



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

FROM CONCEPT TO CONSTRUCTION

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

Date: August 15, 2016
To: Interested Person
From: Susan Ellis, Land Use Services
503-823-5361 / susan.ellis@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 mailed copy of this document is only a summary of the decision. The reasons for the decision are included in the version located on the BDS website <http://www.portlandonline.com/bds/index.cfm?c=46429>. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

CASE FILE NUMBER: LU 16-125979 LDP

Applicant: Jennie Bricker
Jennie Bricker Land & Water Law
818 SW 3rd Ave, Pmb 1517
Portland OR 97204
jennie@jbrickerlaw.com or 503-928-0976

Owner: Harold A Jr Schmelzer
8123 N Ivanhoe St
Portland, OR 97203

Site Address: Vacant lot east of 8123 N IVANHOE ST

Legal Description: BLOCK 3 LOT 16, SEVERANCE ADD
Tax Account No.: R676394
State ID No.: 1N1W12AB 02901
Quarter Section: 2122
Neighborhood: St. Johns, contact Josh Leslie at 503-505-8495.
Business District: St. Johns Business Boosters, contact Mike Johnson at 503-206-8633.
District Coalition: North Portland Neighborhood Services, contact Mary Jaron Kelley at 503-823-4099.

Plan District: St. Johns
Other Designations: none
Zoning: R1d – Medium Density Multi-Dwelling with a Design Overlay Zone
Case Type: LDP – Land Division Partition
Procedure: Type Ix, an administrative decision with appeal to the Oregon Land Use Board of Appeals (LUBA).

Proposal:

The applicant is proposing a two-parcel land division on this 5,000 square foot lot resulting in two 2,500 square foot lots. In the R1d zone in the St. Johns Plan District, the minimum density for lots that are less than 10,000 square feet is one unit per 2,250 square feet of site area and the maximum density is one unit per 1,000 square feet. Since this is a Design

zone, new development must either meet Chapter 33.218 Community Design or be approved through a Design Review.

This partition is reviewed through a Type Ix land use review because: (1) the site is in a residential zone; (2) fewer than four lots are proposed; (3) none of the lots, utilities, or services are proposed within a Potential Landslide Hazard or Flood Hazard Area, and; (4) no other concurrent land use reviews (such as an Adjustment, Design Review, or Environmental Review) are requested or required (see 33.660.110).

For purposes of State Law, this land division is considered a partition. To partition land is to divide an area or tract of land into two or three parcels within a calendar year (See ORS 92.010). ORS 92.010 defines “parcel” as a single unit of land created by a partition of land. The applicant’s proposal is to create two lots. Therefore this land division is considered a partition.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are found in Section 33.660.120, Approval Criteria for Land Divisions in Open Space and Residential Zones.

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. This application was submitted on February 24, 2016 and determined to be complete on June 28, 2016.

ANALYSIS

Site and Vicinity: This is a flat vacant site recently separated from the adjacent lot to the west that has a house at 8123 N Ivanhoe Street via the City’s Lot Confirmation process. This is surrounded by a mix of single and multi-dwelling development. Commercial development begins 50 feet to the west in the Commercial Storefront zone. This site is located less than 200 feet from N Richmond Avenue, which is a transit street with a frequent service bus line.

Infrastructure:

- **Streets** – This site has 50 feet of frontage on N Ivanhoe St. At this location, the City’s Transportation System Plan (TSP) classifies N Ivanhoe St as a Local Service Street for all transportation modes. Trimet provides transit service on N Richmond Ave with the bus route #44 approximately 180 feet from the site. N Ivanhoe St currently exceeds street standards.
- **Water Service** – There is an existing 6-inch water main in N Ivanhoe St to serve the lots to be developed.
- **Sanitary Service** - There is an existing 12-inch combination sewer line in N Ivanhoe Street.
- **Stormwater Disposal** – There is no public storm-only sewer currently available to this property.

Zoning:

R1 – This is one of the City’s multi-dwelling zones which is intended to create and maintain higher density residential neighborhoods. The zone implements the comprehensive plan policies and designations for multi-dwelling housing.

