



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

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**Date:** July 3, 2019  
**To:** Interested Person  
**From:** Lois Jennings, Land Use Services  
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## **NOTICE OF A TYPE II<sub>x</sub> 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 19-148352 LDS**

#### **GENERAL INFORMATION**

**Applicant:** Sarah Radelet | Strata Land Use Planning  
Po Box 90833 | Portland OR 97290  
Phone#: 503-320-0273 or [sarah@stratalanduse.com](mailto:sarah@stratalanduse.com)

**Owner/Owner's Representatives:** Sean Heyworth or Mike Mitchoff | Portland Houseworks LLC  
5105 SW 45th Ave, Suite 201 | Portland OR 97221

**Site Address:** 7016 SE Duke St

**Legal Description:** BLOCK 6 W 96' OF LOT 10, BRENTWOOD & SUB  
**Tax Account No.:** R099902040  
**State ID No.:** 1S2E20BA 05000  
**Quarter Section:** 3737

**Neighborhood:** Brentwood-Darlington, contact Patrick Burke at [bdlanduse@gmail.com](mailto:bdlanduse@gmail.com).  
**Business District:** None  
**District Coalition:** Southeast Uplift, contact Leah Fisher at 503-232-0010.

**Plan District:** None

**Zoning:** R2.5-Single Dwelling Residential -1 unit per 2,500 s.f. with an "a"-Alternative Design Density Overlay

**Case Type:** LDS-Land Division (Subdivision)  
**Procedure:** Type IIX, an administrative decision with appeal to the Hearings Officer.

**Proposal:** The applicant is proposing to divide this 13,846 s.f. vacant property into five (5) lots. Lots 1, 2 and 3 will be developed with attached houses, each unit will include an internal Accessory Dwelling Unit (ADU). Lots 4 and 5 will be developed with detached houses and a detached ADU. Lot sizes will range from 1,747 s.f. to 3,840 s.f. in area. Two trees exist on the property and the applicant is proposing to preserve the 29-inch Douglas Fir tree to meet the

Tree Preservation Standard. The applicant's preliminary site & utility plan shows how services (sanitary, stormwater and water) will be provided for each lot.

No on-site parking is required for this site, since the site is adjacent to a transit street, SE Duke Street, where Trimet provides frequent transit service via Bus Line #19. The applicant is proposing to provide on-site parking space for the future development on Lots 4 and 5 with vehicle access from SE 70<sup>th</sup> Avenue.

Portland Bureau of Transportation (PBOT) noted for this land division that, SE Duke Street and SE 70<sup>th</sup> Avenue, currently do not meet City standards. The applicant has submitted a public works permit to construct improvements on both streets. The site plan reflects a 4-ft. street dedication along SE Duke Street.

This subdivision proposal is reviewed through a Type IIx procedure because: (1) the site is in a residential zone; (2) four to ten dwelling lots are proposed (see 33.660.110).

For purposes of State Law, this land division is considered a subdivision. To subdivide land is to divide an area or tract of land into four or more lots within a calendar year, according to ORS 92.010. ORS 92.010 defines "lot" as a single unit of land created by a subdivision of land. The applicant's proposal is to create five units of land (five lots). Therefore, this land division is considered a subdivision.

**Relevant Approval Criteria:**

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant criteria are found in **Section 33.660.120, Approval Criteria for Land Divisions in Open Spaces and Residential Zones.**

## FACTS

**Site and Vicinity:** The site is a corner lot on the south side of Duke Street and SE 70<sup>th</sup> Avenue. The site is relatively flat with two trees, Douglas Fir and Western Red Cedar. Directly across the street to the west is a religious institution. The surrounding neighborhood is developed with mostly single-level houses.

The zoning directly north, south and east of the site is residential R2.5 and then directly to the west is R5-single-family residential (1 unit per 5,000 s. f). At the intersection of SE Duke and SE 72<sup>nd</sup> Avenue there is CM1 zoning, where a convenience store is located. R2 zoning is east of SE 72<sup>nd</sup> Avenue on the south side of Duke Street. The closest parks within this vicinity are Brentwood Darlington to the west and Mt. Scott Park to the north of this site.

**Infrastructure:**

- **Streets** –The site has approximately 96-ft. of frontage on SE Duke Street and 144-ft. of frontage on SE 70<sup>th</sup> Avenue. At this location, SE Duke Street is classified as a Neighborhood Collector, Transit Access street, City Walkway, City Bikeway, Secondary emergency response, and Community Corridor for design in the Transportation System Plan (TSP). At this location SE 70<sup>th</sup> Avenue is classified as a Local Service street for all modes per the Transportation System Plan (TSP). Tri-Met provides transit service approximately 325-ft. from the site at SE Duke Street via Bus 19.

SE Duke Street has a 44-ft. curb-to-curb paved surface with a 60-ft. right-of-way with parking on both sides. Along the 96-ft. wide site frontage the pedestrian corridor includes a 0-ft. wide planter area, curb, 6-ft. sidewalk and a 2-ft. wide buffer at the back of the sidewalk (0-6-2 configuration). SE 70<sup>th</sup> Avenue is improved with and approximate 32-ft. wide roadway within a 50-ft. right-of-way, which is lacking a curb and sidewalk.

- **Water Service** – There is an existing 16-inch CI water main in SE Duke Street and 6-inch DI water main in SE 70<sup>th</sup> Avenue. Static pressure is estimated at 59-74 psi.

- **Fire Hydrant Water Service:** The nearest fire hydrants to this site include one located north of SE Duke Street on the east side of SE 71<sup>st</sup> Avenue and also another on the south side of SE Duke Street on the east side of SE 70<sup>th</sup> Avenue with a 2,400 gpm at a minimum 20 psi residual pressure. Another fire hydrant is located on the south side of SE Tolman Street on east side of SE 70<sup>th</sup> Avenue with a 1,700 gpm at a 20-psi residual pressure.
- **Sanitary Service** - There is an existing public 8-inch PVC sanitary only sewer line in SE Duke Street and within SE 70<sup>th</sup> Avenue (BES as-built# 5050).
- **Stormwater Disposal** – There is a public underground injection control (UIC) system (sump) within vicinity of this site. This public sump provides an infiltration system for stormwater runoff from the public right-of-way. Stormwater from private development cannot be discharged to this public UIC system. The applicant is proposing to manage stormwater runoff through drywell for the future development on the new lots, which is discussed later in this report under 33.653.

