



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

Dan Saltzman, Commissioner
Paul L. Scarlett, Director
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Fax: (503) 823-5630
TTY: (503) 823-6868
www.portlandoregon.gov/bds

Date: June 16, 2016
To: Interested Person
From: Matt Wickstrom, Land Use Services
503-823-6825 / Matt.Wickstrom@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 mailed copy of this document is only a summary of the decision. The reasons for the decision are included in the version located on the BDS website <http://www.portlandonline.com/bds/index.cfm?c=46429>. 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 16-120761 AD

GENERAL INFORMATION

Applicant: Brint Riggs
Studio Eccos Design LLC
5835 N Omaha Ave
Portland, OR 97217

Property Owners: Vince and Laura E Onstad
1711 SE 47th Ave
Portland, OR 97215

Site Address: 1711 SE 47TH AVE

Legal Description: BLOCK 3 E 100' OF LOT 5, NEWPORT; BLOCK 3 LOT 5 TL 22400, NEWPORT

Tax Account No.: R603300760, R603300790

State ID No.: 1S2E06CA 22300, 1S2E06CA 22400

Quarter Section: 3235

Neighborhood: Richmond, contact Douglas Klotz at 503-233-9161

Business District: Hawthorne Blvd. Bus. Assoc., contact Hilda Stevens at 503-775-7633

District Coalition: Southeast Uplift, contact Leah Fisher at 503-232-0010

Zoning: R5 (Residential 5,000)

Case Type: AD (Adjustment Review)

Procedure: Type II, an administrative decision with appeal to the Adjustment Committee.

Proposal:

The applicant proposes the construction of an accessory dwelling unit (ADU) and a new garage behind the existing home on this site. The ADU and garage will be attached by a covered walkway which also connects to the house. The proposed ADU will have ground floor

wheelchair accessible living space as well as an attic for storage. In the R5 zone, the Portland Zoning Code requires attached accessory structures to be set back at least 5 feet from the side and rear property lines. The applicant requests two Adjustments associated with these requirements. First, the applicant requests for portions of the ADU to be located less than 5 feet from the side and rear property lines, specifically 3 feet 7 inches from the rear (west) property line and as close as 1-foot 7 inches from the side (north). In addition, because the applicant proposes to attach the ADU and house to the new detached garage which is located 1-foot from the side (south) property line, an Adjustment to reduce that setback from 5 feet to 1-foot is required as well.

Staff note: *In response to neighbor comments, the applicant revised the previous proposal so that the main entrance and covered porch are no longer within the setback.*

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. Adjustment requests will be approved if the review body finds that the applicant has shown that approval criteria A through F of Section 33.805.040, Adjustment Approval Criteria, have been met.

ANALYSIS

Site and Vicinity: The site is currently composed of two tax lots totaling 6,475 square feet in area. The site is developed with a two-story single-dwelling residence and a detached garage. The surrounding vicinity is developed with single-dwelling homes.

Zoning: The site is zoned R5 (Residential 5,000), a single-dwelling residential zone. The single-dwelling residential zones are intended to preserve land for housing and to provide housing opportunities for individual households. The Portland Zoning Code definition of Attached Structure refers to the use of breezeways as a means to attach one structure to another (33.910).

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 **March 18, 2016**. The following Bureaus have responded:

The Water Bureau responded with no concerns about the Adjustment proposal but noted that the two tax lots will need to be combined into a single tax account prior to the Water Bureau’s approval of a building permit for the ADU (Exhibit E-1).

The Site Development Section of the Bureau of Development Services (BDS) responded with information on stormwater discharge and treatment and erosion control (Exhibit E-2).

The Life Safety Section of BDS responded with information on obtaining a building permit (Exhibit E-3).

The Bureau of Environmental Services responded with information on sanitary service and stormwater management (Exhibit E-4).

The Fire Bureau and Portland Bureau of Transportation responded with no concerns (Exhibit E-5).

Neighborhood Review: A total of three written responses have been received from either the Neighborhood Association or notified property owners in response to the Notice of Proposal.

- The first comment came from individuals who did not identify themselves and declined to provide their mailing address. The letter stated the respondents’ objection to the proposal and stated that the setback and building coverage regulations should be met.

