



**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  
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[www.portlandoregon.gov/bds](http://www.portlandoregon.gov/bds)

**Date:** December 11, 2014  
**To:** Interested Person  
**From:** Andrew Gulizia, Land Use Services  
 503-823-7010 / [Andrew.Gulizia@portlandoregon.gov](mailto:Andrew.Gulizia@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 mailed copy of this document is only a summary of the decision. The reasons for the decision, including the written response to the approval criteria and to public comments received on this application, 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 14-221733 AD**

**GENERAL INFORMATION**

**Representative:** Christe White / Radler White Parks & Alexander LLP  
 111 SW Columbia St., Ste. 1100 / Portland, OR 97201

**Applicant:** Seth Henderson / Sullivan's Gulch Group LLC  
 3330 NW Yeon Ave., Ste. 210 / Portland, OR 97210

**Property Owner:** E. John Rumpakis  
 2006 NE Multnomah St. / Portland, OR 97232

**Site Address:** 2034 NE Multnomah St.

**Legal Description:** BLOCK A LOT 20, HOLLADAY PK & 1ST ADD; BLOCK A LOT 21, HOLLADAY PK & 1ST ADD; BLOCK A LOT 22, HOLLADAY PK & 1ST ADD; TL 11800 1.59 ACRES, SECTION 35 1N 1E

**Tax Account No.:** R395504070, R395504090, R395504110, R941350130

**State ID No.:** 1N1E35AA 11300, 1N1E35AA 11400, 1N1E35AA 11500, 1N1E35AA 11800

**Quarter Section:** 2932

**Neighborhood:** Sullivan Gulch, contact Carol Gossett at 503-449-1253

**District Coalition:** Northeast Coalition of Neighborhoods, contact Claire Adamsick at 503-388-9030

**Zoning:** RH, CO2, RHc – High Density Residential and Office Commercial 2 with Environmental Conservation ('c') overlay zone on a portion of the site

**Case Type:** AD – Adjustment Review

**Procedure:** Type II administrative decision with appeal to the Adjustment Committee

**Proposal:** The applicant proposes to construct a multi-dwelling residential building on this site. Most of the site is zoned RH (High Density Residential), with a 75-foot maximum building height and 85% maximum building coverage. The central portion of the site is zoned CO2 (Office

Commercial 2), with a 45-foot maximum building height and 65% maximum building coverage. The applicant requests approval of two Adjustments in order to:

- increase the maximum building height on the CO2-zoned portion of the site from 45 feet to 75 feet; and
- increase the maximum building coverage on the CO2-zoned portion of the site from 65% to 93%. (The building coverage for the entire site will be approximately 65%.)

Approval of the Adjustments will create more consistent zoning requirements across the site and allow a more cohesive building design.

**Relevant Approval Criteria:** In order to be approved, this proposal must comply with the Adjustment Review approval criteria of Section 33.805.040.A-F of the Portland Zoning Code.

## ANALYSIS

**Site and Vicinity:** The 84,260 square-foot site is comprised of four tax lots on the southwest corner of NE 21<sup>st</sup> Avenue and NE Multnomah Street. The site is currently developed with a single-dwelling house fronting on NE Multnomah Street which the applicant intends to demolish. The applicant intends to create two separate developable parcels from this site, either through a property line adjustment or a land division application. The surrounding neighborhood is characterized by a mix of uses and development intensities. The immediate vicinity of the site consists of mostly single-dwelling and multi-dwelling residential development, though a nonconforming industrial service use is across NE 21<sup>st</sup> Avenue from the site. High-density commercial and residential development in the Lloyd District is approximately two blocks west of the site. The I-84 freeway abuts the site to the south.

**Zoning:** The Adjustments are requested for the portion of the site zoned CO2 (Office Commercial 2). Commercial zones generally seek to promote uses and developments that will enhance the economic viability of both the City and neighborhood. The CO2 zone in particular is intended for low- and medium-intensity office development, though Household Living use is also permitted. Retail uses are limited in order to discourage strip commercial development.

The remainder of the site is designated with the RH (High Density Residential) base zone. The RH designation is one of the City's multi-dwelling zones, which are intended to preserve land for urban housing and to provide opportunities for multi-dwelling housing. The development standards work together to create desirable residential areas by promoting aesthetically pleasing environments, safety, privacy, energy conservation, and recreational opportunities. No Adjustments are requested for the RH-zoned portion of the site.

