



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

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Date: August 13, 2014
To: Interested Person
From: Kathy Harnden, Land Use Services
503-823-7318 / Kathy.Harnden@portlandoregon.gov

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 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 14-161017 TR

GENERAL INFORMATION

Applicant: Mark Dane / Mark Dane Planning, Inc.
13630 SW Bunter Rd / Beaverton, OR 97005

Owner: Jim Morton / Claybourne Commons LLC
6637 SE Milwaukie Ave #201 / Portland, OR 97202-5658

Site Address: 6637 SE MILWAUKIE AVE

Legal Description: BLOCK 3 LOT 1&2 E 50' OF LOT 7&8, CITY VIEW PK ADD & NO 2; BLOCK 3 E 1/2 OF LOT 5&6, CITY VIEW PK ADD & NO 2; BLOCK 3 W 1/2 OF LOT 5&6, CITY VIEW PK ADD & NO 2; BLOCK 3 W 50' OF LOT 7&8, CITY VIEW PK ADD & NO 2

Tax Account No.: R158900390, R158900490, R158900510, R158900530

State ID No.: 1S1E23AB 14600, 1S1E23AB 14900, 1S1E23AB 14800, 1S1E23AB 14700

Quarter Section: 3732

Neighborhood: SEU, Sellwood-Moreland, contact Ellen Burr at 503-754-3868.

Business District: Sellwood-Westmoreland, contact Tom Brown at 503-381-6543

District Coalition: Southeast Uplift, contact Bob Kellett at 503-232-0010

Zoning: CS – Storefront Commercial

Case Type: Tree Review – TR

Procedure: Type II, an administrative decision with appeal to the Hearings Officer

Proposal: The applicants propose to remove three trees that had been designated as preservation trees in Land Use Case LU 11-108346 LDS. In that former case, this site and an adjacent “also-owned” property received approval for division into 21 lots and three tracts. In order for that land division case to meet the tree preservation requirements, the applicants proposed and received approval to preserve three Scotch pine trees on the adjacent “also-owned” property, which became Lot 21, and which is the subject property of this review.

Now, the applicants want to construct two new buildings on the Lot 21, and in order to do that, they must remove the three preservation trees. These trees are all Scotch pines with diameters of 12, 15, and 17 inches, for a total diameter of 44 inches. These trees are mature and have a large spread. With the proposed new structures, however, there will be less room on the site to plant all the required inches of new trees. Therefore, in addition to planting 24 diameter inches

of new trees on the site, the applicants also propose to pay \$6,000 into the City's tree fund, so that additional trees can be planted elsewhere in the City in areas that need them.

This Tree Review is required to analyze the proposal and to determine whether removal of the preservation trees and replanting the site with 12 small trees and paying a sum into the City's Tree Fund is equivalent to preserving the original 3 Scotch pine trees. A Type II Tree Review is required to make changes to a Tree Preservation Plan approved as part of a land division.

Relevant Approval Criteria:

To be approved, this proposal must comply with the approval criteria of Title 33. The relevant criteria are found in **33.853.040 Approval Criteria B., Changes to tree preservation requirements following land use approval.**

FACTS

Site and Vicinity: The site is relatively flat and is bounded by SE Milwaukie Avenue to the east and SE Claybourne Street to the north. As the result of the land division approved in LU 11-108346 LDS, new Lot 21 is a somewhat smaller, squarer lot of 13,623 square feet. Surrounding properties are developed with both residential and small scale commercial uses.

Zoning: The site is zoned Commercial Storefront (CS) which is intended to preserve and enhance older commercial areas that have a storefront character. The zone allows a range of retail, service and business uses. Residential uses are also allowed in the zone. The CS zoning forms a corridor along both sides of SE Milwaukie Avenue. The area west of the site is zoned R2.5, single dwelling residential 2,500, and to the northwest, R5, single dwelling residential 5000.

Land Use History: City records indicate there is one prior land use review for this site that resulted in the land division discussed above, composed of 21 new lots and three tracts on subject site and the adjacent, also owned property to the west.

