



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: April 14, 2015
To: Interested Person
From: Jeff Mitchem, Land Use Services
503-823-7011 / Jeffrey.Mitchem@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 14-240996 DZ **PACS MEDICAL/DENTAL CLINIC**

GENERAL INFORMATION

Owner: Oregon Conference Adventist
19800 Oatfield Rd
Gladstone, OR 97027-2564

Representative: Paul Cole
Portland Adventis Communiy Services
11020 NE Halsey
Portland OR 97220

Site Address: 1424 NE 109TH AVE

Legal Description: BLOCK 2 LOT 1 TL 4000, WALDHEIM TR
Tax Account No.: R874000230
State ID No.: 1N2E34BA 04000
Quarter Section: 2941
Neighborhood: Hazelwood, contact Arlene Kimura at 503-252-9429.
Business District: Gateway Area Business Association, contact Fred Sanchez at 503-256-3910.
District Coalition: East Portland Neighborhood Office, contact Richard Bixby at 503-823-4550.
Plan District: Gateway
Zoning: CSd, Storefront Commercial with a Design Overlay
Case Type: DZ, Design Review
Procedure: Type II, an administrative decision with appeal to the Design Commission.

Proposal:

The applicant proposes to convert an existing single-family residence into a dental/medical exam office. The scope of the work is limited to the removal of an existing covered patio structure on the east, replacement of existing windows/doors, the addition of approximately

545 square feet of floor area on the west toward NE 109th Ave, installation of new accessible stairs and ramp, and installation of landscaping required by code. Materials include asphalt shingles roofing, cast-in-place concrete steps/walk, Hardie Artisan Lap siding (concealed fasteners) and dark anodized aluminum storefront window/door system throughout the original structure and addition. On-site parking will be provided at an existing rear lot accessed from NE Halsey St through an adjacent lot (easement in place.)

Design review is required because the project proposes exterior alterations in a Design Overlay Zone.

Relevant Approval Criteria:

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

- 33.825 Design Review
- Gateway Regional Center Design Guidelines
- Community Design Guidelines

ANALYSIS

Site and Vicinity: The 6,564 SF site fronts SE 109th Ave approximately 80 feet south of the intersection with NE Halsey Street, within the Gateway Plan District and the Gateway Pedestrian District. The site currently supports one single-family house built in 1953, which will be converted to accommodate the proposed alterations. A retail establishment (fly fishing shop) and surface parking abut the site's northern property line and detached single-family development predominates south of the site. Motels, fast-food restaurants and tilt-up commercial are located to the east and west on NE Halsey St. Generally, the context within ¼ mile of the site is older auto-oriented developments with large surface parking lots as well as vacant and underdeveloped lots. NE Halsey and NE Weilder Streets form a one-way couplet through this area and serve as the major vehicular routes to and from I-205 and the Gateway Regional Center MAX station approximately ½ mile west.

Zoning: The Storefront Commercial (CS) zone is intended to preserve and enhance older commercial areas that have a storefront character. The zone intends that new development in these areas will be compatible with this desired character. The zone allows a full range of retail, service and business uses with a local and regional market area. Industrial uses are allowed but are limited in size to avoid adverse effects different in kind or amount than commercial uses and to ensure that they do not dominate the character of the commercial area. The desired character includes areas which are predominately built-up, with buildings close to and oriented towards the sidewalk especially at corners. Development is intended to be pedestrian-oriented and buildings with a storefront character are encouraged.

The "d" or Design Overlay Zone promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. The Design Overlay Zone also promotes quality high-density development adjacent to transit facilities. 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 or compliance with the Community Design Standards. In addition, design review or compliance with the Community Design Standards ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

Land Use History: City records indicate there are no prior land use reviews for this site.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **November 26, 2014**. The following Bureaus have responded with no issues or concerns:

The **Life Safety Plans Examiner** responded with general permitting comments. Please see **Exhibit E-1** for additional details.

The **Bureau of Transportation Engineering** responded with comments related to right-of-way dedication requirements and street improvements. Please see **Exhibit E-2** for additional details.

The **Bureau of Parks-Forestry Division** responded with comments related to street tree requirements. Please see **Exhibit E-3** for additional details.

The **Site Development Section of BDS** responded with comments related to Geotechnical and Erosion Control requirements. Please see **Exhibit E-4** for additional details.

