



### City of Portland, Oregon

### **Bureau of Development Services**

#### **Land Use Services**

FROM CONCEPT TO CONSTRUCTION

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

**Date:** June 12, 2014 **To:** Interested Person

**From:** Jennifer Kenny, Land Use Services

503-823-7011 / Jennifer.Kenny@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 <a href="http://www.portlandonline.com/bds/index.cfm?c=46429">http://www.portlandonline.com/bds/index.cfm?c=46429</a>. 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 14-138147 HR – RADIO FREQUENCY ANTENNAS GENERAL INFORMATION

**Applicant:** Jeffory Dunham, Sprint

6580 Sprint Parkway / Overland Park, KS 66251

**Representative:** Steven Topp, Hoss Consulting on behalf of Sprint

12566 SW Bridgeview Ct. / Tigard, OR 97223

Site Address: 2701 NW VAUGHN ST

Legal Description: TL 200 11.06 ACRES ALSO SEE SUBS -0291 -0292, SECTION 29 1N

1E

**Tax Account No.:** R941290290

State ID No.:1N1E29D00200Quarter Section:2826Neighborhood:Northwest District, contact John Bradley at 503-313-7574.Business District:Nob Hill, contact Mike Conklin at 503-226-6126. North-Northeast

Business Assoc, contact Joice Taylor at 503-841-5032.

**District Coalition:** Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.

**Other Designations:** Historic Landmark known as Montgomery Ward & Co.

**Zoning:** EXd, Central Employment (EX) zone with a Design (d) Overlay

**Case Type:** HR, Historic Resource Review

**Procedure:** Type II, an administrative decision with appeal to the Historic

Landmarks Commission.

**Proposal:** The applicant seeks Historic Resource Review approval to install radio frequency equipment on the rooftop of a Historic Landmark, the Montgomery Ward & Company Warehouse Building. The proposal is to replace three existing antennas and Remote Radio Units (RRUs) and add one new antenna and RRU, on the "Montgomery Park" sign and roof parapet edge. The antennas are 12" x 5'-1" and the RRUs are 15.5" x 22.98". Historic Resource Review approval is required for non-exempt alterations to a Historic Landmark.

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

- Code Chapter 33.274 Radio Frequency Transmission Facilities
- 33.846.060 G Other Approval Criteria

#### **ANALYSIS**

**Site and Vicinity:** The site for this proposal includes the Montgomery Park Building. Located on a large tract of land comprising 11.06 acres in Northwest Portland, this building was originally erected in 1921 as a warehouse for the Montgomery Ward Company. At approximately 152 feet in height to the tallest portion of the building, the Montgomery Park Building is considered to be non-conforming to the current height limitation of 65'-0" in the Central Employment Zone (EX). The sign structure, erected in 1925, with "Montgomery Ward" spelled out in red neon illuminated letters; provides the building with additional 25 feet of presence in the Portland Skyline beyond the already grand presence of the building. The building was renovated and converted into a trade center with retail, office, and exhibit space in 1986. The sign has been modified to say, "Montgomery Park." In 1985 the Montgomery Ward Building was approved as a Portland Historic Landmark (HLDZ 53-85). It was placed on the National Register of Historic Places in 1975.

In general, the property is surrounded on the east and north by General and Heavy Industrial Zones, on the west by General Employment Zones and to the south by Residential Zones. The building is considered the most important example of Reinforced Concrete Utilitarian style architecture in the city. When constructed, it was the largest building in Portland, and one of the largest concrete structures west of the Rockies. It continued to be the largest building in Portland until 1970 when the First National Bank Tower was constructed. By its sheer size relative to its surroundings, the Montgomery Park Building contributes strongly to the neighborhood and the sign structure and signage is a prominent element against Forest Park as a background to the west.