Design “d” overlay – This overlay zone promotes the conservation and enhancement of areas of the City with special historic, architectural or cultural value. New development and exterior modifications to existing development are subject to design review.

St John’s Plan District - The St. Johns plan district provides for an urban level of mixed-use development including commercial, employment, office, housing, institutional, and recreation uses. Specific objectives of the plan district include strengthening St. Johns’ role as the commercial and civic center of the North Portland peninsula. This plan district stimulates business and economic vitality; promotes housing and mixed-use development; discourages auto-oriented uses and development; enhances the pedestrian environment and the character of buildings; and supports the Willamette greenway and opportunities to celebrate the Willamette River as a unique element of the urban environment.

Land Use History: A recent Lot Confirmation (16-160977 PR) at this site confirmed this lot (Lot 16) and the adjacent developed lot to the west (Lot 15).

Agency Review: Several Bureaus have responded to this proposal and relevant comments are addressed under the applicable approval criteria. Exhibits “E” contain the complete responses.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on **July 5, 2016**. No written responses have been received from the Neighborhood Association or notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

APPROVAL CRITERIA FOR LAND DIVISIONS IN OPEN SPACE AND RESIDENTIAL ZONES

33.660.120 *The Preliminary Plan for a land division will be approved if the review body finds that the applicant has shown that all of the following approval criteria have been met.*

Due to the specific location of this site, and the nature of the proposal, some of the criteria are not applicable. The following table summarizes the criteria that are not applicable. Applicable criteria are addressed below the table.

Criterion	Code Chapter/Section and Topic	Findings: Not applicable because:
B	33.630 – Tree Preservation	No trees in excess of 6 inches in diameter are located fully or partially on the site.
C	33.631 - Flood Hazard Area	The site is not within the flood hazard area.
D	33.632 - Potential Landslide Hazard Area	The site is not within the potential landslide hazard area.
E	33.633 - Phased Land Division or Staged Final Plat	Not applicable. These standards only apply to land divisions in the RF through R2.5 zones.
F	33.634 - Recreation Area	Not applicable. The minimum required density is less than 40 units.
H	33.636 - Tracts and Easements	No tracts or easements have been proposed or will be required.
J	33.640 - Streams, Springs, and Seeps	No streams, springs, or seeps are evident on the site outside of environmental zones.

L	33.654.110.B.2 - Dead end streets	No dead end streets are proposed.
	33.654.110.B.3 - Pedestrian connections in the I zones	The site is not located within an I zone.
	33.654.110.B.4 - Alleys in all zones	No alleys are proposed or required
	33.654.120.C.3.c - Turnarounds	No turnarounds are proposed or required
	33.654.120.D - Common Greens	No common greens are proposed or required
	33.654.120.E - Pedestrian Connections	There are no pedestrian connections proposed or required
	33.654.120.F - Alleys	No alleys are proposed or required
	33.654.120.G - Shared Courts	No shared courts are proposed or required
	33.654.130.B - Existing public dead-end streets and pedestrian connections	No public dead-end streets or pedestrian connections exist that must be extended onto the site.
	33.654.130.C - Future extension of dead-end streets and pedestrian connections	No dead-end street or pedestrian connections are proposed or required.
	33.654.130.D - Partial rights-of-way	No partial public streets are proposed or required.

Applicable Approval Criteria are:

A. Lots. The standards and approval criteria of Chapters 33.605 through 33.612 must be met.

Findings: Chapter 33.612 contains the density and lot dimension requirements applicable in the R3 through IR zones. The St Johns Plan District (Chapter 33.583) has additional minimum density allowances in the R1 zone. The applicant is proposing 2 parcels that may be developed with either single-dwelling or duplex development; therefore the proposed lots must meet minimum density and not exceed the maximum density stated in Table 120-3 and the St Johns Plan District. For lots less than 10,000 square feet (per Section 33.583.240) the minimum density is one unit per 2,250 square feet and the maximum density is one unit per 1,000 square feet. The total site area shown on the applicant's survey is 5,000 square feet. The site has a minimum required density of 2 units and a maximum allowed density of 5 units. The lot dimensions required and proposed are shown in the following table:

R1	Minimum lot area (square feet)	Minimum lot width (feet)	Minimum lot depth (feet)	Minimum front lot line (feet)
Attached Houses	none	15	none	15
Parcel 1	2,500	25	25	25
Parcel 2	2,500	25	25	25
Detached Houses	none	25	none	25
Parcel 1	2,500	25	25	25
Parcel 2	2,500	25	25	25
Duplexes	none	none	none	10
Parcel 1	2,500	25	25	25
Parcel 2	2,500	25	25	25

* Width is measured from the midpoints of opposite lot lines.