The **Portland Water Bureau** responded with conditions of approval related to separate service agreements and new water service. Please see **Exhibit E-5** for additional details.

The **Fire Bureau** responded with a comment related to obtaining a separate building permit for the proposed work. Please see **Exhibit E-6** for additional details.

The **Bureau of Environmental Services** responded with support for the project. Please see **Exhibit E-7** for additional details.

Neighborhood Review: A “Notice of Proposal in Your Neighborhood” was mailed on **November 26, 2014**. The Hazelwood Neighborhood Association responded with no issues regarding this proposal.

ZONING CODE APPROVAL CRITERIA

Chapter 33.825 Design Review

Section 33.825.010 Purpose of Design Review

Design review ensures that development conserves and enhances the recognized special design values of a site or area. Design review is used to ensure the conservation, enhancement, and continued vitality of the identified scenic, architectural, and cultural values of each design district or area. Design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area. Design review is also used in certain cases to review public and private projects to ensure that they are of a high design quality.

Section 33.825.055 Design Review Approval Criteria

A design review application will be approved if the review body finds the applicant to have shown that the proposal complies with the design guidelines for the area.

Findings: The site is designated with design overlay zoning (d), therefore the proposal requires Design Review approval. Because of the site’s location, the applicable design guidelines are the Gateway Regional Center Design Guidelines.

Gateway Regional Center Design Guidelines

The Gateway Regional Center is the City of Portland’s only designated regional center. The area is envisioned to redevelop into a highly urbanized, pedestrian-oriented center, with an overall built size and scale second only to Portland’s Central City.

The purpose of design review is to carry out the urban design vision for the District by emphasizing unique district assets in a manner that is respectful, creative, supportive, and compatible with all its areas. Although the District is a complex urban environment, it can become a cohesive whole with the use of these design principles.

Gateway Regional Center Design Goals

Ten goals for design review in the Gateway Regional Center have been established to enhance the area’s design quality, support its livability, and guide its transition to a pedestrian-oriented, active, urban regional center. They are:

1. Encourage urban design excellence.
2. Ensure that new development is at a human scale and that it relates to the scale and desired character of its setting and the Gateway Regional Center as a whole.
3. Provide for a pleasant, rich, and diverse experience for pedestrians.
4. Assist in creating a regional center that emphasizes a mix of active uses and experiences and is safe, lively, and prosperous.
5. Provide for the humanization of the Gateway Regional Center through the promotion of parks, plazas, open spaces, public art, and trees.
6. Integrate and honor the diversity and history of Gateway.
7. Integrate sustainable principles into the development process.
8. Encourage the development of a distinctive character for subdistricts within the regional center, and link them.
9. Encourage and incorporate transit orientation and usage.
10. Enhance the physical and visual linkages between the Gateway Regional Center and adjacent neighborhoods.

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

A Pedestrian Emphasis

A1. Strengthen Relationships Between Buildings and the Street. Integrate building setback areas with adjacent streets.

A2. Enhance Visual and Physical Connections. Enhance visual and physical connections between buildings and adjacent sidewalks. Orient semi-public building spaces to the sidewalk and street.

C4. Develop Complementary Parking Areas. Develop, orient and screen parking areas to complement adjacent buildings and the pedestrian environment.

Findings for A1, A2 & C4: Right-of-way dedications and frontage improvements will be required along SE 109th Ave. The front yard setback between the new addition and the sidewalk will be 7 feet and will consist of a cast in place planter (3') and turf (4'). The expanded building footprint will be set back from the south property line (R7) by approximately 7 feet and the north property line (CS) by approximately 28 feet. The building's primary entry will be perpendicular to the sidewalk approximately 12' from the street-facing façade. The ground level of the street-facing façade will be approximately 75% glazed allowing views between active interior space and the sidewalk. The building's primary entry will be accessed via an accessible walkway connecting both the sidewalk and an existing surface parking lot at the rear of the lot. Parking lot access to NE Halsey will be via an existing drive aisle through the adjacent parcel to the north (access easement in place.)

These guidelines are therefore met.

B Development Design

B1. Convey Design Quality and Building Permanence. Use design principles and building materials that convey quality and permanence.

D6. Architectural Integrity. Respect the original character of buildings when making modifications that affect the exterior. Make additions compatible in scale, color, details, material proportion, and character with the existing building.

