



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

Ted Wheeler, Mayor
 Rebecca Esau, Director
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www.portlandoregon.gov/bds

Date: January 18, 2019
To: Interested Person
From: Emily Hays, Land Use Services
 503-823-5676 / Emily.Hays@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 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 18-275101 HR – BALCONY ALTERATIONS

GENERAL INFORMATION

Applicant: Marissa Brown | Emerick Architects
 321 SW 4th Avenue, Suite 200 | Portland, OR 97204
marissa@emerick-architects.com

Owner: Association of Unit Owners of 705 Davis Condominium
 12550 SE 93rd Avenue | Clackamas, OR 97015

Party of Interest: Daniel Boyer | C/O Bridge City Community Management
 12550 SE 93rd Avenue, Suite 300 | Clackamas, OR 97015

Del Star | J.R. Johnson LLC
 9425 N Burrage Avenue | Portland, OR 97217

Site Address: **2141 NW Davis Street**

Legal Description: GENERAL COMMON ELEMENTS, 705 DAVIS CONDOMINIUM
Tax Account No.: R754900010
State ID No.: 1N1E33CA 70000
Quarter Section: 3027

Neighborhood: Northwest District, contact John Bradley at 503-313-7574.
Business District: Nob Hill, contact Nob Hill at nobhillportland@gmail.com.
District Coalition: Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.
Plan District: Northwest
Other Designations: Historic Landmark and Contributing Resource in the Alphabet Historic District

Zoning: **RH** – High Density Residential with Historic Resource Protection Overlay

Case Type: **HR** – Historic Resource Review
Procedure: **Type II**, an administrative decision with appeal to the Landmarks Commission.

Proposal:

The applicant is seeking Historic Resource Review approval for alterations to a contributing resource and individually listed Historic Landmark structure in the Alphabet Historic District. Alterations to balconies on the east elevation include:

- Removal of the balcony enclosure on the 7th floor and restoration of the original with new painted steel railings
- Extension of the footprint of balconies on the 1st-6th floors to align with the structural bay on the interior of the building; new painted steel railings to visually match the original existing
- Removal of balcony enclosures on the 2nd-5th floors and enclosure of new extended balconies with aluminum clad wood windows and Portland Cement plaster wall finish
- New aluminum clad wood door at the east entry
- New aluminum clad wood door with sidelights at the basement entry, centered beneath the balcony tier
- New windows, doors, and trim on the balconies as needed to match the profile of historic windows and doors elsewhere on the structure

Historic Resource Review is required for non-exempt alterations to Landmark structures in the Alphabet Historic District.

Relevant Approval Criteria:

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

- Community Design Guidelines
- 33.846.060.G – Other Approval Criteria
- Historic Alphabet District: Community Design Guidelines Addendum

ANALYSIS

Site and Vicinity: The site is a 13,720 square foot parcel developed with what was originally built as an apartment building in circa 1913 and is a National Historic Landmark. When completed in 1913, the 705 Davis Street apartment building was the grandest structure of its kind in Portland. It is located at the end of King Street in King's 2nd Addition, for many years a fashionable residential district. The original design was for a "square doughnut" plan with an opening at the south center on Davis Street, leading to a central entrance courtyard. Construction was to be in two stages. The west half was never built, leaving a "U" shaped plan with the front leg slightly shorter than the rear leg. Multi-dwelling buildings dominate the area, as lands in all directions from the site are zoned RH. Parcels zoned CX [Central Commercial] are to the southwest and also intensely developed.

Zoning: The High Density Residential (RH) is a high density multi-dwelling zone which allows the highest density of dwelling units of the residential zones. Density is not regulated by a maximum number of units per acre. Rather, the maximum size of buildings and intensity of use are regulated by floor area ratio (FAR) limits and other site development standards. Generally the density will range from 80 to 125 units per acre. Allowed housing is characterized by medium to high height and a relatively high percentage of building coverage. The major types of new housing development will be low, medium, and high-rise apartments and condominiums. Generally, RH zones will be well served by transit facilities or be near areas with supportive commercial services. Newly created lots in the RH zone must be at least 10,000 square feet in area for multi-dwelling development. There is no minimum lot area for development with detached or attached houses or for development with duplexes. Minimum lot width and depth standards may apply.

The Historic Resource Protection overlay is comprised of Historic and Conservation Districts, as well as Historic and Conservation Landmarks and protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those

living in and visiting the region. 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.

