



City of Portland, Oregon
Bureau of Development Services
Land Use Services

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Date: September 10, 2009
To: Interested Person
From: Abigail Fowle, Land Use Services
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**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 this notice. If you disagree with the decision, you can appeal it and request a public hearing. Information on how to appeal this decision is listed at the end of this notice.

**CASE FILE NUMBER: LU 09-102622 HDZ CU – CELLULAR
EQUIPMENT ON THE WORTHINGTON APARTMENT BUILDING**

GENERAL INFORMATION

Applicant:	Phyllis P Kliks, Owner 3662 SW Tunnelwood St Portland, OR 97221-4147	Worthington Limited Partnership 3662 SW Tunnelwood St Portland, OR 97221
	Steve Blindheim, Worthington Limited Partnership 708 NW 19th Ave Portland OR 97209	Kevin Maki, Clearwire US LLC 4400 Carillon Point Kirkland WA 98033
Representative:	Steven Topp, ACIP, 503-708-7337 12566 SW Bridgeview Court Tigard, OR 97223	
Site Address:	708 NW 19 th Avenue	
Legal Description:	LOT 2&3 BLOCK 176, COUCHS ADD	
Tax Account No.:	R180216110	
State ID No.:	1N1E33AC 06500	
Quarter Section:	2928	
Neighborhood:	Northwest District, contact John Bradley at 503-313-7574.	
Business District:	Nob Hill, contact Kay Wolfe at 503-227-0898.	
District Coalition:	Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.	
Plan District:	Northwest, Alphabet Historic District	
Zoning:	RH: High Density Residential zone	
Case Type:	HDZ CU: Historic Design Review and a Conditional Use Review	
Procedure:	Type II, an administrative decision with appeal to the Landmarks Commission.	

Proposal: The applicant seeks Historic Design Review approval for the installation of six new panel antennas, three new 2'-0" diameter microwave dishes, and one new site support cabinet on the roof of the Worthington Apartment Building located at the corner of NW 19th Avenue and NW Irving Street in the Alphabet Historic District. The antennas and microwave dishes are to be grouped and screened by locating the new equipment in two opaque screen enclosures. One screen enclosure will house four antennas and two microwave dishes and will be placed around the building's existing penthouse upon which four existing antennas are located. This enclosure will measure 19'-6" wide, 15'-4" deep and 14'-0" tall and is set back approximately 18'-0" from the northern and western edges of the roof. A smaller enclosure located 9'-0" from the southern edge of the roof will measure 5'-0" square and 10'-0" tall and house two antennas and one microwave dish. Each antenna measures approximately 3'-9" tall, 0'-6" wide and 0'-3" deep, but is mounted at differing heights above the roof, as determined by the requirements of the site and the technology. The microwave dishes measure 2'-2" wide and are similarly mounted at a height determined by the requirements of the technology. The site support cabinet will be located in the central portion of the roof, 15'-0" from the western roof edge, and will measure 7'-3" tall to the top of its GPS antenna and 2'-2" square. The shroud enclosures will be painted a matte light grey color.

Because the proposal is in an historic district and exterior alterations are proposed, Historic Design Review is required.

Relevant Approval Criteria:

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

- Chapter 33.846 Historic Design Review
- Community Design Guidelines
- Chapter 33.815 Conditional Use Reviews
- Historic Alphabet District: Community Design Guidelines Addendum

ANALYSIS

Site and Vicinity: The quarter-block site is located in the Alphabet Historic District and the Northwest Plan District, at the corner of NW 19th Avenue and NW Irving Street. While the building that fills the site is not a designated historic landmark, it has many of the intact architectural qualities of neighboring historic buildings and is a secondary contributing structure to the Alphabet Historic District. The five-story Worthington Apartment Building was built in 1929 in the Gothic/Vernacular style by Architect Elmer E. Feig. The architect is responsible for designing approximately 21 apartment buildings in the Historic District. The building is clad in smooth stucco with decorative embellishment, including an arched, broken pediment above the recessed main entry that includes heraldic shields, crests, modillions and "marquee" style bulb lighting. Pilasters are placed between structural bays on the west and south façades, and the primary window type is six-over-six double-hung wood sash. The roofline is embellished with a stepping form and expressive moldings in the form of cast-stone pendants, a frieze of cast-stone garlands, and fluted pilasters with small canopies. The side walls are simpler in nature, lacking the ornamentation of the two street-facing façades. Existing cellular equipment is located on the roof, placed on the exterior of an existing penthouse and at the eastern (mid-block) edge of the roof. This equipment was approved through a Design Review in 1997 (LUR 97-00194 CU AD), and according to the applicant is currently defunct.

The site is surrounded by historic landmark properties, with the 2 ½-story Richard Koehler House located to the north of the site, the ornate Olympic Apartment Building directly to the west across the street, and the Irving Street Houses one block east of the site. The block is bounded by NW Johnson Street to the north, NW Irving Street to the south, NW 19th Avenue to the west and NW 18th Avenue to the east. The dense neighborhood is a mixture of mid-size apartment buildings, many historic, single-family homes, larger historic homes used for

commercial purposes, historic churches, a hospital, and some newer commercial and residential development. The site is well served by public transit, with a streetcar stop and bus stop located two blocks to the north. NW 19th and 18th Avenues are designated Transit Access Streets by the City of Portland Transportation Plan. NW Johnson Street, 18th Avenue and 19th Avenue are designated City Bikeways, and NW Irving Street is designated a local service Bikeway. The site lies within the Northwest Pedestrian District.

Zoning:

The RH zone is a high-density multi-dwelling residential zone. Certain retail sales and service and office uses are allowed as conditional uses to provide mixed-use development on larger sites that are close to light rail transit facilities. The maximum residential density is limited to a FAR of 4:1 on this site, and the minimum density is one unit per 1,000 square feet of site area. Newly created lots in the RH zone must be at least 10,000 square feet in area for multi-dwelling development, 3,000 square feet for development with detached houses, 800 square feet for development with attached houses, and 2,000 square feet for development with duplexes. Minimum lot width and depth standards may apply.

The Historic Resource Protection overlay is comprised of Historic and Conservation Districts, as well as Historic and Conservation Landmarks. The regulations that pertain to these properties protect certain historic resources in the region and preserve significant parts of the region's heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties.

The Northwest Plan District provides for an urban level of mixed-use development including commercial, office, housing, and employment. The regulations of this chapter promote housing and mixed-use development; discourage auto-oriented developments; enhance the pedestrian experience; and encourage a mixed-use environment and transit supportive levels of development in the area near the streetcar alignment.