Agency and Neighborhood Review: A "Notice of Proposal in Your Neighborhood" was mailed **June 24, 2014.**

Agency Review: The Site Development Section of BDS responded with no major issues or concerns, although they noted that "Full compliance with the erosion control requirements of Title 10, as well as maintenance of the erosion control elements, such as silt fences on private property, storm drain inlet protection and bio bags in the public right-of-way, is the responsibility of the property owner." No other Bureau comments were received.

Neighborhood Review: One written comment was received from the Sellwood Moreland Improvement League, which is discussed in detail below.

ZONING CODE APPROVAL CRITERIA

APPROVAL CRITERIA FOR TREE REVIEW

33.853.010 Purpose

The tree review process evaluates whether mitigation proposed for tree removal is both appropriate and adequate, considering the purpose of the regulations that limit removal. Tree review also evaluates whether changes to tree preservation plans are appropriate, and determines the appropriate mitigation for trees lost due to violations of tree regulations. The review allows flexibility for unusual situations and allows for the purpose of the tree regulations to be met using creative or innovative methods.

33.853.040 Approval Criteria

B. Changes to tree preservation or mitigation methods. The approval criteria for changes to tree preservation or mitigation methods, including a tree preservation plan, tree preservation, tree preservation tract, or mitigation plan are:

- 1. If the tree preservation or mitigation method was approved under the provisions of Chapter 33.630, the requested change will be approved if the review body finds that the applicant has shown that the revised method will continue to meet Chapter 33.630, Tree Preservation.**
- 2. If the tree preservation or mitigation method was not approved under the provisions of Chapter 33.630, the requested change will be approved if the review body finds that the applicant has shown that the revised method better meets the purpose of Chapter 33.630, Tree Preservation, stated in Section 33.630.010.**

Findings: The tree preservation plan subject to this review was approved under the provisions of Chapter 33.630 in land division case file LU 11-108346 LDS. Therefore, Criterion B.1 applies to this review.

This land division approval resulted in twenty-one lots and three tracts, which are in the process of being platted. The original tree preservation plan listed 34 trees on the site; however, 20 of the trees were off-site/right-of-way trees that weren't required to be preserved per Chapter 33.630 of the Zoning Code. In addition, 8 other trees were exempt because of their small diameter or their proximity to buildings that would remain on-site. Six trees that were not exempt were removed, and their total diameter was 72 inches. Chapter 33.630, Option 1, requires 35 percent of the non-exempt tree diameter to be preserved, which in this case would have been 25.2 diameter inches. However, the Decision required preservation of 3 Scotch pine trees, which had a total diameter of 44 inches. There were no findings regarding why the larger number of diameter inches was required to be preserved.

The applicant is now proposing to further develop new Lot 21, which contains an existing structure and the 3 preservation trees. The new development, which is not subject to this review, nor to any additional land use reviews, will be located in the southwest corner adjacent to and well within the root protection zones of the three Scotch pine trees. The new development will impact the growing area of the three trees, which would likely impact their health over time.

Therefore, the applicant proposes to remove the three trees and to use the mitigation options of 33.630.300 to meet the tree preservation requirement of B.1 above.

33.630.300 Mitigation Option

As an alternative to meeting Section 33.630.100, approval of a mitigation plan may be requested. The review body will approve the mitigation plan where the applicant has shown that the applicant has met criteria A. and B. and one of the criteria in C., below:

A. As many trees as possible are preserved; and

Findings: The original land use case (LU 11-108346 LDS) allowed removal of all the trees from the subject site, while preserving three Scotch pine trees on the adjacent "also-owned" property east of the land division site. There are 6 regulated trees on the portion of the site subject to this review, which does not include trees located in the right of way. These 6 trees have a total diameter of 73 inches, including the 44 inches from the Scotch pine trees. The approved tree preservation plan from LU 11-108346 LDS contained alternative root protection zones for the three trees in order to accommodate existing development on the site. However, the new proposed development will be located along the south and west property boundaries, within 4 feet of the 2 westernmost trees and a new building will be located in the same spot as the most eastern of the three trees.