The Northwest Plan District implements the Northwest District Plan, providing for an urban level of mixed-use development including commercial, office, housing, and employment. Objectives of the plan district include strengthening the area’s role as a commercial and residential center. The regulations of this chapter: promote housing and mixed-use development; address the area’s parking scarcity while discouraging auto-oriented developments; enhance the pedestrian experience; encourage a mixed-use environment, with transit supportive levels of development and a concentration of commercial uses, along main streets and the streetcar alignment; and minimize conflicts between the mixed-uses of the plan district and the industrial uses of the adjacent Guild’s Lake Industrial Sanctuary.

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

- LU 14-207448 AD - Adjustment approval to 33.120.255.B.1.a.(1), to allow the main entrance to exceed 120% of the straight line distance to the abutting sidewalk.

Agency Review: A “Notice of Proposal in Your Neighborhood” was mailed **December 20, 2018**. The following Bureaus have responded with no issues or concerns:

- Bureau of Transportation Engineering, *See Exhibit E-1*
- Bureau of Environmental Services, *See Exhibit E-2*
- Life Safety Review Section of BDS, *See Exhibit E-3*
- Fire Bureau, *See Exhibit E-4*
- Water Bureau
- Site Development Section of BDS

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on December 20, 2018. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

Chapter 33.846.060 - Historic Resource Review

Purpose of Historic Resource Review

Historic Resource Review ensures the conservation and enhancement of the special characteristics of historic resources.

Historic Resource Review Approval Criteria

Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the approval criteria have been met.

Findings: The site is located within the Alphabet Historic District and is designated Historic Landmark outside the Central City Plan District. The proposal is for non-exempt treatments. Therefore, the proposal requires Historic Resource Review approval. The approval criteria are those listed in 33.846.060 G – *Other Approval Criteria*, the *Community Design Guidelines*, and the *Historic Alphabet District Community Design Guidelines Addendum*.

Staff has considered all of the approval criteria and addressed only those applicable to this proposal.

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.
3. **Historic changes.** Most properties change over time. Those changes that have acquired historic significance will be preserved.
4. **Historic features.** Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.
5. **Historic materials.** Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

Findings for 1, 2, 3, 4 & 5: According to National Registry of Historic Places Nomination Form, the building's original design is based on the French Renaissance, a popular style for apartment buildings of the era. In 1979, 705 Davis was acquired and converted to condominiums. The scope of alterations will retain and preserve the historic character of the property. The changes will not create a false sense of historic development; the resource will remain a record of its time, place, and use. New windows, doors, and trim on the balconies will match the profile of historic windows and doors elsewhere on the structure.

The property has undergone significant rehabilitation. Most cantilevered balconies in the east light well were enclosed many years ago. Enclosures were in poor condition and were replaced with bronze anodized frames and sash in 1979, when the units were converted to condominiums. The extension of previously enclosed balconies does not constitute an alteration to features that contribute to the property's historic significance. No changes acquiring historic significance will be impacted from the proposed alterations. *These criteria have been met.*

6. **Archaeological resources.** Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken.

Findings: The scope of work will not affect any previously undisturbed area. No significant archaeological resources will be affected by the proposal. *This criterion has been met.*

7. **Differentiate new from old.** New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a property. New work will be differentiated from the old.

Findings: The footprint of balconies on the 1st-6th floors will be extended to align with the structural bay on the interior of the building. Non-original balcony enclosures will be removed on the 2nd-5th floors. The enclosure of new extended balconies with aluminum clad wood windows and Portland Cement plaster wall finish will not destroy materials that characterize the property. These altered architectural elements are consistent with style and massing of the existing; the new work will be differentiated by contemporary materials and detailing. *This criterion has been met.*

8. **Architectural compatibility.** New additions, exterior alterations, or related new construction will be compatible with the resource's massing, size, scale, and architectural features. When retrofitting buildings or sites to improve accessibility for persons with

disabilities, design solutions will not compromise the architectural integrity of the historic resource.