Staff response: The applicant modified the proposal and the original Adjustment request to increase the maximum allowed building coverage for accessory structures is no longer necessary because the structures are now attached to the house. The Adjustment Review process is in place so that applicants can request an alternate proposal that doesn't meet the letter of the regulation but meets the intent.

- The second letter came from the neighbor who lives to the south of the site. The letter provides three reasons the neighbor believes the proposal does not meet the Adjustment Review approval criteria. The first reason stated is that the reduced setbacks will reduce privacy and livability for neighbors, especially considering the main entrance and covered porch are proposed within the setback, and the proposed 1-foot 7-inch north setback would be a challenge for fire fighting. The second reason stated is the increased building coverage would add too much bulk. The third reason relates to ground water and mentions that additional weight associated with the added buildings will contribute to increased water in neighbors' basements.

Staff response: The proposed ADU has been reconfigured so that the main entrance and covered entry are no longer located within the south side setback. The Fire Bureau responded to the proposal with "no concerns" indicating that access for fire-fighting will not be negatively impacted by the proposal. It is important to note that the applicant was not requesting to increase the overall building coverage allowed for the site, only the amount of building coverage associated with accessory structures. The redesign of the project has eliminated the need to request an Adjustment to accessory structure building coverage. The Bureau of Environmental Services and Site Development Section of BDS provide comments related to stormwater management. Both Bureaus stated no concerns with the Adjustments proposed and BES noted that stormwater management must comply with the Stormwater Management Manual.

- The third letter came from a nearby neighbor. It states that the zoning rules are in place to maintain open space and spacing between structures. The letter states that the ADU will undermine these objectives. The letter states that because the property owners' lot is large, meeting zoning regulations is possible. The neighbor expresses concern about the number of short term rentals in the neighborhood.

Staff response: The proposed setbacks are reviewed as part of the findings below; however, the approval criteria do not require proposals on larger sites to meet the zoning regulations. According to the applicant, a parent is the intended occupant of the ADU; however, Accessory Short-Term Rentals are allowed provided the regulations of Portland Zoning Code Chapter 33.207 are met. Again, as noted above the Adjustment Review allows alternative ways of meeting the intent of development standards. The process does not require an applicant to demonstrate that there is a hardship in meeting the required development standards.

ZONING CODE APPROVAL CRITERIA

33.805.010 Purpose (Adjustments)

The regulations of the zoning code are designed to implement the goals and policies of the Comprehensive Plan. These regulations apply city-wide, but because of the city's diversity, some sites are difficult to develop in compliance with the regulations. The adjustment review process provides a mechanism by which the regulations in the zoning code may be modified if the proposed development continues to meet the intended purpose of those regulations. Adjustments may also be used when strict application of the zoning code's regulations would preclude all use of a site. Adjustment reviews provide flexibility for unusual situations and allow for alternative ways to meet the purposes of the code, while allowing the zoning code to continue providing certainty and rapid processing for land use applications.

33.805.040 Approval Criteria

Adjustment requests will be approved if the review body finds that the applicant has shown that approval criteria A. through F. below have been met.

- A.** Granting the adjustment will equally or better meet the purpose of the regulation to be modified; and

Findings: The applicant requests Adjustments to reduce the north side and rear setbacks for a new ADU from 5 feet to as narrow as 1-foot 7 inches (north side setback) and 3 feet 7 inches (west rear setback). The applicant also requests an Adjustment to reduce the south side setback for a new garage from 5 feet to 1-foot.

The purpose for the setback regulations for single-dwelling zones is found in 33.110.220, which states:

Purpose: *The building setback regulations serve several purposes:*

- *They maintain light, air, separation for fire protection, and access for fire fighting;*
- *They reflect the general building scale and placement of houses in the City's neighborhoods;*
- *They promote a reasonable physical relationship between residences;*
- *They promote options for privacy for neighboring properties;*
- *They require larger front setbacks than side and rear setbacks to promote open, visually pleasing front yards;*
- *They provide adequate flexibility to site a building so that it may be compatible with the neighborhood, fit the topography of the site, allow for required outdoor areas, and allow for architectural diversity; and*
- *They provide room for a car to park in front of a garage door without overhanging the street or sidewalk, and they enhance driver visibility when backing onto the street.*

