



City of Portland, Oregon

Bureau of Development Services

Land Use Services

FROM CONCEPT TO CONSTRUCTION

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

Date: February 4, 2015 **To:** Interested Person

From: Shawn Burgett, Land Use Services

503-823-7618 / shawn.burgett@portlandoregon.gov

NOTICE OF A TYPE IX DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The reasons for the decision are included in the version located on the BDS website http://www.portlandonline.com/bds/index.cfm?c=46429. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

Case File Number: LU 14-135583 LC

GENERAL INFORMATION

Applicant: Jay Higgins / Trimet /1800 SW 1st Ave, Suite 300 / Portland, OR

97201

Owner: Tri-County Metropolitan /710 NE Holladay St / Portland, OR 97232-

2168

Site Address: 1505 SE Gideon Street

Legal Description: BLOCK 6 LOT 4 INC PT VAC ST LOT 5, TIBBETTS HMSTD; BLOCK

7 INC PT VAC ST LOT 1 LOT 2, TIBBETTS HMSTD; BLOCK 6 LOT 2

& 3, TIBBETTS HMST

Tax Account No.: R834600490, R834600530, R834600450

State ID No.: 1S1E11AB 17600, 1S1E11AB 17700, 1S1E11BA 08001

Quarter Section: 3331

Neighborhood: Hosford-Abernethy, contact Joanne Stainbrook at 503-231-9245. Business District: Greater Brooklyn, contact David Weislogel at 503-872-9320. Southeast Uplift, contact Bob Kellett at 503-232-0010.

Zoning: IG1 (General Industrial 1)
Case Type: LC (Lot Consolidation)

Procedure: Type Ix, an administrative decision with appeal to the Oregon Land

Use Board of Appeals (LUBA).

Proposal:

The applicant proposes to consolidate historic block 6 (lots 2-5 and a portion of vacated SE 15th Avenue) and block 7 (lots 1-2 and a portion of vacated SE 15th Ave) of Tibbett's Homestead into one parcel. The lot consolidation is in preparation for a future property line adjustment with the abutting lot 1 (block 6) of Tibbett's Homestead under the same ownership. The property line adjustment will result in an additional developable lot. The property line adjustment is not part of this review.

Relevant Approval Criteria:

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

• Zoning Code Section 33.675.300, Lot Consolidation Standards.

ANALYSIS

Site and Vicinity: The site is vacant. The commercial building that had been on the site and built in 1959 was demolished in 2013 according to City records. The properties directly adjacent to the subject site are all industrial and employment based type uses.

Zoning: The IG1 zone is one of the three zones that implement the Industrial Sanctuary map designation of the Comprehensive Plan. The zone provides areas where most industrial uses may locate, while other uses are restricted to prevent potential conflicts and to preserve land for industry. IG1 areas generally have smaller lots and a grid block pattern.

Land Use History: City records indicate that the applicant has applied for a property line adjustment under 14-167071 PR in association with Lot 1, Block 6 of Tibbett's Homestead. The property line adjustment proposed cannot be approved until the lot consolidation is recorded. In addition LU_14-167065 AD was approved on September 25, 2014, this land use decision approved reduced lot size dimension standards in the IG1 zone associated with property line adjustment under review.

Agency Review The service Bureaus have responded with no issues or concerns about the proposal (exhibits E).

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on **May 13, 2014**. No written response has been received from a notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

LOT CONSOLIDATIONS

33.675.010 Purpose

This chapter states the procedures and regulations for removing lot lines within a site to create one lot. The regulations ensure that lot consolidation does not circumvent other requirements of this Title, and that lots and sites continue to meet conditions of land use approvals. The lot consolidation process described in this chapter is different from (and does not replace) the process used by the county to consolidate lots under one tax account. A tax consolidation does not affect the underlying platted lots. A lot consolidation results in a new plat for the consolidation site.

33.675.050 When These Regulations Apply

A lot consolidation may be used to remove lot lines within a site. The applicant may also choose to remove such lot lines through a land division. A lot consolidation may be required by other provisions of this Title.