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.
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 8, 9 & 10: The character of the structure will not be affected by the proposal. All alterations proposed are respectful of the pattern, proportions, finish details, and materials of the historic structure. The essential form and integrity of the resource will remain intact. The proposed alterations are compatible with the existing structure and with the Alphabet Historic District. *These guidelines have been met.*

Historic Alphabet District - Community Design Guidelines Addendum

1. **Historic Changes.** Most properties change over time; those changes that have acquired historic significance will be preserved.
2. **Differentiate New from Old.** New additions, exterior alterations, or related new construction will retain historic materials that characterize a property to the extent practicable. Replacement materials should be reasonable facsimiles of the historic materials they replace. The design of new construction will be compatible with the historic qualities of the district as identified in the Historic Context Statement.
3. **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. New development will seek to incorporate design themes characteristic of similar buildings in the Historic Alphabet District.

Findings for 1, 2 & 3: The new windows will be detailed to match the existing windows in design, inset and trim. The proposed windows and metal railings are consistent with materials and systems original to the resource. Collectively, the alterations proposed to the resource will not impact the architectural integrity or character of the site or structure, which will remain a valuable contributing asset to the immediate neighborhood as well as the greater Historic Alphabet District as a whole. *These guidelines have been met.*

Community Design Guidelines

- P1. **Plan Area Character.** Enhance the sense of place and identity by incorporating site and building design features that respond to the area's desired characteristics and traditions.

Findings: The proposed alterations do not alter the urban character of the building. The locations of windows and balconies has not changed; the pattern, scale, and texture of the elevations remains. The proposed design makes no alterations to the overall massing of the building or its relationship to the street or neighboring buildings. *This guideline has been met.*

- E5. **Light, Wind, and Rain.** Enhance the comfort of pedestrians by locating and designing buildings and outdoor areas to control the adverse effects of sun, shadow, glare,

reflection, wind, and rain.

- D2. Main Entrances.** Make the main entrances to houses and buildings prominent, interesting, pedestrian-accessible, and transit-oriented.
- D5. Crime Prevention.** Use site design and building orientation to reduce the likelihood of crime through the design and placement of windows, entries, active ground level uses, and outdoor areas.

Findings: The main entrance faces west at the bottom center of the "U" and is approached through a walkway and courtyard which was extensively remodeled in 1979. This courtyard, accessed from NW Davis Street, serves as the main pedestrian connection to the main entrance for all the tenants within the building. Entry doors on the east elevation allow for a safe and reasonably direct pedestrian connection for those entering the site by car. A new aluminum clad wood door is proposed at the east entry and a new aluminum clad wood door with sidelights at the basement entry, is proposed to be centered beneath the balcony tier. The location of these improvements enhance the comfort of pedestrians and reduce the likelihood of crime. *These guidelines have been met.*

- 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.
- D8. Interest, Quality, and Composition.** All parts of a building should be interesting to view, of long lasting quality, and designed to form a cohesive composition.

Findings: The proposed alterations are compatible in design and character with existing features on the historic structure. The proposed elements are of a similar scale and style to other features on the structure and so respect and integrate the new design into the building. In addition, all trim, head, jamb and mullion profiles will closely match those existing on the building. The attention to existing architectural details found on the building regarding style, scale, material, mass and character help to insure that this alteration will be long lasting and continue to be a contributing building and asset to the Historic Alphabet District. *These guidelines have been 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 requirements of Title 11 can be met, and 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. This proposal meets the applicable Historic Resource Review criteria and therefore warrants approval.

ADMINISTRATIVE DECISION

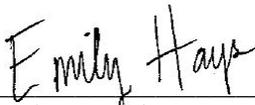
Approval of Historic Resource Review for alterations to a contributing resource and individually listed Historic Landmark structure in the Alphabet Historic District. Alterations to balconies on the east elevation include:

- Removal of the balcony enclosure on the 7th floor and restoration of the original with new painted steel railings
- Extension of the footprint of balconies on the 1st-6th floors to align with the structural bay on the interior of the building; new painted steel railings to visually match the original existing
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- New windows, doors, and trim on the balconies as needed to match the profile of historic windows and doors elsewhere on the structure

Approval per the approved site plans, Exhibits C-1 through C-6, signed and dated January 16, 2019, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related conditions (B through C) 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 18-275101 HR." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. At the time of building permit submittal, a signed Certificate of Compliance form (<https://www.portlandoregon.gov/bds/article/623658>) must be submitted to ensure the permit plans comply with the Design/Historic Resource Review decision and approved exhibits.
- C. No field changes allowed.