An Environmental Conservation ("c") overlay zone covers the southern portion of the RH-zoned portion of the development site. The Environmental Conservation overlay zone is intended to conserve important environmental features and resources while still allowing compatible development.

As part of the North/Northeast Quadrant Plan, the Bureau of Planning and Sustainability has proposed to change the zoning for this entire site to CX (Central Commercial) with a Design ("d") overlay zone. If this change is adopted by the City Council, the entire site will have a 75-foot building height limit and no limit on building coverage.

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

- CU 083-80. This 1980 review approved a Conditional Use to construct two new office buildings. Because the current proposal would redevelop the site, this approval and the related conditions will not apply.
- ZC 3874. This pre-1990 review denied a request to change the zoning designation for the site to a Commercial Zone.

There were also several variance reviews conducted for the site in the 1960s. These reviews are not relevant, as Zoning Code Section 33.700.110.B states that conditions of approval from variance reviews prior to 1981 are no longer applicable.

**Agency Review:** A “Notice of Proposal” was mailed October 30, 2014, for the requested Adjustment to maximum building height in the CO2-zoned portion of the site. A revised “Notice of Proposal” was mailed November 13, 2014, after the applicant requested an additional Adjustment for the building coverage standard in the CO2-zoned portion of the site. The 21-day comment period was restarted with the mailing of the revised “Notice of Proposal.”

The following Bureaus have responded with no concerns about the proposal:

- Bureau of Environmental Services;
- Bureau of Transportation Engineering;
- Water Bureau;
- Fire Bureau;
- Site Development Section of BDS;
- Life Safety Review Section of BDS; and
- Bureau of Parks-Forestry Division.

**Neighborhood Review:** The applicant submitted a copy of a letter from the Sullivan’s Gulch Neighborhood Association addressed to the property owner (Exhibit F-1). The letter stated the Neighborhood Association Board had voted to support the proposed height Adjustment for the CO2-zoned portion of the site. The letter raised no specific issues related to the approval criteria. The building coverage Adjustment was not discussed, as the letter was sent before the applicant revised the application to include the second Adjustment.

Four written responses were received from neighboring property owners in response to the mailed “Notice of Proposal.”

One neighboring property owner expressed support for the proposal and requested that design review be incorporated into the process (Exhibit F-2).

Another neighboring property owner opposed the proposal, suggesting that a uniform 75-foot-tall structure would be detrimental to the neighborhood and decrease property values (Exhibit F-3).

Another neighbor submitted two e-mails in opposition to the proposal (Exhibits F-4 and F-5). These e-mails expressed concerns about neighborhood compatibility (in terms of building scale), loss of solar access, glare, on-street parking, and privacy.

**Staff response:** Since the intent of the standards is found to be met (as discussed under Zoning Code Approval Criteria, below), and the site is not currently encumbered with a Design overlay zone, staff finds insufficient nexus to require a subjective design review as a condition of approval for these Adjustments. However, design-related standards of the CO2 and RH zones will apply during the building permit review for this site. Design-related standards regulate, among other things, the location of the main entrance, windows on the ground floor, and screening for garbage collection areas and mechanical equipment.

Light, building scale, and privacy are discussed below under Zoning Code Approval Criteria. There are no applicable standards or approval criteria related to property values or glare for a multi-dwelling residential building. Though unrelated to the specific Adjustments requested, staff notes the applicant’s conceptual plans appear to illustrate more on-site parking than would be required per Zoning Code Section 33.266.110.D (Minimum for Sites Well Served by Transit).

## **ZONING CODE APPROVAL CRITERIA**

### **33.805.040 Approval Criteria**

Adjustment requests will be approved if the applicant has demonstrated that approval criteria A through F, below, have been met.

- A.** Granting the Adjustment will equally or better meet the purpose of the regulation to be modified; and

**Findings:** The applicant is requesting Adjustments to the maximum building height and the maximum building coverage requirements of the CO2 zone.

