - 2. Development Review Section of Portland Transportation
 - 3. Water Bureau
 - 4. Fire Bureau
 - 5. Site Development Review Section of BDS
 - 6. Bureau of Parks, Forestry Division
 - 7. Life Safety Review Section of BDS
- F. Correspondence:
 - Letter of support with suggestions from Irvington Community Association, rec'd. 3/19/13
- G. Other:
 - 1. Original LU Application Form and Receipt
 - 2. Incomplete letter sent to applicant 2/13/13

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).