**Zoning:** The R2.5 designation is one of the City’s single-dwelling zones which is intended to preserve land for housing and to promote housing opportunities for individual households. The zone implements the comprehensive plan policies and designations for single-dwelling housing.

The “a” overlay is intended to allow increased density that meets design compatibility requirements. It fosters owner-occupancy, focuses development on vacant sites, preserves existing housing stock, and encourages new development that is compatible with the surrounding residential neighborhood. This land division is not using any provisions of the “a” overlay.

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

**Agency Review:** Several Bureaus have responded to this proposal and relevant comments are addressed under the applicable approval criteria. Exhibits “E” contain the complete responses.

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on **May 21, 2019**. No written responses have been received from the Neighborhood Association or notified property owners in response to the proposal.

## ZONING CODE APPROVAL CRITERIA

### ***APPROVAL CRITERIA FOR LAND DIVISIONS IN OPEN SPACE AND RESIDENTIAL ZONES***

***33.660.120. The Preliminary Plan for a land division will be approved if the review body finds that the applicant has shown that all of the following approval criteria have been met.***

Due to the specific location of this site, and the nature of the proposal, some of the criteria are not applicable. The following table summarizes the criteria that are not applicable. Applicable criteria are addressed below the table.

<b>Criterion</b>	<b>Code Chapter/Section and Topic</b>	<b>Findings: Not applicable because:</b>
C	33.631 - Flood Hazard Area	The site is not within the flood hazard area.
D	33.632 - Potential Landslide Hazard Area	The site is not within the potential landslide hazard area.
E	33.633 - Phased Land Division or Staged Final Plat	A phased land division or staged final plat has not been proposed.
F	33.634 - Recreation Area	The proposed density is less than 40 units.
H	33.636 - Tracts and Easements	No tracts or easements have been proposed or will be required.

J	33.640 - Streams, Springs, Seeps and Wetlands	No streams, springs, seeps or wetlands are evident on the site.
L	33.654.110.B.2 - Dead end streets	No dead-end streets are proposed.
	33.654.110.B.3 - Pedestrian connections in the I zones	The site is not located within an I zone.
	33.654.110.B.4 - Alleys in all zones	No alleys are proposed or required.
	33.654.120.C.3.c - Turnarounds	No turnarounds are proposed or required.
	33.654.120.D - Common Greens	No common greens are proposed or required.
	33.654.120.E - Pedestrian Connections	There are no pedestrian connections proposed or required.
	33.654.120.F - Alleys	No alleys are proposed or required.
	33.654.120.G - Shared Courts	No shared courts are proposed or required.
	33.654.130.B - Existing public dead-end streets and pedestrian connections	No public dead-end streets or pedestrian connections exist that must be extended onto the site.
	33.654.130.C - Future extension of dead-end streets and pedestrian connections	No dead-end street or pedestrian connections are proposed or required.
	33.654.130.D - Partial rights-of-way	No partial public streets are proposed or required.
	33.655 - School District Enrollment Capacity	The proposal is for less than 11 lots or is not in the David Douglas School District.

**Applicable Approval Criteria are:**

**A. Lots. The standards and approval criteria of Chapters 33.605 through 33.612 must be met.**

**Findings:** Chapter 33.611 contains the density and lot dimension requirements applicable in the R2.5 zone. Based on the applicant's survey, the site area is 13,846 square feet. The maximum density in the R2.5 zone is one unit per 2,500 square feet. Minimum density is one unit per 5,000 square feet based on 80 percent of the site area.

The site has a maximum density of 5 units and a minimum required density of 2 units. The applicant is proposing 5 single-dwelling lots. The density standards are therefore met.

The lot dimensions required and proposed are shown in the following table:

	Min. Lot Area (square feet)	Max. Lot Area (square feet)	Min. Lot Width* (feet)	Min. Depth (feet)	Min. Front Lot Line (feet)
<b>R 2.5 zone</b>	1,600	N/A	36	40	30
Lot 1 -Attached Housing Lot	2,018		33.5	60	33.5
Lot 2 -Attached Housing Lot	1,747		29.0	60	29.0
Lot 3 -Attached Housing Lot	2,018		33.5	60	33.5
Lot 4 -Detached House Lot	3,840		40	96	40
Lot 5- Detached House Lot	3,840		40	96	40

\* Width is measured by placing a rectangle along the minimum front building setback line specified for the zone. The rectangle must have a minimum depth of 40 feet, or extend to the rear of the property line, whichever is less.

As shown in the table above, Lots 4 and 5 meet the minimum lot dimensions. However Lots 1, 2 and 3 are narrower than the minimum width of 36-ft. The Zoning Code, however, allows narrower lots if the future development can meet the regulations of Section 33.611.200.C as discussed below:

### **Narrow Lots**

***On balance, the proposed lots will have dimensions that are consistent with the purpose of the Lot Dimension Regulations for an R2.5 zoned property:***

The lot dimension requirements ensure that: (1) each lot has enough room for a reasonably-sized attached or detached house; (2) lots are of a size and shape that development on each lot can meet the development standards of the R2.5 zone; (3) lots are not so large that they seem to be able to be further divided to exceed the maximum allowed density of the site in the future; (4) each lot has room for at least a small, private outdoor area; (5) lots are wide enough to allow development to orient toward the street; (6) each lot has access for utilities and services; (7) lots are not landlocked; (8) lots don't narrow to an unworkable width close to the street; (9) lots are compatible with existing lots while also considering the purpose of this chapter; and (10) lots are regularly shaped.