Because the 5th unit of maximum density cannot be applied to a lot based on the proposed lot sizes, minimum and maximum density will be assigned via a condition of this proposal.

With this condition, the findings above show that the applicable density and lot dimension standards are met. Therefore this criterion is met.

G. Clearing, Grading and Land Suitability. The approval criteria of Chapter 33.635, Clearing, Grading and Land Suitability must be met.

Findings:

The regulations of Chapter 33.635 ensure that the proposed clearing and grading is reasonable given the infrastructure needs, site conditions, tree preservation requirements, and limit the impacts of erosion and sedimentation to help protect water quality and aquatic habitat. In this case the site is relatively flat, and is not located within the Potential Landslide Hazard Area. Therefore, no significant clearing or grading will be required on the site to make the new lots developable. In addition, there are no trees required to be preserved on this site. This criterion is met.

Land Suitability

The site is currently in residential use, and there is no record of any other use in the past. As indicated above, the site is relatively flat and contains no known geological hazards. Therefore, there are no anticipated land suitability issues and the new lots can be considered suitable for new development. This criterion is met.

I. Solar access. If single-dwelling detached development is proposed for the site, the approval criteria of Chapter 33.639, Solar Access, must be met.

Findings: The solar access regulations encourage variation in the width of lots to maximize solar access for single-dwelling detached development and minimize shade on adjacent properties.

All of the proposed lots are on the north side of an east-west oriented street, and are considered interior lots (not on a corner). In this context there is no preference that any one lot be wider or narrower than the other lots. This criterion is therefore met.

K. Transportation impacts. The approval criteria of Chapter 33.641, Transportation Impacts, must be met; and,

Findings: The transportation system must be capable of safely supporting the proposed development in addition to the existing uses in the area. The Development Review Section of the Portland Bureau of Transportation has reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, and for potential impacts upon transportation services.

PBOT has provided the following findings (see Exhibit E.2):

The regulations of this Chapter allow the traffic impacts caused by dividing and developing land to be identified, evaluated, and mitigated if necessary. The following approval criterion applies to all land divisions in all zones: The transportation system must be capable of safely supporting the proposed development in addition to the existing uses in the area. Evaluation factors include: street capacity and level-of-service; vehicle access and loading; on-street parking impacts; the availability of transit service and facilities and connections to transit; impacts on the immediate and adjacent neighborhoods; and safety for all modes.

The proposal will result in a net increase of up to 3 single-family residences if a duplex is constructed on each lot. These residences can be expected to generate 30 daily vehicle trips with 3 trips occurring in each of the AM and PM Peak Hours. This small increase in peak hour vehicles will not have significant impact on intersection levels of service or street capacity. No mitigation is needed.

The site is within 180-ft of the north/south running N Richmond Ave. Connectivity requirements do not apply. The new lots are proposed to have a driveway to provide access to parking and loading. The new lots will have at least one on-site parking space with an additional space between the garage and the front property line. Impacts to the on-street parking supply should be minimal. In addition, standard frontage improvements including sidewalks will reduce the potential for conflicts between pedestrians and vehicles. Sidewalks along both sides of the area streets provide adequate pedestrian facilities. Given the low vehicle speeds and volumes on N Ivanhoe Street, cyclists and vehicles can safely share the roadway.

There are existing transit facilities in the vicinity and the Tri Met Bus Line #44 is available to serve the site at N Richmond and N Syracuse. This small increase in peak hour vehicles will not have significant impact on intersection levels of service or street capacity. No mitigation is needed.

PBOT has reviewed and concurs with the information supplied and available evidence. No mitigation is necessary for the transportation system to be capable of safely supporting the proposed development in addition to the existing uses in the area. These criteria are met.