Staff Planner: Emily Hays

Decision rendered by:  on **January 16, 2019.**
By authority of the Director of the Bureau of Development Services

Decision mailed: January 18, 2019

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 December 7, 2018, and was determined to be complete on December 18, 2018.

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 December 7, 2018.

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: April 17, 2019.**

Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

Conditions of Approval. If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term “applicant” includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

Appealing this decision. This decision may be appealed to the Landmarks Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on February 1, 2019** at 1900 SW Fourth Ave. Appeals can be filed at the 5th floor reception desk of 1900 SW 4th Avenue Monday through Friday between 8:00 am and 4:30 pm. **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 Landmarks Commission is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 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 Landmarks Commission an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

If this Land Use Review is approved the final decision will be recorded with the Multnomah County Recorder.

- *Unless appealed*, the final decision will be recorded after **February 1, 2019** by the Bureau of Development Services.

The applicant, builder, or a representative does not need to record the final decision with the Multnomah County Recorder.

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:

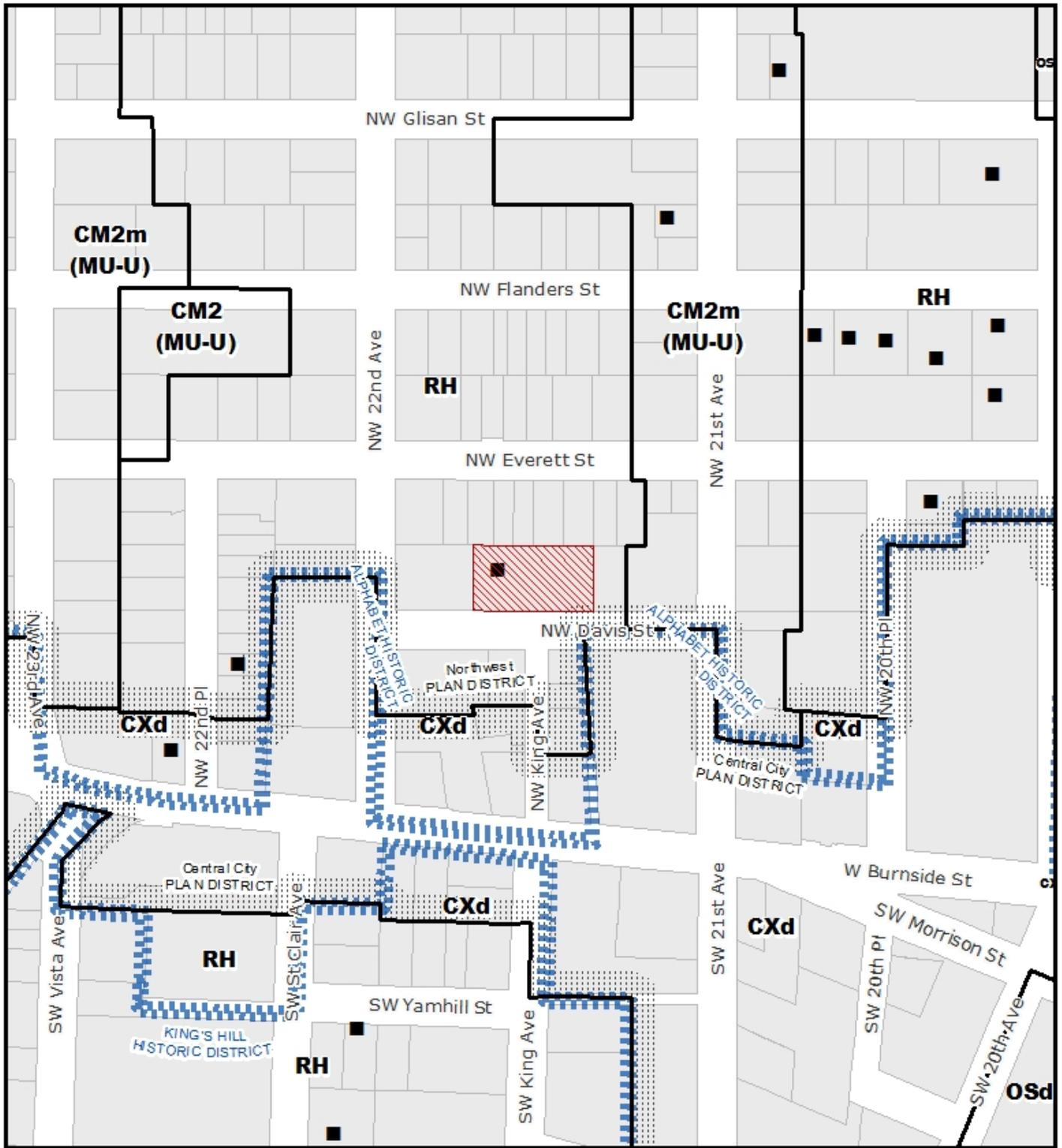
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Submittal
 - 1. Original Drawing Set
 - 2. Proposal Narrative
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Proposed Basement Entry & Balcony Plans
 - 3. Proposed South & East Elevation (attached)
 - 4. Enlarged Elevations
 - 5. Door Section Details
 - 6. Window Types & Section Details
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Bureau of Transportation Engineering and Development Review
 - 2. Bureau of Environmental Services
 - 3. Life Safety Review Section of BDS
 - 4. Fire Bureau
- F. Correspondence: None.
- 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).