**Zoning:** The zoning for the site is Central Employment (EX). This zone implements the Central Employment map designation of the Comprehensive Plan. The zone allows mixed-uses and is intended for areas in the center of the City that have predominantly industrial type development. The intent of the zone is to allow industrial and commercial uses which need a central location. Residential uses are allowed, but are not intended to predominate or set development standards for other uses in the area. The development standards are intended to allow new development which is similar in character to existing development.

The <u>Design Overlay Zone [d]</u> promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. This is achieved through the creation of design districts and applying the Design Overlay Zone as part of community planning projects, development of design guidelines for each district, and by requiring design review. In addition, design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

The <u>Historic Resource Overlay Zone</u> protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties

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

- LUR 96-00448 CU DZ, Approved [with conditions] an unmanned cellular telecommunications facility consisting of 3 "whip-style" antennas mounted on the support structure of the existing rooftop sign
- LUR 98-00163 DZ, Approved [with conditions] 3 additional whip-style antennas mounted to the roof of the existing mechanical penthouse, 2 GPS antennas, 1 diagnostic antenna, and a future expansion of up to a maximum of 12 panel style antennas flush mounted to the sides of the existing mechanical penthouse
- LUR 98-01027 DZ, Request for a roof-mounted telecommunications facility This request was voided before a decision was issued
- LUR 00-00770 HDZ, Approval of eleven antennas on three metal pole masts
- LU 02-126847 HDZ, Approval two new antennas to the rooftop sign structure
- LU 05-105768 HDZ, Approval to install three (3) new PCS antennas within the "Montgomery Park" rooftop sign structure

- LU 06-100938 HDZ, Approval of one new antenna to be mounted on an existing rooftop storage tank
- LU 07-145772 HDZ, Approval of new antennas, dishes and mechanical room
- LU 09-126115 HDZ, AD, Approval of upgrades to the perimeter and interior parking lot landscaping on the site
- LU 10-116139 HDZ, Approval of monument sign
- LU 11-135616 HDZ, Approval to replace antennas on the "Montgomery Park" sign
- LUR 96-00331 DZ, Approval [with conditions] of an unmanned cellular communications facility consisting of three antenna arrays: two wall-mounted to the roof parapet and one mounted on the support structure of the existing rooftop sign

Agency Review: No response was required.

**Neighborhood Review:** A "Notice of Proposal in Your Neighborhood" was mailed on May 15, 2014. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

#### ZONING CODE APPROVAL CRITERIA

Approval criteria and standards from multiple chapters of Title 33 must be met because the proposal is for radio frequency equipment and the site is a Historic Landmark. These include:

- Code Chapter 33.274 Radio Frequency Transmission Facilities
- Code Chapter 33.846 Historic Resource Reviews

Staff considered all criteria and requirements and addressed only those applicable to this project.

## 1) Chapter 33.274 Radio Frequency Transmission Facilities Section 33.274.040 Purpose

- 1. Ensure that Radio Frequency Transmission Facilities will be compatible with adjacent uses.
- 2. Reduce the visual impact of towers and accessory equipment in residential and open space zones whenever possible.
- 3. Protect adjacent populated areas from excessive radio frequency emission levels.
- 4. Protect adjacent property from tower failure, falling ice, and other safety hazards.

**Findings:** This proposal is for Radio Frequency equipment; therefore the requirements of *Chapter 33.274 Radio Frequency Transmission Facilities - General Requirements*, are applicable.

#### C. General Requirements

- **5. Radio Frequency Emission Levels**. All existing and proposed Radio Frequency Transmission Facilities are prohibited from exceeding or causing other facilities to exceed the radio frequency emission standards specified in Table 274-1, (shown below) except as superseded by Part 1, Practice and Procedure, Title 47 of the Code of Federal Regulations, Section 1.1310, Radio Frequency Radiation Exposure Limits.
- **6. Antenna Requirements.** The antenna on any tower or support structure must meet the minimum siting distances to habitable areas of structures shown in Table 274-2 (shown below). Measurements are made from points A and B on the antenna to the nearest habitable area of a structure normally occupied on a regular basis by someone other than the immediate family or employees of the owner/operator of the antenna. Point A is measured from the highest point of the antenna (not the tower) to the structure, and Point B is measured from the closest point of the antenna to the structure.
- **11. Mounting Device**. The device or structure used to mount facilities operating at 1000 watts ERP or less to an existing building or other non-broadcast structure may not project more than 10 feet above the roof of the building or other non-broadcast structure.
  - **Findings for C-5, C-6, and C-11:** As part of Exhibit C-8, the applicant has submitted an engineer's letter documenting that, with the proposed antennas, the telecommunications facility complies with the radio frequency emissions standards of Table 274-1 in Chapter