Land Use History: City records indicate that prior land use reviews include the following:

- LU 97-014240 (Ref. File #: LUR 97-00194 CU AD): Approval for a conditional use to install rooftop antennas and equipment, with an adjustment to reduce the lot size and eliminated required parking spaces.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed June 26, 2009. The following Bureaus have responded with no issues or concerns:

- Bureau of Environmental Services
- Bureau of Transportation Engineering
- Fire Bureau
- Bureau of Parks-Forestry Division

The Life-Safety Plans Examiner of BDS responded with the following comment: "A separate Building Permit is required for the work proposed and the proposal must be designed to meet all applicable building codes and ordinances". *Please see Exhibit E-1 for additional details.*

The Water Bureau responded with the following comment: "The Water Bureau has no objections to the roof top telecommunications equipment." *Please see Exhibit E-2 for additional details.*

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on June 26, 2009. One written response has been received from either the Neighborhood Association or notified property owners in response to the proposal.

- John Bradley, Chair of the Northwest District Association Planning Committee responded on July 17, 2009 in opposition to the proposal. The NWDA Planning Committee noted a

number of issues of concern. First, the Committee requested that the proposal meet the development standard of 33.274 that speaks to Tower sharing. Secondly, the Committee requests that the existing penthouse structure be used for antenna attachment. Thirdly, the Committee requests that the antennas not be mounted to the shroud enclosure, as the shroud enclosure extends above the 10'-0" height maximum for mounting devices. Fourthly, the Committee opposes a large screening structure on the building and sites Community Design Guideline D6 as not being met by this proposal. They suggest that the screen accentuates the visual impact of the new equipment and is not compatible with the desired character of the surrounding historic district. The Committee suggests that the new equipment be power pole mounted, mounted on a non-contributing structure, or as a last resort, mounted directly on to the existing roof structure. *Exhibit F.1 provides additional information.*

Staff Note: Staff shared these comments with the applicant, and the applicant investigated the possibility of locating the new equipment on surrounding power poles in the right-of-way. The applicant has stated that the power pole option was not feasible. The applicant also looked at mounting the equipment on the existing penthouse structure, which appears to be a feasible option. Regarding the NWDA Planning Committee's first comment, the standard that speaks to tower sharing is not applicable here, as the applicant is not proposing building a new tower and is instead proposing to place the new equipment on the building roof, as the standards support. Additional concerns are described in the findings below.

ZONING CODE APPROVAL CRITERIA

1) CONDITIONAL USE REVIEW

33.815.010 Purpose

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

33.815.225 Radio Frequency Transmission Facilities

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

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

Findings: The project involves the addition of radio transmission facilities to the roof of an existing 5-story building. Specifically, the proposal includes the installation of six panel antennas, three microwave antennas, and one equipment cabinet with two associated screen enclosures. The equipment cabinet and one of the screen enclosures is located centrally on the roof, while the second screen enclosure is located towards the

southern end of the roof. While the antennas and microwave dishes have been consolidated into two rectangular shroud enclosures that are located at opposite ends of the building and pulled-back a significant distance from the edges of the roof, the mass of the larger screen enclosure is visible from the street and competes in scale with the building's decorative parapet. The location of the site support cabinet is supportable, as it is aligned and grouped with an existing rooftop penthouse, and is located a significant distance from all roof edges, and is of a minimum height. Similarly, the equipment and screen enclosure located at the southern end of the roof is supported by the criterion due to its setback of 9'-0" from the edge of the roof, height of 10'-0" and minimal dimensions of 5'-0" wide and 5'-0" deep. However, from a street perspective, and from views of the rooftop from neighboring buildings, the equipment and shroud that surrounds the existing penthouse represents a significant visual mass that is visually incompatible with the scale and ornamentation of the building and its decorative architectural parapet. *Therefore, this criterion is met for the smaller shroud enclosure and the equipment cabinet, but not for the larger shroud enclosure and equipment that surrounds the existing penthouse.*

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

Findings: Accessory equipment associated with the facility includes one equipment cabinet, located on the western edge of the roof, 15'-0" from the western edge of the parapet. The height of the building limits views of this portion of the roof from the street or adjacent properties. *Therefore, this criterion is met.*

3. The regulations of Chapter 33.274, Radio Frequency Transmission Facilities are met.

Findings: The relevant regulations and standards for this proposal as discussed below, are the development standards of Chapter 33.274 - Radio Frequency Transmission Facilities. *As discussed in detail below, all applicable regulations are not met for all aspects of the proposal; therefore, this criterion is met for portions of the proposal, but not for the equipment and the larger shroud enclosure that surrounds the existing penthouse.*

2) RADIO FREQUENCY TRANSMISSION FACILITIES DEVELOPMENT STANDARDS (33.274.040)

A. Purpose. The development standards:

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

B. When standards apply. Unless exempted by 33.274.030, above, the development standards of this section apply to all Radio Frequency Transmission Facilities.

Applications to modify existing facilities regulated by this chapter are only required to meet the standards of Paragraphs C. 3, C.4, C.5, C.6, and C.9, below, in addition to any previous conditions of approval. Increasing the height of a tower is not considered modification of an existing facility.

C. General requirements

1. Tower sharing. Where technically feasible, new facilities must co-locate on existing towers or other structures to avoid construction of new towers. Requests for a new tower must be

accompanied by evidence that application was made to locate on existing towers or other structures, with no success; or that location on an existing tower or other structure is infeasible.

2. Grouping of towers. The grouping of towers that support facilities operating at 1,000 watts ERP or more on a site is encouraged where technically feasible. However, tower grouping may not result in radio frequency emission levels exceeding the standards of this chapter.
3. Tower finish. For towers not regulated by the Oregon Aeronautics Division or Federal Aviation Administration, a finish (paint/surface) must be provided that reduces the visibility of the structure.
4. Tower illumination. Towers must not be illuminated except as required for the Oregon State Aeronautics Division or the Federal Aviation Administration.

Findings for C.1 through C.4: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, these criteria are not applicable.*

5. Radio frequency emission levels. All existing and proposed Radio Frequency Transmission Facilities are prohibited from exceeding or causing other facilities to exceed the radio frequency emission standards specified in Table 274-1, except as superseded by Part 1, Practice and Procedure, Title 47 of the Code of Federal Regulations, Section 1.1310, Radio Frequency Radiation Exposure Limits.

