

## City of Portland, Oregon

### **Bureau of Development Services**

#### **Land Use Services**

FROM CONCEPT TO CONSTRUCTION

Amanda Fritz, Commissioner Paul L. Scarlett, Director Phone: (503) 823-7300 Fax: (503) 823-5630 TTY: (503) 823-6868 www.portlandoregon.gov/bds

**Date:** May 6, 2014

**To:** Interested Person

From: Mark Walhood, City Planner (503) 823-7806

mark.walhood@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 <a href="http://www.portlandonline.com/bds/index.cfm?c=46429">http://www.portlandonline.com/bds/index.cfm?c=46429</a>. 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 14-120330 DZM – OREGONIAN SIGNS AT CROWN PLAZA

#### **GENERAL INFORMATION**

**Applicant:** Amalia Mohr / FFA Architecture & Interiors, Inc.

530 SW Yamhill St., Suite 900 / Portland, OR 97204

Owner: Urban Office & Parking Facilities

111 SW Columbia St #1380 / Portland, OR 97201-5845

Site Address: 1500 SW 1ST AVE

Legal Description: BLOCK 116 TL 600, PORTLAND

**Tax Account No.:** R667710770 **State ID No.:** 1S1E03CA 00600

Quarter Section: 3229

**Neighborhood:** Portland Downtown, contact Jennifer Geske at 503-750-9843.

Business District: None

**District Coalition:** Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.

**Zoning:** CXd (Central Commercial base zone with Design overlay zone), Central

City plan district

Case Type: DZM (Design Review with Modifications)

**Procedure:** Type II, an administrative decision with appeal to the Design

Commission.

**PROPOSAL:** The applicant is working with the Oregonian newspaper to propose a series of four new signs on the Crown Plaza building in downtown Portland. The site location and zoning requires all signs over 32 square feet to receive approval through the Design Review process. One of the four signs near the building entry (sign #3 on the attached) is under 32 square feet and therefore exempt from Design Review.

The three signs under review include two large at-grade fascia signs on blank painted concrete walls at ground level facing either Clay Street or First Avenue, and one smaller fascia sign on the building parapet facing Naito Parkway. Specific sign details include the following:

- Sign #1 would be located on the upper portion of the ground floor wall facing south onto Clay Street, immediately west of SW Naito Parkway. The sign includes pin-mounted stainless steel letters on the lower portion, and a stainless steel 'O' logo that is held off from the wall and halo lit with LED lighting at night. With total dimensions of 20'-0" wide by 7'-1034" tall, this sign includes 157.92 square feet of sign area;
- Sign #2 is located under the existing sky-bridge over SW 1<sup>st</sup> Avenue just north of Market Street, facing the adjacent covered public sidewalk. The sign is similar in scale, appearance and materials to Sign #1, except the 'O' logo is not halo-illuminated. A rectangle measured around all the sign components is 9'-0" tall by 22'-9½" wide, for a total of 205.11 square feet of sign area; and
- Sign #4 is a smaller parapet sign near the top of the building facing east, adjacent to the northeast building corner at SW Naito Parkway and Clay Streets. Constructed of painted stainless steel letters and logo elements, each piece is separately pin-mounted to the building face and halo lit with LED lighting. This sign measures 6'-0" tall by 5'-4½" wide, for a total of 32.25 square feet.

**Modifications:** Sign regulations allow a maximum amount of signage for the site depending on the length of the primary building wall, and whether or not any freestanding signs occur on the same frontage as the primary building wall. In this case, with a 200'-long building, one main entry door facing SW 1st Avenue, and a freestanding sign on the same frontage, the building is allowed a total of 200 square feet of signage (32.32.020/Table 32.32-2). The same section of the Sign Code limits the maximum sign size in the CX base zone to 100 square feet.

The applicant identifies 53 square feet of existing signage on the building. A total of 464.28 square feet of signage is proposed, including all existing and proposed signage. Therefore, a Modification is necessary to increase the maximum allowable sign area for the building from 200 to 464.28 square feet. A second Modification is required to increase the maximum sign size for the two large signs (#1 and #2) from 100 to 157.92 and 205.11 square feet. Therefore, concurrent with the required Type II Design Review, the applicant has requested the two above Modifications to Sign Code standards.