33.274, shown below. The attached narrative states that the facility is in compliance with the minimum siting distance to habitable areas (per Table 274-2 in Chapter 33.274). The equipment mounting device will not project more than 10 feet above the roof. *These requirements are therefore met.* 

Radio Frequency Emission Standards [1]				
Frequency Range	Mean Squared Electric (E <sup>2</sup> ) Field Strength (V <sup>2</sup> /m <sup>2</sup> ) [2]	Mean Squared Magnetic (H <sup>2</sup> ) Field Strength (A <sup>2</sup> /m <sup>2</sup> ) [3]·	Equivalent Plane-Wave Power Density (mW/cm <sup>2</sup> ) [4]	
100 KHz - 3 MHz 3 MHz - 30 MHz 30 MHz - 300 MHz 300 MHz - 1500 MHz 1500 MHz - 300 GHz	80,000 4,000 (180/f <sup>2</sup> ) [5] 800 4,000 (f/1500) 4.000	0.5 0.025 (180/f <sup>2</sup> ) 0.005 0.025 (f/1500) 0.025	20 180/f <sup>2</sup> 0.2 f/1500 1.0	

#### Notes:

- [1] All standards refer to root mean square (rms) measurements gathered by an approved method.
- [2]  $V^2/m^2 = Volts$  squared per meter squared.
- [3]  $A^2/m^2 =$  Amperes squared per meter squared.
- [4]  $mW/cm^2 = Milliwatts$  per centimeter squared.
- [5] f = Frequency in megahertz (MHz).

Table 274-2  Distance Between Antenna and Habitable Area of Structure (Where f is frequency in megahertz)				
Effective Radiated Power	Frequency (MHz)	Point A: Minimum Distance From Highest Point of Antenna To Habitable Area of Structure (feet)	Point B: Minimum Distance From Closest Portion Of Antenna To Habitable Area of Structure (feet)	
< 100 watts		10	3	
100 watts to 999 watts		15	6	
1,000 watts to 9.999 Kw	< 7 7 - 30 30 - 300 300 - 1500 > 1500	11 f/0.67 45 780/vf 20	5 f/1.5 20 364/vf 10	
10 Kw plus	< 7 7 - 30 30 - 300 300 - 1500 1500	17.5 f/0.4 75 1300/vf 34	8 f/0.91 33 572/vf 15	

Staff note: The Federal Telecommunications Act of 1996 prohibits a local government from denying a request to construct such facilities based on "harmful radio frequency emissions" as long as the wireless telecommunications facility meets the standards set by the FCC. Furthermore, the Act required the FCC to adopt standards for radio frequency emissions from wireless telecommunications by August 1996. In a rule making procedure, the FCC adopted standards effective August 1, 1996, which are virtually the same as those reflected in Chapter 33.274, Table 274-1. Because this land use review was submitted after those standards took effect, this conditional use review cannot be denied solely on the issue of harmful radio frequency emission levels.

## 2) 33.846 Chapter Historic Resource Review Approval Criteria Section 33.846.060 Purpose

Historic Resource Review ensures the conservation and enhancement of the special characteristics of historic resources. Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the relevant approval criteria have been met.

**Findings:** The site is a Historic Landmark and the proposal is for non-exempt treatment, therefore, Historic Resource Review approval is required. The approval criteria are 33.846.060.G – Other Approval Criteria.

