



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

Ted Wheeler, Mayor
 Rebecca Esau, Director
 Phone: (503) 823-7300
 Fax: (503) 823-5630
 TTY: (503) 823-6868
www.portlandoregon.gov/bds

Date: February 5, 2019
To: Interested Person
From: Marguerite Feuersanger, Land Use Services
 503-823-7619 / Marguerite.Feuersanger@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 18-220027 CU AD

GENERAL INFORMATION

Applicant: Danelle Isenhart | Isenhart Consulting, LLC
 PO Box 2364 | Beaverton, OR 97075

Owner/Owner's Representative: James Jodoin | Bethel Baptist Church Of Portland
 7807 N Fessenden Street | Portland, OR 97203

Site Address: 7807 N FESSENDEN STREET

Legal Description: TL 15600 0.30 ACRES, SECTION 06 1N 1E; TL 15800 0.83 ACRES, SECTION 06 1N 1E; TL 15700 0.25 ACRES, SECTION 06 1N 1E

Tax Account No.: R941060100, R941060430, R941060440

State ID No.: 1N1E06CB 15600, 1N1E06CB 15800, 1N1E06CB 15700

Quarter Section: 2022, 2023

Neighborhood: St. Johns, contact Sheryl Lyons at sjnal@gmail.com

Business District: St. Johns Business Boosters, contact info@stjohnsboosters.org

District Coalition: North Portland Neighborhood Services, contact Mary Jaron Kelley at 503-823-4099.

Zoning: R1, Medium Density Multi-Dwelling Residential and R5, Single Dwelling Residential 5,000

Case Type: CU AD, Conditional Use and Adjustment

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

Proposal: The applicant proposes to reduce the site area of the existing Bethel Baptist Church. The current site is approximately 60,000 square feet in area and measures 240 feet (east-west) by 250 feet (north-south). The proposed reduced church site will be 35,000 square feet in area (the east 140 feet of the existing church site) and will contain the existing church building, the accessory parking area and associated perimeter landscaping. The remaining westerly 25,000 square feet of the site (with frontage on both N Fessenden and N Allegheny) will

be sold; it contains a small storage accessory structure surrounded by trees and lawn. To date, development plans have not been submitted for this largely undeveloped portion of the church's property.



Current church site boundary

Proposed property to be removed from church site boundary



The site consists of three tax lots and the applicant submitted two Property Line Adjustment applications (#18-220039 PLA and #18-220051 PLA) to relocate property lines and facilitate the sale of the westerly 100 feet of the site. Property Line Adjustment standards in part require that resulting properties not be “split-zoned” or have more than one zoning designation. Because the proposed church site will be partly within the R1 zone and partly within the R5 zone, an Adjustment to Standard 33.667.300.C, Split Zoning, is requested concurrently with the Conditional Use review.

Religious institutions are considered a “Conditional Use” in the R1 and R5 Residential Zones. Conditional Use approval was granted in 1977 for development of the church parking area (Case File CU-75-77). Because the request is to reduce the site area of the church site, Conditional Use review is required. The proposed site plan, attached to this notice, shows the proposed reduced site area for the church.

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

- **Conditional Uses: Section 33.815.105, Institutional and Other Uses in R Zones;**
- **Adjustments: Section 33.805.040, Adjustment Approval Criteria; and**
- **Oregon Statewide Planning Goals**

ANALYSIS

Site and Vicinity: The 60,000 square-foot site is located at N Fessenden Street, between N Allegheny and N Tyler Avenues. Bethel Baptist church building (shown below, circa 1952) is located at the southeast corner of the site, facing N Fessenden Street. Near the church building at the east property line of the site is the N Tyler right-of-way which is unimproved and covered in lawn. West of the church is a 32-space surface parking area. A small storage shed is located near N Allegheny. The remainder of the site contains lawn, shrubs and four mature evergreen trees.



View of N Bethel Baptist Church, looking north
looking north



Area to be removed from Church site at N Fessenden,

Development along N Fessenden within two blocks of the site contains a mix of single dwelling houses and apartments. Development within neighborhoods immediately to the north and south of this corridor is primarily single dwelling detached houses on lots averaging 5,000 square feet in area. Houses are set back from the sidewalk approximately 10 to 20 feet. Front yards are landscaped with lawn, shrubs, and trees.

Zoning: The site is within two base zones: The southerly 100 feet of the site is within the Multi-Dwelling Residential (R1) zone and the remaining northerly portion is within the Single Dwelling 5,000 (R5) zone. A zoning map showing these designations is attached to this notice.

The R1 Zone is one of the City's multi-dwelling zones, intended to preserve land for urban housing and to provide opportunities for multi-dwelling housing. The use regulations are intended to create and maintain higher density residential neighborhoods. At the same time, they allow for large scale institutional campuses and other nonresidential uses but not to such an extent as to sacrifice the overall residential neighborhood image and character.

The R5 Zone is one of the City's single-dwelling zones, intended to preserve land for housing and to provide housing opportunities for individual households. The zones implement the comprehensive plan policies and designations for single-dwelling housing. The use regulations are intended to create, maintain and promote single-dwelling neighborhoods. They allow for some non-household living uses but not to such an extent as to sacrifice the overall image and character of the single-dwelling neighborhood.

Land Use History: City records indicate the following prior land use review for this site:

CU 075-1977, Conditional Use approval for a 30-space parking area on the existing church site.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **November 5, 2018**. The following Bureaus responded with no issues or concerns:

- Water Bureau (Exhibit E-3);
- Fire Bureau (Exhibit E-4);
- Police Bureau (Exhibit E-5)
- Site Development Section of BDS (Exhibit E-6); and
- Urban Forestry Division of the Bureau of Parks and Recreation (Exhibit E-8).

The following Bureaus have no objection to the proposal and no recommended conditions, but cite requirements that apply to future building permit review:

- Bureau of Environmental Services (Exhibit E-1)
- Bureau of Transportation Engineering (Exhibit E-2); and
- Life Safety Commercial Plan Review (Exhibit E-7).

Neighborhood Review: No written responses were received from either the Neighborhood Association or notified property owners in response to the “Notice of Proposal.”

ZONING CODE APPROVAL CRITERIA

Conditional Uses

33.815.010 Purpose

Certain uses are conditional uses instead of being allowed outright, although they may have beneficial effects and serve important public interests. They are subject to the conditional use regulations because they may, but do not necessarily, have significant adverse effects on the environment, overburden public services, change the desired character of an area, or create major nuisances. A review of these uses is necessary due to the potential individual or cumulative impacts they may have on the surrounding area or neighborhood. The conditional use review provides an opportunity to allow the use when there are minimal impacts, to allow the use but impose mitigation measures to address identified concerns, or to deny the use if the concerns cannot be resolved.