The applicant has demonstrated via the plans and narrative (Exhibit C.1, C2, C3 and A.14) that the proposed attached housing lots, Lots 1, 2 and 3 are consistent with the purpose of lot dimension regulations for the following reasons:

- The applicant has provided an example of a building footprint that meets all applicable setback requirements and is oriented towards the street. Therefore, they have demonstrated that the proposed lot(s) can accommodate a reasonably sized house with a detached accessory dwelling unit while meeting the development standards of the zoning code.
- The applicant has provided a preliminary utility plan that demonstrates that each lot has access for utilities and services
- The proposed lots are not landlocked, nor do they narrow to an unbuildable width close to the street
- This property is near SE Woodstock Blvd, a designated neighborhood corridor with frequent transit service on SE Duke Street and frequent transit service on SE 82<sup>nd</sup> Avenue, which is a designated Civic Corridor. This site is not too far from the Woodstock neighborhood, a designated neighborhood center and to north is the Lents neighborhood, a designated town center per the 2035 Comprehensive Plan (Exhibit G.5). Therefore, the proposed attached housing lots are consistent with the desired character of the R2.5 zone, which allows for a mix of housing types near, in, along centers and corridors where urban public services, including access to frequent transit is available.
- Directly to the west of this site is R5 zoning and to the east is CM1 and R2 zoning. These attached housing lots are appropriate for the designated R2.5 zoning and housing type allowed in this zone, which serves as a transition between detached single-family houses within the R5 zone, and the religious institution to the west and commercial and multi-family development to east of the site.
- These narrow lots, Lots 1, 2 and 3, are compatible to other attached housing lots within the vicinity to the west of this property and a few to the east of this site. The applicant's narrative (Exhibit A.14) addressing the narrow lot standards provides examples of sites within the neighborhood with similar lot dimensions and areas.
- Lots 1, 2 and 3 are regular in shape.

***The minimum width for lots that will be developed with detached houses may not be reduced below 25 feet***

- The lots will be developed with attached houses; therefore, this standard does not apply.

***If the lot abuts an alley, then vehicle access is allowed only from the alley***

- The site does not have access from an alley, so this standard does not apply.

***Lots must be configured so that development on the site will be able to meet the garage limitation standard of Subsection 33.110.253.D at the time of development***

- No parking on-site is being proposed for these attached housing lots, since this property is adjacent to a transit street, SE Duke Street, with frequent transit service being provided by TriMet Bus line #19.

***Lots that will be developed with attached houses must be configured so that 60 percent of the area between the front lot line and front building line can be landscaped at the time of development.***

- Lots 1 and 3 are 33.5-ft. wide and Lot 2 is 29-ft. wide which will still allow for the 60% standard to be met in the area as shown on Exhibit C.3.

***If parking is not required, alley access and garage limitation requirements do not have to be met if a covenant is provided.***

- The applicant is not proposing parking on the site. As noted under the Facts section of this report on page 2 and 33.641 Transportation Impacts, Lots 1, 2 and 3, are exempt from minimum parking requirements due to their location within 500 feet of a transit street, SE Duke Street, with 20-minute transit service via Trimet Bus Line #19. The applicant/owner will be required to sign and record a covenant that restricts future development of parking or curb cuts on the lots.

The findings above show that the applicable density and lot dimension standards are met. Therefore, this criterion is met.

***B. Trees. The standards and approval criteria of Chapter 33.630, Tree Preservation, must be met.***

**Findings:** The regulations of Chapter 33.630 require that trees be considered early in the design process with the goal of preserving high value trees and, when necessary, mitigating for the loss of trees.

To satisfy these requirements, the applicant must provide a tree plan that demonstrates, to the greatest extent practicable, the trees to be preserved provide the greatest environmental and aesthetic benefits for the site and the surrounding area. The tree plan must also show that trees are suitable for preservation, considering the health and condition of the tree and development impacts anticipated. Tree preservation must be maximized, to the extent practicable, while allowing for reasonable development considering the intensity of development allowed in the zone and site constraints, including existing utility easements and requirements for services and streets.

Trees that are healthy, native and non-nuisance species, 20 or more inches in diameter and in tree groves are the highest priority for preservation. Additional considerations include trees that are slower growing native species, buffering natural resources, preventing erosion and slope destabilization and limiting impacts on adjacent sites.

Some trees are exempt from the requirements of this chapter, if they are unhealthy, a nuisance species, within 10 feet of a building to remain on the site, within an existing right-of-way, or within an environmental zone.

In order to identify which trees are subject to these requirements, the applicant provided a tree survey (Exhibit A.9) and preliminary plan (Exhibit C.1) that shows the location and size of trees on the site. The applicant also provided arborist reports (Exhibit A.11 & A.19) that identified

two trees, a 29-inch Douglas Fir (#34) and a 23-inch Western Red Cedar (#35), their condition and suitability for preservation, and specifies a root protection zone and tree protection measures for each tree to be preserved.

Both of these trees are considered high priority native trees per the Portland Plant List. The applicant's narrative (Exhibit A.18) addresses why it is not practicable to preserve both native trees and achieve the purpose of the R2.5 zone for development in relationship to housing goals allowed by the R2.5 zone. The applicant's narrative discusses the how the retention of the Douglas Fir tree was considered when designing development plans and the lot layout, for this land division proposal. The arborist report (Exhibit A.19) mentions preserving the Douglas Fir, has the greatest benefits and the development plans have been designed to prioritize the preservation of the more dominant Douglas Fir Tree.

Specifically, the applicant proposes to retain one of the two trees, the 29-inch Douglas Fir (#34), which is 50 percent of the trees that are 20 or more inches and 29 inches of the total 52-inches of tree diameter, so the proposal complies with Option 3 of the Tree Preservation standard which reads as follows:

Option 3: Preserve at least 50 percent of the trees that are 20 or more inches in diameter and at least 30 percent of the total tree diameter of the site.

The tree proposed for preservation is in good condition, a native tree-Douglas Fir, and is 29-inches in diameter. The arborist proposed an alternative root protection zones for the Douglas Fir tree to be retained and preserve the health of the tree for proposed development plan shown on Exhibit C.1 and A.19. At the recommendation of the arborist, an arborist is required to be on-site during any excavation within 22-ft. of this Douglas Fir Tree, which per Title 11.60.030.2 will require the applicant provide a contract for services of an arborist, prior to permit issuance. Also prior to final inspection of the new houses on Lots 4 and 5, a final arborist report will be required documenting the inspections and verifying the viability of this Douglas Fir Tree. This preservation plan will allow for the type of development anticipated in the R2.5 zone and will not conflict with any existing utility easements, proposed services.

Based on these factors, no additional mitigation is warranted to satisfy the approval criteria.

In order to ensure that future owners of the lots are aware of the tree preservation requirements, the applicant must record an Acknowledgement of Tree Preservation Land Use Conditions, at the time of final plat. The acknowledgement must identify that development on Lots 4 and 5 must be carried out in conformance with the Tree Preservation Plan (Exhibit C.1) and the Arborist Report (Exhibit A.19).

With the implementation of the noted conditions, the approval criteria will be met.