- **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.
- **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 for 1 and 2:** The replacement antennas will have minimal visual impact on the building and sign so that the historic character will remain intact. The panel antennas and Remote Radio Units (RRUs) will be mounted behind the first "R" and the "Y" on the "Montgomery Park" sign, and on the south side roof parapet. The "Y" and parapet site received prior approval. No historic materials will be altered or removed. With the requirement that the antennas be painted to match the surrounding conditions, the historic character of the building will not change.

The historic building and sign will remain a record of their time because no historic materials will be removed, altered or obscured. The small size of the antennas and RRUs relative to the size of the sign and the building will ensure that the historic features remain prominent and unaltered. No conjectural features will be added so that the original architecture will remain intact. With the Condition of Approval that the new antennas and associated equipment will be painted to match existing conditions, these criteria are met.

- **7. Differentiate new from old:** New additions, exterior alteration, or related new construction will not destroy historic materials that characterize the property. New work will be differentiated from old.
- **8. Architectural compatibility:** New additions, exterior alteration, or related new construction will be compatible with the resource's massing, size, scale and architectural features. When retro-fitting building's or sites to improve accessibility for persons with disabilities, design solutions will not compromise the architectural integrity of the historic resource.
- **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 for 7, 8, and 9:** The proposed alterations are modern in design and material and therefore differentiated from the historic building and sign. No historic materials will be altered or destroyed and the antennas and associated equipment can be removed without permanent damage to the resource.

The antennas will be mounted on the existing sign structure behind the letters "R" and "Y" and on the roof parapet, thus limiting their visibility and impact on the historic structure. The equipment will be placed vertically along existing structures and with the Condition of Approval that the equipment be painted to match existing conditions, the resource's massing, size, scale and architectural features will be maintained.

If the proposed antennas and associated equipment were removed in the future, the essential form and integrity of the roof parapet and sign would remain unimpaired because such installations are readily removed without damage to structures. With the Condition of Approval that the new antennas and associated equipment will be painted to match existing conditions, these criteria are 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 for 10:** The proposed radio frequency transmission facility is designed so that the externally visible components are limited to the panel antennas and RRUs. These exterior alterations will have as little impact as possible due to their relatively small size in relation to the building and large sign, being painted to match existing conditions and their vertical alignment with existing structures. Such a configuration results in an installation that is compatible with the architectural features highlighted in the Historic Landmark designation.

The proposal to affix telecommunication antennas to the building's existing sign structure and parapet does not diminish the building's historical features. Among the features preserved are the building's historical significance as a massive, Reinforced Concrete utilitarian warehouse and the rooftop neon sign, in place since 1925. In terms of compatibility with neighboring properties, the structure will retain its original setbacks, height, massing, materials, site coverage, design, and orientation to the street. Thus, there is no change to its historic place in the neighborhood. *This criterion 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 Resource Review process is to ensure that additions, new construction, and exterior alterations to historic resources do not compromise their ability to convey historic significance. As noted in the findings above, the proposed alterations will not adversely impact the character-defining features of the Montgomery Park building and sign structure. This proposal meets the applicable Historic Resource Review criteria and therefore warrants approval.

#### ADMINISTRATIVE DECISION

Approval of alterations to the Montgomery Ward building, a Historic Landmark listed in the National Register of Historic Places. Alterations include:

- Replacement of one Radio Frequency Antenna and RRU on the back of the "Y" on the "Montgomery Park" sign
- Installation of one Radio Frequency Antenna and RRU on the back of the "R" on the "Montgomery Park" sign

 Replacement of two Radio Frequency Antennas and RRUs on the south side roof parapet

Approval per the approved site plans, Exhibits C-1 through C-8, signed and dated June 3, 2014, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related condition (B) must be noted on each of the 4 required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE Case File LU 14-138147 HR." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. Antennas, RRUs and related equipment shall be painted to match existing conditions.