33.815.105 Institutional and Other Uses in Residential and Campus Institutional Zones

These approval criteria apply to all conditional uses in R and Campus Institutional zones except those specifically listed in sections below. The approval criteria allow institutions and other non-Household Living uses in residential and campus institutional zones that maintain or do not significantly conflict with the appearance and function of residential or campus areas. Criteria A through E apply to institutions and other non-Household Living uses in residential zones. Criteria B through E apply to all other conditional uses in campus institutional zones. The approval criteria are:

A. Proportion of Household Living uses. The overall residential appearance and function of the area will not be significantly lessened due to the increased proportion of uses not in the Household Living category in the residential area. Consideration includes the proposal by itself and in combination with other uses in the area not in the Household Living category and is specifically based on:

1. The number, size, and location of other uses not in the Household Living category in the residential area; and

Findings:

Approximately 25,000 square feet of site area (the westerly 100 feet) is being removed from the church site. The applicant states that this area is planned for future residential (household) development. This land is not developed, and contains only a small storage shed, lawn, trees and shrubs. “The church plans on selling these parcels in the future.” (Exhibit A-1). The church site will be reduced from 60,000 square feet to 35,000 square feet in area, a reduction of 42 percent of the total existing site area. By removing 25,000 square feet from the church site, the residential area will experience a reduction of the uses not in the Household Living category. In other words, a potential increase in the number of household units within the neighborhood area will result, as residential-zoned land will become available for residential development.

Although the applicant suggests that additional housing units will be created due to the boundary change, the applicant does not provide a plan or explain how additional housing units will be added. Still, the proposal meets this part of the criterion, given that the proposal does not include a new or expanded nonresidential use. In fact, it is the opposite that will likely be the result in that the proposal results in a reduction in the amount of Residential zoned land area devoted to nonresidential use. The exempted part of the church site will allow for the creation of residential units in the future. Future proposals for uses other

than household living must comply the use regulations of the R5 and R1 base zones and potentially require a new Conditional Use (land use) review.

2. The intensity and scale of the proposed use and of existing Household Living uses and other uses.

Findings: No changes are proposed to the existing church building and the surface parking area will remain with the site. The westerly 100 feet of open area will be removed from the site, which doesn't affect or change the scale of the church development but will result in a slight increase in intensity of the church development. Nevertheless, this increase in intensity is minimized as the new site area of 35,000 square feet remains significantly larger than surrounding sites, which average 5,000 square feet in area. The church building footprint occupies only 3,746 square feet or 11 percent of the 35,000 square-foot site. For contrast, the maximum building coverage for an institutional site is 50 percent in the R5 zone and 70 percent in the R1 zone. Because building coverage is an indicator of a site's intensity, the resulting smaller church site area continues to have a low intensity and will not lessen the overall appearance and function of the residential area.

Lastly, additional trees and shrubs will be planted along the new west property line. This landscaping will effectively contribute to the overall appearance of the residential area and will satisfy current zoning code requirements for screening landscaping adjacent to the parking area and driveway. A row of trees and high evergreen shrubs (6 feet in height) must be planted along the new west boundary as shown in Exhibit C-1. The new landscaping area must be at least 5 feet in width, excluding the required protective curb, and meet the L3 standard of Chapter 33.248.

Because of the above reasons, and with the condition that requires planting of landscaping to the L3 standard along portions of the new west property line, as shown in Exhibit C-1, this criterion is met.

B. Physical compatibility.

1. The proposal will preserve any City-designated scenic resources; and

Findings: The site does not contain any City-designated scenic resources. Therefore, Criterion B.1. does not apply.

2. The proposal will be compatible with adjacent residential developments based on characteristics such as the site size, building scale and style, setbacks, tree preservation and landscaping; or
3. The proposal will mitigate differences in appearance or scale through such means as setbacks, screening, landscaping, tree preservation, and other design features.

Findings: The portion of the site to be removed from the church's Conditional Use site will likely be redeveloped in a manner consistent with the R1 and R5 residential zones. Residential uses are inherently more compatible with adjacent residential development than an institutional use.

No changes are proposed to the main church building. The building was constructed in the early 1950s and is an established landmark in the neighborhood. A landscape plan for the reduced church site was submitted by applicant (Exhibit C-2). The applicant proposes to remove some existing paving and add landscaping to the site to provide the required perimeter parking area screening at the new west boundary of the church site. Such additional landscaping will meet the current perimeter parking area screening

requirements and will help mitigate differences in appearance between the existing main church building and parking area and the future residential development to its west.

The church and parking area are surrounded by landscaping, largely consisting of lawn and high evergreen shrubs. To help ease transitions between institutional and residential sites, trees are required by zoning code standards. To the point, the church site is required to have at least 20 percent (R1 zone) or 25 percent (R5 zone) of its site area in landscaping that meets the L1 standard. Both the existing and proposed (reduced) church sites easily exceed the minimum 25 percent area requirement. However, the existing church site does not meet current requirements for the minimum number of trees and is considered nonconforming in this respect. The site plan identifies four existing evergreen trees located west of the church, on the portion of the site to be removed from the church boundary. While the applicant has not proposed removal of any trees on the site or within adjacent public rights-of-way (and any proposed removal of the existing trees is subject to the requirements of City Code Title 11, Trees), this portion of the site will be sold. The existing evergreen trees are mature and are a beautifying and defining characteristic of the site and nearby neighborhood area. To retain the characteristics of the existing evergreen trees and improve compatibility with nearby residential development, and to ensure that the proposed (reduced) church site does not go further out of compliance with the minimum landscape requirement, at least four replacement evergreen trees must be planted on the proposed (reduced) church site. Note that the four replacement evergreen trees may be included in the required parking area perimeter landscaping requirement or may be in addition to the perimeter landscaping area.

With the following conditions requiring installation of at least 5 feet of landscaping to the L3 standard along the west boundary of the existing parking area and driveway and the planting of at least four evergreen trees, this criterion is met.

