



City of Portland  
**Bureau of Development Services**  
Land Use Services Division

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Portland, Oregon 97201  
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[www.portlandonline.com/bds](http://www.portlandonline.com/bds)

**Date:** May 2, 2008  
**To:** Interested Person  
**From:** Staci Monroe, Land Use Services  
503-823-7870 / [staci.monroe@ci.portland.or.us](mailto:staci.monroe@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 07-174804 HDZ – HISTORIC DESIGN  
REVIEW FOR A REAR BUILDING AND STAIR ADDITION**

**GENERAL INFORMATION**

**Applicant:** Overby Holding Company LLC  
303 SE 78th Ave  
Portland, OR 97215

**Representative:** Alan Armstrong, 503-731-5909  
Litmus Design Architecture  
206 NE 28th Ave  
Portland, OR 97211

**Site Address:** 6031-6033 SE STARK STREET

**Legal Description:** W 10.7' OF S 100' OF LOT 1 BLOCK 2 E 21.3' OF LOT 2 BLOCK 2,  
RAMONA

**Tax Account No.:** R686800140  
**State ID No.:** 1N2E31DD 06000  
**Quarter Section:** 3036  
**Neighborhood:** Mt. Tabor, contact Dave Hilts at 503-780-0826.  
**Business District:** Eighty-Second Avenue, contact Nancy Chapin at 503-774-2832.  
**District Coalition:** Southeast Uplift, contact Gary Berger at 503-232-0010.  
**Plan District:** None  
**Other Designations:** Historic Landmark No. 351 – Thomas Graham Building  
**Zoning:** CN1 – Neighborhood Commercial 1 zone  
**Case Type:** HDZ – Historic Design Review  
**Procedure:** Type II, an administrative decision with appeal to the Landmarks Commission.

**Proposal:**

The applicant seeks Historic Design Review for a rear building addition and exterior stair on the Thomas Graham Building, an Historic Landmark. The proposed alterations result from a kitchen expansion on the main floor and partial conversion of the upper floor from residential to additional dining area. The existing stair at the northeast rear corner of the building would

be removed and both the upper and lower floors would be expanded into this area in line with the existing building footprint. Two new windows are proposed on the lower rear addition and one window on the upper rear addition. The addition would tie into the existing flat roof of the building and match the exterior materials (wood, single hung windows, trim and horizontal shiplap siding). The replacement stair required for the residential unit on the 2nd floor would be located along the east side of the building. Due to its proximity to the property line the north and eastern sides of the stair must be enclosed with a solid wall that would also match the building's exterior materials and design. A wood, open-work railing would be provided on the interior wall of the stair. A trash enclosure is proposed beneath the stair with 2 solid wood doors on the east elevation.

Proposals for exterior alteration to a Historic Landmark require Historic Design Review.

**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:

- Other Approval Criteria Section  
33.846.060.G

## ANALYSIS

**Site and Vicinity:** The 3,200 square foot site contains a 2,256 square foot mixed use building. The two-story, Thomas Graham Building was built in 1910 and was designated as a Historic Landmark in 1981. Currently, the first floor is occupied with a restaurant, Caldera, which also occupies the rear of the property developed with an outdoor dining area. The upper level contains a residential apartment, which is to be partially converted to accommodate the expansion of the dining area upstairs.

The Thomas Graham Building is a 2-story wood frame commercial building constructed in 1910. The rectangular building has a flat roof and horizontal shiplap siding. It is a rather simple building with the exception of the prominent front façade which contains a recessed storefront under the 2<sup>nd</sup> story supported by fluted columns and a bracketed cornice.

**Zoning:** The "CN1" (Neighborhood Commercial 1) zone is intended for small sites in or near dense residential neighborhoods. The zone encourages the provision of small-scale retail and service uses for nearby residential areas. Development is intended to be pedestrian-oriented and compatible with the scale of surrounding residential areas.

The Historic Landmark designation protects certain Portland historic resources and preserves significant parts of Portland's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation by recognizing the role historic resources have in promoting the education and enjoyment of those living in and visiting Portland. Proposed alterations to Historic Landmarks must go through a Historic Design Review process (Chapter 33.846) and proposed demolition is subject to certain demolition protections (Section 33.445.150).