Staff Planner: Jennifer Kenny

Decision rendered by: \_\_\_\_\_\_ on June 3, 2014.

By authority of the Director of the Bureau of Development Services

Decision mailed: June 12, 2014.

**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 April 9, 2014, and was determined to be complete on May 9, 2014. *Zoning Code Section 33.700.080* states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on April 9, 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 extended by the applicant, **the 120 days will expire on September 5, 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 Historic Landmarks Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on June 26, 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 5<sup>th</sup> 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.

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 <a href="https://www.portlandonline.com">www.portlandonline.com</a>.

**Attending the hearing.** If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the 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 **June 27, 2014**.
- 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:

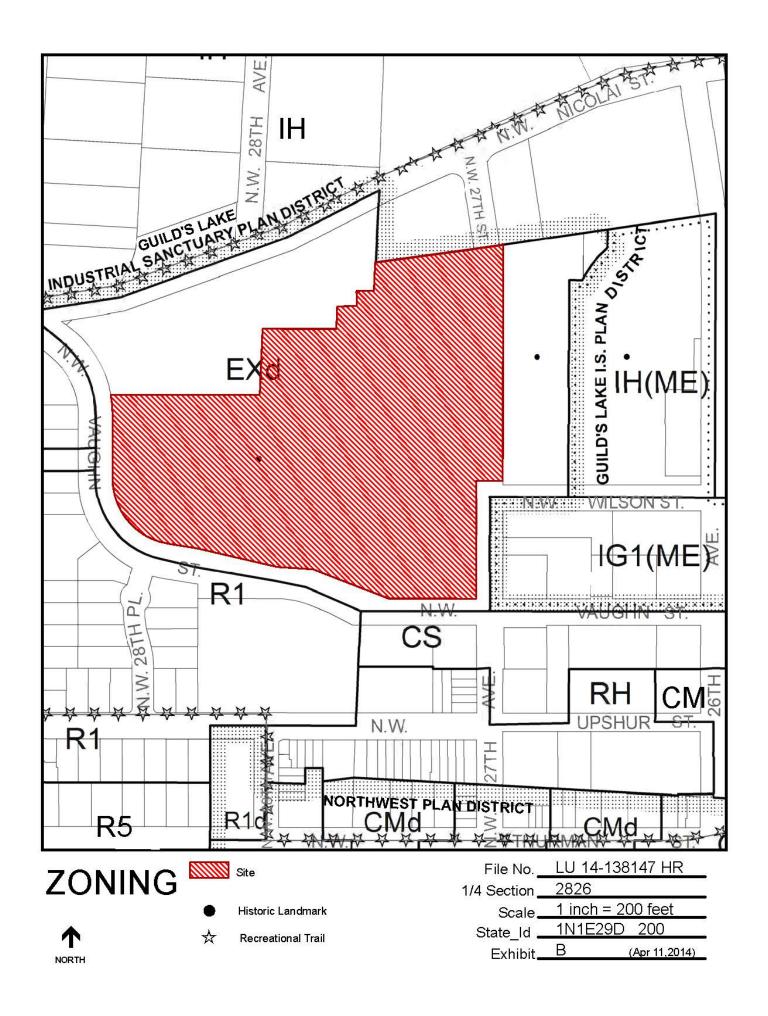
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