ZONING

THIS SITE LIES WITHIN THE:
 NORTHWEST PLAN DISTRICT
 ALPHABET HISTORIC DISTRICT

-  Site
-  Historic Landmark

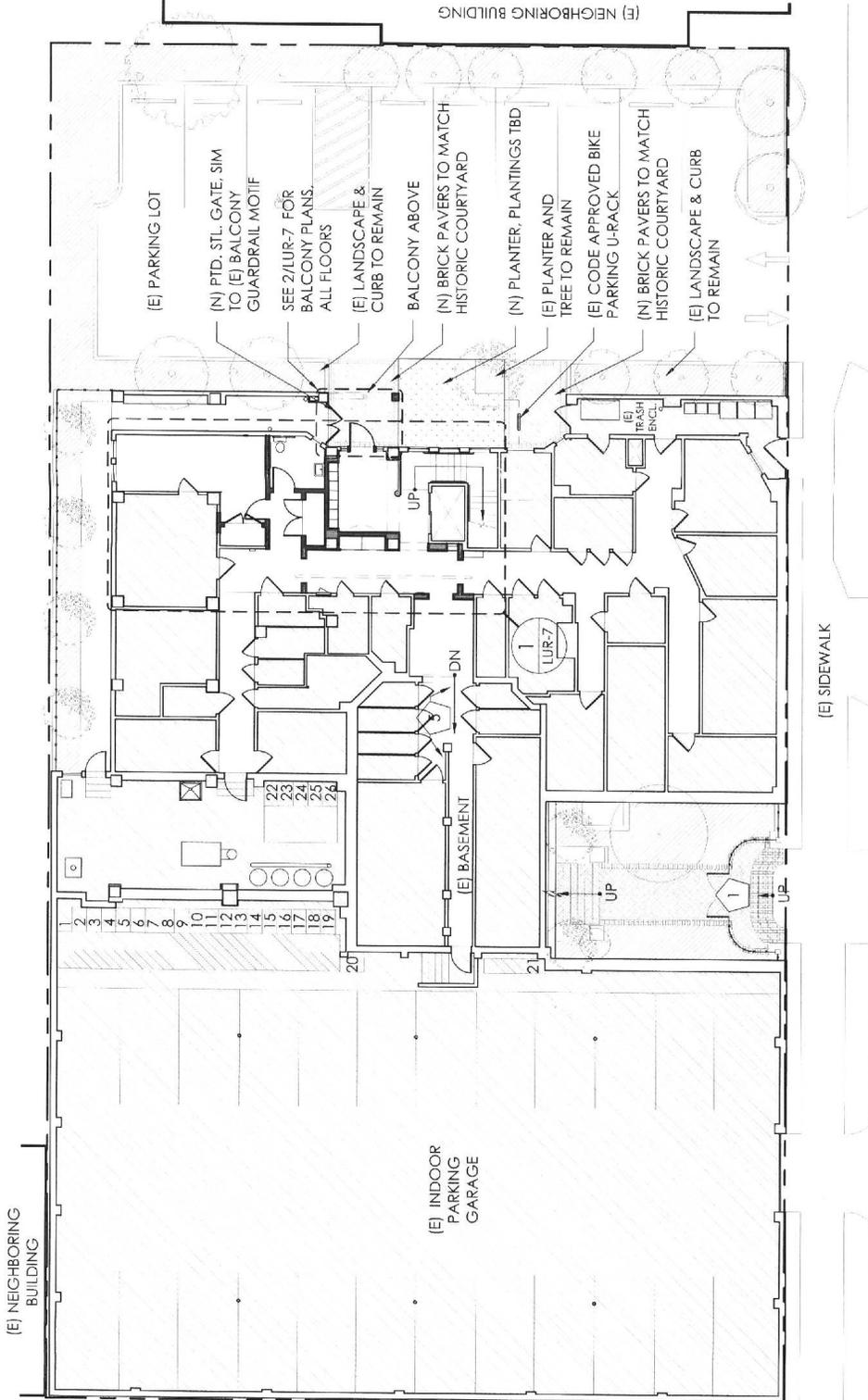
File No.	LU 18-275101 HR
1/4 Section	3027
Scale	1 inch = 200 feet
State ID	1N1E33CA 70000
Exhibit	B Dec 10, 2018