C. Livability. The proposal will not have significant adverse impacts on the livability of nearby residential zoned lands due to:

1. Noise, glare from lights, late-night operations, odors, and litter; and

Findings: The applicant provided information about current activities and programs held at the site (Exhibit A-3):

Weekly

- 10:45 AM - 12:45 PM Sunday AM Worship & Praise Service (up to 50 people);
- 11:00 AM - 1:00 PM Wednesday AM Ladies' Bible Study (up to 8 people);
- 11:00 AM - 1:00 PM Thursday AM Knights of Grace Meeting for Men (up to 8 people); and
- 10 AM - 3 PM Office Open Tuesdays, Wednesdays, Thursdays, Sundays (varied).

Monthly

- 10:45 AM - 3:00 PM Sunday AM Communion & PM Movie Matinee (up to 50 people);
- 5:30 - 7:30 PM Bethel Ladies' Fellowship (up to 12 people);
- (Held off site) Bethel Men's Breakfast; and
- Weddings & Memorials as needed (up to three/year; 50-85 guests).

Every Quarter:

- 11:00 AM - 1:00 PM Deacons' Quarterly Leadership Meeting (up to 12 people); and
- 12:30 - 3:00 PM Congregational Business Meeting (up to 50 people)

Potential noise, glare from lights, and late-night operations impacts are not expected due to the proposal for a reduced church boundary site and the current modest church program identified above. Church programs with the highest attendance include weekly Sunday services (up to 50 people) and monthly communion and movie matinee events on one Sunday of each month (up to 50 people). In addition, weddings and memorials

are held three times per year (up to 85 people) and business meetings are held four times per year (up to 50 people). The 32-space surface parking area will be fully contained on the site. None of the events occurring at the church extend beyond 7:30 pm on any day, so late night activity

Potential odor and litter impacts also are not expected to result from the proposal. The church and church site are well maintained, and the existing activities are not a concern regarding these impacts.

Transportation staff reviewed and accepted the analysis and findings of the applicant's Transportation Impact Study (Exhibits A-4 and E-2), which concludes that there will be no adverse impacts to the transportation system because the proposal does not include expansion of the church activities.

No changes are proposed for the main church building or to the proposed reduced site at the north, east or south property lines. Screening landscaping will be added at the new west site boundary. This new landscaping, including trees, evergreen shrubs and groundcover, will reduce visual impacts of the parking area and noise and glare on adjacent residential properties.

For the reasons above, noise, glare from lights, late-night operations, odors, and litter impacts resulting from the proposal will not have significant adverse effects on the livability of nearby residential zoned lands. With the condition requiring screening landscaping at the west property line, as described in Criterion A above, this criterion is met.

2. Privacy and safety issues.

Findings: The area to be removed from the church boundary will likely be redeveloped with residential uses. New trees, shrubs and groundcover for screening will be added on the site, adjacent to the new west property line. This landscaping will provide screening and an adequate transition between the church site/parking area and adjacent residential properties. The north, east and south church boundaries will not change as result of the proposal. No new development is proposed on the site. Additionally, the Police Bureau indicates that the police services are available and adequate to serve the existing and proposed reduced church site. While frontage along N Allegheny Street will be removed from the site, police officers can continue to access the site using existing rights-of-way by foot and vehicle without restriction (Exhibit E-5). Thus, the proposal will not result in significant adverse impacts on the livability of nearby residential zoned lands due to privacy or safety issues. This criterion is met.

D. Public services.

1. The proposed use is supportive of the street designations of the Transportation Element of the Comprehensive Plan;

Findings: Portland Bureau of Transportation (PBOT) staff reviewed the proposal and submitted the following comments and recommendations (Exhibit E-2): At this location, the City's Transportation System Plan (TSP) classifies N Fessenden as a *Neighborhood Collector, Transit Access street, City Bikeway, City Walkway, and Major Emergency Response Route*; whereas N Allegheny and N Tyler are classified as *Local Service* for all modes. North Tyler adjacent to the site's east property line is unimproved and presently a grass surface. The new reduced church site will no longer have frontage along N Allegheny Avenue per this Conditional Use request to reduce the church site area and the proposed two Lot Confirmation/Property Line Adjustments (18-220039 PR and 18-220051 PR).

2. Transportation system:

- a. The transportation system is capable of supporting the proposed use in addition to the existing uses in the area. Evaluation factors include safety, street capacity, level of service, connectivity, transit availability, availability of pedestrian and bicycle networks, on-street parking impacts, access restrictions, neighborhood impacts, impacts on pedestrian, bicycle and transit circulation. Evaluation factors may be balanced; a finding of failure in one or more factors may be acceptable if the failure is not a result of the proposed development, and any additional impacts on the system from the proposed development are mitigated;
- b. Measures proportional to the impacts of the proposed use are proposed to mitigate on- and off-site transportation impacts. Measures may include transportation improvements to on-site circulation, public street dedication and improvement, private street improvements, intersection improvements, signal or other traffic management improvements, additional transportation and parking demand management actions, street crossing improvements, improvements to the local pedestrian and bicycle networks, and transit improvements;
- c. Transportation improvements adjacent to the development and in the vicinity needed to support the development are available or will be made available when the development is complete or, if the development is phased, will be available as each phase of the development is completed.

Findings: To address the Transportation system approval criteria, the applicant submitted a professional Transportation Impact Study (TIS) prepared by Global Transportation Engineering (Exhibit A-4). PBOT Development Review staff has reviewed the TIS and agrees with the methodologies, analyses, assumptions, findings and conclusions including intersection capacity (or on-street parking impacts, or neighborhood impacts, etc.) to confirm that the transportation-related approval criteria are satisfied.

As noted, the subject church property is reducing its physical boundaries by approximately half for future development to the west. With no change to the existing church's congregation size, current programs or extracurricular activities; nor changes to the existing parking lot, vehicle circulation, or other site characteristics, impacts related to any of the evaluation factors related to this approval criteria are not expected, therefore will have no effect on the public transportation system, and minimal impacts to the surrounding neighborhood.

Availability to transit is immediately accessible adjacent to the subject site on N Fessenden, with Line #4 operating Frequent Service; and an established bike lane and continuous sidewalks are also in place in N Fessenden adjacent to the property. Vehicle access will continue to be provided via the existing curb cut to the site's existing parking lot and will retain approximately 96-ft of uninterrupted curb adjacent to the church site for on-street parking on N Fessenden as well.

The applicant notes that the St. John's Truck Strategy, Phase 2 project, is in the works, which will address pedestrian and bicycle safety concerns, as well as neighborhood livability impacts. The project includes pedestrian crossing safety, and traffic calming improvements such as curb extensions and median islands. According to the Transportation System Plan (TSP), this project will be implemented within 1 to 10 years.