L. Services and utilities. The regulations and criteria of Chapters 33.651 through 33.654, which address services and utilities, must be met.

Findings: Chapters 33.651 through 33.654 address water service standards, sanitary sewer disposal standards, stormwater management, utilities and rights of way. The criteria and standards are met as shown in the following table:

33.651 Water Service standard – See Exhibit E.3 for detailed bureau comments.
The Water Bureau has indicated that service is available to the site, as noted on page 1 of this report. The water service standards of 33.651 have been verified.
33.652 Sanitary Sewer Disposal Service standards – See Exhibit E.1 for detailed comments.
The Bureau of Environmental Services has indicated that service is available to the site, as noted on page 1 of this report. The sanitary sewer service standards of 33.652 have been verified.
33.653.020 & .030 Stormwater Management criteria and standards – See Exhibits E.1
No stormwater tract is proposed or required. Therefore, criterion A is not applicable. The applicant has proposed stormwater management methods as follows: Staff reviewed the project's stormwater report from Harold Schmelzer, dated 10/9/15 that describes Simplified Approach infiltration test results of 5 inches per hour on this site. The applicant proposes to infiltrate runoff from the development onsite in rain gardens on each site that can meet minimum setbacks as established in the facility design standards and Exhibit 2-1 of the SWMM. Therefore, this criterion is met.
33.654.110.B.1 Through streets and pedestrian connections
Generally, through streets should be provided no more than 530 feet apart and at least 200 feet apart. The block on which the subject property is located meets the noted spacing requirements. Therefore, this criterion is met.
33.654.120.B & C Width & elements of the right-of-way – See Exhibit E.2 for bureau comment
In reviewing this land division, Portland Transportation relies on accepted civil and traffic engineering standards and specifications to determine if existing street improvements for motor vehicles, pedestrians and bicyclists can safely and efficiently serve the proposed new development. Portland Transportation has not identified or been made aware of any factors related to this proposal that lead to a conclusion other than that allowed development can be safely served by this existing street without having any significant impact on the level of service provided. This criterion is met.

33.654.130.A - Utilities (defined as telephone, cable, natural gas, electric, etc.)

Any easements that may be needed for private utilities that cannot be accommodated within the adjacent right-of-ways can be provided on the final plat. At this time no specific utility easements adjacent to the right-of-way have been identified as being necessary. Therefore, this criterion is met.

DEVELOPMENT STANDARDS

Development standards that are not relevant to the land division review, have not been addressed in the review, but will have to be met at the time that each of the proposed lots is developed. The Design zone overlay requires that new development either meet Chapter 33.218 Community Design or be approved through a Design Review.

OTHER TECHNICAL REQUIREMENTS

Technical decisions have been made as part of this review process. These decisions have been made based on other City Titles, adopted technical manuals, and the technical expertise of appropriate service agencies. These related technical decisions are not considered land use actions. If future technical decisions result in changes that bring the project out of conformance with this land use decision, a new land use review may be required. The following is a summary of technical service standards applicable to this preliminary partition proposal.

Bureau	Code Authority and Topic
Development Services/503-823-7300 www.portlandonline.com/bds	Title 24 – Building Code, Flood plain Title 10 – Erosion Control, Site Development Administrative Rules for Private Rights-of-Way
Environmental Services/503-823-7740 www.portlandonline.com/bes	Title 17 – Sewer Improvements 2008 Stormwater Management Manual
Fire Bureau/503-823-3700 www.portlandonline.com/fire	Title 31 Policy B-1 – Emergency Access
Transportation/503-823-5185 www.portlandonline.com/transportation	Title 17 – Public Right-of-Way Improvements Transportation System Plan
Urban Forestry (Parks)/503-823-4489 www.portlandonline.com/parks	Title 11 – Trees
Water Bureau/503-823-7404 www.portlandonline.com/water	Title 21 – Water availability

As authorized in Section 33.800.070 of the Zoning Code conditions of approval related to these technical standards have been included in the Administrative Decision on this proposal.