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

- 81-005844 HL: Approval of a 1981 Historic Landmark Designation for the Thomas Graham Building.

**Agency Review:** A "Notice of Proposal in Your Neighborhood" was mailed on February 15, 2008. The following Bureaus have responded with no issues or concerns:

- Water Bureau
- Fire Bureau
- Bureau of Parks-Forestry Division
- Site Development Section of BDS
- Bureau of Transportation Engineering

The Bureau of Environmental Services responded with the following comment (see Exhibit E-1 for additional details):

*Sanitary Services*

1. There is an existing 16-inch City-owned combination sewer located in SE Stark Street that appears to serve the sanitary disposal needs of this property.

*Stormwater Management & Water Resources.*

The stormwater runoff generated from the proposed development must meet the requirements of the City of Portland's Stormwater Management Manual current at the time of building plan review. For all projects, the Stormwater Destination/Disposal Hierarchy must be addressed (pages 1-18 and 1-19 of the Stormwater Management Manual). Free CD-ROM discs of the 2004 Stormwater Management Manual are available at the City of Portland Development Services Center, 1900 SW 4th Avenue or on the internet at [www.portlandonline.com/bes/](http://www.portlandonline.com/bes/). The applicant may also contact BES with any questions or for additional information.

1. There is no City-owned storm-only sewer available to this property.
2. The 2004 Stormwater Management Manual requires that stormwater runoff from new or redeveloped impervious area be managed on-site through surface infiltration facilities to the maximum extent practicable. Roof runoff may be managed in drywells or soakage trenches (if on-site infiltration is approved by BDS Site Development). Pollution reduction is required for all non-rooftop runoff, and all runoff that is not infiltrated on site. Stormwater runoff from parking lot, driveway and other ground-level impervious surface must be treated by means of vegetated surface facilities with overflow directed to an appropriate disposal location. A disposal location for stormwater must be identified for any size development. NOTE: The Stormwater Management Manual defines redeveloped impervious area as any development that requires demolition or complete removal of existing structures or impervious surfaces at a site and replacement with new impervious surfaces.

The current 2004 Stormwater Management Manual is being revised and a new version of the Stormwater Management Manual is currently scheduled to be adopted in the winter of 2007-2008. This project will be required to comply with the manual that is current at the time of building plan application.

*Conditions of Approval*

BES has no recommended conditions of approval.

*Additional Information*

1. The Pollution Prevention Group highly recommends the removal of all food/garbage disposals and the installation of grease management devices where appropriate. These steps will help reduce the extra strength sewer charges this facility may incur in the near future. Additionally, by reducing the amount of food wastes, grease and solids that are rinsed down the drain, this facility's potential to cause an obstruction in the main sewer line will be reduced and unnecessary repair costs avoided.
2. To comply with the City's Extra Strength Sewerage Charge (ESSC) Program, facilities that have a likelihood of having high strength wastewater shall provide a structure for sampling. Facilities with high strength waste can include, but are not limited to; food processors, hotels, supermarkets, commercial kitchens, breweries, bakeries, restaurants, or any facility that may contain those operations.
  - a. ESSC sampling points are typically installed downstream of grease treatment structures, and are placed in the sanitary waste line at a location that accounts for all discharge flows from the activity areas subject to the ESSC program requirements.
  - b. A plumbing clean-out on the waste line may accommodate sampling needs; however, the location of the clean-out needs to be out of the way of traffic or standard operations of the facility, and in a space that measures 3' W X 3' L X 3' H. If this does not suit your development, alternatives can be discussed and a structural manhole or vault may

be necessary. For assistance please contact the Pollution Prevention Group at 503-823-7122.

#### *Building Permit Issues*

1. The pertinent design requirements of the Stormwater Management Manual (SWMM) Chapter 4 are briefly described as follows (please read chapter 4 of the SWMM to help recognize any requirements we may have overlooked). The Stormwater Management Manual is available on the Internet at:  
<http://www.portlandonline.com/bes/index.cfm?c=35117>:
  - a. Solid waste and recycling areas require pavement underneath the receptacles, protection from stormwater/rainwater through berming or grading (hydraulic isolation), a structural cover that is relative in size to the perimeter of the trash/recycling area, and a sanitary (waste line) drain inside the bermed/graded area. Depending on where the area is located, a planning/design review may be required. If the covered area is large, a structural engineering review may be required for the structural cover.