The applicants propose to retain the 3 other regulated trees on the site. These 3 trees equal 29 inches, or 40.3 percent of existing tree diameter on the site.

Given the locations of all the trees and existing development on the site, the applicant has proposed preserving as many trees as possible and still be able to continue developing it to its allowed potential. Therefore, Criterion A is met.

B. The applicant has submitted a mitigation plan that adequately mitigates for the loss of trees, and shows how the mitigation plan equally or better meets the purpose of

this chapter. Mitigation can include tree planting, preservation of groups of smaller trees, eco-roof, porous paving, or pervious surface permanently preserved in a tract;

Findings: The applicant's proposed method of mitigation for removing the three Scotch pine trees includes planting additional trees on the site, and paying into the City's Tree Fund for the required number of inches that cannot be planted on the site due to space limitations.

The applicants propose planting twelve 2-inch diameter American hornbeams (*Carpinus caroliniana*) as the replacement trees. This species is described as a "short and stubby tree with multiple trunks, each growing to a foot wide" which can grow up to 30 feet in height, with a spread of between 30 to 60 feet at maturity. Given that each designated planting area on the site contains approximately 1,250 square feet, and each tree at maturity would need approximately 900 square feet, it would appear that a more columnar shaped tree would be preferable to managing trees that will grow to be too big for the site. The Columnar Hornbeam Tree (*Carpinus betulus* 'Fastigiata') is a slow-growing tree with a mature height of 30' to 40' and width of 20' to 30'. Even this hornbeam would appear to be too wide for the three planting areas, but it would be better than the American hornbeam. Other columnar trees could be more practicable.

The cost of paying into the Tree Fund is \$300 per inch of required mitigation. In this case, 44 inches of required tree diameter, less 24 inches of proposed planted tree diameter leaves 20 inches to be paid into the fund. At \$300 per inch, the amount required to be paid is \$6,000, which the applicants propose to pay.

The Sellwood Moreland Improvement League submitted a written response in which they requested that mitigation trees be 2.5 inches in diameter and that the amount to be paid into the Tree Fund be \$7,000 because this proposal will alter the original land use decision. The larger diameter of the new trees to be planted was requested in the hope that the slightly larger trees would more quickly lessen the impact of removing the three nature Scotch pines. The request for the additional \$1,000 to be paid into the Tree Fund was not explained.

Staff conducted some research on planting sizes for trees. The consensus appear to be that smaller diameter trees actually survive better than larger diameter trees because more of their roots are preserved during the field excavation process, and they appear to regain their strength and to grow faster than larger diameter trees that are planted. Based on this information, staff finds no scientific or other compelling reason for requiring the requested larger tree diameter.

Staff also finds that because this is not a violation case, there are no compelling reasons to require that a larger amount of funds be paid into the Tree Fund. The \$300 per diameter inch of proposed tree removal is consistent with what would have been required had the applicants proposed removal of these trees during the original land division review. Furthermore, the 44 inches from the original review were more than required to meet standards. Only two of the three Scotch pines were required by Code to be preserved due to their sizes and the 35 percent preservation requirement. There is no explanation in that Decision as to why all three pines were required to be preserved.

The same Tree Preservation criteria apply to this review as those which were applied at the time of the land division review. Therefore, staff finds that planting 12 new 2-inch diameter trees, or 24 inches of new trees, plus paying \$6,000 into the Tree Fund is adequate and appropriate mitigation for removal of 44 inches of trees, especially when only 25 of those inches were technically required to be preserved at the time of land division. With conditions to ensure that 12 new columnar trees are planted in areas shown for the new trees on Exhibit C.1, and that \$6,000 is paid into the City's Tree Fund prior to removal of the 3 Mitigation Trees, the proposal continues to meet the requirements of Tree Preservation Chapter 33.630, and this Criterion is met.

With a condition to require columnar trees to be planted as replacement trees, and for a Zoning Permit and final inspection for planting the required trees prior to Building Permit Approval, Criterion B will be met.