The proposed ADU is set at an angle to the north property line so that only a portion of the structure is within the side setback. This allows the setback for the north facing wall to be between 1-foot 7 inches and 13 feet 2 inches from the north side lot line. This maintains light and air for the property to the north. Furthermore, the majority of the portion of the ADU within the north side setback steps down to a height of 9 feet. A structure of this height is allowed in the side setback (provided it has a footprint of less than 24 by 24), in part, because smaller single-story structures pose less of an impact on the availability of light and air for adjacent properties. The same can be said for the reduced west setback for the ADU as the only portion of the ADU within the setback is a 1-foot 4-inch deep bump out that steps down to a height of 9 feet. The remainder of the ADU is outside of the west rear setback. The Fire Bureau responded to the Adjustment request with "no concerns" indicating that access for fire-fighting is adequate. Although the ADU is not technically a "house", these limited reductions to setback allow the structure to reflect the general building scale and placement of houses. The limited reductions to setback also ensure a reasonable physical relationship between residences especially considering that the ADU will be adjacent to the rear yards of the lots to the north and south, not the homes. Privacy for neighboring properties is maintained despite the Adjustment requests because the walls within the setback do not contain windows. In addition, the window facing north is located 5 feet from the property line and is located within an attic storage area, not within living space. The front yard of the site is not impacted by the proposal. The ADU is appropriately integrated into the layout of the site and will share a large outdoor area with the house. The garage would be allowed by right in the south side setback were it not for the covered walkway connecting it to the house and ADU. Because the covered walkway is outside the setback, the garage will have no further impact on the availability of light and air for the property to the south than the previous detached garage located on this site.

Furthermore, the garage is located to the north of the adjacent property and therefore will have no impact on southern exposure. Condition of approval “A” requires the plans be in conformance with this land use review. Based on this information, this criterion is met.

- B.** If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, or I zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and

Findings: The proposal will not significantly detract from the livability or appearance of the residential area. As mentioned under Criterion A, the majority of the portions of the ADU within the setback are stepped down to a height of 9 feet, with only a portion of the wall being within the reduced setback area. The relatively lower height and limited amount of building area will not cast significant shadows on neighboring properties and because no windows are proposed within the lower-height, bumped-out portions of the ADU, privacy will not be negatively impacted. The applicant also redesigned to the proposal to pull any areas where activity may occur such as the main entrance and covered porch outside of the setbacks, this also reduces negative impacts to privacy. The location of the garage and its limited footprint within the setback is consistent with the location of detached garages in single-dwelling zones; its single-story height will have no impacts on livability and because garages are not intended for living space, impacts on privacy should be negligible. The ADU and garage are designed in a manner consistent with the house and have an attractive appearance. Based on this information, this criterion is met.

- C.** If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and

Findings: Considering that the requested Adjustments only apply to small portions of the ADU, most of which are stepped down to a single-story height and to a garage which resembles a typical detached garage apart from its connection to the house and ADU by a covered walkway, the cumulative effect of the Adjustments is minimal. The purpose of the single-dwelling zones is to preserve land for housing and to provide housing opportunities for individual households. The proposed ADU and garage Adjustments do not impact the provision of land for housing at the site. The proposal is supportive of the use regulations found in Portland Zoning Code Section 33.110.010.A because the site will continue to be occupied by a single-dwelling house (one ADU is allowed for a home, manufactured home or attached home). The proposal is also supportive of the development standards found in Section 33.110.010.B which promote an aesthetically pleasing environment with no adverse impacts on safety, privacy, energy conservation and recreational opportunities.

As described above, the proposed Adjustments are minimal and therefore maintain compatibility within the neighborhood, and result in a project that is consistent with the purpose of the Single-dwelling Zone. This criterion is met.

- D.** City-designated scenic resources and historic resources are preserved; and

Findings: No City-designated scenic or historic resources are located on this site; therefore, this criterion is not applicable.

- E.** Any impacts resulting from the adjustment are mitigated to the extent practical; and

Findings: There are no discernible impacts that would result from granting the requested adjustments that require mitigation. The majority of the portions of the ADU located within the setback are stepped down to a 9-foot height which limits impacts. The bumped-out portions of the ADU as well as the garage wall facing do not contain

windows and therefore will not negatively impact privacy. The garage is sited in a location typical of detached garages in Portland and therefore will have no greater impacts than that of a standard detached garage. This criterion is met.

- F.** If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable;

Findings: The site is not within an environmental zone. This criterion is not applicable.