33.675.100 Review Procedure

- A. Generally. Lot consolidations are reviewed through Type Ix procedure.
- B. Sites in PUDs or PDs. If any portion of the site is within a Planned Unit Development (PUD) or Planned Development (PD), an amendment to the PUD or PD is also required. The amendment to the PUD or PD must be reviewed concurrently with the lot consolidation.

Findings: The site is not involved in any past or proposed Planned Unit Development or Planned Developments. The requested lot consolidation review is being reviewed under the Type Ix procedure.

33.675.300 Standards

A lot consolidation must meet the following standards:

- A. Lots. Consolidated lots must meet the standards of Chapters 33.605 through 33.615, with the following exceptions:
 - 1. Lot dimension standards.
 - **A. IG1 zone.** All lots in the IG1 zone must meet Standard B stated in Table 615-1 (see below).

Findings: The proposed site is in the IG1 zone. Approval standard is related to the required lot dimensions and creation of a consolidated parcel that will either meet the lot dimension standards of the zone or meet the listed exceptions. The proposed consolidated lot meets the lot dimension standards of the IG1 zone. The site meets the minimum lot area, lot width, minimum depth and front lot line requirements of the IG1 zone.

	IG1 Zone (Table 615-1, standard B)	Parcel 1 (after consolidation)
Minimum Lot Area	10,000 square feet	38,177 square feet
Minimum Lot Width*	75 feet	100 feet
Minimum Front Lot Line	35 feet	100 feet
Minimum Lot Depth*	75 feet	382 feet

^{*} Lot widths and depths are measured from the midpoints of opposite lot lines.

As noted herein, the proposed consolidated lot meets standard A

2. Maximum density. If the consolidation brings the lot consolidation site closer to conformance with maximum density requirements, the consolidation does not have to meet maximum density requirements;

Findings: The IG1 zone does not have density standards; therefore this standard does not apply.

3. Lots without street frontage. If the lot consolidation consolidates lots that do not have street frontage with a lot that has street frontage, the consolidation does not have to meet minimum density and maximum lot area requirements;

Findings: All the lots within this lot consolidation site have street frontage, therefore this standard does not apply.

4. Through lots. If any of the existing lots within the lot consolidation site are through lots with at least one front lot line abutting an arterial street, then the consolidated lot may be a through lot;

Findings: None of lots in the lot consolidation site are through lots, therefore this standard does not apply.

5. Split zoning. If any of the existing lots within the lot consolidation site are in more than one base zone, then the consolidated lot may be in more than one base zone.

Findings: This site contains only one zoning designation; therefore the consolidated lot will not have split zoning. This standard does not apply.

B. Conditions of land use approvals. Conditions of land use approvals continue to apply, and must be met.

Findings: There are no previous land use case conditions for this site, therefore this standard does not apply.

DEVELOPMENT STANDARDS

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

CONCLUSIONS

The applicant proposes to consolidate historic block 6 (lots 2-5 and a portion of vacated SE 15th Avenue) and block 7 (lots 1-2 and a portion of vacated SE 15th Ave) of Tibbett's Homestead into one parcel. No City Bureaus raised objection to the proposal.

As discussed above, the requested lot consolidation has been reviewed and shown to be able to meet all the required standards for lot consolidations as laid out in Section 33.675.300.

ADMINISTRATIVE DECISION

Approval of a Lot Consolidation to create one parcel out of historic block 6 (lots 2-5 and a portion of vacated SE 15th Avenue) and block 7 (lots 1-2 and a portion of vacated SE 15th Ave) of Tibbett's Homestead, as illustrated by Exhibit C.1, signed and dated January 30, 2015

Staff Planner: Shawn Burgett

Decision rendered by: ________on January 30, 2015

By authority of the Director of the Bureau of Development Services

Decision mailed February 4, 2015

About this Decision. This land use decision is not a permit for development. THE SIGNED FINAL PLAT MUST BE RECORDED WITH MULTNOMAH COUNTY DEED RECORDS WITHIN 90 DAYS OF THE DATE OF THIS DECISION (5/5/15) OR THIS DECISION WILL BECOME NULL AND VOID.

Procedural Information. The application for this land use review was submitted on **April** 4, 2014, and was determined to be complete on **May 2, 2014.**

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on April 4, 2014.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant did not waive 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.