The purpose of the building height standard is stated in Zoning Code Section 33.130.210.A:

***Purpose.** The height limits are intended to control the overall scale of buildings. The height limits in the CN1, CN2, and CO1 discourage buildings which visually dominate adjacent residential areas. The height limits in the CO2, CM, CS, and CG zones allow for a greater building height at a scale that generally reflects Portland's commercial areas. Light, air, and the potential for privacy are intended to be preserved in adjacent residential zones. The CX zone allows the tallest buildings, consistent with its desired character.*

While the majority of the site is zoned RH (High Density Residential), a building height Adjustment is requested for a central portion of the site which is zoned CO2. The Adjustment will match the height limitation of the CO2-zoned portion to the building height allowed outright in the RH-zoned portion (75 feet). Staff finds the impacts to neighbors in terms of light, air, and potential for privacy will not be significantly greater with this Adjustment than they would be without it. If a building is constructed without the benefit of this Adjustment, most of the building (in the RH zone) could still be 75 feet tall while a central portion of the building would have to step down to 45 feet. Staff finds this type of building configuration would not only appear awkward aesthetically, it would provide little additional benefit to neighbors because most of the building would still be 75 feet in height. Therefore, staff finds the proposed Adjustment request equally meets the purpose of the building height standard.

The purpose of the building coverage standard is stated in Zoning Code Section 33.130.220.A:

***Purpose.** The building coverage standards limit the footprint of buildings and work with the FAR, height, and setback standards to control the overall scale of development. The standards promote development consistent with the desired character of the zone. In the CM and CS zones, the required minimum building coverage standards promote development which will support the built-up, urban character of these zones. In the CN2 and CO1 zones, the standards promote buildings at a scale compatible with surrounding residential development.*

The applicant proposes to increase the maximum building coverage in the CO2-zoned portion of the site from 65% to 93%, but also proposes to limit the building coverage for the site as a whole to less than 65% (Exhibit A-3). If the site as a whole is limited to 65% building coverage, which is the maximum for the CO2 zone, staff finds the proposed Adjustment to increase the building coverage in the CO2-zoned portion of the site equally meets the purpose of the building coverage standard. The footprint of the overall development will be consistent with the building scale envisioned for the CO2 zone. With a condition of approval to limit the final building coverage for the site to 65%, this criterion is met.

- B.** If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, or I zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and

**Findings:** Because the Adjustments are requested for the portion of the site zoned CO2, the applicant must demonstrate that the proposal will be consistent with the classifications of the adjacent street and the desired character of the area.

#### Street Classifications

The CO2-zoned portion of the site fronts on NE 21<sup>st</sup> Avenue. The classifications of this street, as identified in the Transportation Element of the Comprehensive Plan, are as follows:

Traffic	Transit	Bikeway	Pedestrianway	Freight
Neighborhood Collector	Transit Access Street	City Bikeway	City Walkway	Local Service

As part of an early assistance process separate from this review, Portland Bureau of Transportation (PBOT) staff informed the applicant of transportation-related public improvements and dedication of property that will be required when the building permit application is submitted. However, the current Adjustment application relates only to the allowable building envelope on a portion of the site. PBOT staff reviewed the current Adjustment application and responded with no concerns. Therefore, the current proposal is consistent with the adjacent street classifications. This aspect of the criterion is met.

#### Desired Character of Area

The “desired character” of an area is defined in Zoning Code Section 33.910.030 as the preferred or envisioned character based on the purpose statement or character statement of the base zone and any adopted area plans. The portion of the site subject to the proposed Adjustments is within the CO2 zone and within the boundaries of the adopted Sullivan’s Gulch Neighborhood Plan.

The character statement for the CO2 zone in Section 33.130.030.D reads:

*The Office Commercial 2 (CO2) zone is a low and medium intensity office zone generally located on Major City Traffic Streets as designated by the Transportation Element of the Comprehensive Plan. Uses are limited to those in the Office category and may have a local or regional emphasis. The zone is intended to prevent the appearance of strip commercial development by allowing office uses but not other commercial uses. Commercial uses are also restricted to limit detrimental impacts on nearby residential areas. Development is expected to be somewhat auto-accommodating. Where the site is adjacent to a transit street or in a Pedestrian District, development should be oriented to pedestrians. The development standards allow for more intense development than in the CO1 zone, but not so intense as the CG zone.*

A multi-dwelling residential development does not seem to relate directly to the office character described above; however, Household Living use is permitted outright in the CO2 zone. The applicant’s proposal for increased height and building coverage in the CO2-zoned portion of the site will allow a consistent building design throughout the site that will not have the appearance of strip commercial development. The proposal to increase the height and building coverage limitation on a portion of the site will not have a direct impact on the pedestrian orientation or auto accommodation of the development, but the conceptual design submitted by the applicant includes on-site parking and sites the building wall and main entrance abutting the right-of-way. Compliance with design standards and parking standards will be verified during building permit review and inspection.