- The applicant must meet the requirements of the Fire Bureau in regards to addressing requirements; fire apparatus access, including aerial access. These requirements are based on the technical standards of Title 31 and Fire Bureau Policy B-1.
- The applicant must meet the requirements of Urban Forestry for street tree planting at the time of development of these parcels.

CONCLUSIONS

The applicant has proposed a 2 parcel partition as shown on the attached preliminary plan (Exhibit C.1). As discussed in this report, the relevant standards and approval criteria have been met, or can be met with conditions. The primary issue identified with this proposal are the Fire Bureau and Urban Forestry planting requirements. With conditions of approval that address these requirements this proposal can be approved.

ADMINISTRATIVE DECISION

Approval of a Preliminary Plan for a 2 lot partition, that will result in 2 single-dwelling or duplex lots as illustrated with Exhibit C-1, subject to the following conditions:

The following conditions are applicable to site preparation and the development of individual lots:

1. The applicant must meet the Fire Bureau requirements for addressing and aerial fire department access for development on Parcel 2. Aerial access applies to buildings that exceed 30 feet in height from the fire access as measured to the bottom of the eave of the structure or the top of the parapet for a flat roof.
2. The minimum and maximum density for the lots in this land division are as follows:

Lot	Minimum Density	Maximum Density
1	1 unit	2 units
2	1 unit	2 units

3. Street trees shall be shown on building permit plans and installed prior to final inspection approval of permits.