At this location, N Fessenden Street is improved with a 52-ft wide paved roadway within a 72-ft wide ROW, in which the pedestrian corridor is in a 3-6-0 configuration. Given the high classification of N Fessenden Street, the existing pedestrian corridor does not meet the City standard of a 12-ft pedestrian corridor. Because the proposal does not result in an increase in occupancy and/or Significant Alteration, frontage improvements are not required at this time. It shall be advised that any future development in which

the proposal generates an increase in use, occupancy, and/or trips, improvements to the abutting rights-of-way will be required.

In conclusion, based on the evidence included in the record, and primarily, the applicant has demonstrated to PBOT's satisfaction that "the transportation system is capable of supporting the proposed use in addition to the existing uses in the area".

3. Public services for water supply, police and fire protection are capable of serving the proposed use and proposed sanitary waste disposal and stormwater disposal systems are acceptable to the Bureau of Environmental Services.

Findings: Water Supply Water Bureau staff reviewed the proposal and have no concerns about the availability of water service (Exhibit E-3).

Police The Police Bureau staff states that police service is available to the existing church at the site. The Police Bureau will be able to continue providing services to the church after the size of its area is reduced (Exhibit E-5).

Fire Protection Fire Bureau staff have no concerns about proposal with respect to fire protection (Exhibit E-4).

Sanitary Waste Disposal and Stormwater Disposal Systems Bureau of Environmental Services (BES) staff finds that sanitary sewer service is available and adequate to serve the site and proposal. Regarding stormwater systems, BES staff reviewed the applicant's site utility plan, which shows that stormwater from the existing surface parking area is directed to the landscaped area at the north portion of the site. This area will remain part of the church site. The church building is connected to combined sewer in N Fessenden. BES staff conclude that the applicant's submitted materials and proposal complies with this criterion and has no recommended conditions of approval (Exhibit E-1).

In summary public services for water supply, police and fire protection are adequate and available to serve the site and proposal. Therefore, this criterion is met.

E. Area plans. The proposal is consistent with any area plans adopted by the City Council as part of the Comprehensive Plan, such as neighborhood or community plans.

Findings: The site is within the St. Johns neighborhood. The adopted *St. Johns/Lombard Plan (2004)* focused on the St. Johns town center and N Lombard main street. The site is not within this adopted plan boundary or any other boundaries of an adopted area plan. This criterion is not relevant to the proposal.

Adjustments

33.805.010 Purpose

The regulations of the zoning code are designed to implement the goals and policies of the Comprehensive Plan. These regulations apply city-wide, but because of the city's diversity, some sites are difficult to develop in compliance with the regulations. The adjustment review process provides a mechanism by which the regulations in the zoning code may be modified if the proposed development continues to meet the intended purpose of those regulations. Adjustments may also be used when strict application of the zoning code's regulations would preclude all use of a site. Adjustment reviews provide flexibility for unusual situations and allow for alternative ways to meet the purposes of the code, while allowing the zoning code to continue providing certainty and rapid processing for land use applications.

33.805.040 Approval Criteria

Adjustment requests will be approved if the review body finds that the applicant has shown 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 an Adjustment to the Property Line Adjustment standard that requires that the Property Line Adjustment *will not result in a property that is in more than one base zone, unless that property was already in more than one base zone* (Section 33.667.300.C, Split Zoning). It is important to note that the existing church site consists of three tax lots, or properties. Two tax lots are entirely within the R1 zone and the “third tax lot” is entirely within the R5 zone. Thus, for the existing situation, none of the three properties that make up the church site are within more than one base zone. The proposal to reduce the church site requires that the existing property lines be relocated (through a Property Line Adjustment), which results in one of the revised properties being within two base zones, thus this proposal does not meet Section 33.667.300.C.

The purposes of the Property Line Adjustment standards are as follows (Section 33.667.010):

This chapter states the procedures and regulations for property line adjustments. A Property Line Adjustment (PLA) is the relocation of a common property line between two abutting properties. A Property Line Adjustment does not create lots. The regulations ensure that:

- *A Property Line Adjustment does not result in properties that no longer meet the requirements of this Title;*
- *A Property Line Adjustment does not alter the availability of existing services to a site;*
- *A Property Line Adjustment does not result in properties that no longer meet conditions of approval; and*
- *A Property Line Adjustment does not make it difficult to delineate property boundaries or apply use and development standards predictably and uniformly.*

Staff finds that the proposal continues to satisfy the above purposes. The proposed reduced church site will continue to comply with or will not go further out of compliance with the applicable standards of the R1 and R5 Residential zones. Of note are the Institutional development standards that apply to church sites, such as minimum site area, maximum floor area ration (FAR), maximum building setbacks and building coverage (33.110.245 for the R5 zone and 33.120.275 for the R1 zone). The proposed site meets these standards. Furthermore, the first three bulleted purpose statements are implemented through Property Line Adjustment (PLA) regulations and will be satisfied as part of the review and decision for the requested PLAs for the site (#18-220039 PR and #18-220051 PR). This includes requiring the removal of the church’s accessory structure (a nonresidential structure) on land to be removed from the church’s boundary,

The last bullet point of the purpose statement is relevant and directly applies to this Adjustment request because the resulting reduced church site property will be contained within two base zones: R1 on the southern portion and R5 on the northern portion. Below are two diagrams illustrating the existing site and proposed reduced site, and the location of the R5 and R1 base zones:



Existing Church Site – base zones R1 and R5



Proposed Reduced Church Site – base zones R1 and R5

The above diagrams show that while the west church site boundary is changing because of the proposal, the boundary between the R1 and R5 zones remains in the same location. Thus, the reduced church site continues to be within two base zones. The resulting new west property line will be surveyed and is in a reasonable location, given the location of existing tax lots boundaries and the location of the surface parking area, must be located entirely on the proposed reduced church site, including the required perimeter landscaping. Therefore, a condition of approval is necessary that requires approval of a Development Review (DR) permit that includes site work necessary to add five feet of perimeter landscaping to the L3 standard of Chapter 33.248, as shown in Exhibit C-1. With this condition, this criterion is met.

- B.** If in a residential, CI1, or IR zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, I, or CI2 zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and

Findings: Although one of the boundaries of a property will be within two base zones, the existing church site and proposed reduced church site are both within two Residential zones, R1 and R5. This is illustrated by the diagrams above. The reduced church site will retain frontage along N Fessenden Street and N Tyler Avenue right-of-

way. This proposal results in a smaller church site; no changes or expansion is proposed to the church buildings or programs. The land removed from the church boundary will likely be redeveloped with residential uses. Lastly, screening landscaping will be installed along the new west property line of the church site and will provide separation and visual screening for nearby residential properties. For these reasons, the proposal will not significantly detract from the livability or appearance of the residential area. 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: Only one adjustment is requested. This criterion does not apply.