- C. It is not possible under any reasonable scenario to meet Section 33.630.100 and meet one of the following:**
- 1. Minimum density;**
 - 2. All service requirements of Chapters 33.651 through 33.654, including connectivity;**
 - 3. Implementation of an adopted street plan;**
 - 4. On sites 15,000 square feet or less in area, a practicable arrangement of lots, tracts, and streets within the site that would allow for the division of the site with enough room for a reasonable building site on each lot;**
 - 5. In E and I zones, provide a practicable arrangement of lots, tracts, and streets within the site that would allow for the division of the site with enough room for a reasonable building site on each lot, considering the uses and development allowed in the zone; or**
 - 6. Preserve the trees within the environmental zones on site while providing a practicable arrangement of building sites and disturbance area.**

Findings: The subject site at approximately 13,100 square feet is less than 15,000. The Storefront Commercial (C) zone allows zero setbacks along lot lines that abut another commercial zone, which is the situation for this case. Therefore, the proposed building layout meets zoning code requirements, which limits the area for tree preservation. The required 44 inches of tree preservation from the original land division case exceeded the 25.2 inches required to meet standards by 19 inches. The applicants' proposal to plant 24 inches of new trees on the site, and pay \$6,000 into the City's Tree Fund will fulfill the typical replanting requirements and provide for new trees to be planted throughout the City. Therefore, this Criterion is 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 original land division for this site resulted in preservation of 3 Scotch pine trees with a total combined diameter of 44 inches, approximately 17 inches more than what would typically be required. Additional development proposed for the site containing the mitigation trees could impact these trees, so the applicant requested that these trees be replaced with other, more practical trees that will fit within the site's parameters. The applicants requested 12 American hornbeam trees to be planted with 4 trees in each of three designated tree spaces around the site. However, staff determined that the growth habit of this species would make them rather large for the planting areas and instead suggested that Columnar hornbeam or Italian cypress, or similar columnar species might be more appropriate for tree health in the small planting areas.

ADMINISTRATIVE DECISION

Approval of Tree Review to modify the Tree Preservation Plan approved under LU 11-108346 LDS, per the arborist report, Exhibit A.1 and the approved site plan, Exhibit C.1, signed and dated July 16, 2014, 2014, subject to the following conditions:

- A. The applicant shall pay \$6,000, equivalent to 20 inches of tree diameter, into the City's Tree Fund prior to removal of the 3 trees. The applicant shall provide a copy of the Tree Fund payment receipt with the Zoning Permit application for the proposed removal of the 3 trees required for preservation in LU 11-108346 LDS.
- B. The applicant shall obtain a Zoning Permit to remove the trees and install the 12 required columnar trees to ensure that the trees comply with this approval and are planted in the

- C. areas shown for new trees on Exhibit C.1, in accordance with the following requirements:
1. Required trees shall be installed prior to initiating construction of the two new buildings proposed for the site.
 2. The new trees shall be properly protected with 6-foot tall chain link fencing around the root protection zones and will be secured to the ground with 8-foot metal posts driven into the ground for the duration of the construction activity on the site.
 3. Required trees shall have minimum 2-inch diameters.
- D. The land owner shall maintain the required plantings for two years to ensure survival and replacement. The land owner is responsible for ongoing survival of required plantings during and beyond the designated two-year monitoring period. The landowner shall:
1. Obtain a Zoning Permit for a final inspection at the end of the 2-year maintenance and monitoring period. The permit must be finalized no later than 24 months from the final inspection for the installation of the 12 trees to ensure they remain on the site in a healthy condition.
 2. Any trees that appear to be failing at any time during the two year maintenance and monitoring period shall be replaced in the same quantity and with the same species, unless otherwise allowed due to site related health impacts on the original species.
- E. Development on this site shall be in conformance with the Tree Mitigation Plan (Exhibit C.2) and the applicant's arborist report (Exhibit A.4). Proposed trees and existing trees to be preserved shall be protected with 6-foot high chain link fencing placed around their required root protection zones, and be secured to the ground with 8-foot metal posts driven into the ground.
- F. Encroachment into the specified root protection zones may only occur under the supervision of a certified arborist. Planning and Zoning approval of development in the root protection zones is subject to receipt of a report from a Certified Arborist, explaining that the arborist has approved of the specified methods of construction, and that the activities will be performed under his supervision.
- G. Failure to comply with any of these conditions may result in the City's reconsideration of this land use approval pursuant to Portland Zoning Code Section 33.700.040 and /or enforcement of these conditions in any manner authorized by law.