#### **EXHIBITS**

#### NOT ATTACHED UNLESS INDICATED

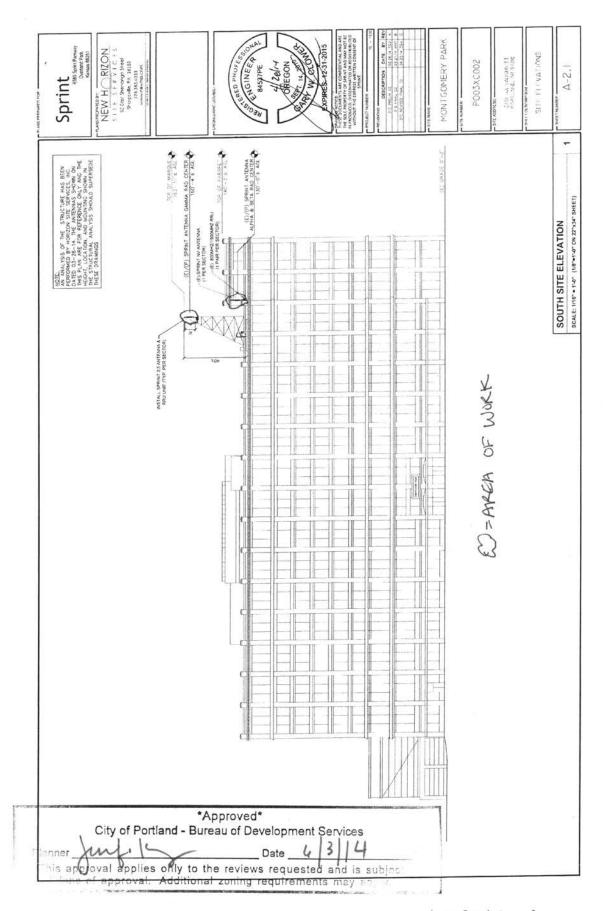
- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Site Plan (attached)
  - 2. South Site Elevation (attached)
  - 3. West Site Elevation (attached)
  - 4. Equipment Plan
  - 5. Existing Alpha, Beta and Gamma Sectors
  - 6. Proposed Alpha, Beta and Gamma Sectors
  - 7. RRU Detail
  - 8. Exposure Analysis and Engineering Certification
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice
- E. Agency Responses: No responses were required.
- F. Correspondence: No responses were received.
- G. Other:
  - 1. Original LU Application

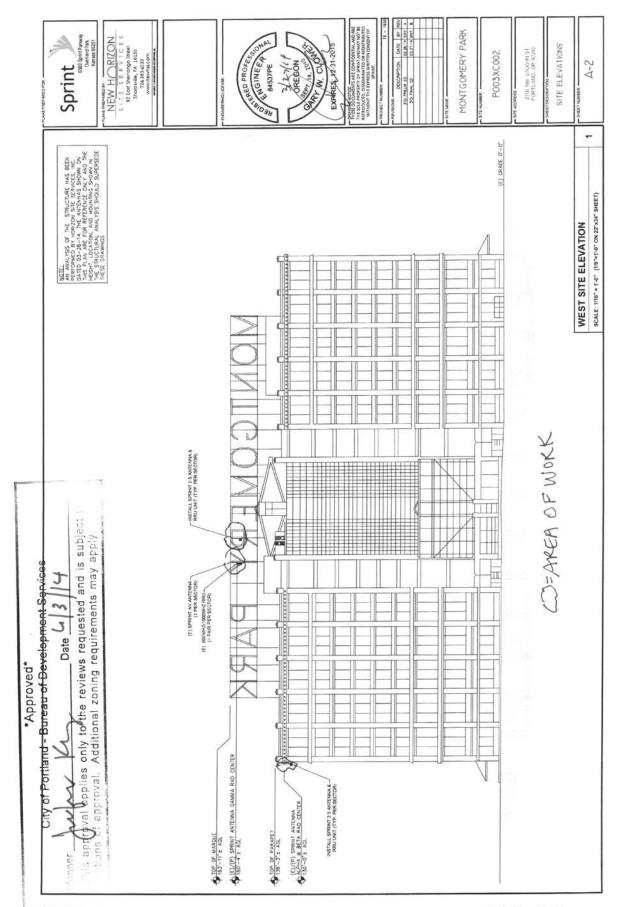
The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).



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(E) BALLONG	Workering (B) PROPERTY LAYOUT  Absorbed of the contract of the property Layout  Abbroad  Abbr
del late	City of Portland - Bureau of Development Services  Planner Date 43/4  This approval applies only to the reviews requested and is subject to determine the subject to determ

LU14-138147 HR





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