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

Findings: City designated resources are shown on the zoning map by the 's' overlay; historic resources are designated by a large dot, and by historic and conservation districts. There are no such resources present on the site. Therefore, this criterion does not apply.

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

Findings: There are no discernible impacts that would result from granting the requested adjustment. This criterion is met.

- 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: Environmental overlay zones are designated on the Official Zoning Maps with either a lowercase "p" (Environmental Protection overlay zone) or a "c" (Environmental Conservation overlay zone). As the site is not within an environmental zone, this criterion does not apply.

Oregon Statewide Planning Goals

Goal 1: Citizen Involvement

Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process." It requires each city and county to have a citizen involvement program containing six components specified in the goal. It also requires local governments to have a Committee for Citizen Involvement (CCI) to monitor and encourage public participation in planning.

Findings: The City of Portland maintains an extensive citizen involvement program which complies with all relevant aspects of Goal 1, including specific requirements in Zoning Code Chapter 33.730 for public notice of land use review applications that seek public comment on proposals. There are opportunities for the public to testify at a local hearing on land use proposals for Type III land use review applications, and for Type II and Type IIX land use decisions if appealed. For this application, a written notice seeking comments on the proposal was mailed to property-owners and tenants within 150 feet of the site, and to recognized organizations in which the site is located and recognized organizations within 400 of the site. There is also an opportunity to appeal the administrative decision at a local hearing.

The public notice requirements for this application have been and will continue to be met, and nothing about this proposal affects the City's ongoing compliance with Goal 1. Therefore, the proposal is consistent with this goal.

Goal 2: Land Use Planning

Goal 2 outlines the basic procedures of Oregon's statewide planning program. It states that land use decisions are to be made in accordance with a comprehensive plan, and that suitable "implementation ordinances" to put the plan's policies into effect must be adopted. It requires

that plans be based on “factual information”; that local plans and ordinances be coordinated with those of other jurisdictions and agencies; and that plans be reviewed periodically and amended as needed. Goal 2 also contains standards for taking exceptions to statewide goals. An exception may be taken when a statewide goal cannot or should not be applied to a particular area or situation.

Findings: Compliance with Goal 2 is achieved, in part, through the City’s comprehensive planning process and land use regulations. For quasi-judicial proposals, Goal 2 requires that the decision be supported by an adequate factual base, which means it must be supported by substantial evidence in the record. As discussed earlier in the findings that respond to the relevant approval criteria contained in the Portland Zoning Code, the proposal complies with the applicable regulations, as supported by substantial evidence in the record. As a result, the proposal meets Goal 2.

Goal 3: Agricultural Lands

Goal 3 defines “agricultural lands,” and requires counties to inventory such lands and to “preserve and maintain” them through farm zoning. Details on the uses allowed in farm zones are found in ORS Chapter 215 and in Oregon Administrative Rules, Chapter 660, Division 33.

Goal 4: Forest Lands

This goal defines forest lands and requires counties to inventory them and adopt policies and ordinances that will “conserve forest lands for forest uses.”

Findings for Goals 3 and 4: In 1991, as part of Ordinance No. 164517, the City of Portland took an exception to the agriculture and forestry goals in the manner authorized by state law and Goal 2. Since this review does not change any of the facts or analyses upon which the exception was based, the exception is still valid and Goal 3 and Goal 4 do not apply.

Goal 5: Open Spaces, Scenic and Historic Areas and Natural Resources

Goal 5 relates to the protection of natural and cultural resources. It establishes a process for inventorying the quality, quantity, and location of 12 categories of natural resources. Additionally, Goal 5 encourages but does not require local governments to maintain inventories of historic resources, open spaces, and scenic views and sites.

Findings: The City complies with Goal 5 by identifying and protecting natural, scenic, and historic resources in the City’s Zoning Map and Zoning Code. Natural and scenic resources are identified by the Environmental Protection (“p”), Environmental Conservation (“c”), and Scenic (“s”) overlay zones on the Zoning Map. The Zoning Code imposes special restrictions on development activities within these overlay zones. Historic resources are identified on the Zoning Map either with landmark designations for individual sites or as Historic Districts or Conservation Districts. This site is not within any environmental or scenic overlay zones and is not part of any designated historic resource. Therefore, Goal 5 is not applicable.

Goal 6: Air, Water and Land Resources Quality

Goal 6 requires local comprehensive plans and implementing measures to be consistent with state and federal regulations on matters such as groundwater pollution.

Findings: Compliance with Goal 6 is achieved through the implementation of development regulations such as the City’s Stormwater Management Manual at the time of building permit review, and through the City’s continued compliance with Oregon Department of Environmental Quality (DEQ) requirements for cities. The Bureau of Environmental Services reviewed the proposal for conformance with sanitary sewer and stormwater management requirements and expressed no objections to approval of the application, as mentioned earlier in this report. Staff finds the proposal is consistent with Goal 6.

Goal 7: Areas Subject to Natural Disasters and Hazards

Goal 7 requires that jurisdictions adopt development restrictions or safeguards to protect people and property from natural hazards. Under Goal 7, natural hazards include floods,

landslides, earthquakes, tsunamis, coastal erosion, and wildfires. Goal 7 requires that local governments adopt inventories, policies, and implementing measures to reduce risks from natural hazards to people and property.

Findings: The City complies with Goal 7 by mapping natural hazard areas such as floodplains and potential landslide areas, which can be found in the City's MapWorks geographic information system. The City imposes additional requirements for development in those areas through a variety of regulations in the Zoning Code, such as through special plan districts or land division regulations. The subject site is not within any mapped floodplain or landslide hazard area, so Goal 7 does not apply.

Goal 8: Recreation Needs

Goal 8 calls for each community to evaluate its areas and facilities for recreation and develop plans to deal with the projected demand for them. It also sets forth detailed standards for expediting siting of destination resorts.

Findings: The City maintains compliance with Goal 8 through its comprehensive planning process, which includes long-range planning for parks and recreational facilities. Staff finds the current proposal will not affect existing or proposed parks or recreation facilities in any way that is not anticipated by the zoning for the site, or by the parks and recreation system development charges that are assessed at time of building permit. Furthermore, nothing about the proposal will undermine planning for future facilities. Therefore, the proposal is consistent with Goal 8.