D7. Blending into the Neighborhood. Reduce the impact of new development on established neighborhoods by incorporating elements of nearby, quality buildings such as building details, massing, proportions, and materials.

Findings for B1, D6 and D7: The new addition incorporates a number of design elements resulting in an architectural expression sympathetic to the original structure and the neighborhood. Rather than attempting to match the existing brick cladding (difficult to do given the age of the brick) the new siding (artisan

smooth Hardie lap, 7” reveal, concealed fasters) will better complement neighboring residential structures through material reference and subdued color palette. Specifically, the Hardie lap (integrated “cobblestone” color) and the existing brick (to be painted “warm stone”) will blend well with the tope-toned vicinity single-dwelling homes. Windows throughout will be dark anodized aluminum storefront manufactured by Cascade or equivalent. These proposed materials are durable, high-quality, and contribute to a sense of the building’s permanence over time. *These guidelines are therefore met.*

B2. Integrate Ground-Level Building Elements. Integrate the different ground-level building elements with the building’s architecture.

B3. Design for Coherency. Integrate the different parts of a building to achieve a coherent design.

Findings for B2 & B3: The building’s existing wall planes will be logically continued to frame the new addition. Similarly, the existing gabled roof form will be coherently extended over the new addition toward the street – the existing eave height, ridge line and roof pitch will be maintained. The existing building’s expression as a classic mid-century bungalow with large windows and corner-butted glazing will be coherently expanded upon by the new addition – similar window patterning, corner-butted glazing and deep eaves. As such, the new addition is a well-integrated architectural expression that will unify the building’s overall quiet simplicity. *These guidelines are therefore met.*

B6. Integrate Ecological / Sustainable Concepts. Integrate ecological/sustainable features or concepts with site and development designs.

Findings for B6: Sustainable features of the project include managing the site’s storm water runoff within an existing catch basin in the northwest corner of the lot. *This guideline is therefore met.*

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

CONCLUSIONS

This conversion and expansion project reinforces the transitional nature of this portion of the NE Halsey/Weidler St corridor by delivering the kind of development encouraged by the Gateway Regional Center Design Goals – human scaled that reinforces the character of its setting and emphasizes a mix of active uses and experiences and is safe, lively, and prosperous. The proposal therefore merits approval.

ADMINISTRATIVE DECISION

Approval of Design Review for the conversion of an existing single-family residence into a dental/medical exam office in the Gateway Plan District per the approved site plans, Exhibits C-1 through C-4, signed and dated April 10, 2015, subject to the following conditions:

- A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibits C.1-C.4. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 14-240996 DZ. No field changes allowed."

Staff Planner: Jeffrey Mitchem

Decision rendered by: _____ **on April 10, 2015**
By authority of the Director of the Bureau of Development Services



Decision mailed: April 14, 2015

About this Decision. This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

Procedural Information. The application for this land use review was submitted on November 21, 2014 and was determined incomplete on December 19, 2014. The applicant submitted additional information and the application was determined to be complete on February 20, 2015.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on November 21, 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: June 20, 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 Design Commission which will hold a public hearing. Appeals must be filed **by 4:30 PM on April 28, 2015** 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 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.

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 Design Commission is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 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 Design Commission an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

If this Land Use Review is approved the final decision must be recorded with the Multnomah County Recorder. A few days prior to the last day to appeal, the City will mail instructions to the applicant for recording the documents associated with their final land use decision.

- *Unless appealed*, The final decision may be recorded on or after **April 29, 2015**.
- 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:

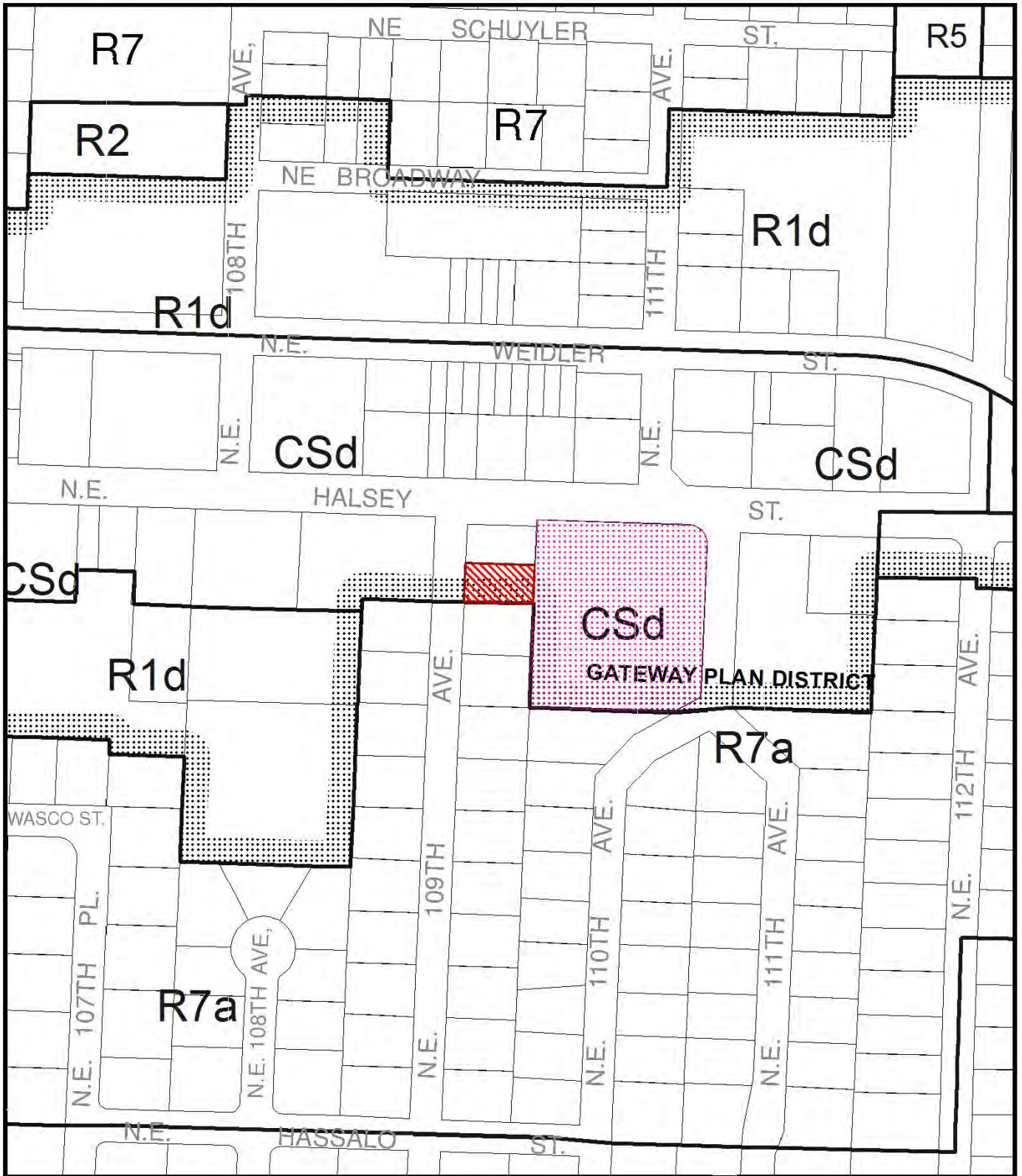
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Elevation (attached)
 - 3. Materials Sample
 - 4. Window Section Detail
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Bureau of Environmental Services
 - 2. Bureau of Transportation Engineering and Development Review
 - 3. Water Bureau
 - 4. Fire Bureau
 - 5. Site Development Review Section of BDS
 - 6. Life Safety Plans Examiner
- F. Correspondence:
 - 1. Hazelwood Neighborhood Association, March 18, 2015, support for proposal.
- G. Other:
 - 1. Original LU Application
 - 2. Incomplete Letter
 - 3. Access Easement