Table 274-1 Radio Frequency Emission Standards [1]			
Frequency Range	Mean Squared Electric (E^2) Field Strength (V^2/m^2) [2]	Mean Squared Magnetic (H^2) Field Strength (A^2/m^2) [3]	Equivalent Plane-Wave Power Density (mW/cm^2) [4]
100 KHz – 3 MHz	80,000	0.5	20
3 MHz – 30 MHz	4,000 ($180/f^2$) [5]	0.025 ($180/f^2$)	$180/f^2$
30 MHz – 300 MHz	800	0.005	0.2
300 MHz – 1500 MHz	4,000 ($f/1500$)	0.025 ($f/1500$)	$f/1500$
1500 MHz – 300 GHz	4,000	0.025	1.0

Notes:

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

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

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

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

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

Findings: The proposed facility will operate within the limits stated in Table 274-1 per calculations provided by the applicant's engineer, Exhibit C.14. *Therefore, this criterion is met.*

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

6. Antenna requirements. The antenna on any tower or support structure must meet the minimum siting distances to habitable areas of structures shown in Table 274-2. Measurements are made from points A and B on the antenna to the nearest habitable area of a structure normally occupied on a regular basis by someone other than the immediate family or employees of the owner/operator of the antenna. Point A is measured from the highest point of the antenna (not the tower) to the structure, and Point B is measured from the closest point of the antenna to the structure.

Table 274-2 Distance Between Antenna and Habitable Area of Structure (Where f is frequency in megahertz.)			
Effective Radiated Power	Frequency (MHz)	Point A: Minimum Distance From Highest Point of Antenna To Habitable Area of Structure (feet)	Point B: Minimum Distance From Closest Portion Of Antenna To Habitable Area of Structure (feet)
< 100 watts		10	3
100 watts to 999 watts		15	6
1,000 watts to 9,999 Kw	< 7	11	5
	7 - 30	$f/0.67$	$f/1.5$
	30 - 300	45	20
	300 - 1500	$780/\sqrt{f}$	$364/\sqrt{f}$
	> 1500	20	10
10 Kw plus	< 7	17.5	8
	7 - 30	$f/0.4$	$f/0.91$
	30 - 300	75	33
	300 - 1500	$1300/\sqrt{f}$	$572/\sqrt{f}$
	1500	34	15

Findings: The proposed facility will be located within two rectangular shroud enclosures on the roof of the subject building and will meet the minimum siting distances for habitable structures per submitted scaleable plans and elevations, Exhibits C.4-C.7. *Therefore, this criterion is met.*

7. Setbacks. All towers must be set back at least a distance equal to 20 percent of the height of the tower or 15 feet, whichever is greater, from all abutting R and OS zoned property and public streets. Accessory equipment or structures must meet the base zone setback standards.
8. Guy anchor setback. Tower guy anchors must meet the main building setback requirements of the base zone.

Findings for C.7 & C.8: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, this criterion is not applicable.*

9. Landscaping and screening. The base of a tower and all accessory equipment or structures located at grade must be fully screened from the street and any abutting sites as follows:
- In C, E or I zones more than 50 feet from an R zone. A tower and all accessory equipment or structures located in the C, E, or I zones more than 50 feet from an R zone must meet the following landscape standard:

Findings: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, this criterion is not applicable.*

- b. In OS or R zones or within 50 feet of an R zone. A tower and all accessory equipment or structures located in an OS or R zone or within 50 feet of an R zoned site must meet the following landscape standards:

- (1) Tower landscaping. A landscaped area that is at least 15 feet deep and meets the L3 standard must be provided around the base of the tower.

Findings: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, this criterion is not applicable.*

- (2) Accessory equipment and structures. A landscaped area that is at least 10 feet deep and meets the L3 standard must be provided around the base of all accessory equipment or structures located at grade.

Findings: The associated accessory equipment will be installed on the rooftop. *Therefore, this criterion is not applicable.*

10. Tower design.

- a. For a tower accommodating a Radio Frequency Transmission Facility of 100,000 watts or more, the tower must be designed to support at least two additional transmitter/antenna systems of equal or greater power to that proposed by the applicant and one microwave facility, and at least three two-way antennas for every 40 feet of tower over 200 feet of height above ground.
- b. For any other tower, the design must accommodate at least three two-way antennas for every 40 feet of tower, or at least one two-way antenna for every 20 feet of tower and one microwave facility.
- c. The requirements of Subparagraphs a. and b. above may be modified by the City to provide the maximum number of compatible users within the radio frequency emission levels.

Findings: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, this criterion is not applicable.*

11. Mounting device. The device or structure used to mount facilities operating at 1000 watts ERP or less to an existing building or other non-broadcast structure may not project more than 10 feet above the roof of the building or other non-broadcast structure.

Findings: The new equipment proposed for the central roof location is proposed to be mounted to its new shroud enclosure, with a projection more than 10'-0" above the height of the roof (14'-0" above the roof). If the proposal were to be mounted to the existing penthouse enclosure it could remain at the height it is at and meet this standard, as it would project only 4'-0" above the height of the existing 10'-0" tall penthouse. The equipment and shroud enclosure located at the southern end of the roof does meet this standard as it projects no more than 10'-0" above the roof. *As proposed, the equipment placed at the southern end of the roof and the equipment cabinet meets this criterion, but the equipment in the central position, surrounding the existing penthouse does not meet the requirements of this standard, therefore this criterion is not met for all aspects of the proposal.*

12. Abandoned facilities. A tower erected to support one or more Federal Communication Commission licensed Radio Frequency Transmission Facilities must be removed from a site if no facility on the tower has been in use for more than six months.

Findings: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, this criterion is not applicable.*

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

1. Purpose. These additional regulations are intended to ensure that facilities operating at 1000 watts ERP or less have few visual impacts. The requirements encourage facilities that look clean and uncluttered.
2. Standards. In addition to the regulations in Subsection C., above, facilities operating at 1000 watts ERP or less located in OS, R, C, or EX zones or EG or I zones within 50 feet of an R zone must meet all of the following standards:
 - a. Antennas mounted on towers. Triangular “top hat” style antenna mounts are prohibited. Antennas must be mounted to a tower either on davit arms that are no longer than 5 feet, flush with the tower, within a unicell style top cylinder, or other similar mounting technique that minimizes visual impact.

Findings: The proposal is to mount the antennas on an existing building, not a tower. *Therefore, this criterion is not applicable.*

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

Findings: As previously discussed under criterion 33.815.225 A.1, the visual impact of the proposed antennas and associated screening enclosures poses a significant visual impact to the building by competing with the scale of the building’s historic architectural parapet and affording views from the street. *Therefore, this criterion is not met.*

- c. Lattice. Lattice towers are not allowed.

Findings: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, this criterion is not applicable.*

D. Additional Requirements in R zones. The minimum site area required for a tower in an R zone is 40,000 square feet. This regulation must be met in addition to the regulations in Subsections C. and D., above.