This decision, and any conditions associated with it, is final. It may be appealed to the Oregon Land Use Board of Appeals (LUBA), within 21 days of the date the decision is mailed,

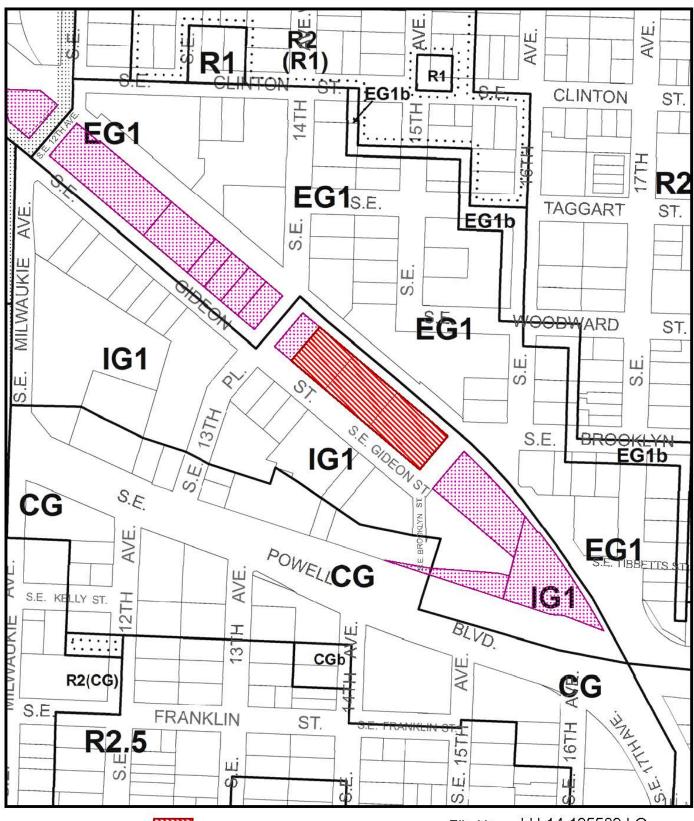
as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have submitted written testimony during the comment period for this land use review. Contact LUBA at 775 Summer St NE Suite 330, Salem, OR 97301-1283 or phone 1-503-373-1265 for further information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at www.portlandonline.com.

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 - 1. Narrative
 - 2. Legal Description
 - 3. Extension to 120 day clock
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Approved Plat (attached)
 - 2. Copy of existing recorded plat (prior to Lot Consolidation)
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Bureau of Environmental Services
 - 2. Bureau of Transportation Engineering and Development Review
 - 3. Water Bureau
 - 4. Fire Bureau
 - 5. Site Development Review Section of BDS
 - 6. Bureau of Parks, Forestry Division
 - 7. Life Safety
 - 8. Auditor
- F. Correspondence:
- G. Other:
 - 1. Original LU application
 - 2. Land Use History





LU 14-135583 LC File No. 3331,3332 1/4 Section 1 inch = 200 feet Scale, 1S1E11AB 17600 State Id

В (Jan 29,2015) Exhibit.



PARTITION PLAT NO.

A LOT CONSOLIDATION, BEING A REPLAT OF LOTS 2, 3, 4 & 5, BLOCK 6 AND LOTS 1 & 2, BLOCK 7, TIBBETTS' HOMESTEAD, AND VACATED SE 15TH AVENUE

IN THE N.W. & N.E, 1/4 OF SECTION 11, T.1S., R.1E., W.M.,

CITY OF PORTLAND, MULTNOMAH COUNTY, OREGON

SCALE 1" = 40'

OCTOBER 28, 2014

THE PURPOSE OF THIS SURVEY IS TO CONSOLIDATE MITTON AONE PARCEL PARTITION PLATLOTS 2, 3,4 AND 5, BLOCK INBESTERS HOMESTERD, TOGETHER WITH VACATED SET 51H A VIEWLE, AND FOR THE RWITH VACATED SET 51H A VIEWLE, AND FOR THE SECRIBED IN DEED TO THE THACOUNT WERROPOLITAM TRANSFORMED IN DEED SISTENCY OF OREGON (TRIMET) BY WARRANIY TO BUSINGTO OF OREGON (TRIMET) BY WARRANIY TO BUSINGTO OF OREGON (TRIMET) BY WARRANIY DEED RECORDED IN DOCUMENT NO. 2012-119813, DEED RECORDS