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 applicant proposes three Adjustments to the regulations of the Portland Zoning Code. The first Adjustment request is to reduce the north side setback from 5 feet to as little as 1-foot 7 inches for the proposed ADU. The second Adjustment request is to reduce the west rear setback from 5 feet to 3 feet 7 inches, again for the ADU. The third Adjustment request is to reduce the south side setback from 5 feet to 1-foot for the garage which is attached to the ADU and house by a covered walkway. The proposed setback Adjustments for the ADU are minimal, in part, because the majority of the portions of the ADU located within the setback are single-story in height and bumped out from the core of the structure. These bumped out portions contain no windows and will not negatively impact privacy. The garage would be allowed by right in the proposed location were it not attached to the house and ADU by a covered walkway. Because the walkway is located outside the setback, the garage has no greater impacts on the adjacent lot than a typical detached garage in Portland. The proposal meets the applicable approval criteria and should be approved.

ADMINISTRATIVE DECISION

Approval of three Adjustments:

1. Reduce the north side setback from 5 feet to as little as 1-foot 7 inches for the ADU;
2. Reduce the west rear setback from 5 feet to 3 feet 7 inches for the ADU; and
3. Reduce the south side setback from 5 feet to 1-foot for the garage,

per the approved site plan and building elevations, Exhibits C-1 through C-2, signed and dated June 10, 2016, 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-C.2. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 16-120761 AD."

Staff Planner: Matt Wickstrom

Decision rendered by:  **on June 13, 2016**

By authority of the Director of the Bureau of Development Services

Decision mailed: June 16, 2016

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 12, 2016, and was determined to be complete on March 8, 2016.

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 12, 2016.

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 6, 2016.**

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 Adjustment Committee, which will hold a public hearing. Appeals must be filed **by 4:30 PM on June 30, 2016** 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 12:00 pm. After 3:00 pm Monday through Wednesday and Fridays, and after 12:00 pm on Thursdays, appeals must be submitted at the reception desk on the 5th 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 Adjustment Committee 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 Adjustment Committee 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 **July 1, 2016 – (the day following the last day to appeal)**.
- 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.

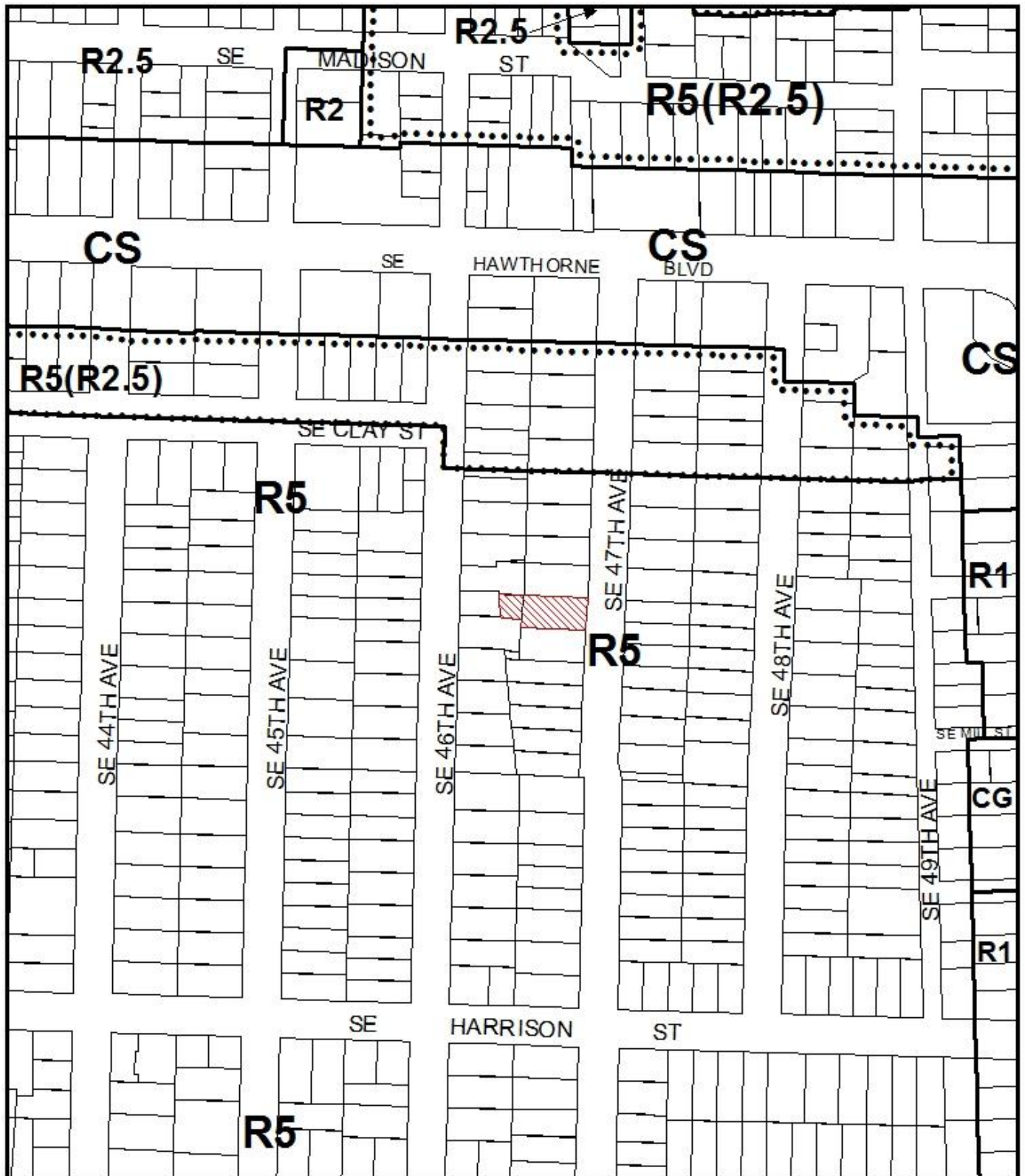
Applying for your permits. A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

