



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

1900 SW 4th Avenue, Suite 5000 Portland, Oregon 97201 503-823-7300 Fax 503-823-5630 TTY 503-823-6868 www.portlandonline.com/bds

Date: March 24, 2009
To: Interested Person

From: Mark Walhood, Land Use Services 503-823-7806

mwalhood@ci.portland.or.us

# 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 09-103425 DZ

(CONCORDIA STUDENT HOUSING CHANGES)

#### GENERAL INFORMATION

**Applicant:** Theresa Paulson (503) 224-9560

Group Mackenzie 1515 SE Water Avenue Portland, Oregon 97293

**Owner:** Concordia University

Attn.: Dennis Stoecklin (503) 288-9371

2811 NE Holman Street Portland, Oregon 97211

**Site Address:** 6405-6551 NE 27<sup>th</sup> Avenue

**Legal Description:** IRVINGTON PK; BLOCK 68 LOT 10-18,

 Tax Account No.:
 R421322800

 State ID No.:
 1N1E13CB 01000

 2022 2022 2022

**Quarter Section:** 2333, 2433

**Neighborhood:** Concordia, contact George Bruender at 503-287-4787.

**Business District:** North-Northeast Business Assoc, contact Joice Taylor at 503-445-1321. **District Coalition:** Northeast Coalition of Neighborhoods, contact Lauren McCartney at

503-823-4135.

**Zoning:** IRdh (Institutional Residential base zone with the "d" or Design and "h"

or Aircraft Landing overlay zones)

Case Type: DZ (Design Review)

**Procedure:** Type II, an administrative decision by staff that can be appealed to the

Design Commission.

**Proposal:** Late last summer, a student housing project for Concordia University was approved on the half-block at the west side of NE 27<sup>th</sup> Avenue, between NE Liberty and NE Highland Streets. The previous case (LU 08-120374 IM DZM ZC) included approval of the required Design Review, Zoning Map Amendment, Impact Mitigation Plan (IMP) Compliance and IMP Amendment Reviews. In the process of refining their construction documents, and with the initiation of site preparation work, several changes were made to this earlier approval.

The applicant is seeking approval for several changes to the prior Design Review approval. No changes to the number of units or overall project scale are proposed. The requested changes include the following:

- □ TREES: The approved landscape plan included the retention of an existing 24" fir tree along the alley, and a 22" spruce tree at the corner of NE 27th Avenue and Liberty Street. After preliminary site work, the applicant determined that retention of these trees would interfere with the building footprint and/or underground utilities and stormwater swales. Concordia received a zoning violation for the removal of the spruce tree. The applicant has proposed the planting of a Douglas Fir in place of the removed spruce tree, and an amended landscape plan eliminating the retained fir along the alley;
- DATA ROOMS: Minor changes were made to the two central buildings (2 and 3) on the west elevation, facing the parking area, to accommodate computer network equipment. In building 2, a 20 sq. ft. addition was made at the first floor to house equipment, and a new access door would be provided. At building 3, the equipment was able to be contained inside the structure, but the access door to a bike parking storage room was relocated 4' to the south;
- SUNSHADES: The four approved buildings all included projecting metal and mesh sunshades atop most window openings. Given concerns about long-term maintenance, snow loads, and water leakage into the building, the sunshades have been re-designed. The revised sunshade design would include a similarly-scaled metal projection as originally approved, but without the metal mesh screen atop each sunshade, and each sunshade would now include diagonal metal support braces. In addition to this change in sunshade design, the applicant has requested that the sunshades be eliminated on the interior/west elevation of the two internal buildings (2 and 3); and
- □ WINDOW TYPE: As approved, all bedroom windows included horizontal mullions separating a fixed from an operable awning window. The applicant has proposed changing all bedroom windows to include vertical mullions with one fixed and one operable sliding window. Bedroom window changes are related to building code egress requirements. The window design for most of the living areas has been similarly changed, with operable sliding versus awning windows.

Because these non-exempt changes modify the Design Review portion of an earlier approval, a subsequent Type II Design Review is required.

**Relevant Approval Criteria:** In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant criteria are the *Community Design Guidelines*.