Staff Planner: Susan Ellis

Decision rendered by:  **on August 10, 2016**
 By authority of the Director of the Bureau of Development Services

Decision mailed (within 5 days of dec.) August 12, 2016

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 February 24, 2016, and was determined to be complete on June 28, 2016.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on February 24, 2016.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant did not waive or extend the 120-day review period. Unless further extended by the applicant, **the 120 days will expire on: October 26, 2016.**

Some of the information contained in this report was provided by the applicant. As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria.

This report is the decision of the Bureau of Development Services with input from other City and public agencies.

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

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

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.

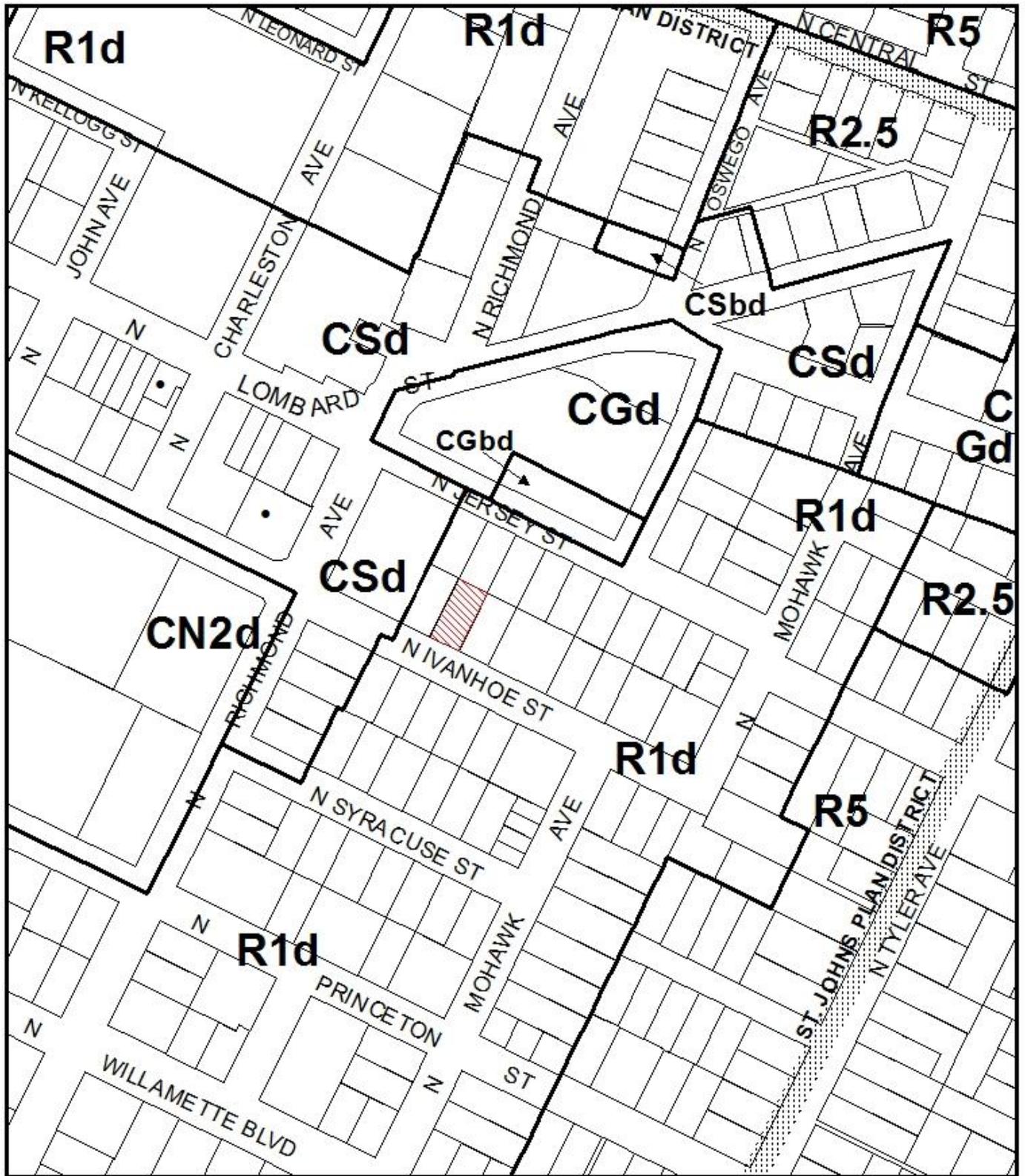
Recording the land division. The final land division plat **must** be submitted to the City **within three years** of the date of the City’s final approval of the preliminary plan. This final plat must be recorded with the County Recorder and Assessors Office after it is signed by the Planning Director or delegate, the City Engineer, and the City Land Use Hearings Officer, and approved by the County Surveyor. **The approved preliminary plan will expire unless a final plat is submitted within three years of the date of the City’s approval of the preliminary plan.**