Findings: The proposal is to mount the facility on an existing building. A new tower is not proposed. *Therefore, this criterion is not applicable.*

3) HISTORIC REVIEWS (33.846)

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 located within the Alphabet Historic District. Therefore the proposal requires Historic Design Review approval. The applicable design guidelines are the Community Design Guidelines and the Historic Alphabet District Community Design Guidelines Addendum [33.846.060 E.1.c]

Historic Alphabet District - Community Design Guidelines Addendum

These guidelines were adopted on September 5, 2000 and were developed to work with the Community Design Guidelines to provide a set of guidelines specific to the district.

Community Design Guidelines

These guidelines provide the constitutional framework for all design review areas outside the Central City that are not covered by their own specific area design guidelines. The Community Design Guidelines focus on three general categories: **(P) Portland Personality**, which establishes Portland's urban design framework; **(E) Pedestrian Emphasis**, which states that Portland is a city for people as well as cars and other transportation systems; and **(D) Project Design**, which assures that each development is sensitive to both Portland's urban design framework and the users of the city.

Staff has considered all guidelines and only has addressed those considered applicable to this proposal. Historic Alphabet District Guidelines and Community Design Guidelines are addressed concurrently.

Historic Alphabet District Approval Criteria

1. Historic Changes. Most properties change over time; those changes that have acquired historic significance will be preserved.

Findings: The site is classified as a secondary contributing structure within the Alphabet Historic District, and the proposal does not alter building elements that have acquired historic significance. The proposal is additive, with the new equipment placed in two shroud enclosures on opposite ends of the roof. While the new additions do not complement the existing architecture, the proposal does not eliminate architectural features that have gained historic significance. *Therefore, this guideline is met.*

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

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

P1. Plan Area Character. Enhance the sense of place and identity by incorporating site and building design features that respond to the area's desired characteristics and traditions.

P2. Historic and Conservation Districts. Enhance the identity of historic and conservation districts by incorporating site and building design features that reinforce the area's historic

significance. Near historic and conservation districts, use such features to reinforce and complement the historic areas.

Findings for Historic Alphabet District Guidelines 2 and 3, and Community Design Guidelines P1 and P2:

Aspects of the proposal meet the requirements of these guidelines, as they pose a negligible impact to the historic character of the building and the district. A portion of the proposal, on the other hand, represents a significant visual impact to the roofline of the historic building, impacting the building's architectural integrity and the integrity of the historic district. The Worthington Apartment Building is a fine example of a Gothic/Vernacular style multi-family residence in the Alphabet Historic District, and is significant as part of the larger grouping of residential development that occurred in the Northwest neighborhood. Some of the changes proposed have a substantial impact on the building façade due to their height and mass, and the visual relationship created between the equipment and the decorative parapet that provides the building with much of its architectural character. While the proposed equipment cabinet and screen enclosures are easily distinguished from original building fabric due to their contemporary construction and design, the larger screening structure at the northwest corner of the roof overwhelms the architecture of the building and undermines the integrity of the district due to its high degree of visibility and visual competition with the building parapet. Consequently, this enclosure and equipment have a detrimental impact on the building's overall composition, and views from the street. The smaller shroud enclosure and grouping of equipment at the southern end of the roof presents a significantly smaller visual impact to the building due to its limited height, width and depth, and setback from the edge of the roof. Similarly, the proposed equipment cabinet maintains the integrity of the building due to its shorter height and mass and significant setbacks from the roof edges. *These guidelines are therefore met for the equipment cabinet and the smaller shroud and equipment located at the southern end of the roof, but not met for the larger shroud and equipment located at the northern end of the roof. If the applicant submitted a proposal for rooftop additions with a reduced height and mass, and showing substantial consolidation on the rooftop, these guidelines might be met for all aspects of the proposal. The Guidelines are met for the equipment cabinet, and the equipment and smaller shroud enclosure located at the southern end of the roof, due to their limited height, mass, and adequate setback from roof edges that limits their visibility.*

Community Design Guidelines

P3. Gateways. Develop or strengthen the transitional role of gateways identified in adopted community and neighborhood plans

Findings: The site is not indicated as a “gateway” location in the adopted community and neighborhood plans. *Therefore, this guideline does not apply.*

E1. The Pedestrian Network. Create an efficient, pleasant, and safe network of sidewalks and paths for pedestrians that link destination points and nearby residential areas while visually and physically buffering pedestrians from vehicle areas.

E2. Stopping Places. New large-scale projects should provide comfortable places along pedestrian circulation routes where people may stop, visit, meet, and rest.

E3. The Sidewalk Level of Buildings. Create a sense of enclosure and visual interest to buildings along sidewalks and pedestrian areas by incorporating small scale building design features, creating effective gathering places, and differentiating street level facades.

E4. Corners that Build Active Intersections. Create intersections that are active, unified, and have a clear identity through careful scaling detail and location of buildings, outdoor areas, and entrances.

E5. Light, Wind, and Rain. Enhance the comfort of pedestrians by locating and designing buildings and outdoor areas to control the adverse effects of sun, shadow, glare, reflection, wind, and rain.

Findings for E1, E2, E3, E4, and E5: The proposal is for additions to the building roof, thus guidelines relating to the pedestrian zone at the street and to the building's articulation of the corner do not apply to this proposal. *Therefore, these guidelines do not apply.*

D1. Outdoor Areas. When sites are not fully built on, place buildings to create sizable, usable outdoor areas. Design these areas to be accessible, pleasant, and safe. Connect outdoor areas to the circulation system used by pedestrians;

D3. Landscape Features. Enhance site and building design through appropriate placement, scale, and variety of landscape features.

D2. Main Entrances. Make the main entrances to houses and buildings prominent, interesting, pedestrian accessible, and transit-oriented.

D4. Parking Areas and Garages. Integrate parking in a manner that is attractive and complementary to the site and its surroundings. Locate parking in a manner that minimizes negative impacts on the community and its pedestrians. Design parking garage exteriors to visually respect and integrate with adjacent buildings and environment.

D5. Crime Prevention. Use site design and building orientation to reduce the likelihood of crime through the design and placement of windows, entries, active ground level uses, and outdoor areas.

Findings for D1, D2, D3, D4 and D5: The proposal is for additions to the building roof, thus guidelines to outdoor areas, main entrances, parking and garages and crime prevention do not apply to this proposal. *Therefore, these guidelines do not apply.*

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

D7. Blending into the Neighborhood. Reduce the impact of new development on established neighborhoods by incorporating elements of nearby, quality buildings such as building details, massing, proportions, and materials.

D8. Interest, Quality, and Composition. All parts of a building should be interesting to view, of long lasting quality, and designed to form a cohesive composition.