The Plan Review Section of BDS responded with the following comment (see Exhibit E-2 for additional details):

- A Building Permit has been applied for and is being assigned to a Life Safety plans examiner who will be in contact with the applicant. Please refer to correspondence from the Life Safety plans examiner for building code-related comments.

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on February 15, 2008. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

## **ZONING CODE APPROVAL CRITERIA**

### **Chapter 33.846, Historic Reviews**

#### **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 a designated Historic Landmark. Therefore the proposal requires historic design review approval. The relevant approval criteria are listed in 33.846.060 G. 1.-10. In addition, because the site is located within the Central City Plan District, the relevant approval criteria are the Central City Fundamental Design Guidelines.

*Staff has considered all guidelines and has addressed only those guidelines considered applicable to this project.*

#### **G. Approval criteria based on the Standards of the Secretary of the Interior:**

1. **Historic character.** The historic character of the property will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the property's historic significance will be avoided.
3. **Historic changes.** Most properties change over time. Those changes that have acquired historic significance will be preserved.
4. **Historic features.** Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.

5. **Historic materials.** Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

**Findings:** The exterior stair (rear façade) and the shed addition (east façade) to be removed are not noted as original building features in the historic nomination and are likely later additions evident by their location, design and materials. The shed addition is on the east side of the building with an asphalt shingle, shed style roof while the building is rectilinear with a flat roof. The horizontal lap siding on the shed addition is a common exterior building material that is still used in current construction and will be incorporated into the new stair wall and building. The wood stairs are attached to a projecting sunroom on the rear of the building, which also contains a shed, asphalt roof non-traditional windows. Neither of these additions are mentioned as having acquired historic status. Therefore, removing these features and materials will not adversely impact the integrity or character of this historic landmark. *These guidelines are therefore met.*

2. **Record of its time.** The historic resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.

**Findings:** The exterior changes on the rear and east façades would retain the appearance of the building as a retail ground floor use with a residential living unit above. Since its construction in 1910 the building has been used for retail on the main floor, specifically for a drug store. The upper level is noted in the historic nomination as a living unit. The new stair on the east side would be replacing the existing stair on the rear which is a common feature for residential access. The rear addition would infill a portion of the northeast corner and falling within the footprint of the rectilinear building. *These guidelines are therefore met.*

3. **Historic character.** The historic character of the property will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the property's historic significance will be avoided.
7. **Differentiate new from old.** New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a property. New work will be differentiated from the old.
8. **Architectural compatibility.** New additions, exterior alterations, or related new construction will be compatible with the resource's massing, size, scale, and architectural features. When retrofitting buildings or sites to improve accessibility for persons with disabilities, design solutions will not compromise the architectural integrity of the historic resource.

**Findings:** As mentioned above, the existing stair and shed addition are not historic materials or features on this landmark building, therefore their removal will not adversely impact the historic character or integrity of the building. The addition of the new stair and 2-story rear addition will be evidently new, however, well integrated into the landmark using compatible materials and design. The stair and will be distinguishable from the original structure in that it would be setback 18" from the east wall and located beyond the original building footprint. It will be integrated by using the same wood horizontal shiplap siding on the building, wood railing from the rear porch and wood doors for the trash area below the stair. The siding will provide for a seamless wall transition and its location parallel with the east wall will reduce the mass by following the rectangular orientation of the building. The stair is also significantly setback from the front façade of the building allowing the ornate and grand street façade to remain the architectural focus of the structure.

The rear addition would infill a portion of the northeastern corner that resulted from a later addition on the western half of the rear façade. The addition would be compatible with the existing materials such as the wood siding, single hung wood windows and wood door. The new windows on the north elevation would match the proportions of existing window on both the east and north facades. The characteristic flat roof will be carried over on the addition rather than the shed roof of the adjacent addition providing better integration with the historic structure. The thick bellyband on all facades of the building will be incorporated into both the rear addition and the stair walls. The trim on the building edges and around the windows and doors would also match these details on the existing building. *These guidelines are therefore met.*

- 9. Preserve the form and integrity of historic resources.** New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic resource and its environment would be unimpaired.