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 - 1. Application narrative
 - 2. Tree removal/replanting permit issued 9/15/15
 - 3. Stormwater Simplified Approach Form
 - 4. Fire Flow Check
 - 5. State of Oregon Geotechnical hole report dated 6/12/06
 - 6. Email with photos documenting removal of accessory structures dated 6/9/16
 - 7. Revised full site plan received 6/28/16
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Site Plan showing proposed development (attached)
- 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 Section of the Bureau of Development Services
- F. Correspondence (none)
- G. Other:
 - 1. Original LU Application and Preliminary Plan
 - 2. Incomplete Letter
 - 3. Lot Confirmation Application
 - 4. Lot Confirmation Approval

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).



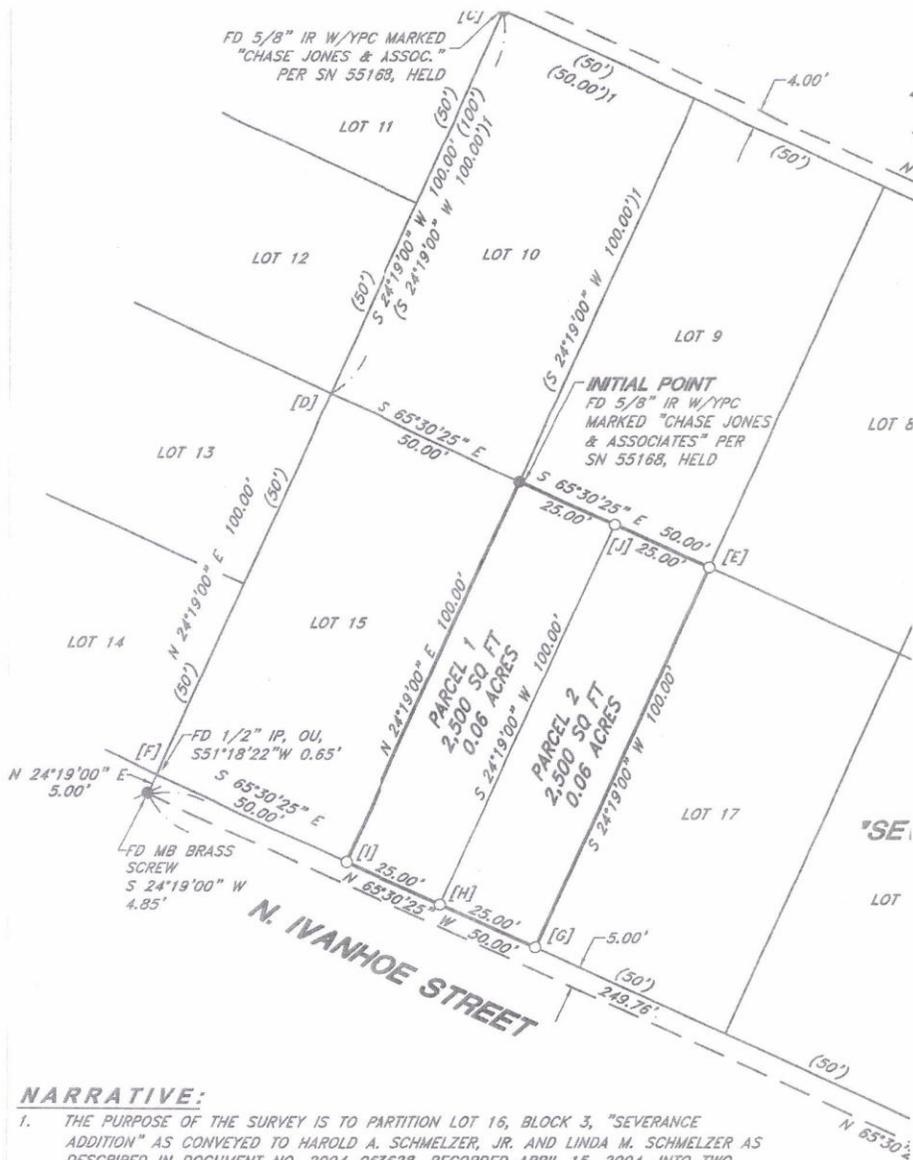
ZONING



This site lies within the:
ST. JOHN'S PLAN DISTRICT

- Site
- Historic Landmark

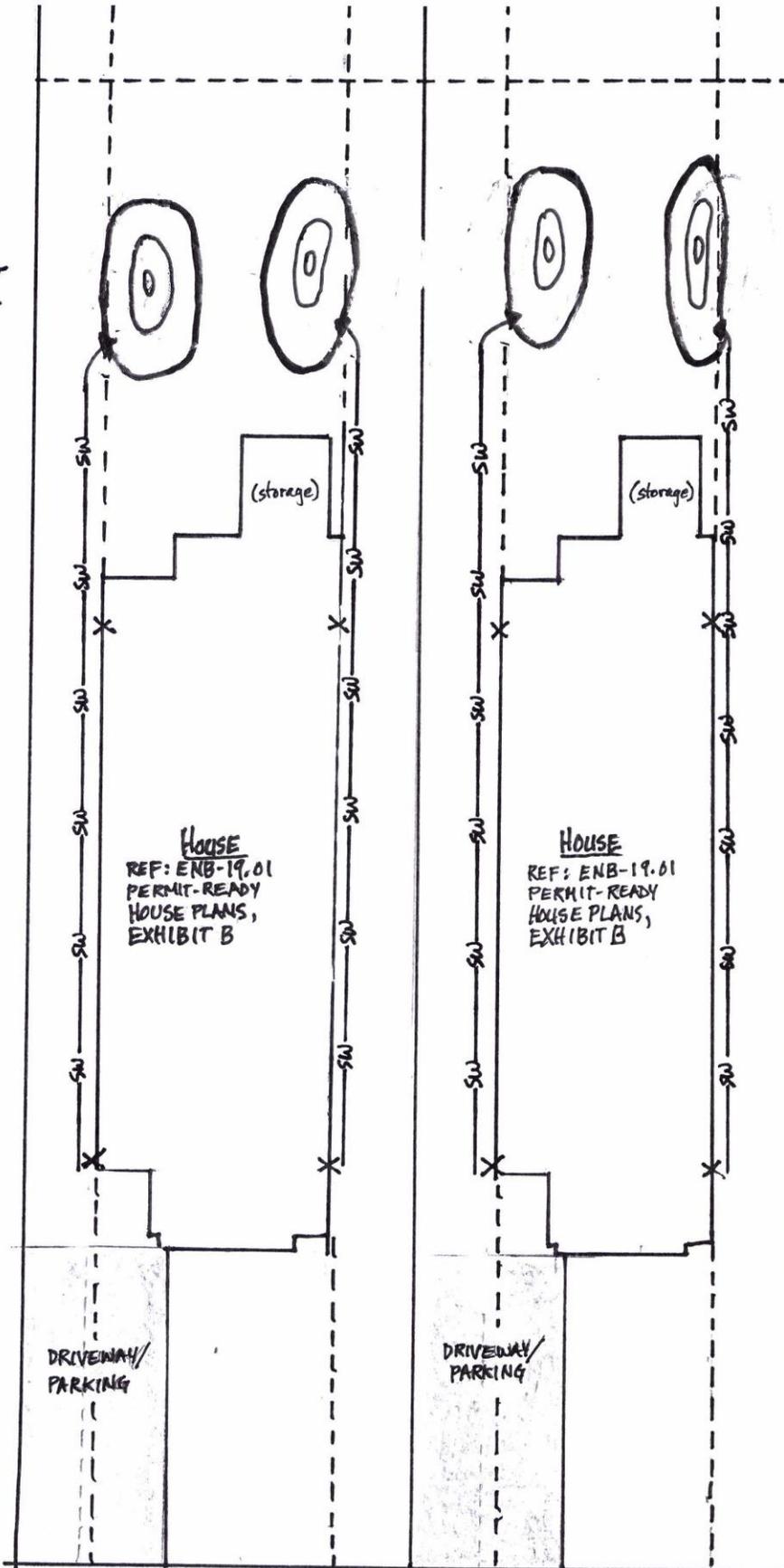
File No.	LU 16-125979 LDP
1/4 Section	2122
Scale	1 inch = 200 feet
State_Id	1N1W12AB 2900
Exhibit	B (Jul 01, 2016)