Staff Planner: Kathy Harnden

Decision rendered by:  **on August 7, 2014.**
By authority of the Director of the Bureau of Development Services

Decision filed August 7, 2014

Decision mailed: August 13, 2014

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 May 23, 2014, and was determined to be complete on **June 23, 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 May 23, 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 or extend the 120-day review period. Unless further extended by the applicant, **the 120 days will expire on: October 20, 2014.**

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 Hearings Officer, who will hold a public hearing. Appeals must be filed **by 4:30 PM on August 27, 2014** at 1900 SW Fourth Ave. Appeals can be filed at the Development Services Center Monday through Wednesday and Fridays between 8:00 am to 3:00 pm and on Thursdays between 8:00 am to 2:00 pm. After 3:00 pm Monday through Wednesday and Fridays, and after 2:00 pm on Thursdays, appeals must be submitted at the reception desk on the 5th 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. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Please see the appeal form for additional information.

Appeal fee waivers. Multnomah County may cover the appeal fees for their recognized associations. An appeal filed by a recognized association must be submitted to the City with either the appropriate fee or the attached form signed by the County. Contact Multnomah County at 503-988-3043, 1600 SE 190th, Portland, OR 97233.

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.

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 Hearings Officer 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 775 Summer St NE, Suite 330, Salem, Oregon 97301-1283, 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 Hearings Officer 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 **August 28, 2014 – (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:

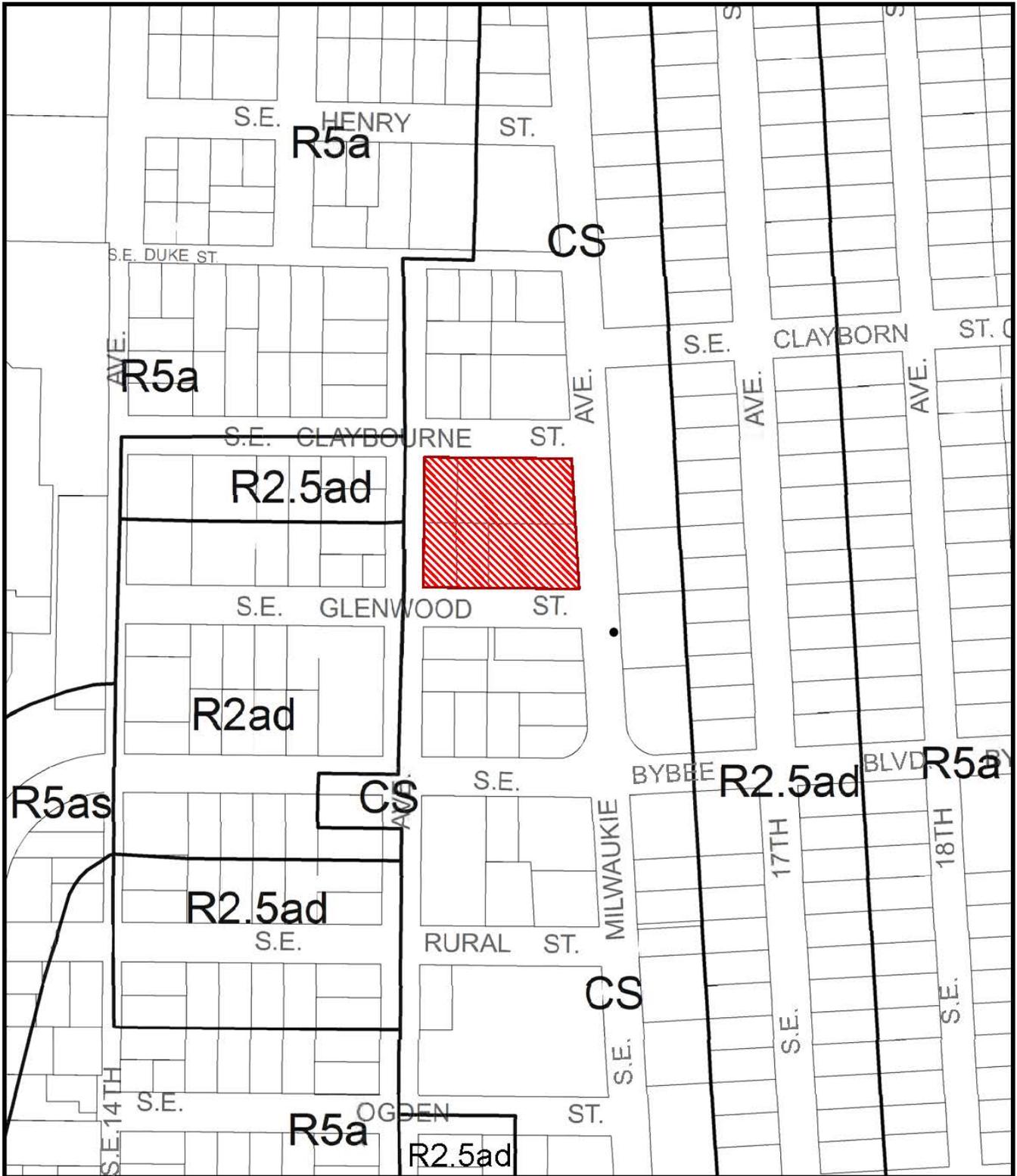
- A building permit has been issued, or
- The approved activity has begun, or
- In situations involving only the creation of lots, the land division has been recorded.