## **ANALYSIS**

**Site and Vicinity:** Concordia University is a small university in the middle of an attractive neighborhood of well-maintained single-dwelling residences. A Master Plan was approved for the university in 1991 that established campus boundaries which generally extend from NE Dekum Street south to NE Holman Street, and from NE 27<sup>th</sup> to NE 29<sup>th</sup> Avenues. The master plan boundary also included properties along the west side of NE 27<sup>th</sup> Avenue between NE Liberty and Holman Streets, the St. Michael's Church and parking area on the east side of NE

29<sup>th</sup> Avenue, and the area between NE 29<sup>th</sup> and 30<sup>th</sup> Avenues, extending from NE Portland Boulevard south to NE Holman Street. Not all of the property within the campus boundary is owned by the university.

The academic core of the campus generally occupies the southern portion of the main block bounded by NE Holman Street, NE 27<sup>th</sup> Avenue, NE 29<sup>th</sup> Avenue (vacated right-of-way), and NE Liberty Street. This campus core includes several academic buildings, and the northern section of the core, along NE Liberty Street, includes more open space occupied by the original athletic field and tennis courts. The existing student housing buildings are located in the southeast quadrant of the campus, near the intersection of NE 30<sup>th</sup> Avenue and NE Dekum Street, within the IMP boundary. St. Michael's Lutheran Church is located at the southeast corner of NE 29<sup>th</sup> Avenue and NE Dekum Street, within the IMP boundary. Faubion School is located east of the church, outside of the IMP boundary.

The site under consideration in this application lies west of the traditional campus core, on a half-block site currently developed with eight single-family homes. The site faces the west frontage of NE 27th Avenue, between NE Liberty and NE Highland Streets, and is separated by a service alley from the remainder of the block immediately to the west. Across the alley to the west are nine single-family homes, including one- and two-story homes. The blocks immediately to the south, north, and northeast of the site are similarly residential in character. The Concordia Buildings directly across NE 27th Avenue to the east of the site include the P.E. Building, the Fine Arts Building, and two tennis courts.

The abutting street frontages at the project site are currently improved with paved two-way roadways with on-street parking, curbing, planting strips, and concrete public sidewalks. Northeast 27th Avenue abutting the site is designated by the City's Transportation System Plan (TSP) as a Transit Access Street, City Bikeway, and City Walkway, but as a Local Service Street for all other designations. The abutting segments of both NE Liberty and NE Highland Streets are designated as Local Service Streets for all modes in the TSP.

**Zoning:** The housing site is currently zoned Institutional Residential, with both the "d" or Design and "h" or Aircraft Landing overlay zones (IRdh). The IR base zone is intended to provide for the establishment and growth of large institutional campuses as well as higher density residential development. The Design overlay zone always accompanies the IR base zone, resulting in requirements that development either meet objective design standards, or be approved through design review. The "h" overlay zone imposes height limits for structures and vegetation within aircraft approach paths to Portland International Airport.

**Land Use History:** City records indicate several land use reviews applicable to the site. The relevant cases include the past design review, zone change, and impact mitigation plan (IMP) approvals for this project under LU 08-120374 IM DZM ZC, as well as the Concordia IMP itself under case file LU 02-106366 IM. A complete listing of relevant case files can be found in Exhibit G.2.

**Agency Review:** A "Notice of Proposal in Your Neighborhood" was mailed **February 6, 2009**. The following Bureaus have responded:

- The Site Development Section of the Bureau of Development Services has no objection to the proposal. The applicant must obtain approved revisions to landscaping plans for all permits affected by the tree protection/planting changes. If any changes to Landscape Certification requirements are necessary, those changes should be communicated to the inspectors. Exhibit E.1 includes staff contact information.
- The *Portland Bureau of Transportation* notes that the proposed changes do not appear to impact the public right-of-way or transportation-related components of the original review. Based on no significant changes to these elements in the response to LU 08-120374 IM DZM ZC, and provided that the proposed planting of trees and/or other

landscape does not obstruct or interfere with Tri-Met bus loading zone standards and loading operations, including loading from rear door access, Transportation has no objection to the proposed changes. Exhibit E.2 contains staff contact information.