Goal 9: Economy of the State

Goal 9 calls for diversification and improvement of the economy. Goal 9 requires communities to inventory commercial and industrial lands, project future needs for such lands, and plan and zone enough land to meet those needs.

Findings: Land needs for a variety of industrial and commercial uses are identified in the adopted and acknowledged Economic Opportunity Analysis (EOA) (Ordinance 187831). The EOA analyzed adequate growth capacity for a diverse range of employment uses by distinguishing several geographies and conducting a buildable land inventory and capacity analysis in each. In response to the EOA, the City adopted policies and regulations to ensure an adequate supply of sites of suitable size, type, location and service levels in compliance with Goal 9. The City must consider the EOA and Buildable Lands Inventory when updating the City's Zoning Map and Zoning Code. Because this proposal does not change the supply of industrial or commercial land in the City, the proposal is consistent with Goal 9.

Goal 10: Housing

Goal 10 requires local governments to plan for and accommodate needed housing types. The Goal also requires cities to inventory its buildable residential lands, project future needs for such lands, and plan and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.

Findings: The City complies with Goal 10 through its adopted and acknowledged inventory of buildable residential land (Ordinance 187831), which demonstrates that the City has zoned and designated an adequate supply of housing. For needed housing, the Zoning Code includes clear and objective standards. Since approval of this application will enable a potential increase in the City's housing supply, the proposal is consistent with Goal 10.

Goal 11: Public Facilities and Services

Goal 11 calls for efficient planning of public services such as sewers, water, law enforcement, and fire protection. The goal's central concept is that public services should be planned in accordance with a community's needs and capacities rather than be forced to respond to development as it occurs.

Findings: The City of Portland maintains an adopted and acknowledged public facilities plan to comply with Goal 11. See Citywide Systems Plan adopted by Ordinance 187831. The

public facilities plan is implemented by the City's public services bureaus, and these bureaus review development applications for adequacy of public services. Where existing public services are not adequate for a proposed development, the applicant is required to extend public services at their own expense in a way that conforms to the public facilities plan. In this case, the City's public services bureaus found that existing public services are adequate to serve the proposal, as discussed earlier in this report.

Goal 12: Transportation

Goal 12 seeks to provide and encourage "safe, convenient and economic transportation system." Among other things, Goal 12 requires that transportation plans consider all modes of transportation and be based on inventory of transportation needs.

Findings: The City of Portland maintains a Transportation System Plan (TSP) to comply with Goal 12, adopted by Ordinances 187832, 188177 and 188957. The City's TSP aims to "make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs." The extent to which a proposal affects the City's transportation system and the goals of the TSP is evaluated by the Portland Bureau of Transportation (PBOT). As discussed earlier in this report, PBOT evaluated this proposal and found that the applicant demonstrated that the transportation system is capable of supporting the proposal in addition to existing uses in the area. Therefore, the proposal is consistent with Goal 12.

Goal 13: Energy

Goal 13 seeks to conserve energy and declares that "land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."

Findings: With respect to energy use from transportation, as identified above in response to Goal 12, the City maintains a TSP that aims to "make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs." This is intended to promote energy conservation related to transportation. Additionally, at the time of building permit review and inspection, the City will also implement energy efficiency requirements for the building itself, as required by the current building code. For these reasons, staff finds the proposal is consistent with Goal 13.

Goal 14: Urbanization

This goal requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs. It calls for each city to establish an "urban growth boundary" (UGB) to "identify and separate urbanizable land from rural land." It specifies seven factors that must be considered in drawing up a UGB. It also lists four criteria to be applied when undeveloped land within a UGB is to be converted to urban uses.

Findings: In the Portland region, most of the functions required by Goal 14 are administered by the Metro regional government rather than by individual cities. The desired development pattern for the region is articulated in Metro's Regional 2040 Growth Concept, which emphasizes denser development in designated centers and corridors. The Regional 2040 Growth Concept is carried out by Metro's Urban Growth Management Functional Plan, and the City of Portland is required to conform its zoning regulations to this functional plan. This land use review proposal does not change the UGB surrounding the Portland region and does not affect the Portland Zoning Code's compliance with Metro's Urban Growth Management Functional Plan. Therefore, Goal 14 is not applicable.

Goal 15: Willamette Greenway

Goal 15 sets forth procedures for administering the 300 miles of greenway that protects the Willamette River.

Findings: The City of Portland complies with Goal 15 by applying Greenway overlay zones which impose special requirements on development activities near the Willamette River. The subject site for this review is not within a Greenway overlay zone near the Willamette River, so Goal 15 does not apply.

Goal 16: Estuarine Resources

This goal requires local governments to classify Oregon's 22 major estuaries in four categories: natural, conservation, shallow-draft development, and deep-draft development. It then describes types of land uses and activities that are permissible in those "management units."

Goal 17: Coastal Shorelands

This goal defines a planning area bounded by the ocean beaches on the west and the coast highway (State Route 101) on the east. It specifies how certain types of land and resources there are to be managed: major marshes, for example, are to be protected. Sites best suited for unique coastal land uses (port facilities, for example) are reserved for "water-dependent" or "water-related" uses.

Goal 18: Beaches and Dunes

Goal 18 sets planning standards for development on various types of dunes. It prohibits residential development on beaches and active foredunes but allows some other types of development if they meet key criteria. The goal also deals with dune grading, groundwater drawdown in dunal aquifers, and the breaching of foredunes.

Goal 19: Ocean Resources

Goal 19 aims "to conserve the long-term values, benefits, and natural resources of the nearshore ocean and the continental shelf." It deals with matters such as dumping of dredge spoils and discharging of waste products into the open sea. Goal 19's main requirements are for state agencies rather than cities and counties.

Findings: Since Portland is not within Oregon's coastal zone, Goals 16-19 do not apply.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards 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

Bethel Baptist Church's request to reduce its site size is straightforward; the church desires to remove unneeded and underutilized land from its boundaries. The church is a neighborhood landmark; the existing church building was constructed in 1952 and continues to provide services and programs to the community. The land to be removed from the church site contains lawn, evergreen trees, and a small accessory structure.