**Findings:** The new stair and rear addition would be located and designed in a manner that would allow the removal of both alterations in the future while maintaining the integrity of the resource. With the exception of the landing area, the stair is not attached to the east building wall. There is an 18" separation which would allow for future removal with minor impacts to the east façade. Due to the square shape and location at the rear of the building, the 2-story addition could also be removed while retaining the rectilinear original form of the structure. *This guideline is therefore met.*

- 10. 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.

**Findings:** As described above, the proposed exterior alterations are compatible with the Thomas Graham historic landmark building in terms of design, materials and function. The building is not within an historic district but is flanked by an electricity substation to the west and a 2-story commercial building to the east. The rear addition and exit stair on the side and rear of the building maintains its commercial façade and use which is consistent with the adjacent retail building. *This guideline is therefore 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 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. The proposed alterations on the side and rear of the building are well integrated and compatible with the design and materials of the Thomas Graham building. The proposal meets the applicable design guidelines and therefore warrants approval.

**ADMINISTRATIVE DECISION**

Approval of a rear building addition at the northeast corner and an exterior stair along the east side of the existing building per the approved site plans, Exhibits C-1 through C-10, signed and dated 4/30/08, subject to the following conditions:

- A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibits C.1-C.10. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 07-174804 HDZ. No field changes allowed."

Decision rendered by:  on April 30, 2008

By authority of the Director of the Bureau of Development Services

**Decision mailed: May 2, 2008**

**Staff Planner: Staci Monroe**

**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 November 6, 2007, and was determined to be complete on **February 13, 2008**.

*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 November 6, 2007.

*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 Landmarks Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on May 16, 2008** 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. Recognized neighborhood associations are not subject to the appeal fee. 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](http://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 **May 19, 2008 – (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:

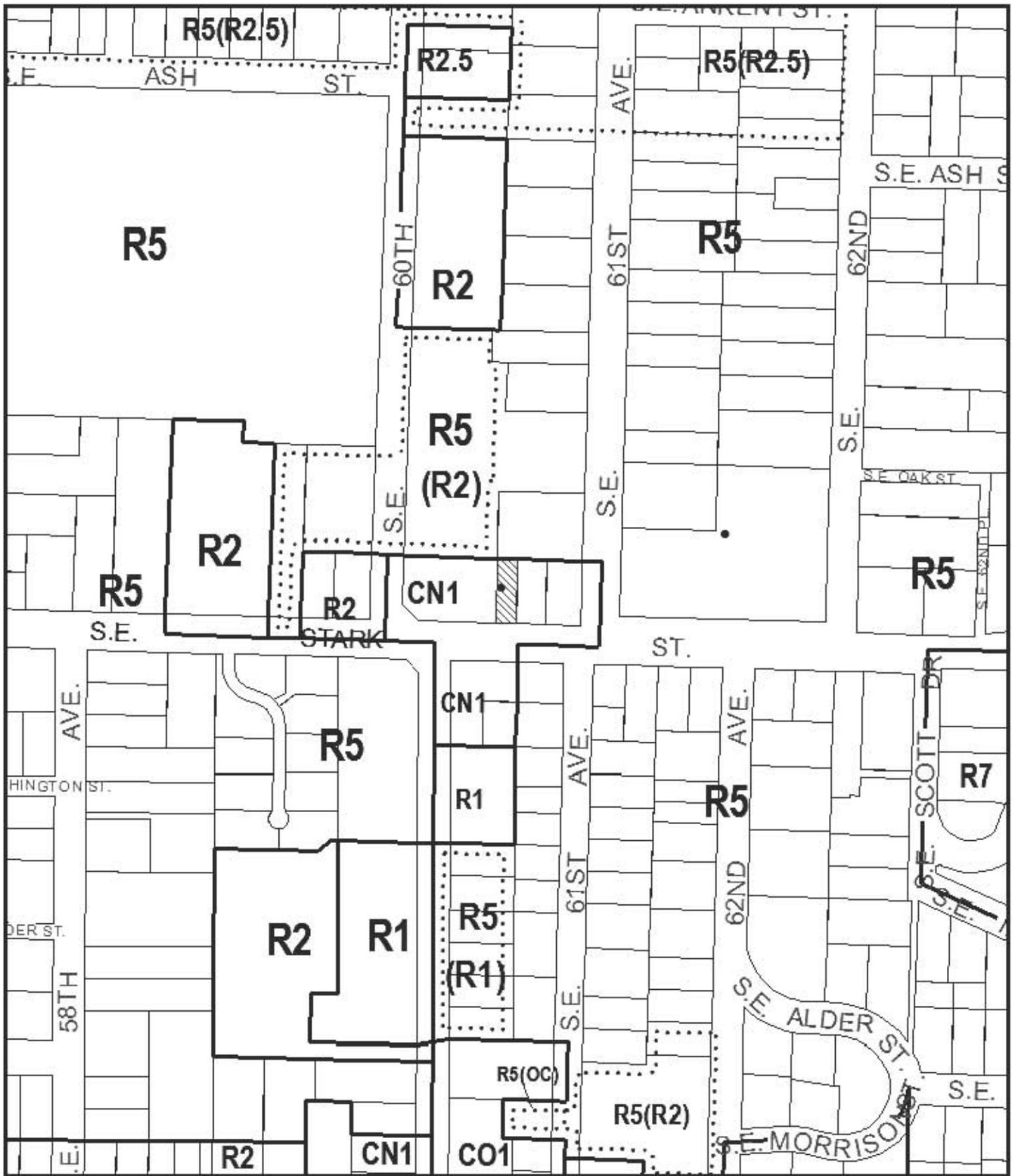
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