Findings for D6, D7 and D8: A portion of the rooftop cellular equipment proposal presents a detrimental impact to the architectural character and historic integrity of the Worthington Apartment Building, a contributing structure to the Alphabet Historic District. The five-story Worthington Apartment Building was built in 1929 in the Gothic/Vernacular style, and is one of many architecturally intact examples of historic multi-family housing in the Historic District. The building is located directly across the street from the Landmark Olympic Apartment Building, and the 2 ½-story Landmark Richard Koehler House borders the site to the north.

The Worthington Apartment Building is clad in smooth stucco with decorative embellishments including an arched, broken pediment above the recessed main entry that incorporates heraldic shields, crests, modillions and “marquee” style bulb lighting. Pilasters are placed between structural bays on the west and south façades, and the primary window type is six-over-six double-hung wood sash. The roofline is embellished with a stepping form and expressive moldings in the form of cast-stone pendants, a frieze of cast-stone garlands, and fluted pilasters with small canopies. The side walls are simpler in nature, lacking the ornamentation of the two street-facing façades.

Located at the corner of NW 19th Avenue and NW Irving Street, and within a Pedestrian District, the five-story building is located in a highly visible block within the Alphabet

Historic District. The shorter landmark building to the north of the site affords clear views of the building's north-facing roofline from the one-way traffic traveling south on NW 19th Avenue. Ample views are also provided for the west and south facades, which are the more ornamented building facades. The neighborhood has active pedestrian traffic, with Couch Park located only two blocks to the south of the site on NW 19th Avenue, and the site is positioned between NW Lovejoy Street and NW Burnside Street, the prior a designated Community Main Street, and the latter a Regional Main Street.

The new facilities are to be screened by two new rectangular fiberglass enclosures, a larger enclosure that surrounds the existing penthouse and measures 19'-6" wide, 15'-4" deep and 14'-0" tall, and a smaller enclosure located near the southern edge of the roof which measures 5'-0" square and 10'-0" tall. The larger enclosure screens four new antennas and two new microwave dishes, as well as four existing antennas on that are attached to the existing penthouse. The smaller enclosure contains two antennas and one microwave dish. Each antenna measures approximately 3'-9" tall, 0'-6" wide and 0'-3" deep, but is mounted at differing heights above the roof, as determined by the requirements of the site and the technology. The microwave dishes measure 2'-2" wide and are similarly mounted at a height determined by the requirements of the technology. The site support cabinet located in the central portion of the roof measures 7'-3" tall to the top of its GPS antenna and 2'-2" square.

The modest scale of the 47'-0" tall (height to the top of the lower parapet) quarter-block building, and the delicacy of its ornamentation, presents difficulties when trying to insert multiple rooftop additions in a manner that complements the building and is supportive of its architectural integrity. The larger enclosure located towards the northwestern corner of the roof represents a substantial visual disruption to the building's rooftop environment and to the building facades, due to its significant mass and height, which competes with the building's architectural parapet and the scale of the building. On the other hand, the smaller shroud enclosure and equipment located at the southern end of the roof does not pose significant visual interference. Due to the high visibility of this building, the importance of a well integrated design for any proposed rooftop additions that respects the character of the building and the Historic District is critical to reducing the impact of the new development on the established neighborhood.

Maintaining the visual integrity of the building's roofline is important to the integrity of the Historic District, as visual disruption caused by new additions to the building undermines the historic architectural character of the District, and represents a lack of consistency between the treatment of rooftops in the District. The existing antennas, which are both pole mounted and directly attached to the parapet, were approved in 1997, before the inception of the Alphabet Historic District in 2000. The addition of new cellular equipment, with or without accompanying shroud enclosures, poses a significant challenge to this building, in part due to the technical requirements for the equipment to either be located very close to the building edge, or be of a taller height when setback from the parapet a greater distance. This creates a challenge in finding a location where the equipment is adequately consolidated on the rooftop, low enough to not impact significant views from surrounding streets and buildings, and does not create a significant volume of new bulk, mass, and "visual clutter" on the building. The smaller shroud and equipment located at the southern end of the roof, as well as the equipment cabinet, do not significantly degrade views of the building or views onto the roof, and thus are approvable aspects of the proposal.

If a solution were proposed that placed the majority of the new equipment at a low enough height and set back an adequate distance from the edges of the roof so that the additions were not visible from the street, and the equipment were consolidated on the roof to present a cohesive composition, as well as being integrated with the building such that the additions did not represent a significant volume of new elements on the

roof, these guidelines could be met for all aspects of the proposal. As it stands, only the equipment cabinet and the addition located at the southern end of the roof are supported by the Guidelines. The smaller shroud enclosure and the site support cabinet will be painted a light grey matte color to further diminish their visual impact on the roof. *Due to the large mass of the new enclosure and equipment at the northwestern corner of the roof, their visibility from the street, and their visual competition with the building and the District's historic architecture, these guidelines are not met. The Guidelines are met for the equipment cabinet, and the smaller shroud enclosure and associated cellular equipment located at the southern end of the roof, due to their limited height and mass, adequate setback from the roof edges, and grey color that limits their visibility.*

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 purpose of the historic design review process is to ensure that exterior alterations to existing buildings protect the integrity of the special characteristics of the historic resources. Aspects of the proposal represent a significant visual impact to the roofline of the historic building, impacting the building's architectural integrity and the integrity of the Historic District. The height and mass of the proposed equipment and screening element located at the northwestern corner of the roof visually overwhelms the existing structure, and in particular the building's decorative parapet that faces NW 19th Avenue and NW Irving Street. If a solution were proposed that placed the new equipment at a low enough height, and set back an adequate distance from the edges of the roof, so that the additions were not visible from the street, and were consolidated on the roof to present a cohesive composition, as well as integrated with the building such that they did not represent a significant volume of new additions to the roof, these guidelines could be met for all aspects of the proposal. The Guidelines are met for the equipment cabinet, and the equipment and smaller shroud enclosure located at the southern end of the roof, due to their limited height and mass, and adequate setback from roof edges that limit their visibility. **Based on the current drawings, the proposal for the larger shroud enclosure and associated equipment located at the northwestern corner of the roof does not meet the following approval criteria: Historic Alphabet District Guidelines 2 and 3 and Community Design Guidelines P1, P2, D6, D7 and D8.**

ADMINISTRATIVE DECISION

A portion of this proposal is approved (1) and a portion denied (2).