Two statements from the Sullivan’s Gulch Neighborhood Plan are found to be relevant to the proposed Adjustments:

*Policy 6, Objective 6F: Encourage new development to adequately buffer for noise and vibration from the freeway and railroad traffic.*

*Policy 7, Objective 7C: Encourage housing and mixed-use development in nonresidential zones which permit housing.*

The applicant proposes to construct a multi-dwelling residential building up to 75 feet in height. Without the requested Adjustments in the CO2-zoned portion of the site, the new building would be lower and smaller in the middle than it would be on either side. Such a configuration would allow fewer housing units and less buffering from the freeway immediately adjacent to the site. Therefore, the proposed Adjustments are found to be consistent with the Sullivan's Gulch Neighborhood Plan.

Summary

As the Adjustments requested are found to be consistent with the classifications of the adjacent street, and because the proposal is consistent with the desired character of the area as described in the purpose statement of the CO2 zone and the Sullivan's Gulch Neighborhood Plan, this criterion is met.

- C. If more than one Adjustment is being requested, the cumulative effect of the Adjustments results in a project which is still consistent with the overall purpose of the zone; and

**Findings:** Two Adjustments are requested for the CO2-zoned portion of the site: one to increase the maximum building height, and one to increase the maximum building coverage. The CO2 zone is intended to promote office development and prevent the appearance of strip commercial development (Zoning Code Section 33.130.030.D). The applicant intends to construct a multi-dwelling residential building on this site, which is allowed outright in the CO2 zone even though such use is not mentioned in the purpose statement for the zone. In any event, the specific Adjustments requested do not affect the use of the site but rather the potential building envelope. Without the proposed Adjustments, the middle portion of the building (zoned CO2) would be lower and smaller than the RH-zoned portions of the building on either side. The cumulative impact of the two Adjustments will allow a consistent building design across the site, and will not lead to the appearance of strip commercial development. This criterion is met.

- D. City-designated scenic resources and historic resources are preserved; and

**Findings:** City-designated scenic resources are identified on the Official Zoning Maps with a lower case "s," and historic resources are identified either with a dot or as being within the boundaries of a Historic or Conservation district. As there are no scenic or historic resource designations mapped on the subject site, this criterion is not applicable.

- E. Any impacts resulting from the Adjustment are mitigated to the extent practical; and

**Findings:** The proposed Adjustments will allow a consistent building design throughout the site, and prevent the middle portion of the building (zoned CO2) from being substantially lower and smaller than the RH-zoned portions of the building on either side. No adverse impacts are identified which would specifically result from approval of the proposed Adjustments on the CO2-zoned portion of the site. Since no adverse impacts are identified for which mitigation would be required, this criterion is not applicable.

- F. If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable;

**Findings:** An Environmental Conservation ("c") overlay zone covers the southern portion of the development site (though not the CO2-zoned portion). As required by the regulations of Zoning Code Section 33.430.140, the preliminary site plan submitted by the applicant shows no development inside the resource area of the "c" zone. Compliance with these regulations will be enforced during the building permit review and inspection process. 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 proposal equally meets the intent of the regulations to be modified and is consistent with the desired character described in the purpose statement of the CO2 zone and the Sullivan's Gulch Neighborhood Plan. The cumulative effect of the two Adjustments is still consistent with the overall purpose of the zone. The applicant has demonstrated that the applicable approval criteria are met. Since the approval criteria are met, the proposal should be approved.

## ADMINISTRATIVE DECISION

Approval of two Adjustments to:

- increase the maximum building height on the CO2-zoned portion of the site from 45 feet to 75 feet (Zoning Code Section 33.130.210.B); and
- increase the maximum building coverage on the CO2-zoned portion of the site from 65% to 93% (Zoning Code Section 33.130.220.B).

subject to the following conditions:

- A. As part of the building permit application submittal, each of the required site plans and elevation drawings must be labeled, "Building coverage and height limitations as approved in Case File # LU 14-221733 AD."
- B. Building coverage for the site is limited to 65%.