#### **EXHIBITS**

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Site Plan (attached)
  - 2. East Elevation (attached)
  - 3. North Elevation (attached)
  - 4. 1<sup>st</sup> Floor Plan
  - 5. 2<sup>nd</sup> Floor Plan
  - 6. Window Details
  - 7. Exterior Details
  - 8. Stair and Railing Details
  - 9. Handrail Details
  - 10. Guardrail and landing details
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice
- E. Agency Responses:
  - 1. Bureau of Environmental Services
  - 2. Plan Review Section of BDS
- F. Correspondence: none
- G. Other:
  - 1. Original LU Application
  - 2. Site History Research

**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

File No. LU 07-174804 HDZ

1/4 Section 3036,3136

Scale 1 inch = 200 feet

State\_Id 1N2E31DD 6000

Exhibit B (Nov 14,2007)



NORTH

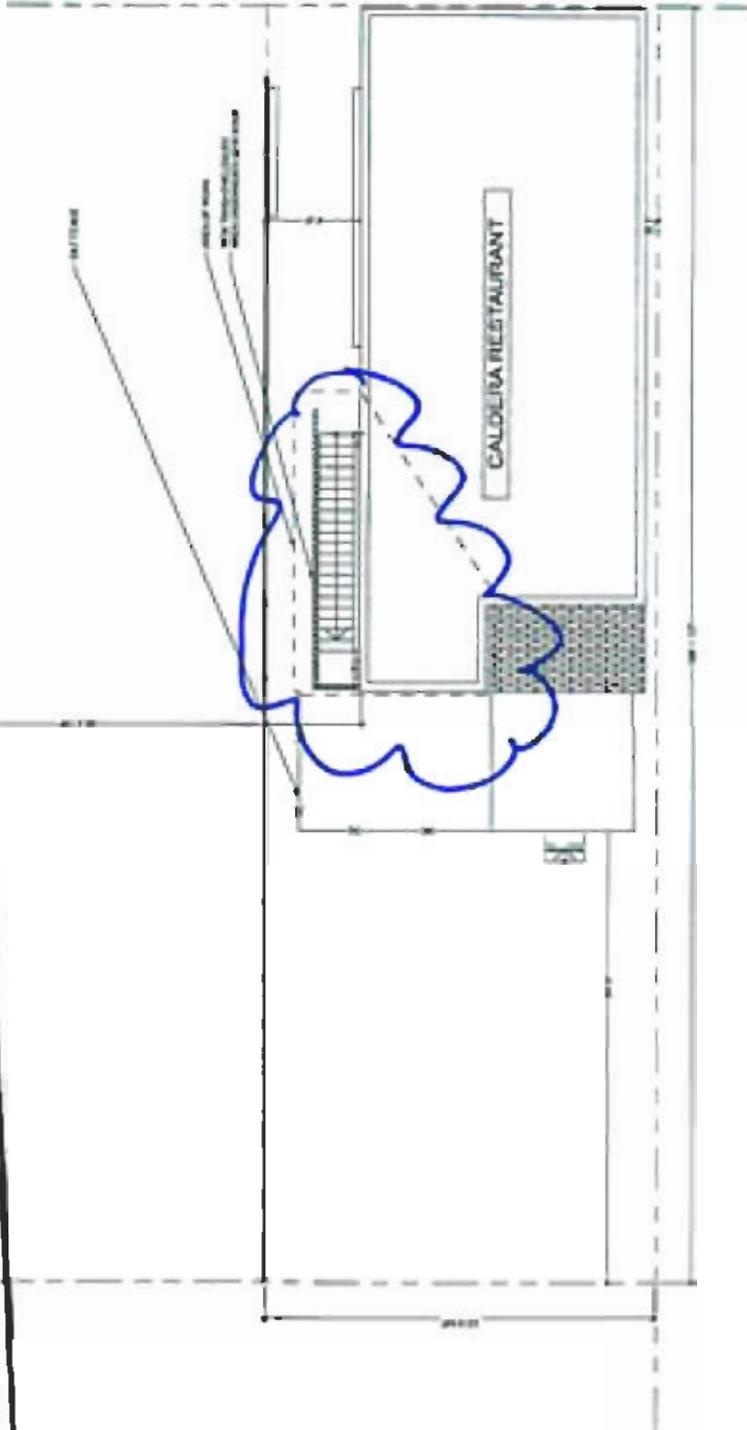
\*Approved\*

City of Portland - Bureau of Development Services

Planner Sullivan

Date 4/30/08

- This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.



☁ AREA OF WORK .

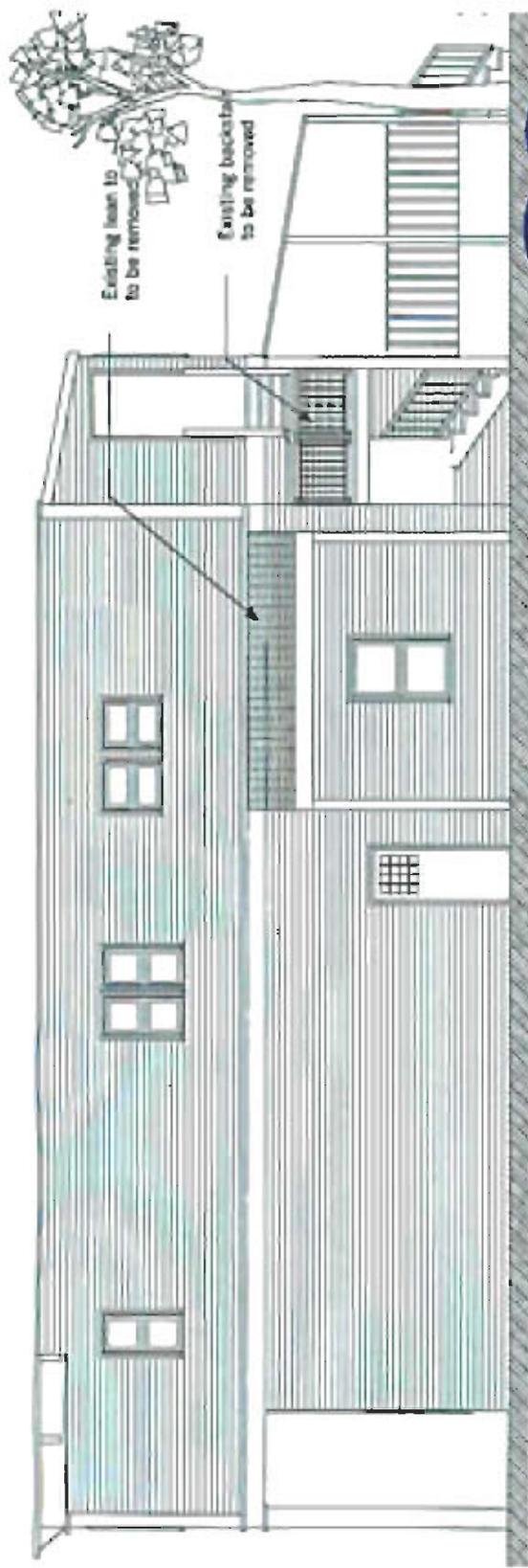
CASE NO. 07-174804-402  
EXHIBIT C-1

Site Plan  
1/16"=1'0"