1. Approval of new rooftop cellular equipment and one shroud enclosure located on the Worthington Apartment building within the Historic Alphabet District and the Northwest Plan District including:

- Two antennas and one microwave dish located 9'-0" from the southern edge of the roof with an associated shroud enclosure that measures 5'-0" square and 10'-0" tall; *and*
- One site support cabinet located in the central portion of the roof measuring 7'-3" tall to the top of its GPS antenna and 2'-2" square.

2. Denial of new rooftop cellular equipment and one shroud enclosure located on the Worthington Apartment building within the Historic Alphabet District and the Northwest Plan District including:

- One rectangular fiberglass enclosures that surrounds the existing penthouse and measures 19'-6" wide, 15'-4" deep and 14'-0" tall and includes screens four new antennas and two new microwave dishes, as well as four existing antennas on that are attached to the existing penthouse.

Approved elements per Exhibits C.1 through C.14, signed and dated September 8, 2009, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related condition (B) must be noted on each of the 4 required drawings or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE - Case File LU 07-183555 CU HDZ." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."

Decision rendered by:  on September 8, 2009.

By authority of the Director of the Bureau of Development Services

Decision mailed: September 10, 2009

Staff Planner: Abigail Fowle

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 15, 2009, and was determined to be complete on **June 23, 2009**.

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 15, 2009.

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 waived the 120-day review period, as stated with Exhibit A.3.

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 September 24, 2009** at 1900 SW Fourth Ave. Appeals can be filed on the first floor in the Development Services Center until 3 p.m. After 3 p.m., 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. Low-income individuals appealing a decision for their personal residence that they own in whole or in part may qualify for an appeal fee waiver. In addition, an appeal fee may be waived for a low income individual if the individual resides within the required notification area for the review, and the individual has resided at that address for at least 60 days. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Fee waivers for low-income individuals must be approved prior to filing the appeal; please allow 3 working days for fee waiver approval. 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 contact the receptionist at 503-823-7967 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 **September 25, 2009 – (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.

Zone Change and Comprehensive Plan Map Amendment approvals do not expire.

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
 - 1. Statement and Drawings
 - 2. Additional Information
 - 3. 120-Day Waiver
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Enlarged Roof Plan (attached)
 - 3. Enlarged Roof Plans
 - 4. West Elevation (facing NW 19th Avenue), North Elevation (attached)
 - 5. East Elevation, South Elevation (facing NW Irving Street) (attached)
 - 6. Enlarged North Elevation, Enlarged South Elevation
 - 7. Enlarged East Elevation, Enlarged West Elevation
 - 8. Equipment Cabinet Details
 - 9. Equipment Details
 - 10. Screen Enclosure Details
 - 11. Antenna Details
 - 12. Antenna Details
 - 13. Electrical Details
 - 14. Radio Frequency Transmission Levels Memo

D. Notification information:

1. Mailing list
2. Mailed notice

E. Agency Responses:

1. Life-Safety Plans Examiner of BDS
2. Water Bureau

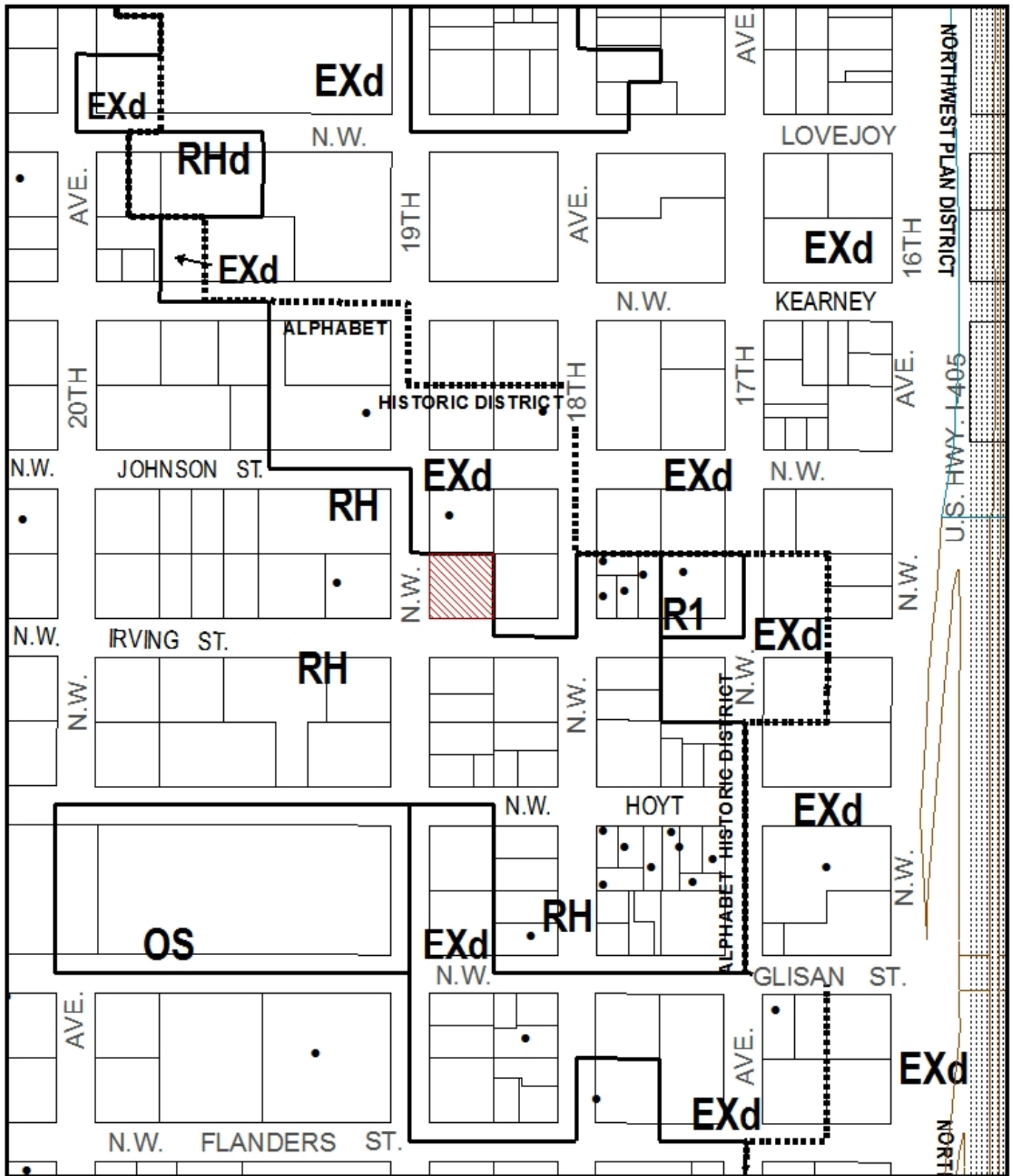
F. Correspondence:

1. John Bradley, Chair of the Northwest District Association Planning Committee responded on July 17, 2009 in opposition to the proposal.