**Staff Planner: Andrew Gulizia**

**Decision rendered by:**  **on December 9, 2014**  
By authority of the Director of the Bureau of Development Services

**Decision mailed: December 11, 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 October 6, 2014, and was determined to be complete on **October 24, 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 October 6, 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: March 6, 2015.**

**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 Adjustment Committee, which will hold a public hearing. Appeals must be filed **by 4:30 PM on December 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 12:00 pm. After 3:00 pm Monday through Wednesday and Fridays, and after 12:00 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 [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 Adjustment Committee 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 Adjustment Committee 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 **December 29, 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.

**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.

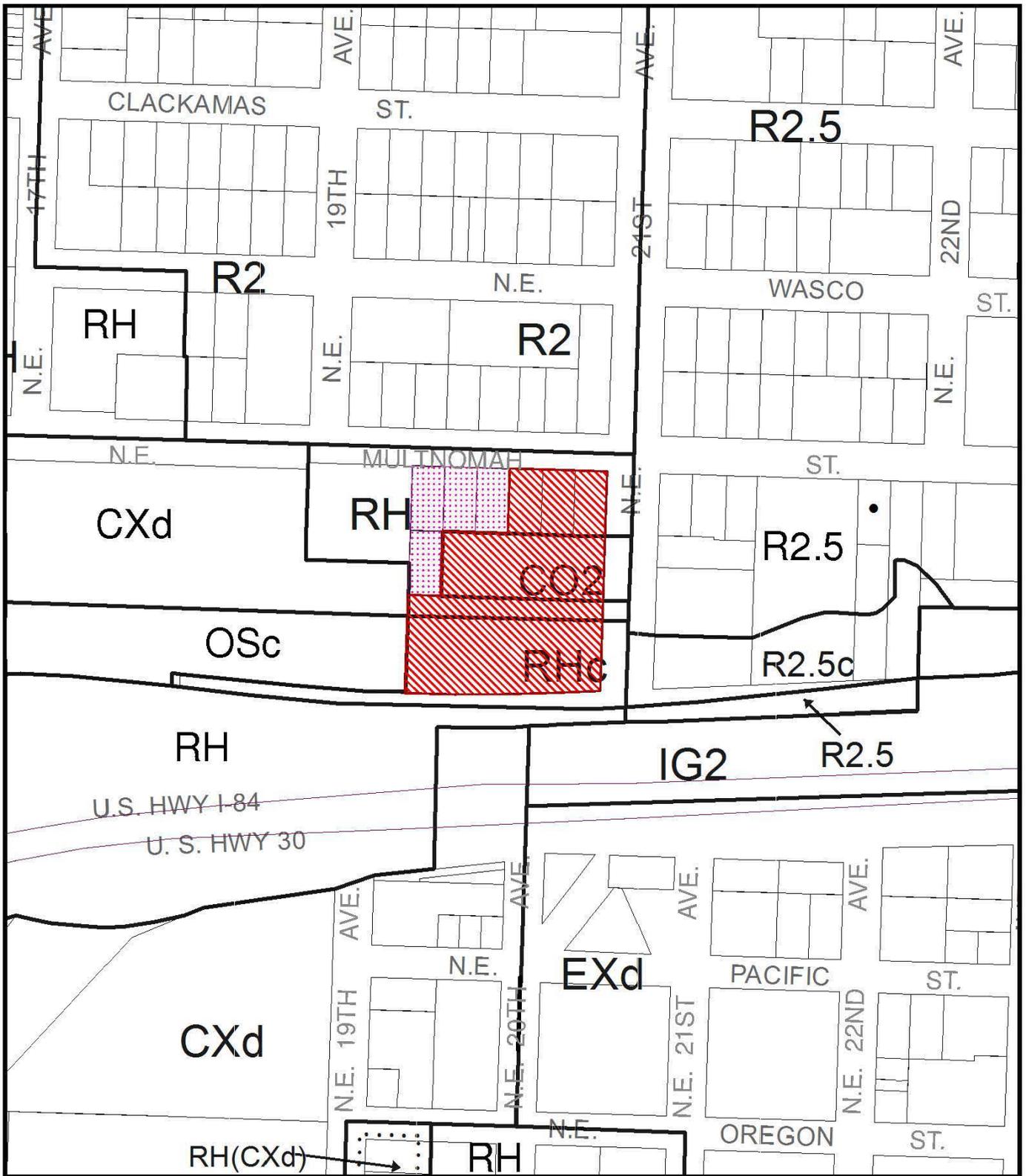
**EXHIBITS**

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
  1. Project narrative, dated October 6, 2014
  2. Response to incompleteness determination letter, dated October 24, 2014
  3. Revised narrative, dated November 4, 2014
  4. E-mail from applicant's representative, dated November 6, 2014
  5. E-mail from applicant's representative, dated December 3, 2014
- B. Zoning Map (attached)
- C. Plans/Drawings:
  1. Conceptual site plan (attached)
  2. Conceptual north-south section drawing (attached)
  3. Conceptual east-west section drawing (attached)
- D. Notification Information:

1. Mailing list for October 30, 2014 notice
  2. Mailed notice dated October 30, 2014
  3. Mailing list for November 13, 2014 notice
  4. Mailed noticed dated November 13, 2014
- E. Agency Responses:
1. Bureau of Environmental Services
  2. Bureau of Transportation Engineering and Development Review
  3. Water Bureau
  4. Fire Bureau
  5. Site Development Review Section of BDS
  6. Life Safety Review Section of BDS
  7. Bureau of Parks, Forestry Division
- F. Correspondence:
1. Letter in support from Sullivan's Gulch Neighborhood Association, dated May 17, 2014
  2. E-mail in support from Will Elder, dated November 3, 2014
  3. Letter in opposition from Maurice Rahming and Alida O'Neill, dated December 2, 2014
  4. E-mail in opposition from Thomas Schloeder and Wayne Harris, dated December 3, 2014
  5. E-mail in opposition from Thomas Schloeder and Wayne Harris, dated December 4, 2014
- G. Other:
1. Original LU application form and receipt
  2. Incompleteness determination letter, dated October 13, 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).**