At the time of development, the individual lots must also meet the Title 11-Tree Code provisions, which require a specific amount of site area for tree planting based on the size of the property and the scale of the development. The trees to be retained as part of this review may be applied toward meeting those Title 11 requirements.

**G. Clearing, Grading and Land Suitability. The approval criteria of Chapter 33.635, Clearing, Grading and Land Suitability must be met.**

**Findings:** The regulations of Chapter 33.635 ensure that the proposed clearing and grading is reasonable given the infrastructure needs, site conditions, tree preservation requirements, and limit the impacts of erosion and sedimentation to help protect water quality and aquatic habitat.

Additionally, where geologic conditions or historic uses of the site indicate that a hazard may exist, the applicant must show that the proposed land division will result in lots that are suitable for development. The applicant may be required to make specific improvements to make the lots suitable for their intended uses and the provision of services and utilities.

Clearing and Grading: In this case, the site is primarily flat and is not located within the Potential Landslide Hazard Area. A preliminary erosion control plan (Exhibit C.3) and a preliminary improvement site utility plan (Exhibit C.1) was submitted, which reflects no significant clearing or grading will be required on the site to make the new lots developable. In addition, the applicant's tree preservation plan and arborist report (Exhibit A.14) discusses how tree #34 –Douglas Fir will be protected during construction of the future houses and accessory dwelling units on Lots 4 and 5. The arborist recommends an arborist supervise excavation when excavation occurs within 22-ft. of this Douglas Fir tree.

With the condition, that at the time of development, the building plans reflect the tree protection plan and arborist report, this criterion is met.

Land Suitability: The site was previously developed with a single-family house, a residential use, and there is no record of any other use in the plans. As indicated above, the site is relatively flat and contains no known geological hazards. Site Development Section of BDS notes the existing house and detached accessory structures were removed under demolition permits #19-104033 RS, 19-104096 RS, and 19-104108 RS. The existing septic system was decommissioned as part of the demolition permit, 19-104033 RS, for the house. Therefore, there are no anticipated land suitability issues and the new lots can be considered suitable for new development. This criterion is met.

**I. Solar access. If single-dwelling detached development is proposed for the site, the approval criteria of Chapter 33.639, Solar Access, must be met.**

**Findings:** The solar access regulations encourage variation in the width of lots to maximize solar access for single-dwelling detached development and minimize shade on adjacent properties.

Lots 1, 2 and 3 are for attached housing, therefore this approval criterion does not apply to these lots.

Lots 4 and 5 are on the east side of a north-south oriented street and are considered interior lots (not on a corner). In this context there is no preference that any one lot be wider or narrower than the other lots. This criterion is therefore met.

**K. Transportation impacts. The approval criteria of Chapter 33.641, Transportation Impacts, must be met; and,**

**Findings:** The transportation system must be capable of supporting the proposed development 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 and measures to mitigate impacts may be necessary.

The applicant provided a written narrative (Exhibit A.8) addressing the transportation approval criteria above.

The Development Review Section of the Portland Bureau of Transportation (PBOT) has reviewed the application against the evaluation factors and comments are summarized below (see Exhibit E.2 for specific details):

The applicant proposes to demolish the existing single-family residence to create a 5-lot subdivision with three lots fronting onto SE Duke, and two fronting onto SE 70th Ave. Based upon trip generation estimates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, each proposed parcel is projected to generate one additional morning and evening trip, for approximately ten daily trips for each new parcel. The net

addition of four single-family residences added to the transportation system resulting from the development will not adversely impact the operations of area intersections, as the proposed development adds few trips to the transportation network compared to existing volumes and is consistent with the zoning of the property. Therefore, the transportation system is capable of safely supporting the proposed development in addition to existing uses in the area. The applicant is proposing a shared driveway for the two lots off SE 70th, and no on-site parking for the three lots off SE Duke. Therefore, the resulting development will preserve 212 linear feet of on-street parking abutting the subject property, which maximizes on-street parking adjacent to the site and minimizes potential conflicts. The site is well served by transportation options to reduce impacts to the neighborhood and provide safety for all modes. Tri-Met bus service #19-Woodstock/Glisan directly abuts the site, in addition to #71-52nd and #72-Killingsworth/82nd within a mile from the site. SE Duke is an identified *City Bikeway*, which provides safe routes to other areas in the City on surrounding low volume traffic streets. The proposed development will construct a new pedestrian corridor to City standards along both frontages of the subject site, in addition to a new ADA curb extension in SE Duke, providing a separated pedestrian corridor which increases pedestrian safety, as discussed further under Criterion L. 3654. Therefore, the resulting proposed development will not negatively impact transit access or other transportation modes and will enhance pedestrian environment and improve pedestrian safety

As such, PBOT concludes the transportation system will be capable of supporting the proposed development in addition to the existing uses. Therefore, these criteria are met.

**L. Services and utilities. The regulations and criteria of Chapters 33.651 through 33.654, which address services and utilities, must be met.**

**Findings:** Chapters 33.651 through 33.654 address water service standards, sanitary sewer disposal standards, stormwater management, utilities and rights of way. The criteria and standards are met as shown in the following table:

<p><b>33.651 Water Service standard</b> – See Exhibit E.3 &amp; E.4 for detailed bureau comments.</p> <p>The Water Bureau has reviewed the applicant’s site utility plan (Exhibit C.1) and indicated that service is available to the site, as noted on page 3 of this report. Water Bureau notes there is an existing 5/8-inch metered domestic service within SE 70<sup>th</sup> Avenue in front of Lot 3, which may be used for the future development on Lot 3.</p> <p>Fire Bureau has reviewed the fire flow information (Exhibit A.7) and determined the nearest fire hydrant has adequate capacity for the future development on these lots.</p> <p>The water service standards of 33.651 have been verified.</p>
<p><b>33.652 Sanitary Sewer Disposal Service standards</b> – See Exhibit E.1 for detailed comments.</p> <p>The Bureau of Environmental Services (BES) has indicated that public sanitary service is available to the site, as noted on page 3 of this report.</p> <ul style="list-style-type: none"> <li>• The applicant’s site utility plan (Exhibit C.1) shows Lots 1 and 2 will receive sanitary service from the 8-inch public sanitary sewer in SE Duke Street. Lots 3, 4 and 5 will receive sanitary service from the 8-inch public sanitary sewer in SE 70<sup>th</sup> Avenue.</li> </ul> <p>BES reviewed the applicant’s site utility plan (Exhibit C.1) and comments are summarized below:</p> <p>According to available GIS data, a large 16-inch water main is located between the proposed development site and sanitary only main in SE Duke Street. The location of this water main may make connections to the sanitary sewer challenging. BES and Water Bureau reviewed the proposed sanitary connections under the Public Works 30% concept development plan and the connections appear to be feasible. However, the applicant should note that the Water Bureau may require a Utility Protection Plan (UPP) and sanitary laterals must meet</p>

required separation distances according to the Water Bureau.