**APPROVAL CRITERIA:** In order to be approved, this proposal must comply with the approval criteria of Title 33. The applicable criteria are the *Central City Fundamental Design Guidelines* and 33.825.040 Modifications That Will Better Meet Design Review Requirements.

#### **ANALYSIS**

**Site and Vicinity:** The Crown Plaza Building, on which the three signs are proposed, is an eleven story office structure, completed in 1971 and renovated in 1995. It and its associated parking structure each fully occupy the two blocks bounded by SW 2<sup>nd</sup> Avenue, SW Clay Street, SW Naito Parkway, and SW Market Street, with a sky-bridge joining the buildings across SW 1<sup>st</sup> Avenue one story above the street. The site is within the Central City Plan District and adjoins but is not within the South Auditorium Plan District. It is served by City Bikeways and Transit Streets on SW Naito and SW 1<sup>st</sup>, and the entire downtown area is a designated pedestrian zone.

**Zoning:** The Central Commercial (CX) zone is intended to provide for commercial development within Portland's most urban and intense areas. A broad range of uses is allowed to reflect Portland's role as a commercial, cultural and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together. Development is intended to be pedestrian-oriented with a strong emphasis on a safe and attractive streetscape.

The Design Overlay Zone promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. The Design Overlay Zone also promotes quality high-density development adjacent to transit facilities. This is achieved through the creation of design districts and applying the Design Overlay Zone as part of community planning projects, development of design guidelines for each district, and by requiring design review or compliance with the Community Design Standards. In addition,

design review or compliance with the Community Design Standards ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

**Land Use History:** City records indicate the following land use reviews for the property within the last ten years:

- LU 08-112464 DZ, approving security bars on the parking structure;
- LU 07-139805 DZ, approving screened, rooftop wireless communications equipment;
   and
- LU 06-123101 DZ, approving rooftop wireless communications equipment.

Public Notice: A "Notice of Proposal in Your Neighborhood" was mailed March 31, 2014.

**Agency Review:** None of the notified Bureaus has responded with issues or concerns.

**Neighborhood Review:** One written response has been received from either the Neighborhood Association or notified property owners in response to the proposal.

• John Russell, owner of a nearby building, wrote on April 1, 2014, with no objection to the proposal.

#### ZONING CODE APPROVAL CRITERIA

#### (1) Chapter 33.825 Design Review Section 33.825.010 - Purpose of Design Review

Design review ensures that development conserves and enhances the recognized special design values of a site or area. Design review is used to ensure the conservation, enhancement, and continued vitality of the identified scenic, architectural, and cultural values of each design district or area. Design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area. Design review is also used in certain cases to review public and private projects to ensure that they are of a high design quality.

#### Section 33.825.055 Design Review Approval Criteria

A design review application will be approved if the review body finds the applicant to have shown that the proposal complies with the design guidelines for the area.

**Findings:** The site is designated with Design Overlay zoning and the proposal is for non-exempt exterior alterations, therefore the proposal requires Design Review approval. Because of the site's location, the applicable design guidelines are the *Central City Fundamental Design Guidelines*.

#### Central City Fundamental Design Guidelines

These guidelines provide the constitutional framework for Design areas in the Central City.

The Central City Fundamental Design Guidelines and the River District Design Guidelines focus on four general categories. (A) Portland Personality, addresses design issues and elements that reinforce and enhance Portland's character. (B) Pedestrian Emphasis, addresses design issues and elements that contribute to a successful pedestrian environment. (C) Project Design, addresses specific building characteristics and their relationships to the public environment. (D) Special Areas, provides design guidelines for the four special areas of the Central City.