BASIS OF BEARINGS IS THE LINE BETWEEN TRIMET PRIMARY CONTROL POINTS 4420 MOI 1440, WHICH IN BERGAS SSG-1720°C 647, 88 FEET BY INVERSE PER SURVEY NO. 654486, MULTYMOMAH COUNTY SURVEY RECORDS. HORIZONTAL DATUM IS NADBS (CORS 96, EPOCH; 2002,000); THIS DATUM IS BEING USED FOR TRIMEYS PORTLAND TO MILWANIKIE LIGHT RALL EXTENSION PROJECT PROJECT PRIMARY CONTROL WAS ESTABLISHED IN 2009, AND THAT CONTROL. IS USED FOR TRIMET-RELATED PROJECTS RETWEEN PORTLAND AND MILWANIKE SHEMET PRIMARY CONTROL SUSED FOR TRIMET-RELATED PROJECTS RETWEEN PORTLAND AND MILWANIKE STAFTE PLANE COORDINATES WHE REDUCED TO A LOCAL DATUM PANIE (LDP) SY DIVIDING STAFTE PLANE COORDINATES BY THE COMBINED SCALE FACTIOR OF 0.989066, BEARINGS ARE GRID. DISTANCES ARE GROUND, AND UNITS ARE INTERNATIONAL FEET.

BOUNDARY RESOLUTION:

SE GIDEON STREET: I HELD THE LINK BETWEEN FOUND POINTS 6008 AND 6018 AS 5.00 FOOT OFFSET TO THE SOUTHWESTERLY RIGHT-OF-WAY LINE. HELD PARALLEL AND 55.00 FEBT NORTHEASTERLY RIGHT-OF-WAY LINE. HELD PARALLEL AND OF-WAY LINE.

SE BROOKLYN STREET: LIGHT RAIL CONSTRUCTION HAS SESTROYED MANY OF THE MONUMENTS NEAR THE PAULROAD. THE BEST RESOLUTION I FIND FOR SE BROOKLYN STREET IS THE SOUTHEASTERLY REINGT-CHAMY, LINE, DEFINED BY THE THROUGH FOUND POINT 600S AND KUNNING PERPENDICULAR. TO THE STRAILSHED BEACHNIGE OF SEQUENCY STREET. I THEN HELD PARALLEL AND NORTHWESTERLY THE PLATIED WITH 10 PERCENTION OF SECONDERS, THE PLATIED WITH 10 PERCENTION OF SECOND SECOND

SE 14TH AVENUE: THE SOUTHEASTERLY RIGHT-OF-WAY LINE OF SE 14TH AVENUES IS THE NORTHWESTERLY LINE OF BLOCK 6, TIBBETT'S HOMESTEAD, I HELD A LINE PERPENDICULAR TO SE GIDEON STREET PASSING THROUGH A POINT 380.00 FEET SAG44855F FROM FOUND POINT GOBS. THIS RESCULTION GIVES GOOD FLAT GOOD FIT FOR FOUND POINT 6001 AND VERY GOOD PLAT A DIMENSIONS FOR BLOCKS 6 AND 7, TIBBETTS' HOMESTEAD.

BLOCKS 6 AND 7, TIBBETTS' HOMESTEAD: I HELD THE PLATTED CATO AND STREET WITHOUT SPROCEEDING SOUTHEASTERLY FROM SE 13TH PLACE. THE PLATTED WIDTH OF LOTS I AND 2, BLOCK 7 COMBINED IS 122.2 FEET. THE MEASURED WIDTH IS 122.22 FEET.

WAY REFERENCE FOR TRANSITION CLIVE FORMULAE IS "DESIGN (DATA BOOK FOR CIVIL ENGINEERSY, VOLUME 1 BY ELLIWN E. SEELYE PAGE 347. FOR RALLEGADS OF THAT FEAL, DEGREE OF CURVATURE DIO) IS BY CHORD DEFINITION, WHERE DIO) IS THE ANGE THAT SUBTENDS A 100 FOOT CHORD.