• The *Bureau of Environmental Services* (BES) notes that the site is in the Columbia Slough Watershed. The Columbia Slough is the received water body for runoff from approximately 32,700 acres of primarily urban land in the City of Portland. As a result, sediments within the Columbia Slough contain a range of contaminants associated with urban activities (e.g., petroleum, polycyclic aromatic hydrocarbons, PCBs, phthalates, and metals) as well as legacy contaminants associated with historical agricultural practices and other historic urban activities.

Mature trees are important to watershed health for many reasons. Benefits include the capture of precipitation and the mitigation of runoff volume and intensity; pollutant filtration; and habitat for native bird and wildlife species. Though it can take many years for newly planted trees to mature and provide the same functions as established trees, BES supports the planting of a native Douglas Fir to replace the already removed Spruce. In addition, the removal of the fir along the alley will allow for the construction of a vegetated stormwater facility as required by the City of Portland's Stormwater Management Manual. Therefore, BES does not object to the proposed changes to LU 08-120374 IM DZM ZC. Exhibit E.3 contains staff contact information.

- The *Water Bureau* has reviewed the proposal and offered no objections or concerns. Exhibit E.4 contains staff contact and additional information.
- The *Tri-County Metropolitan Transit District* (Tri-Met) has responded with comments. Tri-Met bus line 9 serves the site with a southbound bus stop on 27th nearside Highland, southbound (LocID 7245). Currently the stop has a concrete front landing pad and a bus zone. Tri-Met would like to maintain this bus stop, bus zone (~60 feet), and ensure that upon completion of construction, there will still be an ADA accessible front landing pad for the stop. Tri-met would also like to coordinate placement of the southernmost tree scheduled to be planted near the bus stop.

Tree placement should not interfere with rear door access to the bus. To achieve this, we typically ask for a 10-foot front landing pad, followed by a 10 foot area that can contain landscaping, and finally another 10 foot zone that's free of trees, shrubs, and other tripping hazards. This 10-10-10 format ensures that both the front and rear doors are accessible. Exhibit E.5 contains staff contact information, and an e-mail record of discussion of the issue between staff, Portland Transportation, and the applicant.

STAFF NOTE: No changes are proposed to the bus loading area in this application, versus the arrangement that was proposed during the original case (LU 08-120374 IM DZM ZC). There will be 20'-0" of concrete bus landing area in the bus stop area, allowing for ADA accessible front bus entry. The next 10'-0" (totaling 30'-0") is not concrete, but grass. The nearest tree is well out of this 30'-0" bus loading area. For these reasons, Tri-Met's concerns regarding the bus loading area were satisfactorily addressed through the original case.

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on February 6, 2009. No letters were received from notified property owners or the neighborhood association.

#### ZONING CODE APPROVAL CRITERIA

DESIGN REVIEW
Chapter 33.825 Design Review
Section 33.825.010 Purpose of Design Review

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

#### Section 33.825.055 Design Review Approval Criteria

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

**Findings:** Per condition E of the updated Concordia IMP (LU 02-106366 IM), this student housing project was considered through a Design Review. Because this project involves changes to that approval, another Design Review is necessary. As identified in the 2002 IMP, the applicable design guidelines are the Community Design Guidelines.

# **Community Design Guidelines**

The Community Design Guidelines consist of a set of guidelines for design and historic design cases in community planning areas outside of the Central City. These guidelines address the unique and special characteristics of the community plan area and the historic and conservation districts. 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 movement 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 has addressed only those guidelines considered applicable to this project.

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

**Findings for D3:** The changes to the previously-approved project considered in this application result in the removal of two existing trees, and the addition of one new tree. The total percentage of landscaped area remains the same as before, at approximately 19% of the site. The spruce that was removed near the northeast corner of the site will be replaced with a native Douglas Fir. The fir is more suitable for planting near the future building, thereby maintaining the intent of the original design. The existing tree along the alley that was removed had a root zone that was impacted by construction of the stormwater swale, and the spruce tree at the northeast corner also had a root zone impacted by the foundation of one of the new buildings.