BES finds the applicant's proposal for sanitary service acceptable for reviewing the preliminary land division application against the sanitary sewer disposal standard and approval criterion.

The sanitary sewer service standards of 33.652 have been verified.

**33.653.020 & .030 Stormwater Management criteria and standards – See Exhibits E.1**

No stormwater tract is proposed or required. Therefore, criterion A is not applicable.

Public Right-of-Way Stormwater Management: Bureau of Transportation (PBOT) requires the construction of public frontage improvements, which trigger public stormwater management improvements per the standards of the SWMM and the sewer and Drainage Facilities Design Manual. Per Public Works Permit (PWP)#TH0874 (#19-154888-WT), with the addition of a stormwater catch basin in SE 70<sup>th</sup>, stormwater from the public right-of-way improvements will be managed by the existing sump system in SE Duke Street. BES determined that no additional stormwater management facilities in the public right-of-way are required. BES Development Engineering performed a basic utility review and approved the Concept Development plans (i.e. 30% design) on 5/14/2019.

The applicant has proposed the following stormwater management methods for the lots (Exhibit C.1, A.5 A.6 & A.8)

- Lots 1, 2 and 3 (future attached houses): Stormwater from these lots will be directed to individual drywells within the front yard area adjacent to the street lot line. The drywells will treat the water and slowly infiltrate it into the ground. Each of these lots have enough area for a stormwater facility that can be adequately sized and meet setback standards and accommodate water from a reasonably sized home.
- Lots 4 and 5 (future detached houses): The submitted stormwater management/site utility plan reflects stormwater will be directed to individual drywell within the rear yard area and be adequately sized and meet setback standards and accommodate the water from a reasonably sized home.

BES noted the following in regard to Private Property Stormwater Management Infiltration Facility Setback Requirements: Note that infiltration facilities must be set back 5 feet from property lines and 10 feet from structures, as measured to the low point of vegetated facilities, the middle of drywells, and the edge of soakage trenches. Other required minimum setback distances that should be taken into account are summarized in Table 2-1 of the SWMM. BES will enforce these setbacks unless an alternative is allowed per the [BDS Drywell Location Code Guide](#) or is approved through the [BDS plumbing code appeal process](#). Note that the BDS code guide may allow drywells to be located closer than 5 feet from a property line if the property line is adjacent to a right of way (including streets, alleys and public or private pedestrian tracts). The code guide also includes criteria for reducing drywell setbacks to buildings.

The applicant's site utility plan shows Lots, 2 and 3, drywell location less than 5-ft. to the property line adjacent to the right-of-way (SE Duke Street).

Bureau of Environmental Services (BES) reviewed the applicant's stormwater management plan, Stormwater Drainage report (Exhibit A.5) and Simplified Approach Form (Exhibit A.7) and determined the proposed stormwater management plan (Exhibit C.1) is acceptable for reviewing the land division against the stormwater management approval criterion.

The stormwater management criteria and standard is met.

**33.654.110.B.1 Through streets and pedestrian connections**

Generally, through streets should be provided no more than 530 feet apart and pedestrian

connections should be provided no more than 330 feet apart. Through streets and pedestrian connections should generally be at least 200 feet apart.

The block on which the subject property is located meets the noted spacing requirements for north south streets, but not east-west streets. However, the site is a corner lot of the new frontage improvements will provide a pedestrian connection to serve the site and surrounding neighborhood, so no additional connection is warranted at this site. In addition, the site is not within an area that has an adopted Master Street Plan, so criterion d. does not apply.

For the reasons described above, this criterion is met.

**33.654.120.B & C Width & elements of the right-of-way** – See Exhibit E.2 for bureau comment

In reviewing this land division, PBOT relies on accepted civil and traffic engineering standards and specifications to determine if existing street improvements for motor vehicles, pedestrians and bicyclists can safely and efficiently serve the proposed new development.

Portland Bureau of Transportation (PBOT) comments are summarized below:

At this location, the City's Transportation System Plan (TSP) classifies SE Duke as a Neighborhood Collector, Transit Access street, City Walkway, City Bikeway, Secondary Emergency Response, and Community Corridor for design; whereas SE 70th Ave is classified as Local Service for all modes.

At this location, SE Duke is improved with an approximate 44-ft wide paved roadway within a 60-ft wide Right-of-Way (ROW), in which the pedestrian corridor is presently improved in an approximate 0-6-2 configuration. For *City Walkway* streets in the R-2.5 zone, the City's *Pedestrian Design Guide* requires a 12-ft pedestrian corridor consisting of a 0.5-ft curb, 4-ft furnishing zone, 6-ft sidewalk, and a 1.5-ft frontage zone. The existing pedestrian corridor does not meet City standards due to having a curb-tight, 8-ft pedestrian corridor.

At this location, SE 70th is improved with approximate 32-ft. paved roadway within a 50-ft wide ROW, lacking a curb and sidewalk. For a Local Service traffic street within an R2.5 zone, the City's right-of-way document recommends a 56-right-of-way to accommodate a 26-ft. wide roadway with parking on both sides and 15-ft. sidewalk corridors on each side, consisting of a 0.5-ft. curb, 8-ft. stormwater facility, 6-ft. sidewalk, and 0.5-ft. frontage zone.

For a corner, a single-curb extension is required at unsignalized intersections for sites outside of the Central City Plan District or a Pedestrian District, when those sites are located along a City Walkway and abut any street with a traffic classification greater than a Local Service. This site is a corner lot, where SE Duke street and SE 70<sup>th</sup> Avenue intersect, and no signal is provided. SE Duke Street is classified as both a Neighborhood Collector and City Walkway.

**Right-of-way (R-O-W) Improvement Requirements:**

- SE Duke Street: To accommodate meeting City Standards a 4-ft. street dedication will be required and reconstruction of the pedestrian corridor, which includes the corner to meet ADA standards. Also, a single-curb extension is required along SE Duke Street as part of the public works process.
- SE 70<sup>th</sup> Avenue: Frontage improvements (roadway, curb and sidewalk) are required along this frontage to accommodate meeting City Pedestrian Standards.