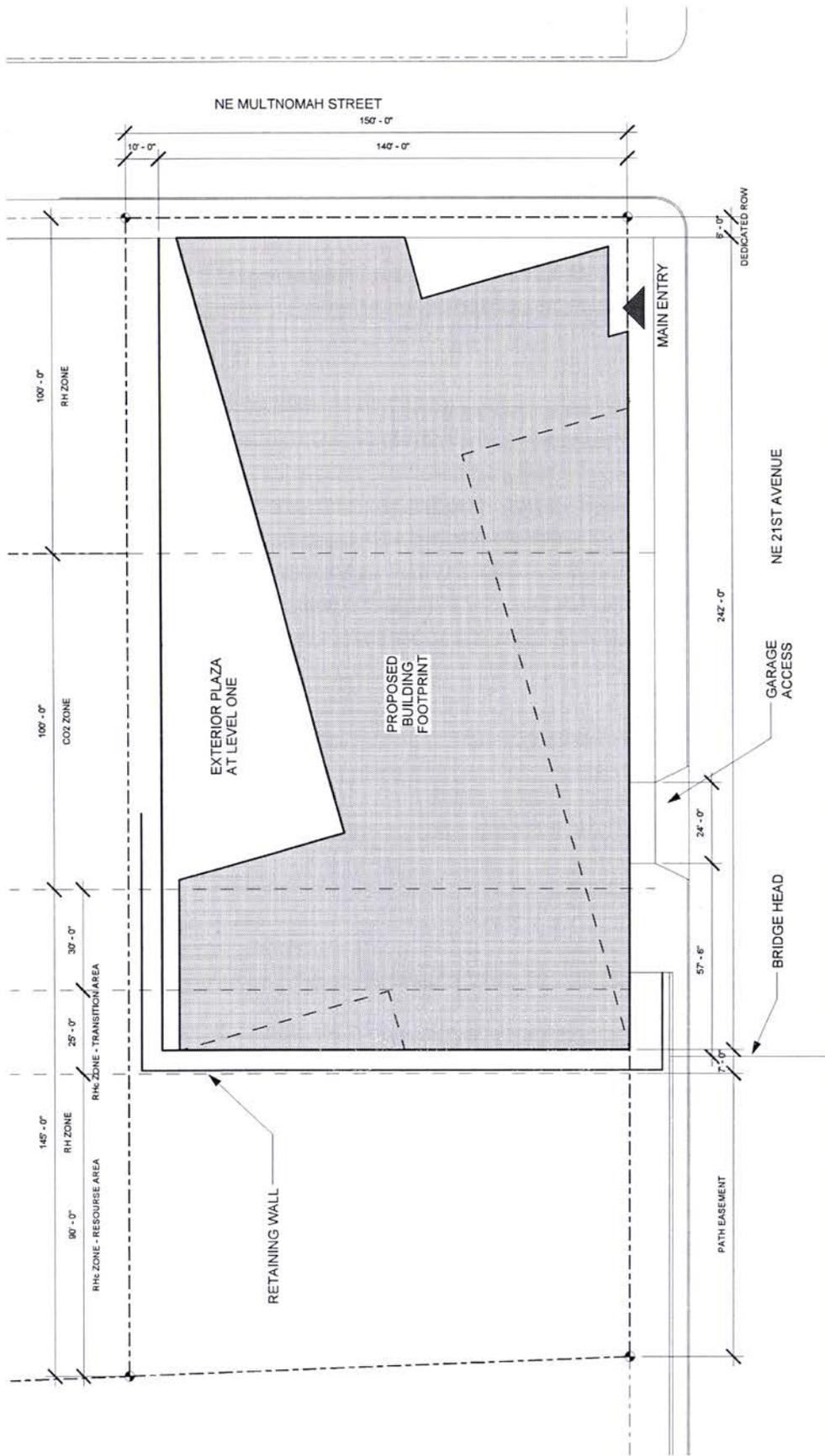


# ZONING

-  Site
-  Also Owned
-  Historic Landmark



File No. LU 14-221733 AD  
 1/4 Section 2932  
 Scale 1 inch = 200 feet  
 State\_Id 1N1E35AA 11500  