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

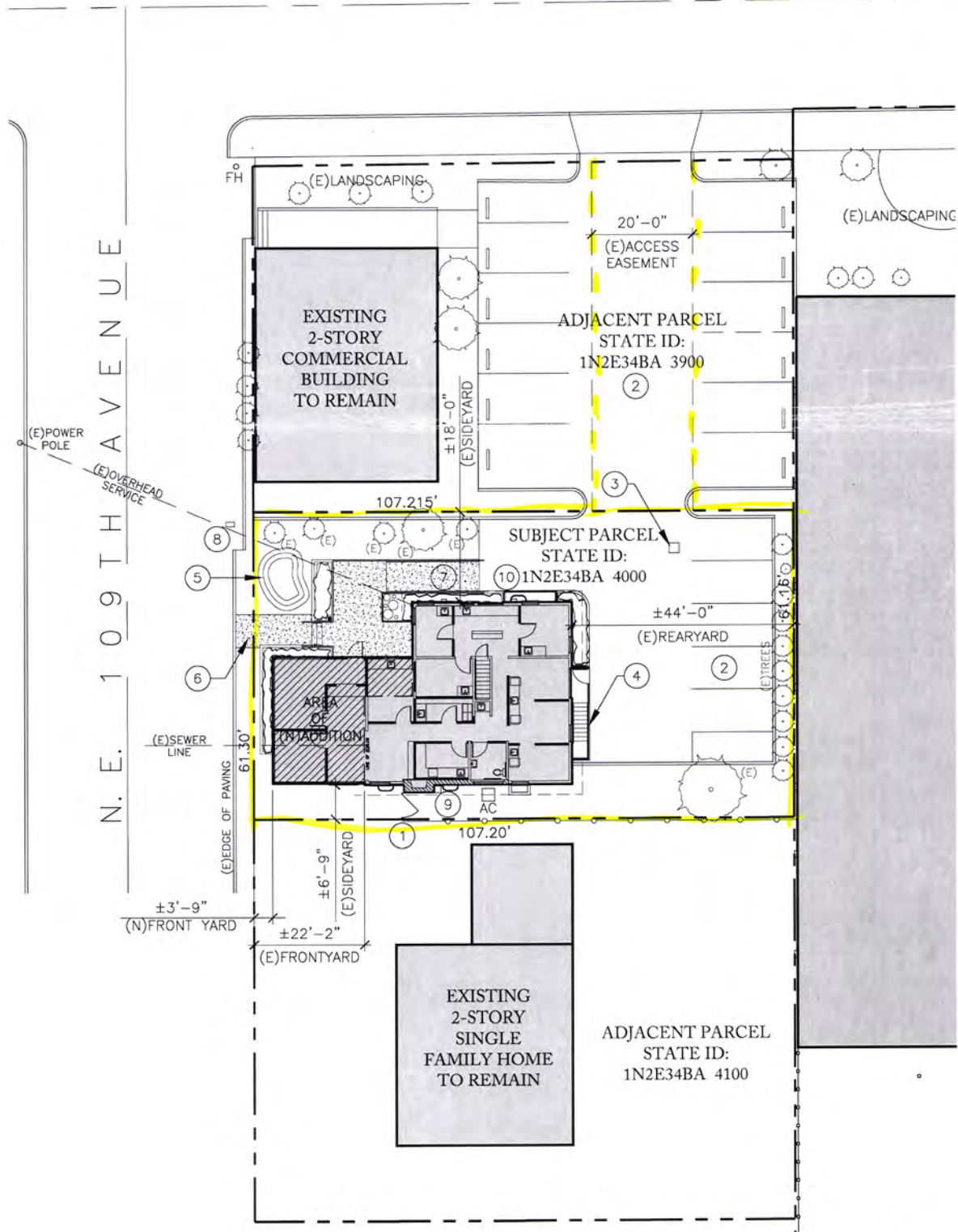
-  Site
-  Also Owned



This site lies within the:
GATEWAY PLAN DISTRICT

File No. LU 14-240996 DZ
 1/4 Section 2941
 Scale 1 inch = 200 feet
 State_Id 1N2E34BA 4000
 Exhibit B (Nov 21, 2014)

Approved
 City of Portland
 Bureau of Development Services
 Planner _____
 Date 1/16/16
 *This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.