KNOW ALL PEOPLE BY THESE PRESENTS THAT TRANSPORTATION DISTRICT OF OREGON, THE OWNER OF THE LAND DISTRICT OF OREGON, THE OWNER OF THE LAND REPRESENTED ON THE ANNEXD MAP, AND MORE PARTICULARLY DESCRIBED IN THE ACCOMPANYING SURVEYORS CERTIFICATE, DOES HEREBY DECLARE THE ANNEXD MAP TO BE A CORRECT MAP OF THE PARTITION OF SURPORTY AND HAS CAUSED THIS PARTITION ED AS SHOWN IN ACCORDANCE WITH THE PROVISIONS OF CHAPTER 92 OF OREGON REVISED STAUTHES.

TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON BY JILLIAN DETWEILER, DIRECTOR OF REAL ESTATE

ACKNOWLEDGMENT:

STATE OF OREGON SS

KNOW ALL PEOPLE BY THESE PRESENTS, ON THIS BEFORE ME A NOTARY PUBLIC IN AND FOR SAID.

STATE AND COUNT. PERSONALITY APPENSED JULIAN ETWELLER, WHO BEING DULY SWORN, DIO SAY THAT HE STREED BECTOR OF REAL ESTATE FOR TRACOUNT.

METROPOLITANT TRAMSPORTATION DISTRICT OF DRESON, AND THAT HE EXECUTED SAID INSTRUMENT FREELY AND DULY HE REELY AND THAT HE PECCUTED SAID INSTRUMENT FREELY.

Notary Signature

NOTARY PUBLIC - OREGON

MY COMMISSION EXPIRES

PLAT NOTES:

- 1. THIS PLAT IS SUBJECT TO THE CONDITIONS IMPOSED BY THE CITY OF PORTLAND IN CASE FILE NO. LU-14-135683 LC.
- THIS PLAT IS SUBJECT TO RESERVATION OF UTILITIES WANTED WAGATED STREET AREA AND THE RIGHT TO MAINTAIN THE SAME AS SET FORTH IN ORDINANCE NO. 108004. RECORDED UME 17, 1958 IN BOOK 1902, PAGE 655, DEED RECORDS OF MULTNOMAH COUNTY.
- THIS PLAT IS SUBJECT TO SHORT FORM EASEMENT
 AND SUBDORDINATION RECORDED JANUARY 7, 1897
 AND THE STATE OF THE STATE OF THE THE OWN 1971, PAGE 430, DEED RECORDS OF MULTNOMAH COUNTY.

CITY OF PORTLAND APPROVALS:

DIRECTOR, CITY OF PORTLAND BUREAU OF DEVELOPMENT SERVICES CASE FILE NO. LU 14-135583 LC

_, 201<mark>5</mark> APPROVED THIS 30th DAY OF January BY BUNK BUNGY (161)

A TRACT OF LAND IN THE NORTHWEST AND NORTHESST COURATTERS OF SECTION 11, 11.5, 11.5, MILLAMETTE MERIDAN, OIT OF PORTILAND. MILLINDAMH COUNTY, OREGON, THE SAID FRACTI BEING LOTS 2, 3, 4 AND 5, BLOCK AND LOTST TA AND 2, BLOCK AT TIBEST THOMESTED TOGETHER WITH THOSE PORTIONS OF VACATION OF WORDINANCE TO 1000 WITH THOSE PORTIONS OF VACATION ORDINANCE TO 1000 WITH THOSE PORTIONS OF VACATION ORDINANCE TO 1000 WITH THOSE PORTIONS OF VACATION ORDINANCE TO 1000 WITH THE SAID TRACT BEING MORE PARTICULARLY DESCRIBED AS AS POLLOWS:

I, JOHN V. THATCHER, HEREBY CERTIFY THAT I HAVE CORRECTLY VEWEYED AND MARKED WITH PROPER MONUMENTS THE LAND REPRESENTED ON THE A TTACHED PARTITION MAP, SAID LAND BESING DESCRIBED AS FOLLOWS:

BY CITY OF PORTLAND, CITY ENGINEER'S DELEGATE APPROVED THIS 27 CF JANUARY BEGINNING AT THE INITIAL POINT, SAID POINT BEING A SET 5/8-INCH BY MARKING THE ROON ROON WITH A YELLOW PLASTIC CAPS TANNED COTAGE MARKING THE MOST SOUTHERY. CORNER OF LOT'S, BLOCK 7, TIBBETTS. BANKING THE MOST SOUTHERY. CORNER OF LOT'S, BLOCK 7, TIBBETTS. SAID BOTH BEASE SAT'S 5/3*1* AND SAID THE SOUTHWESTER CAPS TANNED TO PLASTIC CAPS TANNED SAID TO SET 5/3*1* TIBBETTS. ADDITION TO EAST PORTLAND, THENCE MAS' 48/55/W ALONG THE SOUTHWESTERLY. THE OF SAID BLOCKS? THE SOUTHWESTERLY. LINE OF SAID BLOCKS? THENCE MAS' 48/55/W ALONG THE SOUTHWESTERLY. IN THE OF SAID BLOCKS, THENCE SAID SOUTHWESTERLY. TRENCE FOR SAID LOT'S, 98 SETEET TO A SET 5/8* AND THE SOUTHWESTERLY. IN REJORDANCE TO REPORT AND THE SOUTHWESTERLY. IN REJORDANCE TO REPORT AND THE SOUTHWESTERLY RIGHT-CHANK TO BE THE SOUTHWESTERLY. IN REJORDANCE TO REPORT AND THE SOUTHWESTERLY RIGHT-CHANK TO BE THE SOUTHWESTERLY. IN REJORDANCE TO REPORT AND THE SOUTHWESTERLY RIGHT-CHANK TO BE THE SOUTHWESTERLY. IN REJORDANCE TO REPORT AND THE SOUTHWESTERLY RIGHT-CHANK TO BE THE CONTRIBUTION CHANGE THE MOST TO REPORT AND THE SOUTHWESTERLY RIGHT-CHANK TO BE THE SOUTHWESTERLY RIGHT-CHANK TO REDOR THE SOUTHWESTERLY RIGHT-CHANK TO BE THE SOUTHWESTERLY RIGHT-CHANK TO BE THE SOUTHWESTERLY THENCE. SOUTH SOUTHWESTERLY THENCE SOUTHWESTERLY THENCE TO SOUTHWESTERLY THENCE TO SOUTHWESTERLY THENCE TO SOUTHWESTERLY THENCE TO SOUTH A SET SOUTHWESTERLY THENCE TO THE RIGHT. THENCE THE TOWN THE MISTOR THE MIST OF THE MIST THE RIGHT. THENCE THE SOUTH TO BE CHA

APPROVED THIS DAY OF COUNTY, OREGON, 201—COUNTY SURVEYOR, MULTNOMAH COUNTY, OREGON

AS OF DIRECTOR, DIVISION OF ASSESSMENT & TAXATION, MULTNOMAH COUNTY, OREGON. ALL TAXES, FEES, ASSESSMENTS OR OTHER CHARGES AS PROVIDED BY O.R.S. 92.095 HAVE BEEN PAID

STATE OF OREGON SS

COUNTY RECORDING OFFICE AS PARTITION PLAT NO.

DOCUMENT NO.

SAID TRACT OF LAND CONTAINS 38,177 SQUARE FEET OR 0.88 ACRE, MORE OR LESS.

COPY OF THE ORIGINAL PARTITION PLAT

I HEREBY CERTIFY THIS IS A TRUE AND EXACT

CAD FILE: TM Gideon Plat 1.dgn

PARTITION PLAT FOR LOT CONSOLIDATION TRANSPORTATION DISTRICT OF OREGON FOR TRI-COUNTY METROPOLITAN

ohn V. Thatcher

PROFESSIONAL LAND SURVEYOR REGISTERED

OREGON JULY 19, 1994 JOHN V. THATCHER #02681

RENEWAL 7/01/2016 SIGNED 1/7/2015

CH2MIII

2020 SW FOURTH AVE, STE. 300, PORTLAND, OR 97201

503-235-5000

OCTOBER 28, 2014

SHEET 1 OF 2

EXHIBIT C-1

LU 14-135583 LC