The scale and variety of landscape plantings on the project, therefore, will remain essentially the same as originally approved. No changes to the planting palette are proposed beyond the addition of the Douglas Fir. Douglas Firs are found elsewhere on the campus, and throughout the nearby neighborhood, thereby blending in with the existing context.

The applicant is under enforcement for removal of the trees, via violation case 08-182361 CC. In order to allow construction to continue on the project without replacement of the tree within 30 days, and therefore to ensure the long-term health of the new tree itself, the approval in this decision will allow for the tree planting at a later date, but no later than prior to approval of any final inspections or occupancy of the project.

 $Therefore,\,these\,guidelines\,are\,met.$ 

**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 & D8:** The minor building alterations proposed include a modified sunshade design and placement on the buildings, changes to the interior/east facades for the data rooms, and a revised window type. The proposed changes do not significantly alter the scale, color, or character of the previously-approved buildings. The dimensions and proportions of the new sunshades, and the elimination of these elements on the west/interior facades, does not change the overall architectural integrity of the project, result in significant impacts to the neighborhood, or reduce the visual interest or material quality of the design. The revised window mullions in the new windows are consistent with the original architectural concept, and are necessary to meet building code (egress) standards.

Therefore, these guidelines are met.

#### DEVELOPMENT STANDARDS

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

#### CONCLUSIONS

The applicant is under enforcement for the removal of a tree at the northeast corner of the site, which originally was intended to remain (08-182361 CC). In addition, several minor architectural changes have been proposed. These changes do not significantly alter the original design concept of the project, and a replacement evergreen tree has been proposed. The request is able to meet the relevant design guidelines, and should be approved.

# **ADMINISTRATIVE DECISION**

**Approval** of **Design Review** for the following alterations to the previously-approved Concordia Student Housing Project, originally reviewed under LU 08-120374 IM DZM ZC:

- Removal of an existing 24" fir tree along the alley, as well as a 22" spruce tree near the northeast corner of the site. The applicant has proposed the planting of a Douglas Fir in place of the removed spruce tree, and an amended landscape plan eliminating the (previously retained) fir along the alley. The replacement Douglas Fir must be installed prior to approval of any final inspection on the building permit, and prior to project occupancy;
- Minor changes to the east façade of buildings 2 and 3, including a 20 sq. ft. first floor addition and door on building 2, and re-location of a single door on building 3;
- Revised design for the projecting sunshades on the building, with individual sunshades now constructed of projecting 0'-4" tall metal frames, projecting 2'-0" out from the building face, and supported by 0'-4" tall angled metal support brackets. The sunshades are to be eliminated on the interior/west elevations of buildings 2 and 3; and
- New window designs for bedrooms and living areas, with fixed and awning window types being replaced by fixed and sliding windows, and vertical versus horizontal mullions.

These approvals are granted based on conformance with the approved plans and details, Exhibits C.1 through C.10, each being signed and dated March 19, 2009, and subject to the following condition:

A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibits C.1-C.10. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 09-103425 DZ. No field changes allowed."

| Staff Planner: Mark Walhood | 1                                |                      |
|-----------------------------|----------------------------------|----------------------|
| Decision rendered by:       |                                  | on March 19, 2009    |
| By authority of             | of the Director of the Bureau of | Development Services |

Decision filed March 20, 2009.

Decision mailed March 24, 2009.

**About this Decision.** This land use decision is **not a permit** for development. A Final Plat must be completed and recorded before the proposed lots can be sold or developed. 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 20, 2009, and was determined to be complete on **February 3, 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 20, 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 did not waive or extend the 120-day review period.

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

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

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

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

**Appealing this decision.** This decision may be appealed to the Design Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on April 7, 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 <a href="https://www.portlandonline.com">www.portlandonline.com</a>.

**Attending the hearing.** If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Design Commission is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 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 Design Commission an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

## Recording the final decision.

If this Land Use Review is approved, the final decision must be recorded with the Multnomah County Recorder.

A few days prior to the last day to appeal, the City will mail instructions to the applicant for recording the documents associated with their final land use decision.