- 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 and Original LU Application
 - 1. Email from Brint Riggs to Matt Wickstrom dated February 25, 2016
 - 2. Incomplete letter from Matt Wickstrom to Brint Riggs dated February 29, 2016
 - 3. Email from Brint Riggs to Matt Wickstrom dated March 2, 2016
 - 4. Email from Brint Riggs to Matt Wickstrom dated March 4, 2016
 - 5. Supplemental submittal received March 23, 2016
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. ADU Elevation Drawings (attached)
 - 3. Garage Elevation Drawings (attached)
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Water Bureau
 - 2. Site Development Review Section of BDS
 - 3. Life Safety Section of BDS
 - 4. Bureau of Environmental Services
 - 5. Summary sheet of Bureau responses
- F. Correspondence: 3 letters
 - 1. Anonymous letter received March 28, 2016, opposition
 - 2. Anndy Wiselogle, received April 4, 2016, opposition
 - 3. Marc Schneiberg, received April 11, 2016, opposition

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).

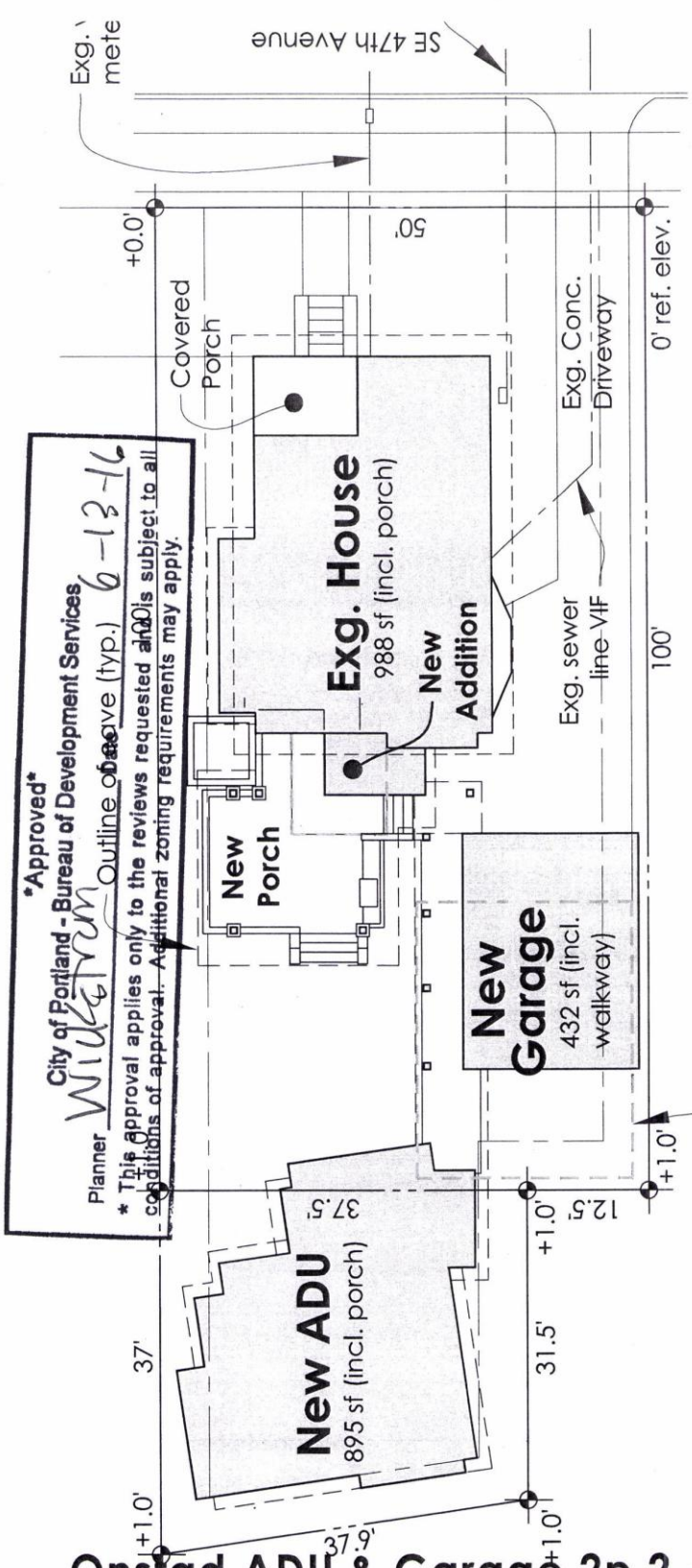


ZONING



 Site

File No. LU 16-120761 AD
 1/4 Section 3235
 Scale 1 inch = 200 feet
 State_Id 1S2E06CA 22300
 Exhibit B (Feb 17, 2016)

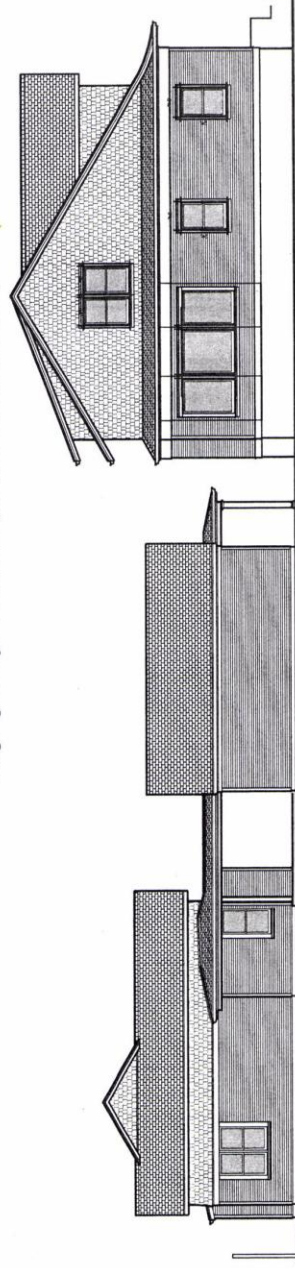


Approved
 City of Portland - Bureau of Development Services
 Planner *Wuketron*
 Outline of *above* (typ.) *6-13-16*
 * This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.

**studio
eccos
architecture**

5835 N Omaha Avenue
 Portland, OR, 97217
 503-701-4494

Exg. garage outline (to be demolished)