NARRATIVE:

1. THE PURPOSE OF THE SURVEY IS TO PARTITION LOT 16, BLOCK 3, "SEVERANCE ADDITION" AS CONVEYED TO HAROLD A. SCHMELZER, JR. AND LINDA M. SCHMELZER AS DESCRIBED IN DOCUMENT NO. 2004-063628, RECORDED APRIL 15, 2004, INTO TWO PARCELS AS SHOWN.
2. I HELD POINTS [A] TO [B] AS THE BASIS OF BEARINGS PER SN 55168. POINT [B] BEING N 24°19'00" E A DISTANCE OF 4.00' FROM THE IRON ROD FOUND AT [C].
3. FROM [C] I HELD S 24°19'00" W PER SN 55168 AND 100.00' PER SAID SURVEY AND PLAT TO [D].
4. FROM [D] I HELD S 65°30'27" E PER SN 55168 A PLAT DISTANCE OF 100.00' TO [E].
5. FROM [D] I EXTENDED LINE [C] - [D] THE PLAT DISTANCE OF 100.00' TO [F].
6. FROM [F] I HELD PARALLEL TO [D] - [E] AND THE PLAT DISTANCE OF 100.00' TO [G].
7. I THEN SET POINTS [E], [G], [H], [I], AND [J] PER THE OWNER.

CASE NO. 16-125979 LPP
EXHIBIT C.1



CONCEPTUAL

BUILDING FOOTPRINTS:

8123 N. Ivanhoe Street

• New Parcel 2

• New Parcel 3

LEGEND:

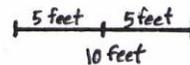
-SW-SW- 4 INCH DRAIN PIPE

X DOWNSPOUT

- - - 5 FOOT SETBACK

 RAIN GARDEN

SCALE: 1 INCH = 10 FEET



L016-125979LOP
Exhibit C.2