- Unless appealed, The final decision may be recorded on or after April 8, 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; OR
- 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 503-823-7967.

**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.

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

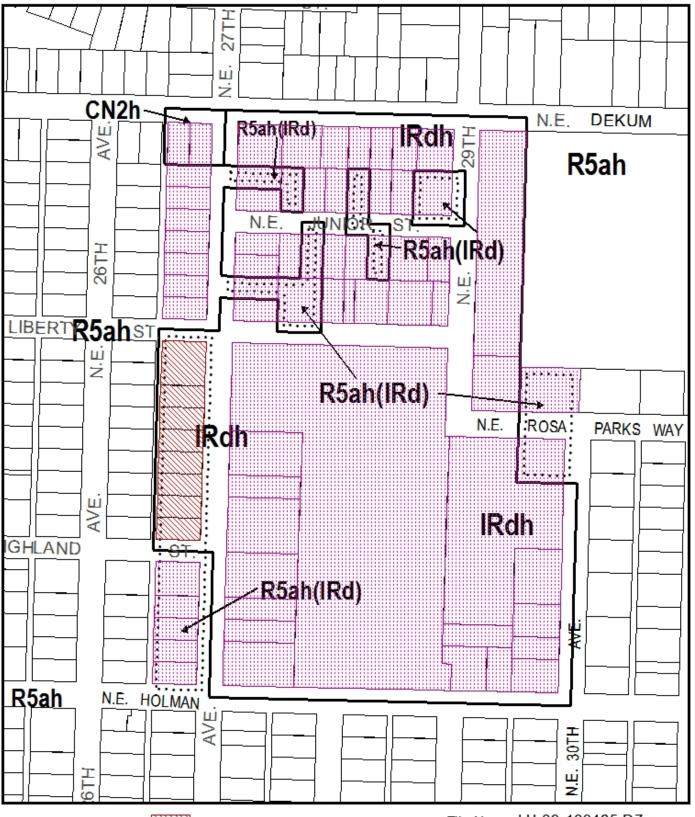
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

# **EXHIBITS**

#### NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Landscape Plan (attached)
  - 2. Elevations (attached)
  - 3. Enlarged Elevation (attached)
  - 4. Revised Sunshade Detail (attached)
  - 5. Site Plan
  - 6. Grading Plan
  - 7. Utility Plan
  - 8. Landscape Planting Details
  - 9. Landscape Irrigation Details
  - 10. Large/Scalable Plan Set 8 pages total excludes sunshade detail
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice
- E. Agency Responses:
  - 1. Site Development Section of the Bureau of Development Services
  - 2. Portland Bureau of Transportation
  - 3. Bureau of Environmental Services
  - 4. Water Bureau
  - 5. Tri-County Metropolitan Transportation District
- F. Correspondence:
  - 1. (none received at time of decision mailing)
- G. Other:
  - 1. Original LU Application Form, Tax Account Information and Receipt
  - 2. Site History Research
  - 3. Code Compliance Documents 08-182361 CC

The Bureau of Development Services is committed to providing equal access to information and hearings. If you need special accommodations, please call 503-823-7300 (TTY 503-823-6868).