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 1. Original Narrative and Arborist Report
 2. Revised Narrative
- B. Zoning Map (attached)
- C. Plans/Drawings:
 1. Existing Conditions Plan/Tree Protection Plan, Case File LU 11-108346 LDS
 2. Proposed Development Plan – Trees to be Removed (attached)
 3. Proposed Mitigation Plan – Trees to be Planted (attached)
- D. Notification information:
 1. Mailing list
 2. Mailed notice
- E. Agency Responses:
 1. Site Development Review Section of BDS
 2. Urban Forestry, Portland Parks & Recreation
- F. Correspondence:
 1. Ellen Burr, Land Use Chair, Sellwood Moreland Improvement League, 7/15/14 with concerns regarding proposed mitigation
- G. Other:
 1. Original LU Application
 2. Incomplete Letter, dated June 5, 2014

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



Site



Historic Landmark



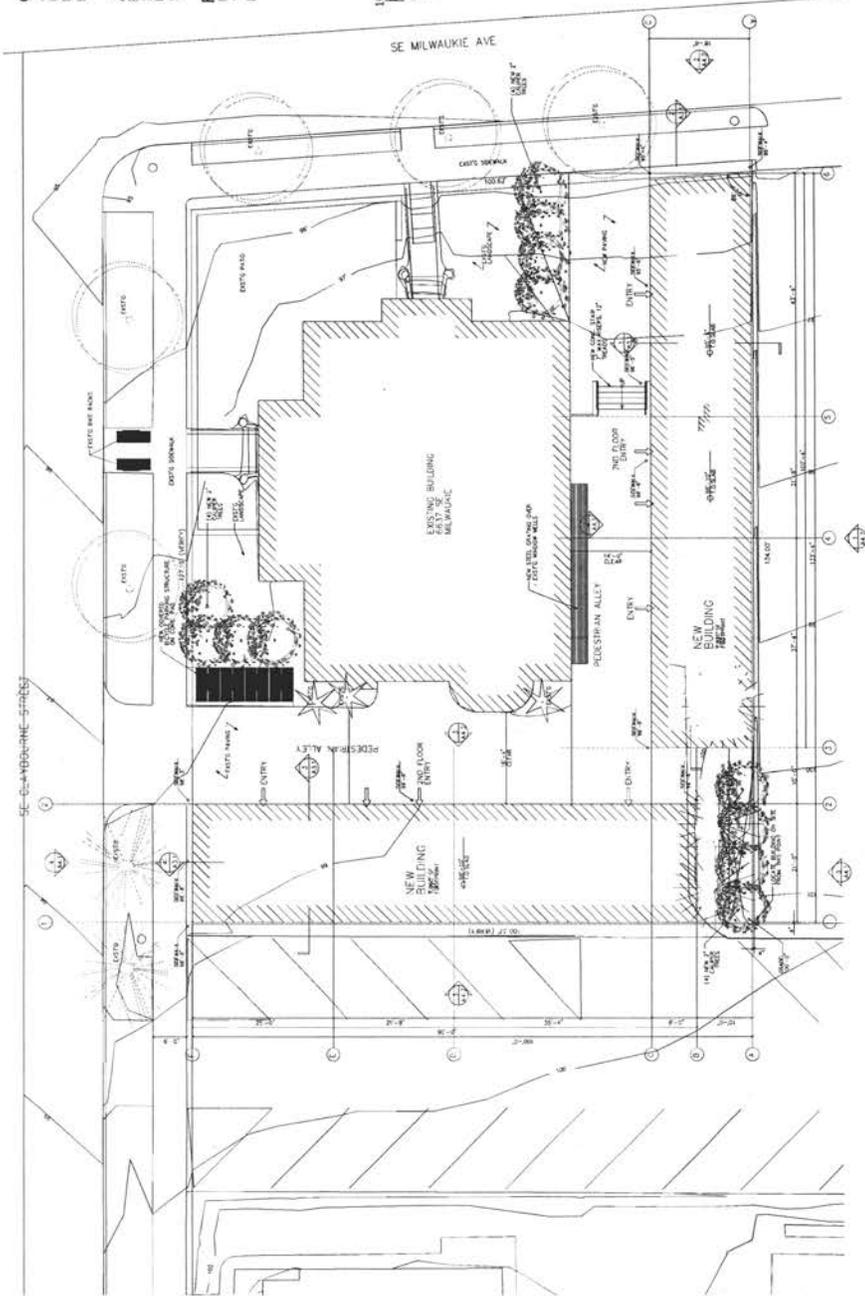
File No. LU 14-161017 TR
 1/4 Section 3732
 Scale 1 inch = 200 feet
 State_Id 1S1E23AB 15000
 Exhibit B (May 28, 2014)