House

Garage

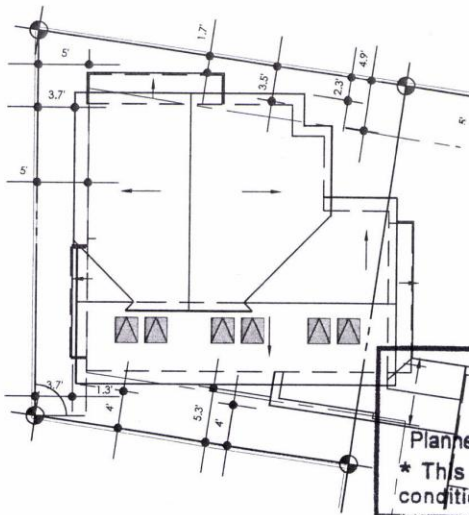
ADU

Onstad ADU & Garage 2p.2 - Adjustment



1711 SE 47th Ave., Portland, OR 97215
 2016.06.13

1.1
 16-120761
 Exhibit C-1



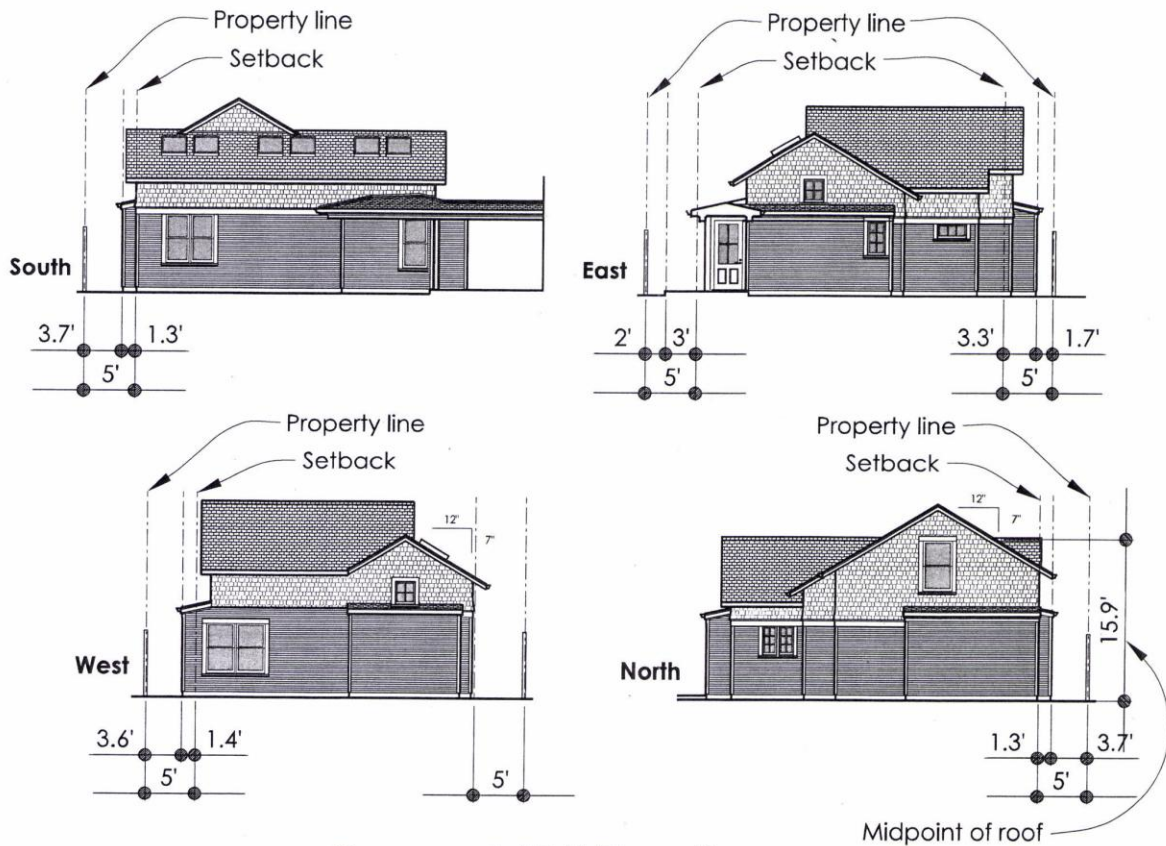
**studio
eccos
architecture**

5835 N Omaha Avenue
Portland, OR, 97217
503-701-4494

Approved
City of Portland - Bureau of Development Services
Planner Wickstrom Date 6-13-16
* This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.