Changes to the church building or significant improvements to the site are not proposed and all existing surface parking will remain on the proposed reduced church site. The resulting smaller site area of 35,000 square feet will result in a church site that remains in compliance with applicable development standards of the R1 and R5 base zones currently designated on the site. To minimize potential negative impacts on the surrounding residential area and to comply with parking area landscaping requirements, a 5-foot-wide area of screening landscaping will be added along the new west boundary, adjacent to the parking area and driveway. The new trees and shrubs will beautify the site, add screening and separation for adjacent residential properties.

Four existing evergreen trees are located on the portion of the site to be removed from the church boundary. Removal of these trees is not proposed or approved through this review. The trees will be subject to tree preservation standards of Title 11, Trees. At least four of the newly planted trees on the reduced church site must be evergreen species. This requirement

will help ensure compliance with the conditions and result in a smaller church site that fits its well with the surrounding residential neighborhood.

Because no changes are proposed to the main church building a follow-up building permit is not needed or proposed, the required condition for landscaping will be tied to the current Property Line Adjustment (PLA) reviews. The PLAs are necessary to facilitate the separation of the unneeded part of the site. The PLA review will require removal of the small accessory storage building.

ADMINISTRATIVE DECISION

Approval of a Conditional Use review to reduce the site boundary of the Bethel Baptist Church, from approximately 60,000 square feet in area to 35,026 square feet in area; and

Approval of an Adjustment for the reduced and new Conditional Use church site to allow a property to be contained within more than one base zone (33.667.300.C, Split zoning).

All Approvals are per the approved site plan, Exhibit C-1, signed and dated January 31, 2019, and are subject to the following conditions:

- A. As part of the Development Review (DR) 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 18-220027 CU AD." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. The applicant must receive and obtain final inspection approval for a Permit (a zoning, development review, or commercial permit as required for scope of work) to install landscaping on the site along the west property line of the remaining Conditional Use site, at least 5 feet in width, as shown in Exhibit C-1, prior to City approval of the Property Line Adjustment applications #18-220039 PR and #18-220051 PR. Landscaping must include trees, evergreen shrubs and groundcover, and must comply with the L3 standard of Chapter 33.248. In addition, at least four of the required trees must be evergreen species.

Staff Planner: Marguerite Feuersanger

Decision rendered by:  **on January 31, 2019**
By authority of the Director of the Bureau of Development Services

Decision mailed: February 5, 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 August 14, 2018 and was determined to be complete on October 25, 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 August 14, 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 requested that

the 120-day review period be extended by 60 days (Exhibit G-3). Unless further extended by the applicant, **the 180 days will expire on: April 23, 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 Hearings Officer, which will hold a public hearing. Appeals must be filed **by 4:30 PM on February 19, 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 Hearings Officer is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 775 Summer St NE, Suite 330, Salem, Oregon 97301-1283, or phone 1-503-373-1265 for further information.

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Hearings Officer an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

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

- *Unless appealed*, the final decision will be recorded after **February 19, 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:

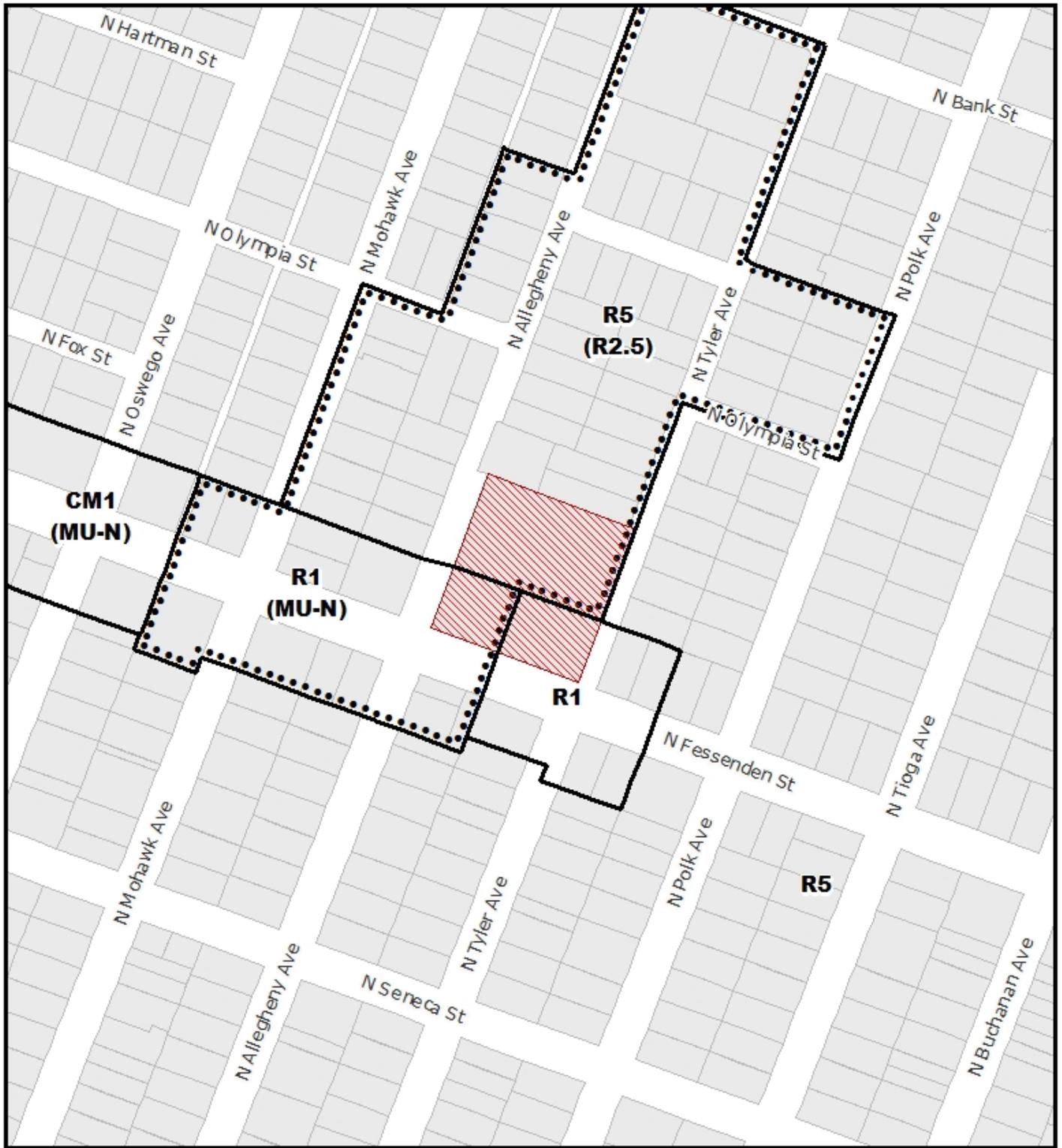
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 - 1. Original Submittal, August 14, 2018
 - 2. Updated Submittal, October 25, 2018
 - 3. Current Activities and Use of Bethel Baptist Church, November 5, 2018
 - 4. Transportation Impact Study, January 16, 2019
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
- 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. Police Bureau
 - 6. Site Development Review Section of BDS
 - 7. Life Safety Commercial Plan Review of BDS
 - 8. Forestry Division, Bureau of Parks and Recreation
- F. Correspondence:
 - None
- G. Other:
 - 1. Original LU Application
 - 2. Letter to Applicant from C. Fuchs listing information needed to complete the application, August 31, 2018
 - 3. Applicant's signed 60-Day Extension of 120-Day Review Period, November 26, 2018