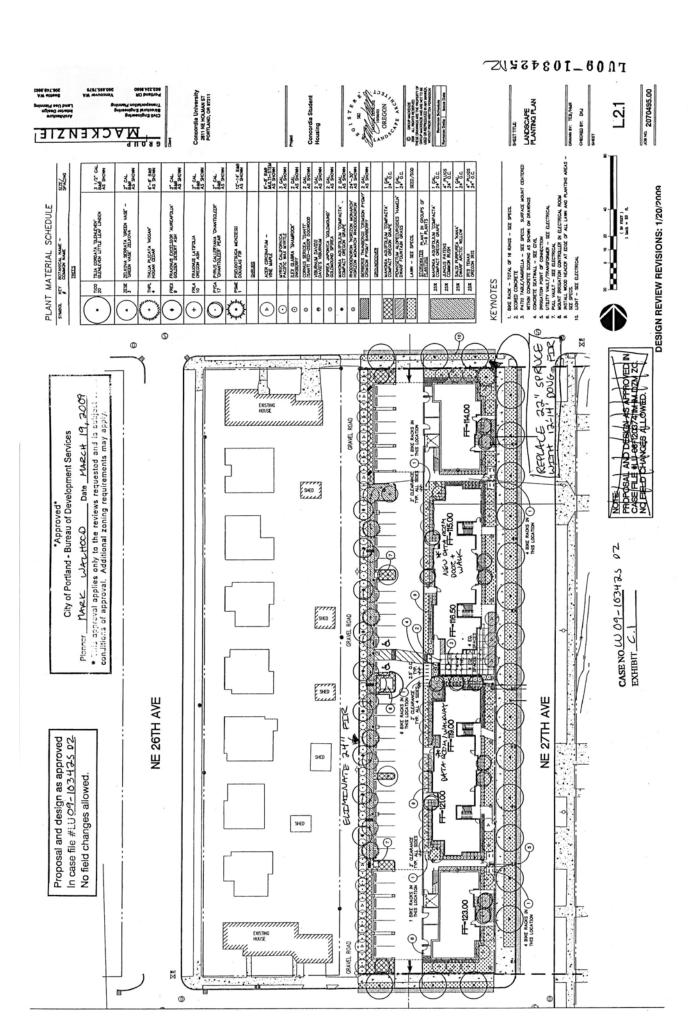


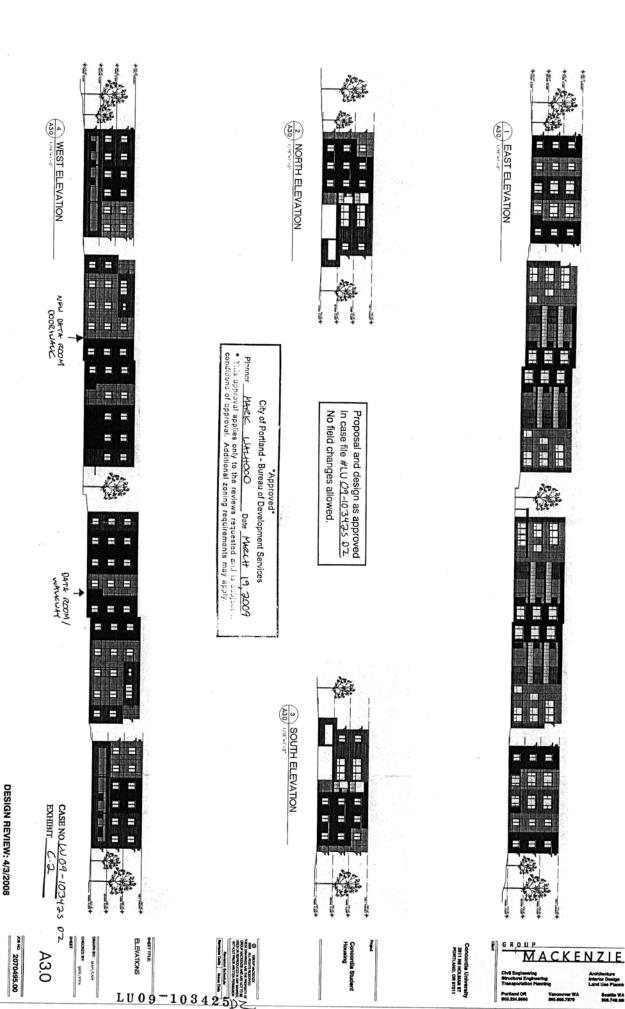


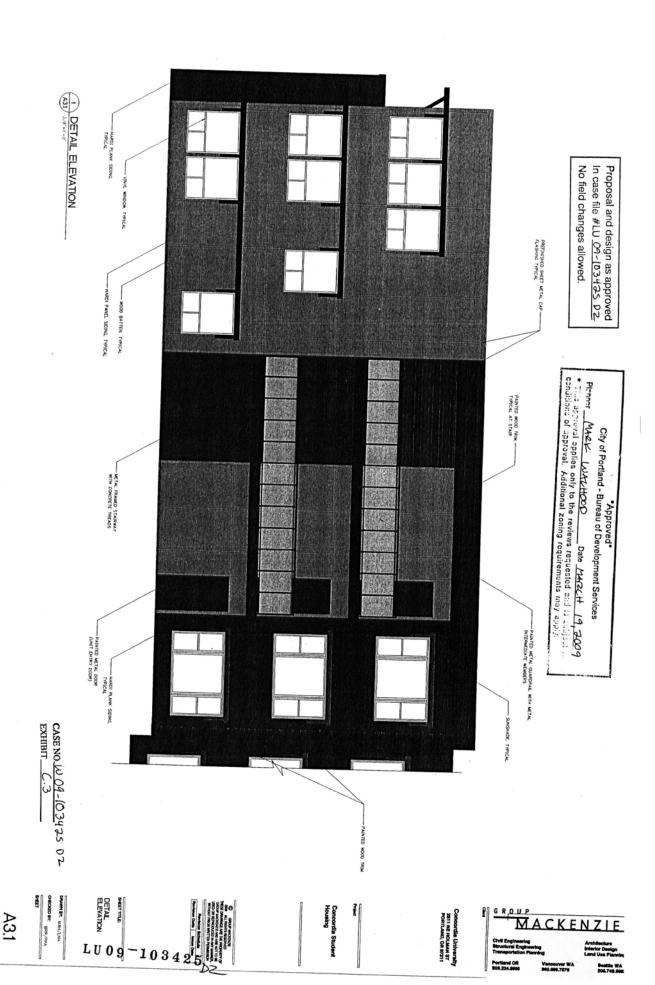


LU 09-103425 DZ File No. 2333,2433 1/4 Section 1 inch = 200 feet Scale 1N1E13CB 900 State\_Id В (Jan 27,2009) Exhibit.