LU 14-240996 DZ

EXHC.1



GENERATIONS
FAMILY OF COMPANIES
Development • Construction • Management
3401 SE Canyon Avenue | Portland, OR 97086
Tel: (503) 452-9250
Fax: (503) 238-9251
www.generationsfb.com



**PACS
MEDICAL/DENTAL CLINIC**
1424 NE 107TH AVENUE
PORTLAND, OREGON 97220
APN: IN2348B 4000

PROJECT NO.	14-240996
DATE	11/20/14
DESIGN NUMBER	3240175
400 YEAR	



ELEVATIONS

SCALE: 1/4" = 1'-0"
DATE: 11/20/14
DRAWN BY: JACOB MARRAS
CHECKED BY: JACOB MARRAS
A4.1
ISSUED: NOVEMBER

SHEET NOTES

KEYED NOTES

- 1 NEW GLASS TYPED DOORWAY TO MATCH EX.
- 2 EXTERIOR TO BE FINISH
- 3 FINISH TO BE FINISH
- 4 NEW GLASS TO MATCH EXISTING FINISH
- 5 NEW FINISH TO MATCH EXISTING FINISH
- 6 NEW FINISH TO MATCH EXISTING FINISH
- 7 NEW FINISH TO MATCH EXISTING FINISH
- 8 NEW FINISH TO MATCH EXISTING FINISH
- 9 NEW FINISH TO MATCH EXISTING FINISH
- 10 NEW FINISH TO MATCH EXISTING FINISH
- 11 NEW FINISH TO MATCH EXISTING FINISH
- 12 NEW FINISH TO MATCH EXISTING FINISH
- 13 NEW FINISH TO MATCH EXISTING FINISH
- 14 NEW FINISH TO MATCH EXISTING FINISH
- 15 NEW FINISH TO MATCH EXISTING FINISH
- 16 NEW FINISH TO MATCH EXISTING FINISH
- 17 NEW FINISH TO MATCH EXISTING FINISH
- 18 NEW FINISH TO MATCH EXISTING FINISH
- 19 NEW FINISH TO MATCH EXISTING FINISH
- 20 NEW FINISH TO MATCH EXISTING FINISH

LEGEND

- 1 FINISH
- 2 FINISH TO FACE OF FINISH
- 3 FINISH TO FACE OF FINISH



A

WEST ELEVATION
SCALE: 1/4"=1'-0"



B

NORTH ELEVATION
SCALE: 1/4"=1'-0"

Approved
City of Portland

Bureau of Development Services

Planner

Date

J. Pappas
4/16/15

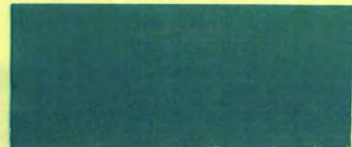
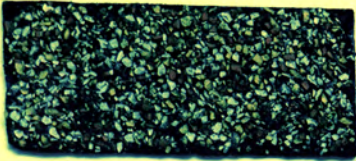
* This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.

LU 14-240996 DZ

EXH C.2

COLOR BOARD

Design Review Submittal - 02.20.15
Land Use Review: LU 14-240996



EXTERIOR SIDING
Type: Lap Siding w/7" reveal
Style: Artisan Smooth
(Textured shown, Smooth samples unavailable)

Mfr: James Hardie or equal

Approved
City of Portland
Bureau of Development Services
Planner CEM
Date 2/15/15
* This approval applies only to the reviews requested and is subject to all conditions of approval.
Additional zoning requirements may apply.

PACS Dental Clinic
1424 NE 109th St
Portland, OR 97220

ROOFING
Type: Asphalt Shingle
Style: To Match Existing Building
Mfr: Various

EXTERIOR TRIM
Type: Painted
Color: Shoji White - SW7042
Mfr: Sherwin Williams

WINDOWS
Type: Aluminum Storefront
Color: Dark Anodized
Mfr: Cascade or Equal

EXTERIOR BRICK
Type: Existing to be Painted
Color: Warm Stone - SW7032
Mfr: Sherwin Williams