The applicant elected to construct the frontage improvements. The applicant submitted a Public Works Permit Application, 19-154888 WT (TH0872) for both street frontage improvements. During the Public Works permitting review process the Bureau of Environmental Services determined that a stormwater facility is not required along SE 70<sup>th</sup> Avenue (see discussion under 33.653.030). Due to no stormwater facility being required along this SE 70<sup>th</sup> Avenue's frontage, no street dedication was required along this street

frontage. This Public Works Permit, 19-154888 WT, has received 30 percent conceptual approval at this time. Prior to final plat approval the PBOT/City Engineer must receive final plans and a financial assurances/guarantees for the Public Works Permit for the frontage improvements along SE Duke Street and SE 70<sup>th</sup> Avenue.

As described above, Portland Bureau of Transportation (PBOT) has determined frontage improvements will be required along both these street frontages to meet City standards, which will ensure safe pedestrian travel is possible to and from the proposed development.

As a condition of final plat approval, the street dedication must be provided along SE Duke Street frontage. This street dedication must be reflected on the final plat survey.

With the required street dedication and frontage improvements, the width of the right-of-way will be sufficient to accommodate the expected users, including residents of the land division site and their visitors and other users passing through this area, PBOT has approved the elements within the right-of-way. With the conditions noted above this criterion is met.

### **33.654.120.H – Street Trees** -see Exhibit E.6 for bureau comments

The City Forester reviews this land division proposal for its impact on existing trees, heritage trees, street tree requirements and related mitigation, in accordance with Title 11, Tree Code.

Street Tree Planting (11.50.060.C): One street tree must be planted or retained for each full increment of 25 linear feet. Street trees must be planted at a minimum of 1.5 caliper inches and be a species chosen from an approved street tree list. Street tree planting may be exempt under 11.50.060.B when existing above or below utilities prevent planting street trees or when the existing planting strip is less than 3-ft. wide. Street trees are required to be planted through building or public works permits

Existing Street Conditions:

- SE Duke Street: The site has approximately 96-ft. of street frontage. The right-of-way is improved with pavement, curbs and sidewalks. There are no overhead high voltage power lines. There are zero street trees.
- SE 70<sup>th</sup> Avenue: The site has approximately 144-ft. of street frontage. The right-of-way is improved with pavement only. There are overhead high voltage power lines. There are zero street trees.

The applicant provided a conceptual street planting plan (Exhibit C.1) showing 7 street trees to be planted.

Prior to the land division there would have been enough planting area for nine (9) street trees. After the proposed land division there will only be enough room seven (7) street trees due to the new lot configuration. A fee in lieu of planting is required to be paid for permanent loss of available street planting spaces along these two street frontages.

With the following conditions of approval, Urban Forestry has no objections to this land division. Prior to final plat approval the applicant must pay a fee in lieu of planting payment for the permanent loss of two (2) street trees.

With the conditions noted above, this criterion is met.

### **33.654.130.A - Utilities (defined as telephone, cable, natural gas, electric, etc.)**

Any easements that may be needed for private utilities that cannot be accommodated within the adjacent right-of-way's can be provided on the final plat. At this time no specific utility easements adjacent to the right-of-way have been identified as being necessary. Therefore, this criterion is met.

## DEVELOPMENT STANDARDS

Development standards that are not relevant to the land division review, have not been addressed in the review. Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 11 can be met, and those 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.

### Future Development

Among the various development standards that will be applicable to this lot, the applicant should take note of:

Narrow Lots- Development on Lots 1, 2 and 3 will be subject to the following standards at the time of development permitting:

- Height of the structures will be limited to 1.5 times the width of the structure, per 33.110.215.B.2; and
- No garages allowed, since no on-site parking allowed per covenant as required by findings and applicant's proposal discussed under Narrow Lots (33.611.200.C.2.f.).

Attached Houses-The Alternative development standards of 33.110.240.C.2 for attached housing in the R2.5 will be required to be met for Lots 1, 2 and 3, which also includes the following:

- Landscape standards. All street-facing facades must have landscaping along the foundation. There must be at least one three-gallon shrub for every 3 lineal feet of foundation; and
- Sixty percent of the area between the front lot line and the front building line must be landscaped. At a minimum, the required landscaped area must be planted with ground cover. Up to one-third of the required landscaped area may be for recreational use, or for use by pedestrians. Examples include walkways, play areas, or patios.

The site is currently vacant, so the division of the property will not cause the structures to move out of conformance or further out of conformance with any development standard applicable in the R2.5 zone. Therefore, this land division proposal can meet the requirements of 33.700.015.

## OTHER TECHNICAL REQUIREMENTS

Technical decisions have been made as part of this review process. These decisions have been made based on other City Titles, adopted technical manuals, and the technical expertise of appropriate service agencies. These related technical decisions are not considered land use actions. If future technical decisions result in changes that bring the project out of conformance with this land use decision, a new land use review may be required. The following is a summary of technical service standards applicable to this preliminary partition proposal.

Bureau	Code Authority and Topic
Development Services/503-823-7300 <a href="http://www.portlandonline.com/bds">www.portlandonline.com/bds</a>	Title 24 – Building Code, Flood plain Title 10 – Erosion Control, Site Development Administrative Rules for Private Rights-of-Way
Environmental Services/503-823-7740 <a href="http://www.portlandonline.com/bes">www.portlandonline.com/bes</a>	Title 17 – Sewer Improvements 2008 Stormwater Management Manual
Fire Bureau/503-823-3700 <a href="http://www.portlandonline.com/fire">www.portlandonline.com/fire</a>	Title 31 Policy B-1 – Emergency Access
Transportation/503-823-5185 <a href="http://www.portlandonline.com/transportation">www.portlandonline.com/transportation</a>	Title 17 – Public Right-of-Way Improvements Transportation System Plan
Urban Forestry (Parks)/503-823-4489 <a href="http://www.portlandonline.com/parks">www.portlandonline.com/parks</a>	Title 11 –Trees
Water Bureau/503-823-7404	Title 21 – Water availability

<a href="http://www.portlandonline.com/water">www.portlandonline.com/water</a>	
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As authorized in Section 33.800.070 of the Zoning Code conditions of approval related to these technical standards have been included in the Administrative Decision on this proposal.