Proposed ADU Roof Plan

Scale: 1/16" = 1'-0"



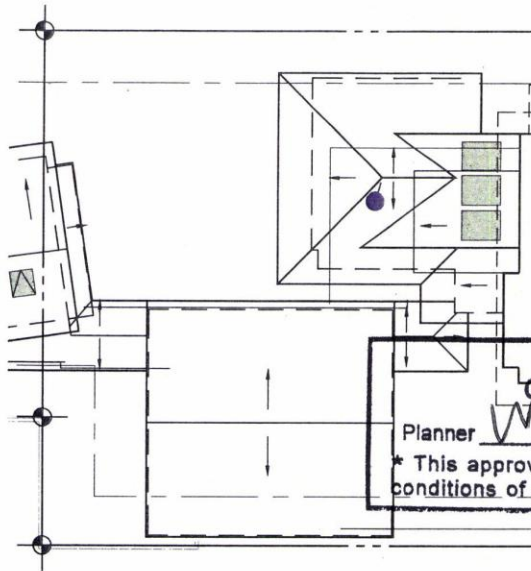
Proposed ADU Elevations

Scale: 1/16" = 1'-0"

Onstad ADU & Garage 2p.2 - Adjustment

1711 SE 47th Ave., Portland, OR 97215
2016.06.13

16-120161
Exhibit C-2



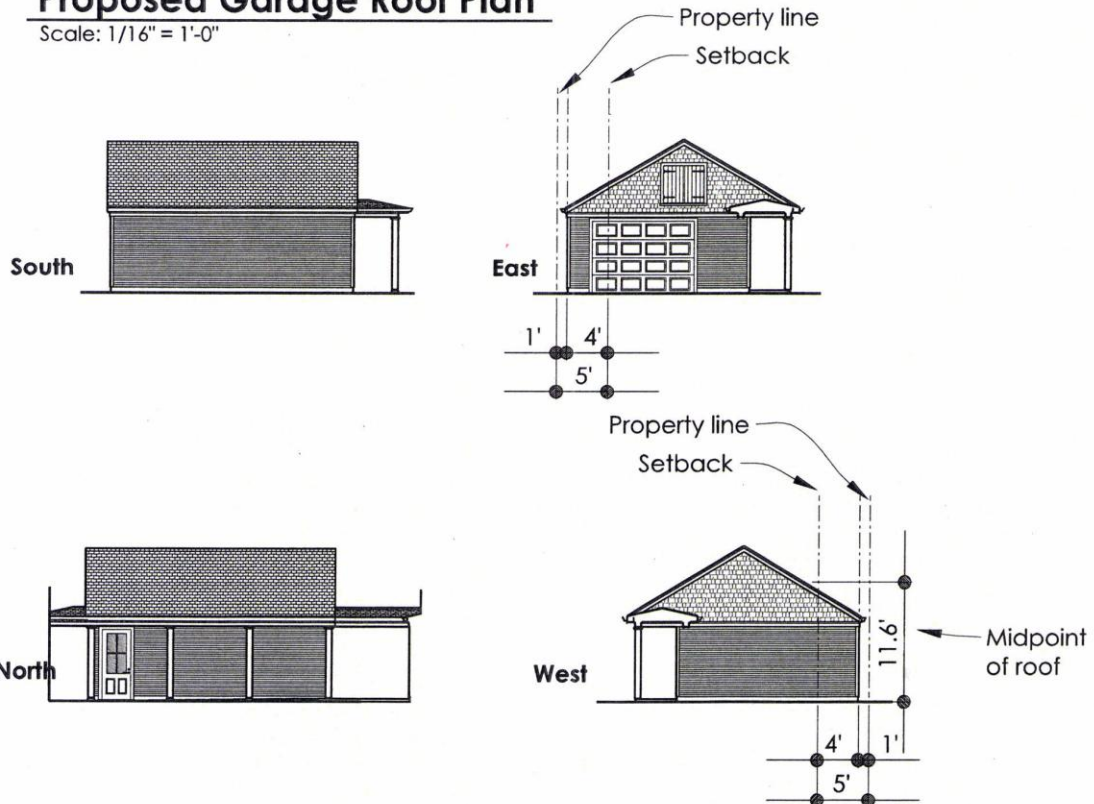
**studio
eccos
architecture**

5835 N Omaha Avenue
Portland, OR, 97217
503-701-4494

Approved
City of Portland - Bureau of Development Services
Planner Widstrom Date 6-13-16
* This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.

Proposed Garage Roof Plan

Scale: 1/16" = 1'-0"



Proposed Garage Elevations

Scale: 1/16" = 1'-0"

Onstad ADU & Garage 2p.2 - Adjustment

1711 SE 47th Ave., Portland, OR 97215
2016.06.13

1.3
16-120761
Exhibit C-3