LU 14-240996 DZ

EXAC.3



**CASCADE
ALUMINUM**

The clear choice for aluminum
fabricated products

4102 NE 72nd Ave
Vancouver, WA 98661

TYPICAL DETAILS

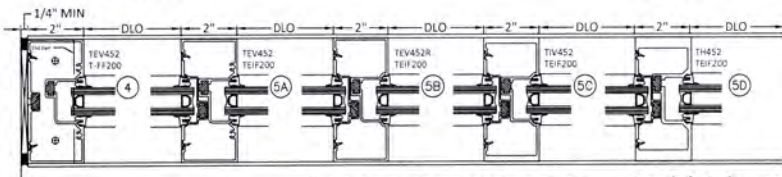
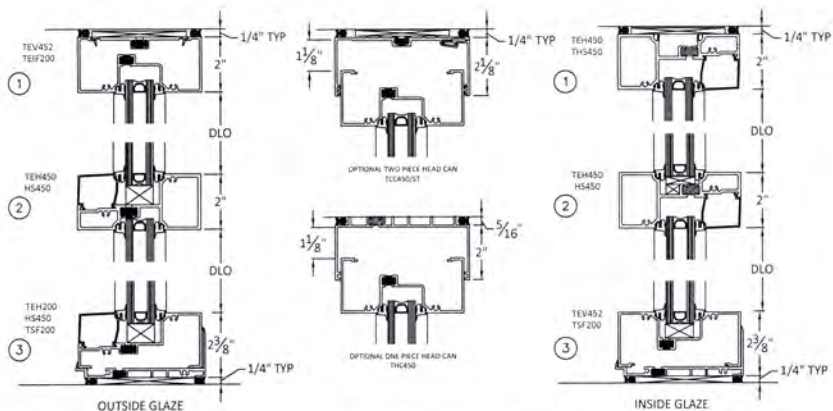
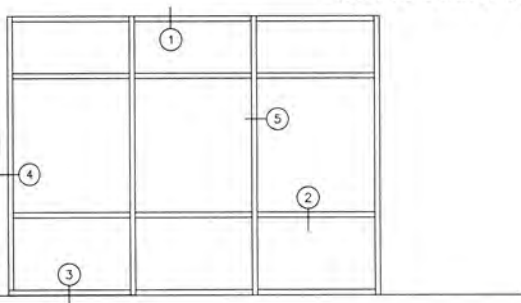
450-TCS SCREW SPLINE

Approved
City of Portland
Bureau of Development Services

Planner *[Signature]*

Date *2/16/15*

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



LU 14-240996 DZ

EXH C.4



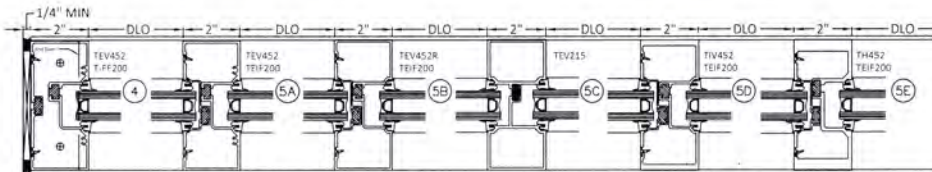
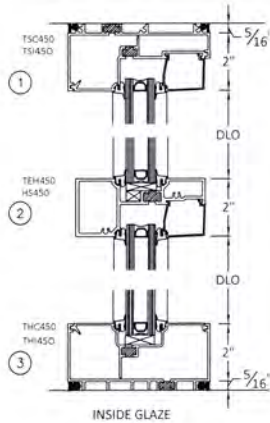
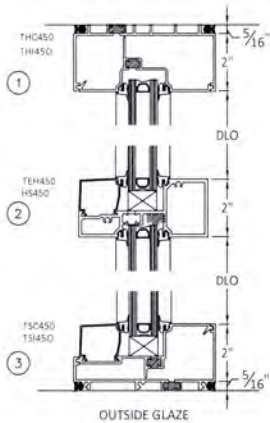
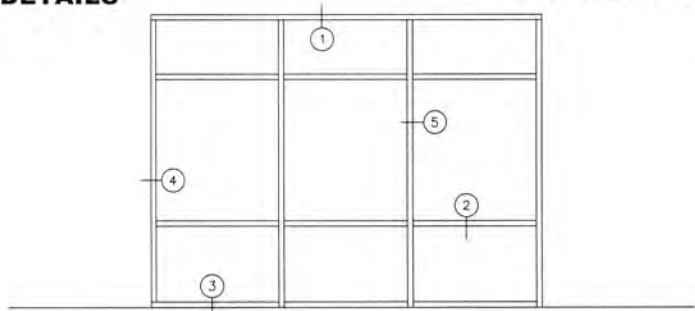
**CASCADE
ALUMINUM**

*The clear choice for aluminum
fabricated products*

4102 NE 72nd Ave
Vancouver, WA 98661

TYPICAL DETAILS

450-TCS STACKING



LU 14-240996 DZ EXH C.4