G. Other:

1. Original LU Application
2. Site History Research
3. Incomplete Letter
4. Site Photos

The Bureau of Development Services is committed to providing equal access to information and hearings. If you need special accommodations, please call 503-823-0625 (TTY 503-823-6868).



ZONING



Site



Historic Landmark

This site lies within the:
ALPHABET HISTORIC DISTRICT HISTORIC DISTRICT
NORTHWEST PLAN DISTRICT



NORTH

File No.	LU 09-102622 HDZ, CU
1/4 Section	2928
Scale	1 inch = 200 feet
State_Id	1N1E33AC 6500
Exhibit	B (Jan 20, 2009)

**PACIFIC TELECOM SERVICES,
LLC**
548 First Avenue S., Suite 650
Seattle, WA 98104
Phone: (206) 342-8000 Fax: (206) 913-8513

OR-POR408-A
708 NW 19TH AVE
PORTLAND, OR 97209

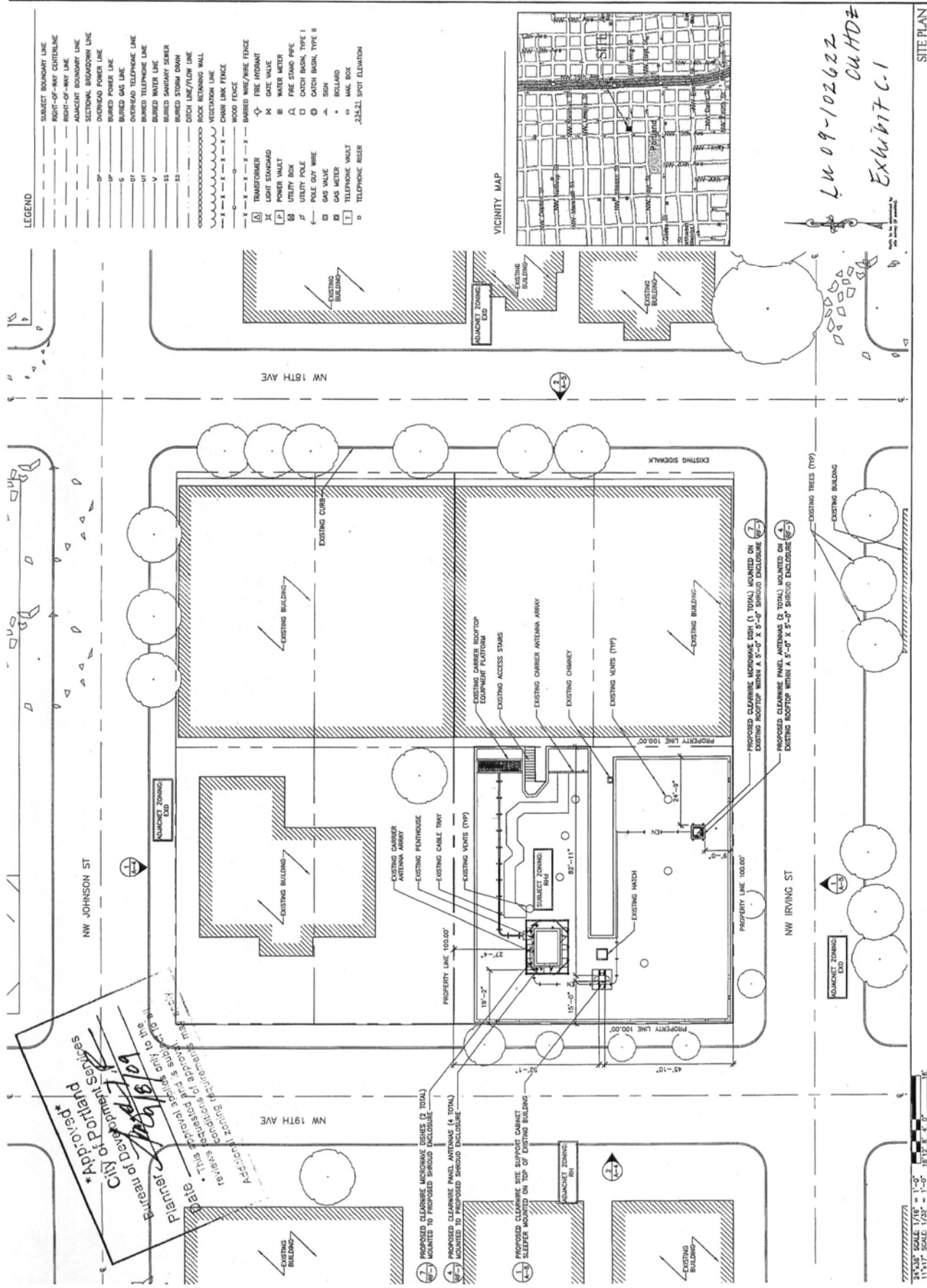
[illegible]

SHEET TITLE
SITE PLAN

SHEET NUMBER

A-1

SITE PLAN



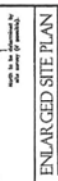
PACIFIC TELECOM SERVICES, LLC
585 First Avenue S., Suite 650
Seattle, WA 98104
Phone: (206) 242-9000 Fax: (206) 803-8300

NO.		DATE	DESCRIPTION	NO.	DATE	DESCRIPTION
1	12-24-88		PRELIM. ZD'S 0			
2	12-24-88		FINAL ZD'S 0			
3	12-24-88		REVISED FINAL ZD'S 0			
4	26-11-88		REVISED FINAL ZD'S 0			