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 
NORTH

 Site

| | |
|-------------|--------------------|
| File No. | LU 18-220027 CU AD |
| 1/4 Section | 2022, 2023 |
| Scale | 1 inch = 200 feet |
| State ID | 1N1E06CB 15600 |
| Exhibit | B Aug 30, 2018 |

PROPOSED SITE PLAN FOR BETHEL BAPTIST CONDITIONAL USE

A TRACT OF LAND LOCATED IN THE
S.W. 1/4 OF SECTION 6, T.1N., R.1E., W.M.,
CITY OF PORTLAND, MULTNOMAH COUNTY, OREGON
AUGUST 9, 2018 SCALE 1"=30'
LAST REVISION: OCTOBER 19, 2018

SURVEY PERFORMED FOR:
BETHEL BAPTIST CHURCH
OF PORTLAND

SURVEY NOT
THE VERTICAL DATUM
BENCHMARK NUMBER
S.E. CORNER OF THE
ALLEGHENY AVENUE.
NO WARRANTIES ARE
ADVERSE POSSESION

Approved
City of Portland
Bureau of Development Services
Planner M. Feuersanger
Date January 31, 2019
* This approval applies only to the
reviews requested and is subject to all
conditions of approval
Additional zoning requirements may apply

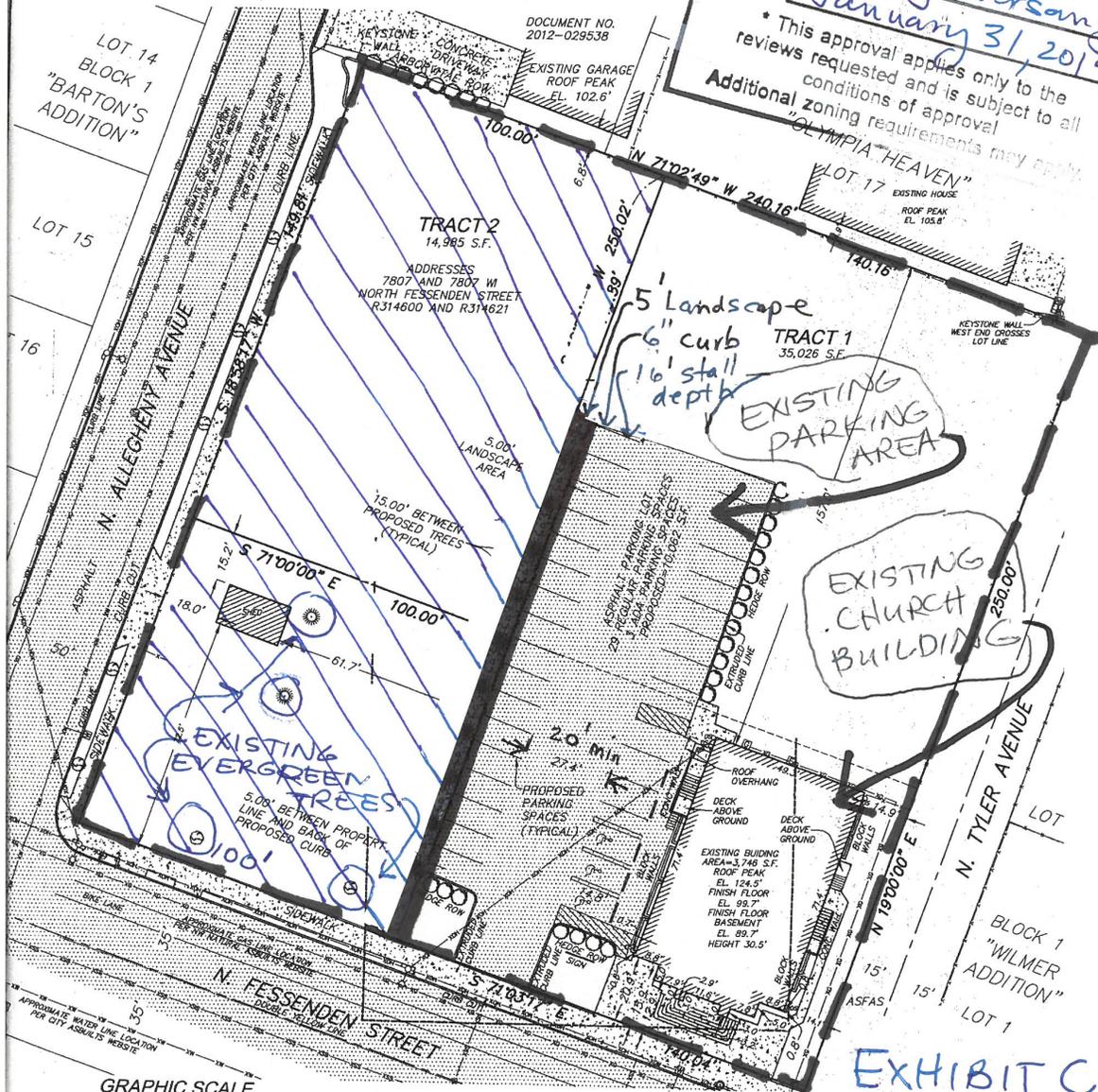
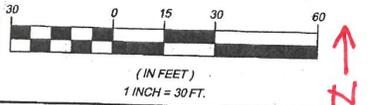
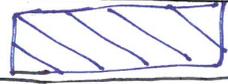


EXHIBIT C-1



--- EXISTING CHURCH SITE BOUNDARY



TO BE REMOVED FROM CHURCH SITE

rec. 10/25/18

REQUIRED L3 Landscaping Area per Condition B.)

LU 18-220027 CU AD