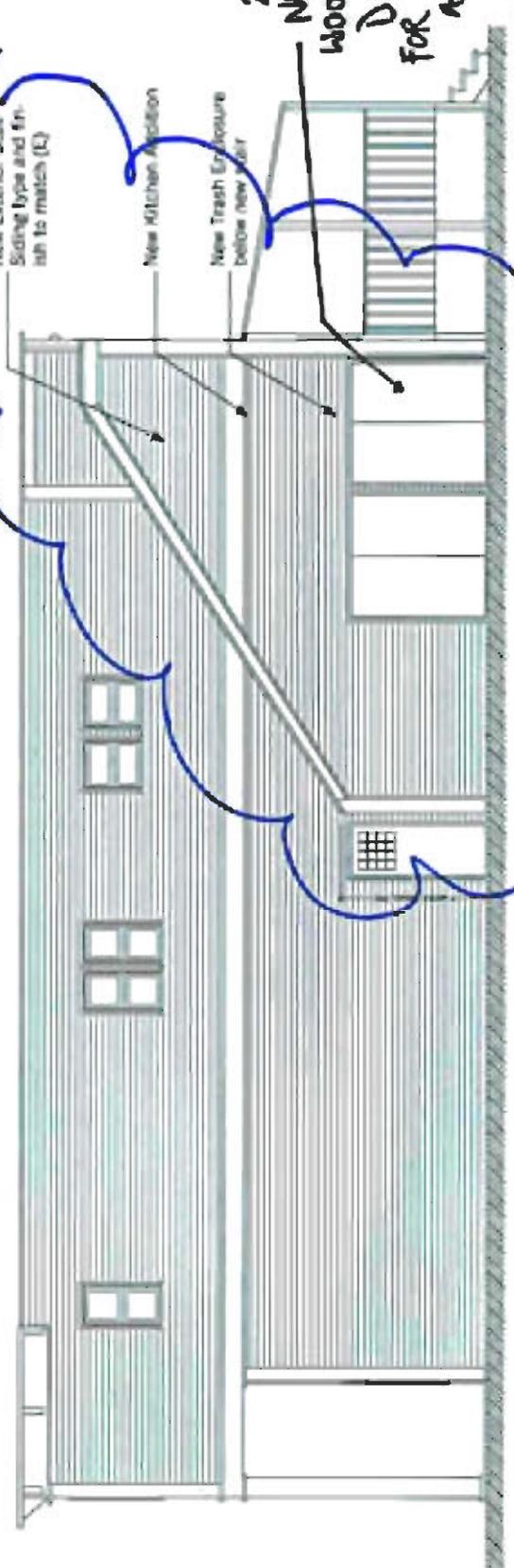
Caldera Restaurant

206 NE 28th Avenue  
Portland, Oregon 97232  
503.731.5509

**[Lftmus]**



Existing Elevation



Proposed Elevation

East Elevation  
Caldera Restaurant



204 NE 26th Avenue  
Portland, Oregon 97232  
503 751 9608

• Approved •

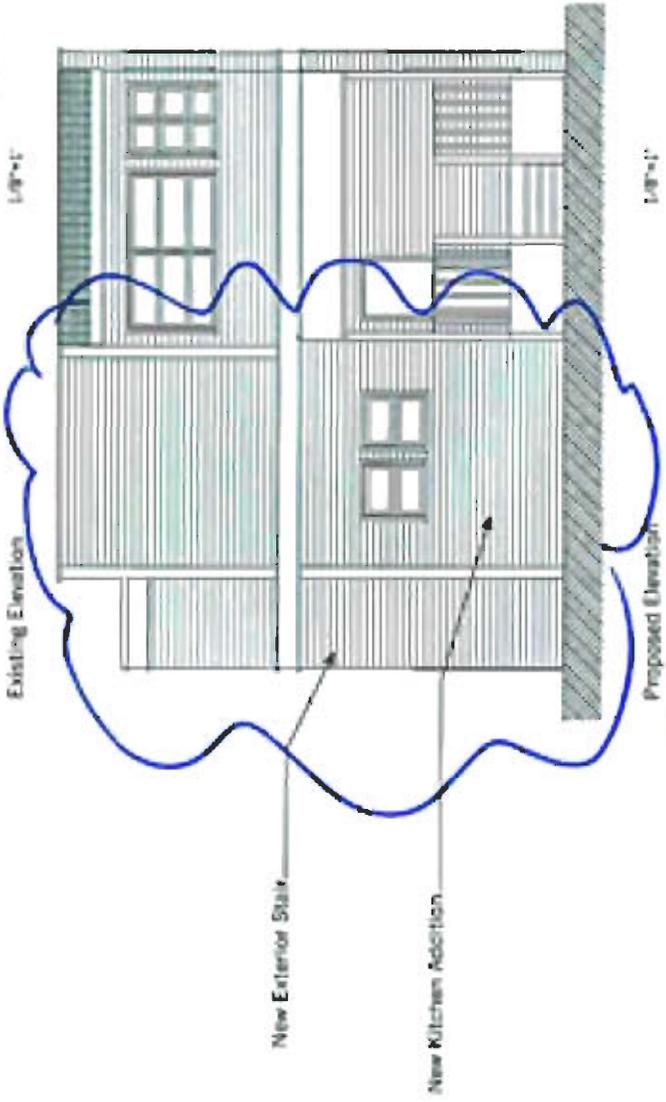
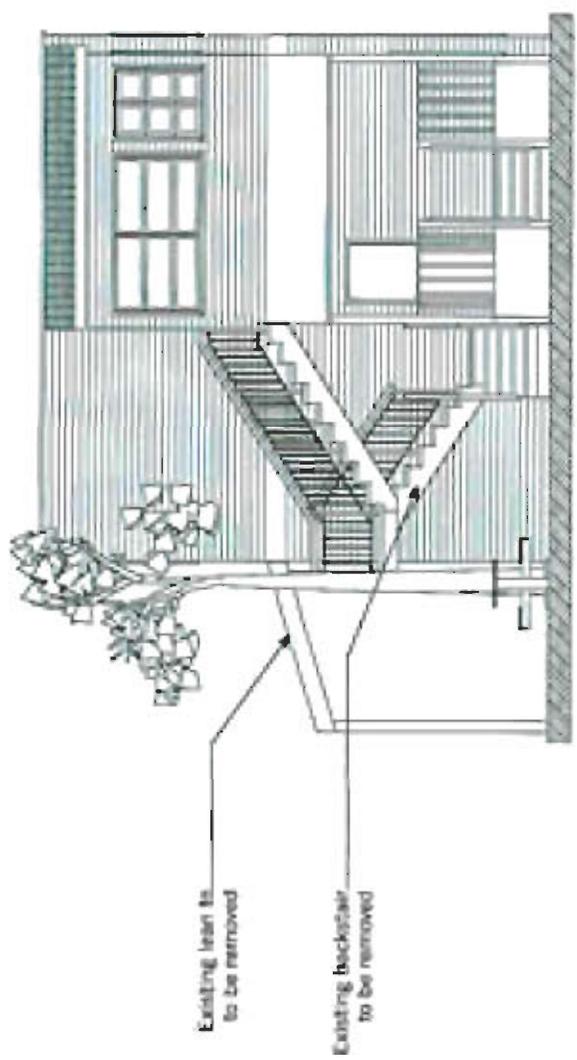
City of Portland - Bureau of Development Services

Planner Sylvan Date 4/30/08

• This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.

CASE NO. 07-174804 HOZ.  
EXHIBIT C-2

City of Portland - Bureau of Development Services  
 \*Approved\*  
 Date 4/24/08  
 Planner S.M.  
 • This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply



North Elevation  
 Caldera Restaurant  
 204 NE 28th Avenue  
 Portland, Oregon 97232  
 503 731 1000  
 [Licensure]

CASE NO. 67-174804 ADZ  
 EXHIBIT C-3