- The applicant at the time of development must meet the requirement of the Fire Bureau regarding addressing requirements; fire apparatus and aerial access. These requirements are based on the technical standards of Title 31 and Fire Bureau Policy B-1.

## CONCLUSIONS

The applicant has proposed a five-lot subdivision, as shown on the attached preliminary plans (Exhibit C.2 & C.1). The attached housing lots, Lots 1, 2 and 3, are considered narrow lots. Lots 4 and 5 are standard detached single-family housing lots. As discussed in this report, the relevant standards and approval criteria have been met, or can be met with conditions.

The primary issues identified with this proposal are: The R2.5 zone provides for a mix of housing types and the proposed lots will provide for attached housing and detached houses. The proposed lots meet the lot dimension regulations and are consistent with the desired character of the R2.5 zone. Additional development standard are required to be met for the narrow lots at the time of development. No on-site parking is required for this site, since frequent transit service is provided on SE Duke Street via TriMet Bus Line#19. Street dedication is required along SE Duke Street. Frontage improvements are required along SE Duke Street and SE 70<sup>th</sup> Avenue to bring the site into compliance with City pedestrian standards. A Public Works permit is required to construct these frontage improvements. Due to the lot configuration there will be a loss of available street tree planting space along this site's frontage. At the time of development on Lots 4 and 5, the Douglas Fir tree (#34) will be preserved in accordance with the arborist report and tree preservation plan.

With conditions of approval that address these requirements this proposal can be approved.

## ADMINISTRATIVE DECISION

**Approval** of a Preliminary Plan for a five (5) lot subdivision, that will result in three attached housing narrow lots (Lots 1, 2 and 3) and two (2) detached single-dwelling standard lots (Lots 4 and 5), as illustrated with Exhibit C.2, subject to the following conditions:

### A. The final plat must show the following:

1. The applicant shall meet the street dedication requirements of the City Engineer for SE Duke Street. The required right-of-way dedication must be shown on the final plat.
2. A recording block for each of the legal documents such as maintenance agreement(s), acknowledgement of special land use conditions, or Declarations of Covenants, Conditions, and Restrictions (CC&Rs) as required by Condition B.2 below. The recording block(s) shall, at a minimum, include language substantially similar to the following example: "A Declaration of Acknowledgement of Tree Preservation Land Use Conditions, has been recorded as document no. \_\_\_\_\_, Multnomah County Deed Records."

### B. The following must occur prior to Final Plat approval:

#### Streets

1. The applicant shall meet the requirements of the City Engineer for right of way improvements along the site's street frontage. The applicant shall complete the application for a Public Works Permit and provide plans and financial assurances to the satisfaction of the Portland Bureau of Transportation for required street frontage improvements.

**Required Legal Documents**

2. The applicant shall execute an Acknowledgement of Tree Preservation Land Use Conditions that notes tree preservation requirements that apply to Lots 4 and 5. A copy of the approved Tree Preservation Plan must be included as an Exhibit C.1 and Arborist Report (Exhibit A.14) to the Acknowledgement. The acknowledgment shall be referenced on and recorded with the final plat.
3. The applicant shall execute a covenant with the city that prohibits the development of an off-street parking space or curb cut on the attached housing lots, Lots 1, 2 and 3, unless the applicant demonstrates that regulations in effect at that time are met. The covenant must meet the requirements of section 33.700.060 and must be referenced on and recorded with the plat.

**Other requirements**

4. The applicant must pay into the City Tree Preservation and Planting Fund [Street Trees – Fee in Lieu of Planting and Establishment (per inch)] the amount equivalent to 3 inches of trees (a fee for the loss of two (2) street trees-1.5-inches each). Payment must be made to the Bureau of Development Services, which administers the fund for the Parks Bureau.

**C. The following conditions are applicable to site preparation and the development of individual lots:**

1. Development on Lots 4 and 5 shall be in conformance with the Tree Preservation Plan (Exhibit C.1) and the applicant's arborist report (Exhibit A.14). Specifically, Tree identified by the arborist report as #34, Douglas Fir, is required to be preserved, with the root protection zones indicated on Exhibit C.1 & the arborist report (Exhibit A.14). Tree protection fencing is required along the root protection zone of the trees to be preserved. The fence must be 6-foot high chain link and be secured to the ground with 8-foot metal posts driven into the ground. This tree preservation plan requires an arborist to be on site when any excavation occurs with 22-ft of this Douglas Fir. A copy of the contract for the arborist services to be on-site during this time, must be provided to Planning prior to permit issuance as required by Title 11.60.030.C.2.d. Also, a final report from the arborist documenting the inspections and verifying the viability of the Douglas Fir (#34) must be provided prior to the City's Final inspection of the building permit.
2. Lots 1, 2 and 3 must be developed with attached dwelling units and meet the development standards of 33.110.240.C.2.
3. The applicant must meet the Fire Bureau requirements for addressing and aerial fire department access. Aerial access applies to buildings that exceed 30 feet in height from the fire access as measured to the bottom of the eave of the structure or the top of the parapet for a flat roof.
4. No on-site parking space(s) or vehicular curb cuts are permitted on Lots 1, 2 and 3, the attached housing lots, unless the applicant demonstrates that regulations in effect at that time are met.

**Staff Planner: Lois Jennings****Decision rendered by:**  **on July 1, 2019**

By authority of the Director of the Bureau of Development Services

**Decision mailed July 3, 2019**

**About this Decision.** This land use decision is **not a permit** for development. A Final Plat must be completed and recorded before the proposed lots can be sold or developed. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

**Procedural Information.** The application for this land use review was submitted on April 15, 2019 and was determined to be complete on May 16, 2019.

*Zoning Code Section 33.700.080* states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore, this application was reviewed against the Zoning Code in effect on April 15, 2019.

*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 September 13, 2019.**

**Note: 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 July 17, 2019** at 1900 SW Fourth Ave. Appeals can be filed at the 5<sup>th</sup> floor reception desk of 1900 SW 4<sup>th</sup> 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 contact the receptionist at 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.ci.portland.or.us](http://www.ci.portland.or.us) .