SHEET LEGEND:

- (E) L1, L2 AND L3 LANDSCAPING AS REQUIRED AND ALLOWED; REF. A0.1
- (N) PROPOSED SITE LANDSCAPING, L1 MIN.
- AREA NOT IN SCOPE (N.I.S.)
- (E) ASSUMED PROPERTY LINE, G.C. TO VERIFY W/ OWNER
- (E) FENCE TO REMAIN
- (E) PARTITION TO REMAIN
- (N) PARTITION

Approved
 City of Portland
 Bureau of Development Services
 Planner Emily Hally
 Date 11/6/19

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



LA 18-275 101 HR

705 DAVIS STREET
 APARTMENTS
 JOB #: 1813

EMERICK ARCHITECTS

705 DAVIS STREET APARTMENTS
 2141 NW DAVIS ST. PORTLAND, OR 97210
 HISTORIC REVIEW (LUR)

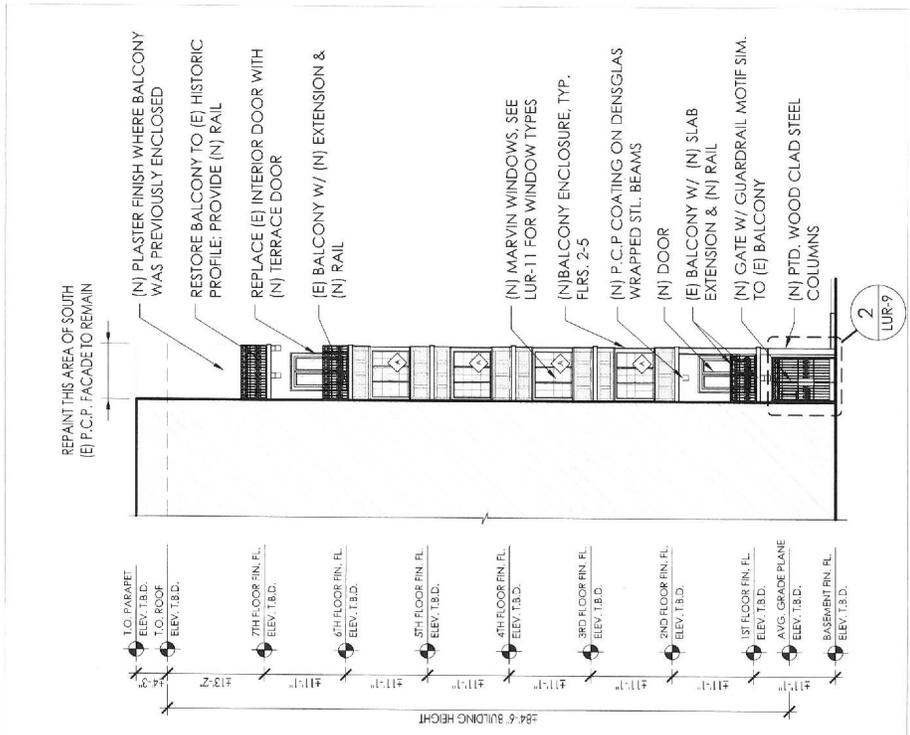