 Exhibit B (Oct 8, 2014)



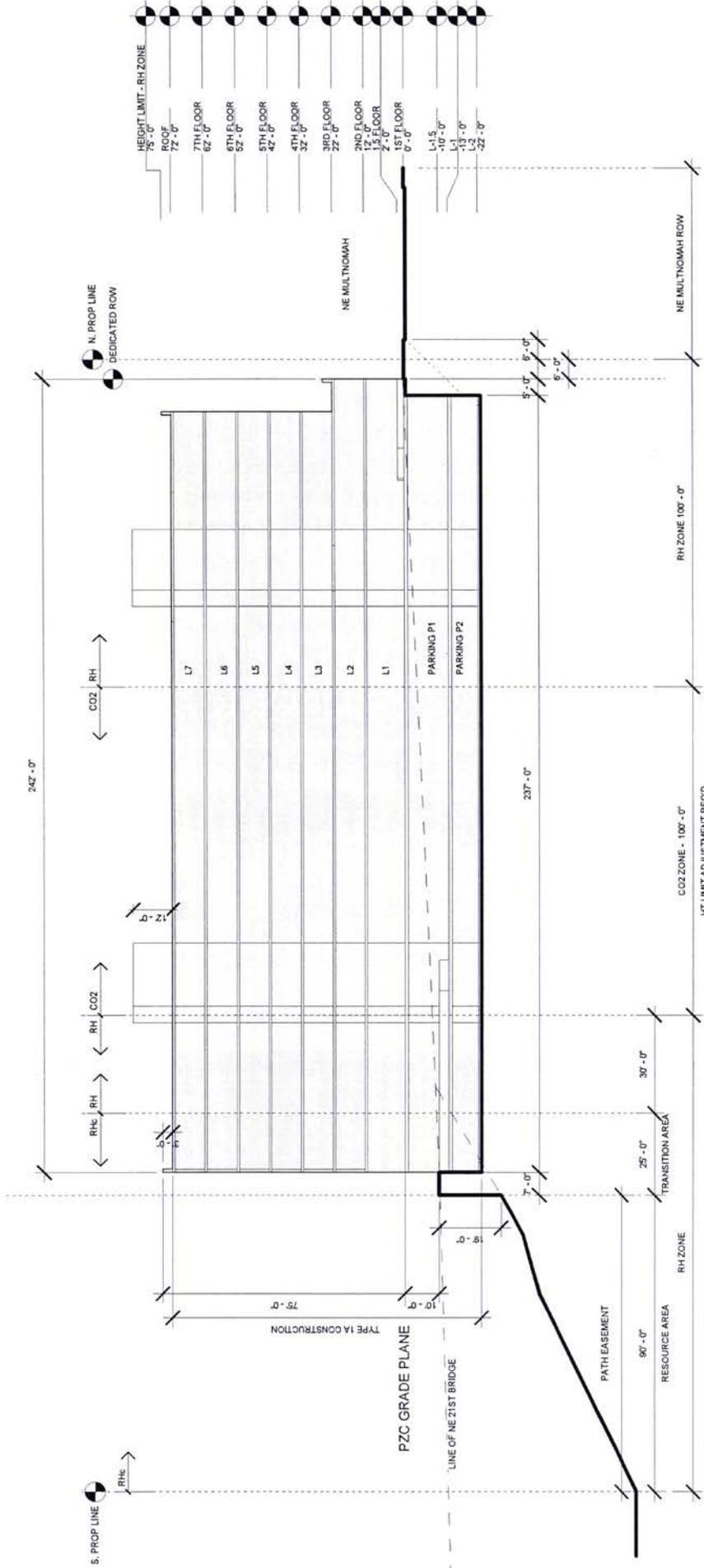
THA ARCHITECTURE INC.  
733 S.W. OAK ST.  
PORTLAND, OREGON 97205  
(503) 227-1254 PHONE  
(503) 227-1616 FAX