*Proposed Mitigation
Trees To Be Planted*

OWNER / APPLICANT
 GAMES STORES, INC.
 CLAYBURNE COMMONS LLC
 PO BOX 130,
 LAKE OSWEGO OR 97034

ARCHITECT
 BENJAMIN MAECHTER, AIA NICARB
 2181 NW NICOLA STREET
 PORTLAND OR 97210
 503-449-1471

PLANNER
 MARK DANE PLANNING INC.
 13630 SW BUTNER ROAD
 BEAVERTON OR 97005



TREES 30, 31 & 32
 SCOTCH PINES TO BE REMOVED
 12" + 15" + 17"

4.4" TO BE REMOVED
 24" TO BE PLANTED (2 X 12)
 20" MITIGATION = \$6000.00



*Mitigation to
Remain Existing*

- LEGEND:**
- WATER METER
 - WATER VALVE
 - WATER MAIN
 - SEWER MAIN
 - STORM MAIN
 - STORM DOWN-SPOUT
 - WATER LINE
 - NATURAL GAS LINE
 - SANITARY SEWER LINE
 - STORM SEWER LINE
 - STORM DRAINAGE LINE
 - UNDERGROUND UTILITY LINES
 - UNDERGROUND FLOORING LINE
 - UNDERGROUND TELEPHONE LINE
 - UNDERGROUND ELECTRIC LINE

DATE: 10/14/2014
 DRAWN BY: MJD
 PROJECT NO: MOR-001
 COUNTY: MULTNOMAH
 TAX LOTS: 3782 OLD
 SHEET TITLE: PROPOSED IMPROVEMENTS
 SHEET NUMBER: D1

PROPOSED IMPROVEMENTS PLAN
 6637 SE MILWAUKIE AVENUE



*LU 14-161017TR
 Exhibit C3*