NOT FOR CONSTRUCTION



1 PROPOSED SITE & BASEMENT PLAN
 1/8" = 1'-0"

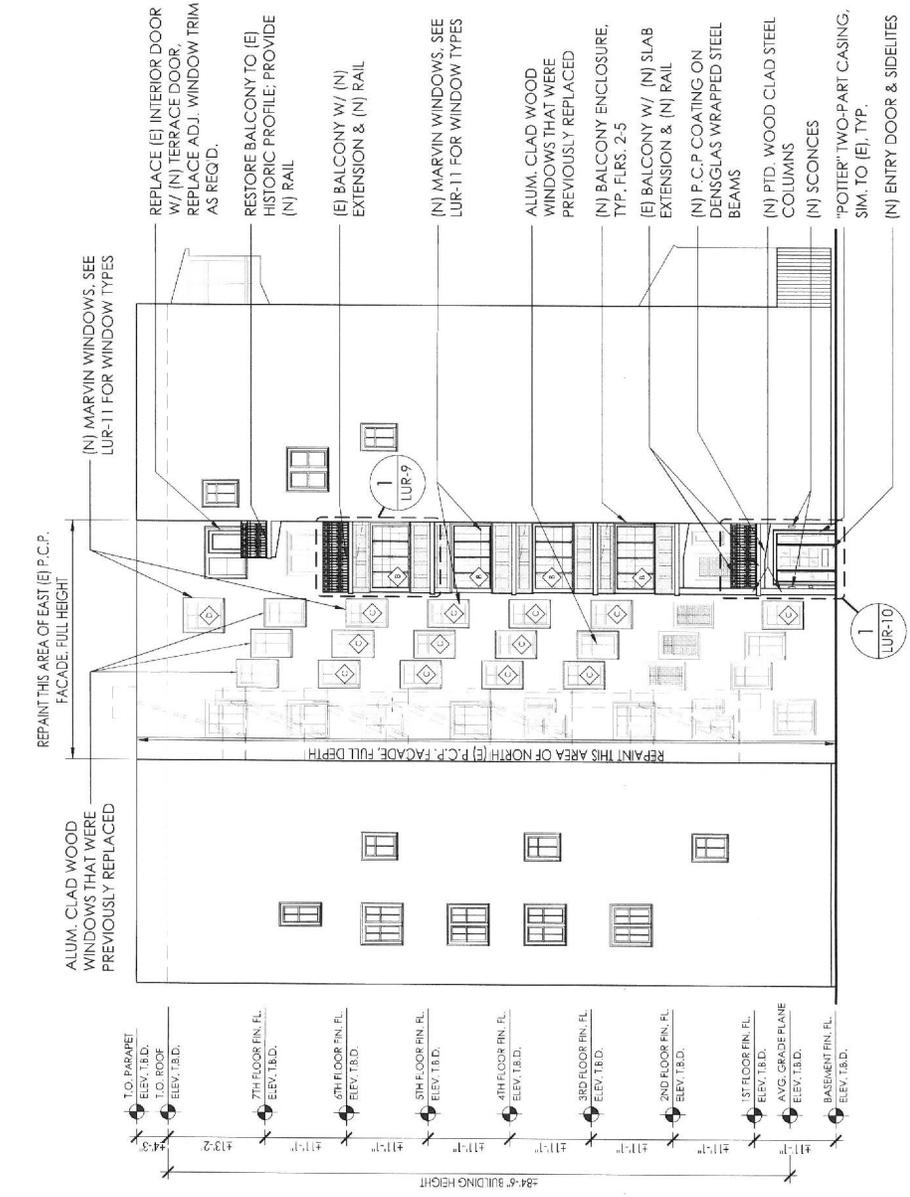


LUR-6
 DATE: 12.06.18
 CIVIL 1.1



1 PROPOSED SOUTH ELEVATION
1/16" = 1'-0"

Approved
City of Portland
Bureau of Development Services
Planner *[Signature]*
Date *11/16/19*
*This approval applies only to the project as shown. Any changes to all conditions of approval may apply.



2 PROPOSED EAST ELEVATION
1/16" = 1'-0"

705 DAVIS STREET APARTMENTS
2141 NW DAVIS ST. PORTLAND, OR 97210
HISTORIC REVIEW (LUR)
NOT FOR CONSTRUCTION

EMERICK ARCHITECTS

705 DAVIS STREET APARTMENTS
JOB #: 1813

LA 18-275101 HR

LUR-8
DATE: 12.06.18
FYH/BJT/LL-2