#### Central City Plan Design Goals

This set of goals are those developed to guide development throughout the Central City. They apply within the River District as well as to the other seven Central City policy areas. The nine goals for design review within the Central City are as follows:

- **1.** Encourage urban design excellence in the Central City;
- **2.** Integrate urban design and preservation of our heritage into the development process;
- **3.** Enhance the character of the Central City's districts;
- **4.** Promote the development of diversity and areas of special character within the Central

City;

- **5.** Establish an urban design relationship between the Central City's districts and the Central City as a whole;
- **6.** Provide for a pleasant, rich and diverse pedestrian experience for pedestrians;
- **7.** Provide for the humanization of the Central City through promotion of the arts;
- **8.** Assist in creating a 24-hour Central City which is safe, humane and prosperous;
- **9.** Ensure that new development is at a human scale and that it relates to the scale and desired character of its setting and the Central City as a whole.

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

- **A5. Enhance, Embellish, and Identify Areas.** Enhance an area by reflecting the local character within the right-of-way. Embellish an area by integrating elements in new development that build on the area's character. Identify an area's special features or qualities by integrating them into new development.
- **C2. Promote Quality and Permanence in Development.** Use design principles and building materials that promote quality and permanence.
- **C3. Respect Architectural Integrity.** Respect the original character of an existing building when modifying its exterior. Develop vertical and horizontal additions that are compatible with the existing building, to enhance the overall proposal's architectural integrity.
  - **Findings for A5, C2, and C3:** Contrary to normal Design Review expectations for oversize signs at ground level, in this case the two proposed large signs will work to the benefit of both the building and its surroundings because they create interest at existing, large, relatively featureless, expanses of concrete wall surface. On a building or other location with a greater level of ground floor detailing, signs of this size and type would not likely be approvable. In addition to enhancing their surroundings by providing needed interest, the proposed signs are well suited to their locations because they respect the character of the walls where they are to be located by leaving ample unused space both around and within the defined face area rectangle. The sign type, substantial pinmounted metal letters and in one instance a halo lit logo, is appropriate at street level because of its durability and pedestrian friendliness. *These guidelines are met*.
- **C12. Integrate Exterior Lighting.** Integrate exterior lighting and its staging or structural components with the building's overall design concept. Use exterior lighting to highlight the building's architecture, being sensitive to its impacts on the skyline at night.
- **C13. Integrate Signs.** Integrate signs and their associated structural components with the building's overall design concept. Size, place, design, and light signs to not dominate the skyline. Signs should have only a minimal presence in the Portland skyline.
  - **Findings C2 and C3:** As discussed above, the two proposed large ground-level signs are well integrated architecturally and minimally lighted. The third proposed sign, at just over 32 square feet, is a halo lit logo mounted at the parapet. It too respects the architecture of the building by leaving ample space around the sign face area. The proposed illumination will be subtle but sufficient to make the sign visible at night. Its effect on the skyline will be negligible and positive because it will add interest to an otherwise featureless building top. *These guidelines are met*.

#### (2) Chapter 33.425 Design Review

**Section 33.825.040 - Modifications That Will Better Meet Design Review Requirements** The review body may consider modification of site-related development standards, including the sign standards of Chapters 32.32 and 32.34 of the Sign Code, as part of the design review process. These modifications are done as part of design review and are not required to go through the adjustment process. Adjustments to use-related development standards (such as floor area ratios, intensity of use, size of the use, number of units, or concentration of uses) are

required to go through the adjustment process. Modifications that are denied through design review may be requested as an adjustment through the adjustment process. The review body will approve requested modifications if it finds that the applicant has shown that the following approval criteria are met:

- **A. Better meets design guidelines.** The resulting development will better meet the applicable design guidelines; and
- **B. Purpose of the standard.** On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

#### 32.10.020 Purpose

These (sign) regulations balance the need to protect the public safety and welfare, the need for a well maintained and attractive community, and the need for adequate identification, communication and advertising. The regulations for signs and awnings have the following specific objectives:

- **A.** To ensure that signs and awnings are designed, constructed, installed and maintained according to minimum standards to safeguard life, health, property and public welfare;
- **B.** To allow and promote positive conditions for sign communication while at the same time avoiding nuisances to nearby properties;
- **C.** To reflect and support the desired character and development patterns of the various zones, overlay zones, and plan districts and promote an attractive environment;
- **D.** To allow for adequate and effective signs in commercial and industrial zones while preventing signs from dominating the appearance of the area; and
- **E.** To ensure that the constitutionally guaranteed right of free speech is protected. The regulations allow for a variety of sign types and sizes for a site. The provisions do not ensure or provide for every property or business owner's desired level of visibility for the signs. The sign standards are intended to allow signs to have adequate visibility from streets and rights-of-way that abut a site, but not necessarily to streets and rights-of-way farther away.