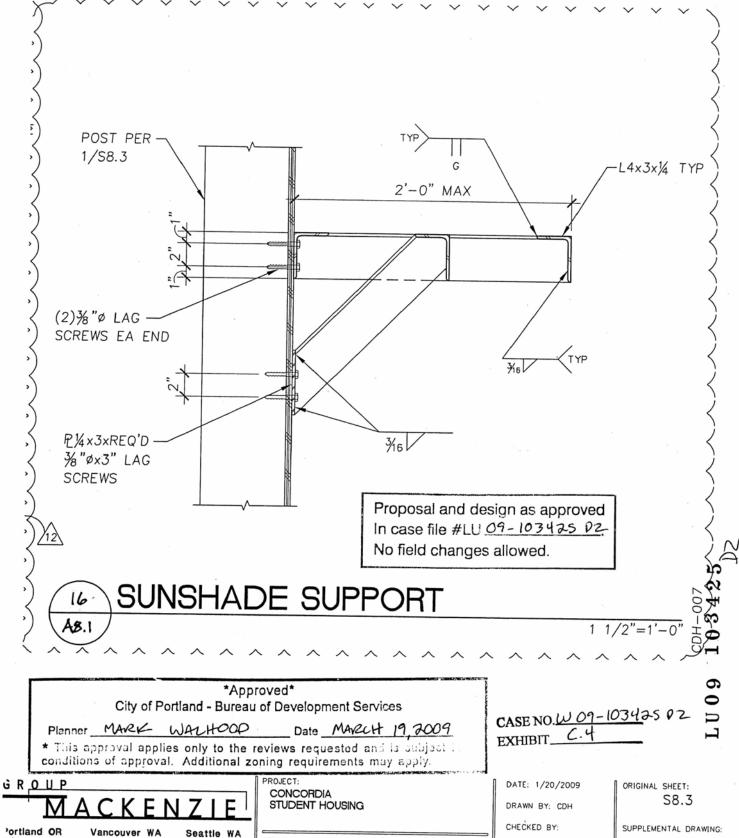






DESIGN REVIEW: 4/3/2008

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360.695.7879

503.224.9560

ORIGINAL SHEET TITLE: DETAILS

206.749.9993

2070495.00

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