PROJECT: SOG MULTNOMAH  
PROJECT NO.: 1418



**SITE PLAN**  
DATE: 11/05/2014  
SCALE: 1/32" = 1'-0"

LU 14-221733 AD Exhibit C-1

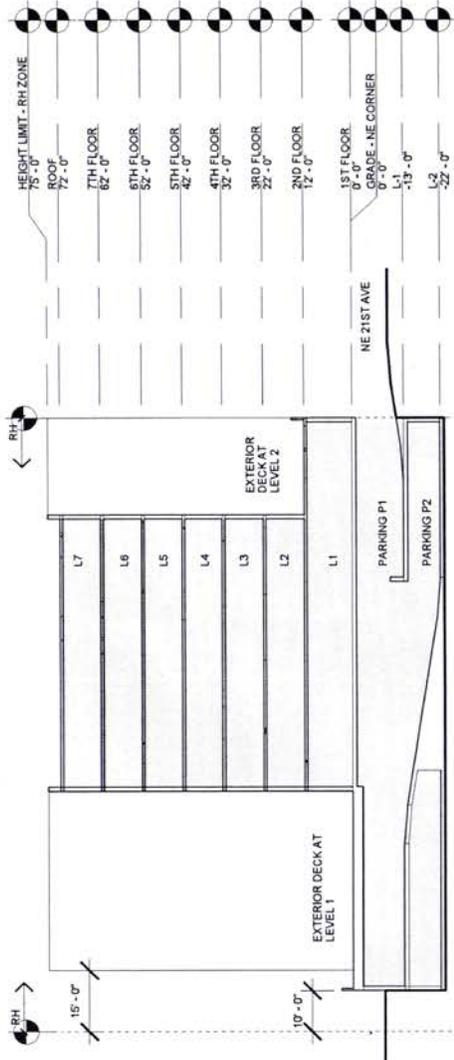


THA ARCHITECTURE INC.  
733 S.W. OAK ST.  
PORTLAND, OREGON 97205  
(503) 227-1254 PHONE  
(503) 227-7818 FAX

PROJECT: SGG MULTNOMAH  
PROJECT NO.: 1418

**NORTH / SOUTH SECTION**  
DATE: 11/05/2014  
SCALE: 1/32" = 1'-0"

LU 14-221733 AD Exhibit C-2



**T H A**  
ARCHITECTURE

T H A ARCHITECTURE INC.  
713 S.W. OAK ST.  
PORTLAND, OREGON 97205  
(503) 227-1254 PHONE  
(503) 227-7818 FAX

PROJECT: SGG MULTNOMAH

PROJECT NO.: 1418

**EAST / WEST SECTION**

DATE: 11/05/2014  
SCALE: 1/32" = 1'-0"

LU 14-221733 AD Exhibit C-3