The applicant is seeking two modifications to the Sign Standards in Table 32.32-2:

- to exceed the total square footage limit for signage on the building (200 square feet) by 264.28 square feet; and
- to exceed the maximum face area for any individual sign (100 square feet) in two cases, with signs of 157.92 and 205.11 square feet.
- **A. Better meets design guidelines.** The resulting development will better meet the applicable design guidelines; and

**Findings:** As discussed in the findings for guidelines A5, C2, and C3 above, the modifications to increase the overall allowed sign area for the building and exceed the standard limit on individual sign area better meet the approval criteria because they introduce needed interest to otherwise featureless expanses of ground level walls near the street.

However, future large signs on the building in these same two locations could technically be allowed as a 'copy change' in the same rectangle area defined by the proposed signs. Part of what makes the current signs acceptable even with their large size is the amount of empty, unoccupied space within the sign itself, with open wall space on either side of the large 'O' logo, and modest illumination. For sign #1 at ground level facing SW Clay Street, the illuminated O element is about 26 square feet, and the non-illuminated text at the bottom of the sign is about 60 square feet (measuring a rectangle around their outside edges). For sign #2 under the skybridge

along SW 1<sup>st</sup> Avenue, the sign measures 205.11 square feet, but the areas of non-illuminated sign image occupy only about 113 square feet, and no elements are illuminated.

To ensure that future signs maintain the elegant, open appearance of the current signs as proposed, with significant empty/open space within the rectangle that measures the sign area, and with only limited illumination of one of the two signs, a condition of approval will require that future copy changes for signs #1 and #2 not exceed the amount of activated sign text/image area and illumination within the sign as proposed in this application. Specifically, this will limit sign #1 to 86 square feet of text/image elements, including no more than 26 square feet of illuminated text/image area, within the total sign size of 157.92 square feet. On sign #2 the limitation is 113 square feet of text/image elements within the total sign size of 205.11 square feet. With the noted condition of approval regarding maximum size of text/image elements within the sign area of the two larger signs, this criterion can be met.

**B. Purpose of the standard.** On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

**Findings:** In addition to providing information to the public, the purpose of the Sign Code is to use signs to enhance the character of the areas where they are located. In this case the signs will add interest and quality to large, relatively featureless expanses of concrete wall adjacent to the sidewalk. Conditions of approval as noted above under findings for criterion A will ensure that future copy changes to these signs do not increase the illumination of visual mass presented by the signs at street level, preventing future sign clutter and unattractive streetscape impacts upon the pedestrians, in keeping with the intent of the Sign Code. With the noted condition of approval limiting the size of internal sign elements on signs #1 and #2 in the future, this criterion is 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 signs will both serve the purpose of identifying the location of the associated business and improve the pedestrian environment by introducing detail to otherwise blank painted concrete wall areas. The design review process exists to promote the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. With a condition of approval limiting the size of text/image elements within the two larger signs that require a Modification, the proposal can meet the applicable design guidelines and modification criteria and warrants approval.

#### ADMINISTRATIVE DECISION

**Approval** of **Design Review** to install three new (Oregonian) signs on the Crown Plaza office building at 1500 SW 1<sup>st</sup> Avenue. Individual signs measure 32.25, 157.92 and 205.11 square feet in size on a building in the Central City Plan District;

**Approval** of two **Modifications** to the Sign Standards in Table 32.32-2, for overall building sign area and two oversize signs, increasing the maximum size from 100 to 157.92 and 205.11 square feet, respectively;

Approvals are per Exhibits C-1 through C-8, signed and dated May 1, 2014, and subject to the following conditions:

- 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 through C-8. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 14-120330 DZM. No field changes allowed."
- B. Future copy changes to the two large signs triggering the sign size Modification must not exceed the proportion of active text/image area versus blank wall area, and no more illuminated elements beyond what is proposed. Specifically, this limits sign #1 on the ground floor facing Clay Street to 86 square feet of text/image elements, including no more than 26 square feet of illuminated text/image area, within the total sign size of 157.92 square feet. On sign #2 at the ground floor facing SW 1st Avenue under the skybridge, the limitation is 113 square feet of text/image elements within the total sign size of 205.11 square feet.