NOT FOR CONSTRUCTION UNLESS
LABELED AS CONSTRUCTION SET

SHEET TITLE
ENLARGED SITE PLAN

SHEET NUMBER
A-2



2009-102622 CU HDZ
Exhibit C-2

WORTHINGTON

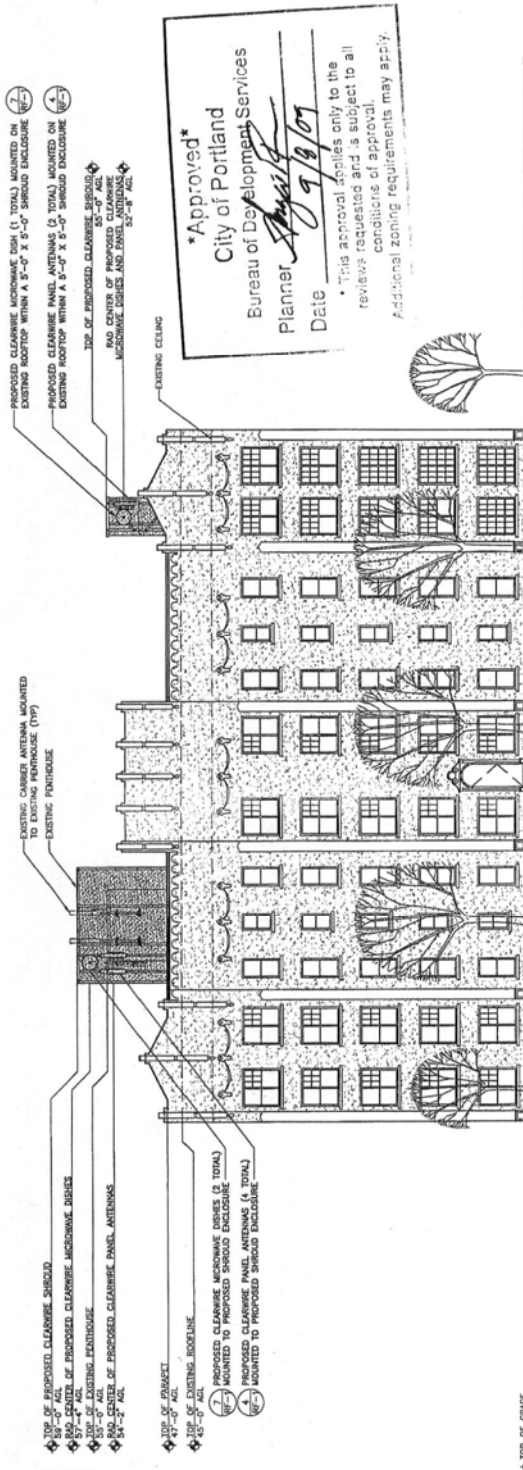
708 NW 19TH AVE
PORTLAND, OR 97209

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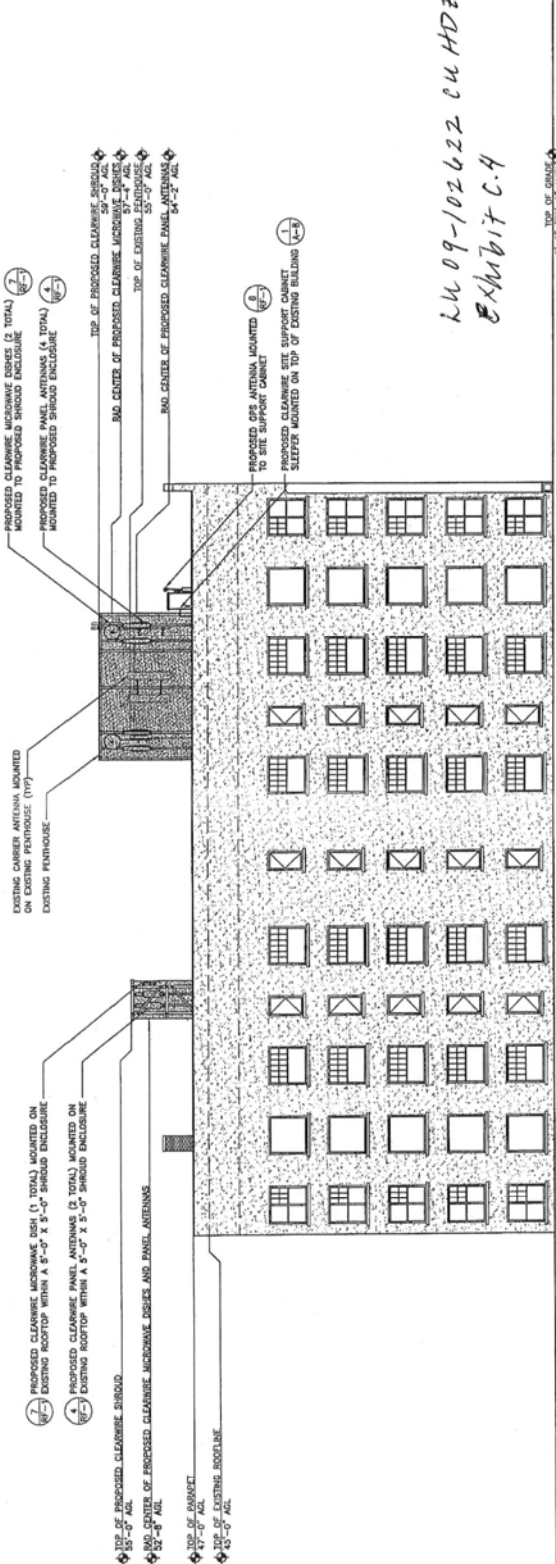
SHEET TITLE
NORTH AND WEST ELEVATIONS

SHEET NUMBER

A-4



WEST ELEVATION	2
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NORTH ELEVATION	1
-----------------	---

LU 09-102622 CU HDZ
Exhibit C.4

TOP OF GRADE
0'-0" (78'-0" AMSL)

NOTES:

1. (12) RUNS OF 5/16" ETHERNET CABLE AND (3) RUNS OF 1/2" COAX TO BE INSTALLED TO EXISTING BUILDING ROOFTOP
2. ANTENNAS SHROUDS TO BE PAINTED AND TEXTURED TO REPRESENT A SOLID STUCCO LOOK IN A LIGHT COOL MATTE GRAY COLOR

1"=36" SCALE: 1/8" = 1'-0"

24"x36" SCALE: 1/8" = 1'-0"

PTS
PACIFIC TELECOM SERVICES, LLC
368 First Avenue S., Suite 650
Seattle, WA 98104
Phone: (206) 342-9000 Fax: (206) 303-8511

CR-POR408-A
708 NW 19TH AVE
PORTLAND, OR 97209

REVISIONS				DESCRIPTION	INITIALS
NO.	DATE	BY	REASON		
1	12-10-99			PRELIM ZD'S	
2	12-14-99			FINAL ZD'S	
3	12-14-99			REVISED FINAL ZD'S	
4	12-14-99			REVISED FINAL ZD'S	

NOT FOR CONSTRUCTION UNLESS LABELED AS CONSTRUCTION SET

SHEET TITLE
SOUTH AND EAST ELEVATIONS

SHEET NUMBER

A-5



LU 09-102622 CU HDZ-
Exhibit C.5



24"x36" SCALE: 1/8" = 1'-0"
11"x17" SCALE: 1/16" = 1'-0"

24"x36" SCALE: 1/8" = 1'-0"
11"x17" SCALE: 1/16" = 1'-0"