Staff Planner: Mark Walhood

Decision rendered by: MARK WALHOOD on It

Decision mailed: May 6, 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 February 25, 2014, and was determined to be complete on March 24, 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 February 25, 2014.

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.

#### 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 Design Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on May 20, 2014** at 1900 SW Fourth Ave. Appeals can be filed at the Development Services Center Monday through Wednesday and Fridays between 8:00 am to 3:00 pm and on Thursdays between 8:00 am to 2:00 pm. After 3:00 pm Monday through Wednesday and Fridays, and after 2:00 pm on Thursdays, appeals must be submitted at the reception desk on the 5<sup>th</sup> 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 <a href="https://www.portlandonline.com">www.portlandonline.com</a>.

**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 Design 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 Design 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 21, 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:

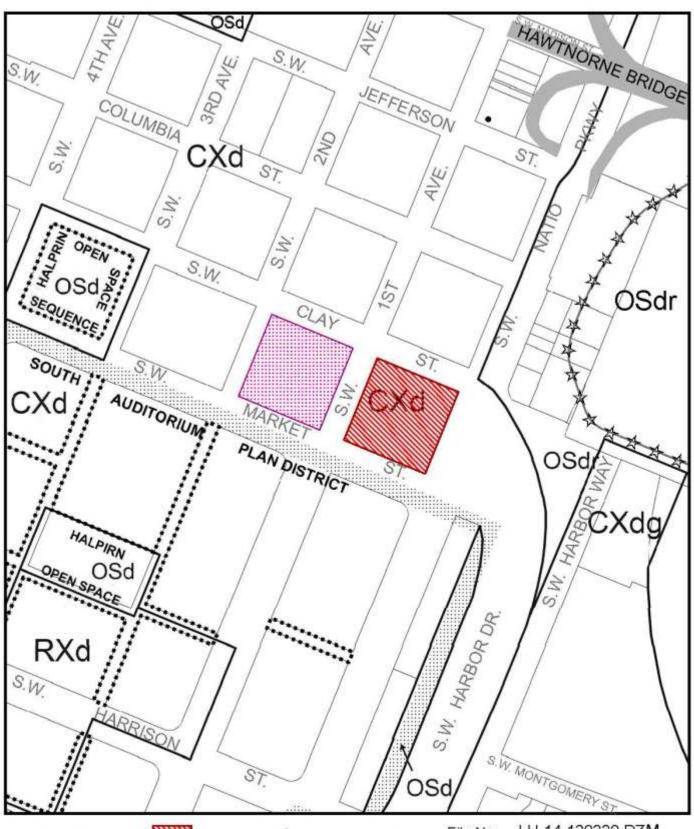
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review:
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

#### **EXHIBITS**

#### NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statements
  - 1. Original narrative statement
  - 2. Supplemental/revised narrative statement, received 3/24/14
  - 3. Extra and original drawings from original packet not necessary for review (neighboring signs, existing signs, outdated original sign 4 details, etc.)
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Site Plan (attached)
  - 2. North/Sign 1 Elevation
  - 3. Sign 1 Detail Sheet (attached)
  - 4. West/Sign 2 Elevation
  - 5. Sign 2 Detail Sheet (attached)
  - 6. West/Sign 4 Elevation
  - 7. Sign 4 Detail Sheet (attached)
  - 8. Large/Scalable Plan Set matching C.1-C.7 above 7 pages total
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice
- E. Agency Responses: none
- F. Correspondence:
  - 1. John Russell, owner of a nearby building, wrote on 4/1/14, with no objection to the proposal.
- G. Other:
  - 1. Original LU Application Form and Receipt
  - 2. Incomplete letter from staff to applicant, sent 3/12/14

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).







Recreational Trail
Historic Landmark

File No. LU 14-120330 DZM

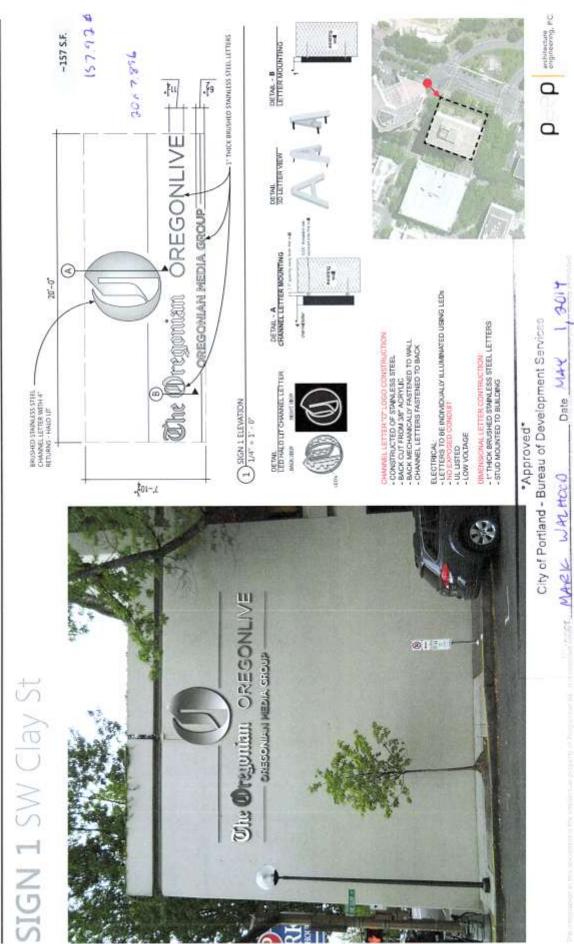
1/4 Section 3129,3229

Scale 1 inch = 200 feet

State\_Id 1S1E03CA 600

Exhibit B (Feb 28,2014)





- represent applies only to the reviews requested and

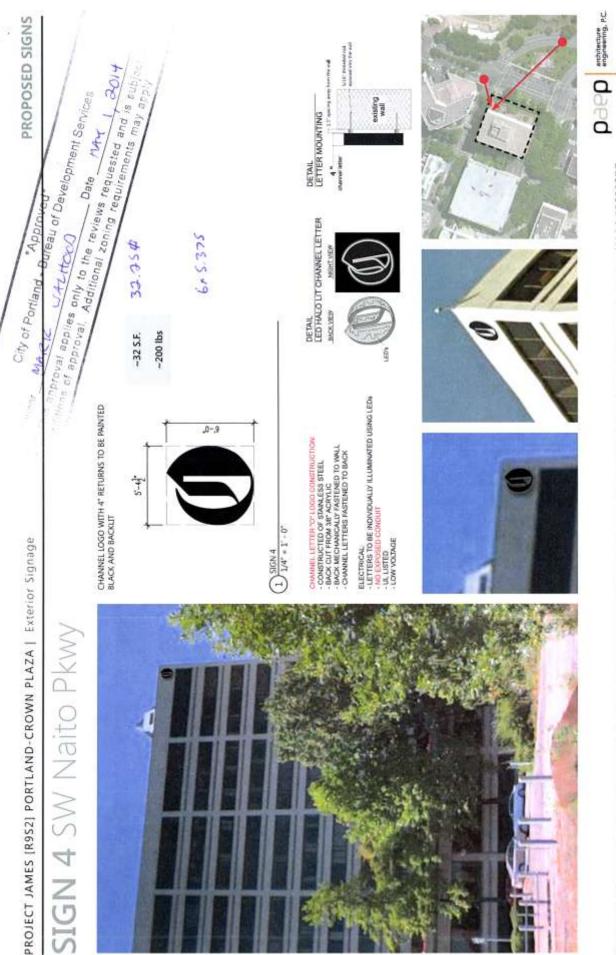
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W 14-120330 024 Exhibit C.S

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TO 14-120330DZ