**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 land division.** The final land division plat **must** be submitted to the City **within three years** of the date of the City's final approval of the preliminary plan. This final plat must be recorded with the County Recorder and Assessors Office after it is signed by the Planning Director or delegate, the City Engineer, and the City Land Use Hearings Officer, and approved by the County Surveyor. **The approved preliminary plan will expire unless a final plat is submitted within three years of the date of the City's approval of the preliminary plan.**

#### **EXHIBITS**

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
  - 1. Neighborhood contact documentation
  - 2. November 13, 1968 Deed information
  - 3. Operating Agreement of Portland Housing Works LLC
  - 4. Fidelity National Title report
  - 5. Preliminary Stormwater Drainage Calculations report
  - 6. Simplified Approach Form for Stormwater
  - 7. Fire Flow Service information from Water Bureau
  - 8. Narrative Addressing Land Division Approval Criteria
  - 9. Existing Conditions Survey
  - 10. Preliminary plans (C1-C3) by Pinnacle Engineering
  - 11. April 11, 2019 Arborist Report
  - 12. March 22, 2019 Post Excavation Report by arborist
  - 13. May 16, 2019 Applicant's response to incomplete letter
  - 14. May 16, 2019 Applicant's additional narrative addressing Lot Dimension Regulations
  - 15. May 16, 2019 Revised Preliminary improvement plat plan- C1 from Pinnacle Engineering
  - 16. June 3, 2019 cover letter from applicant submitting additional survey information
  - 17. Preliminary lot plan of subdivision by Centerline Surveying submitted June 3, 2019
  - 18. June 10, 2019 cover letter from applicant addressing tree preservation approval criteria an submitting new arborist report
  - 19. May 19, 2019 Arborist Report submitted on June 10, 2019 by applicant
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Preliminary Site & Utility Plan by Pinnacle Engineering (attached)
  - 2. Preliminary Lot plan by Centerline Concepts (attached)
  - 3. Preliminary Erosion Control Plan by Pinnacle Engineering
  - 4. Preliminary Plat Plan with building footprints and landscaping by Pinnacle Engineering
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice

E. Agency Responses:

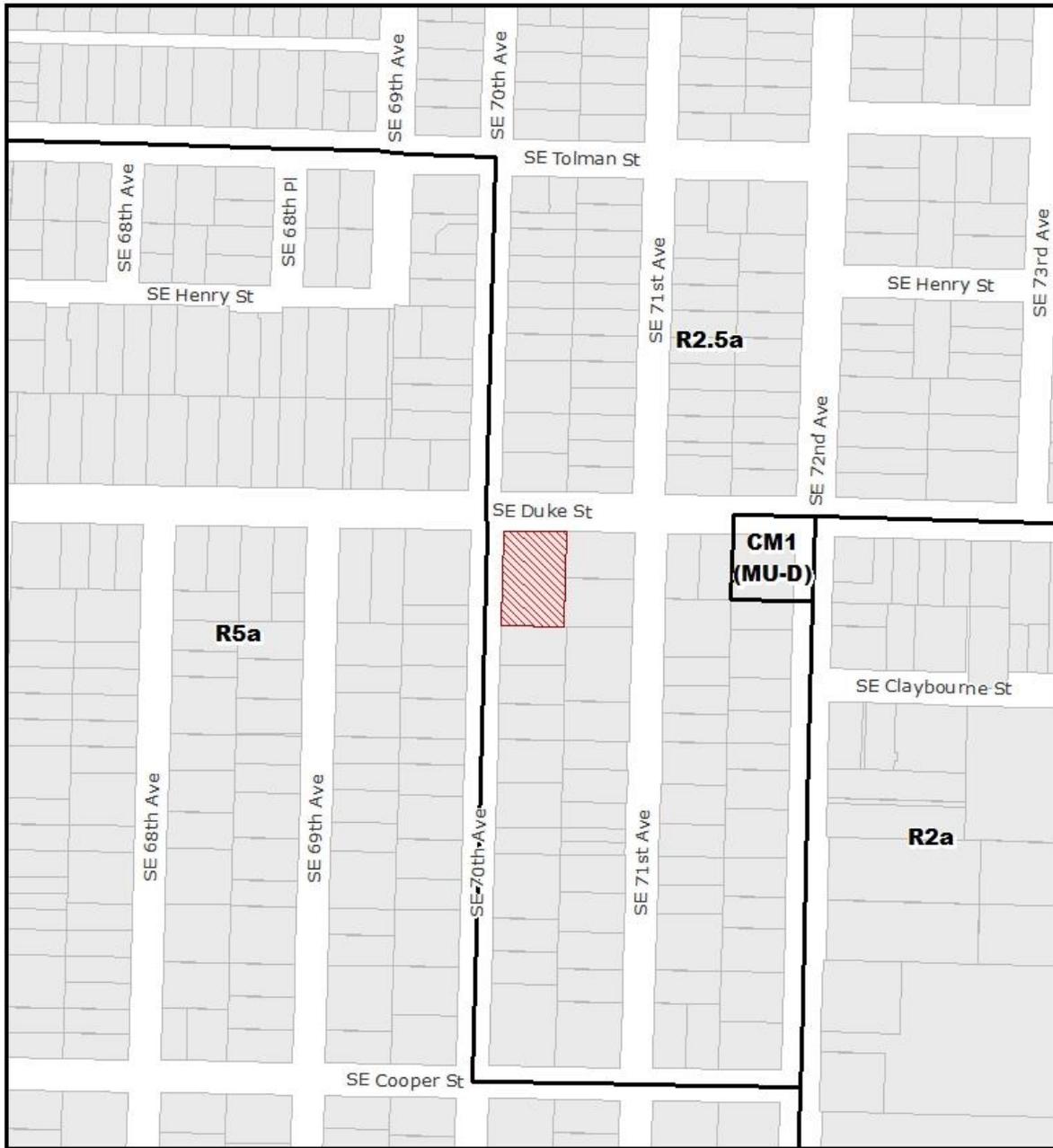
1. Bureau of Environmental Services
2. Bureau of Transportation Engineering and Development Review
3. Water Bureau
4. Fire Bureau
5. Site Development Review Section of BDS
6. Bureau of Parks, Forestry Division
7. Life Safety Section of BDS

F. Correspondence: None

G. Other:

1. Original LU Application
2. Expedited Land Division Acknowledgement form signed
3. May 9, 2019 Incomplete Letter
4. Tax Assessor Map showing lots of similar sizes within the vicinity
5. 2035 Comprehensive Plan Designation of R2.5 zone
6. E-mail communication with applicant

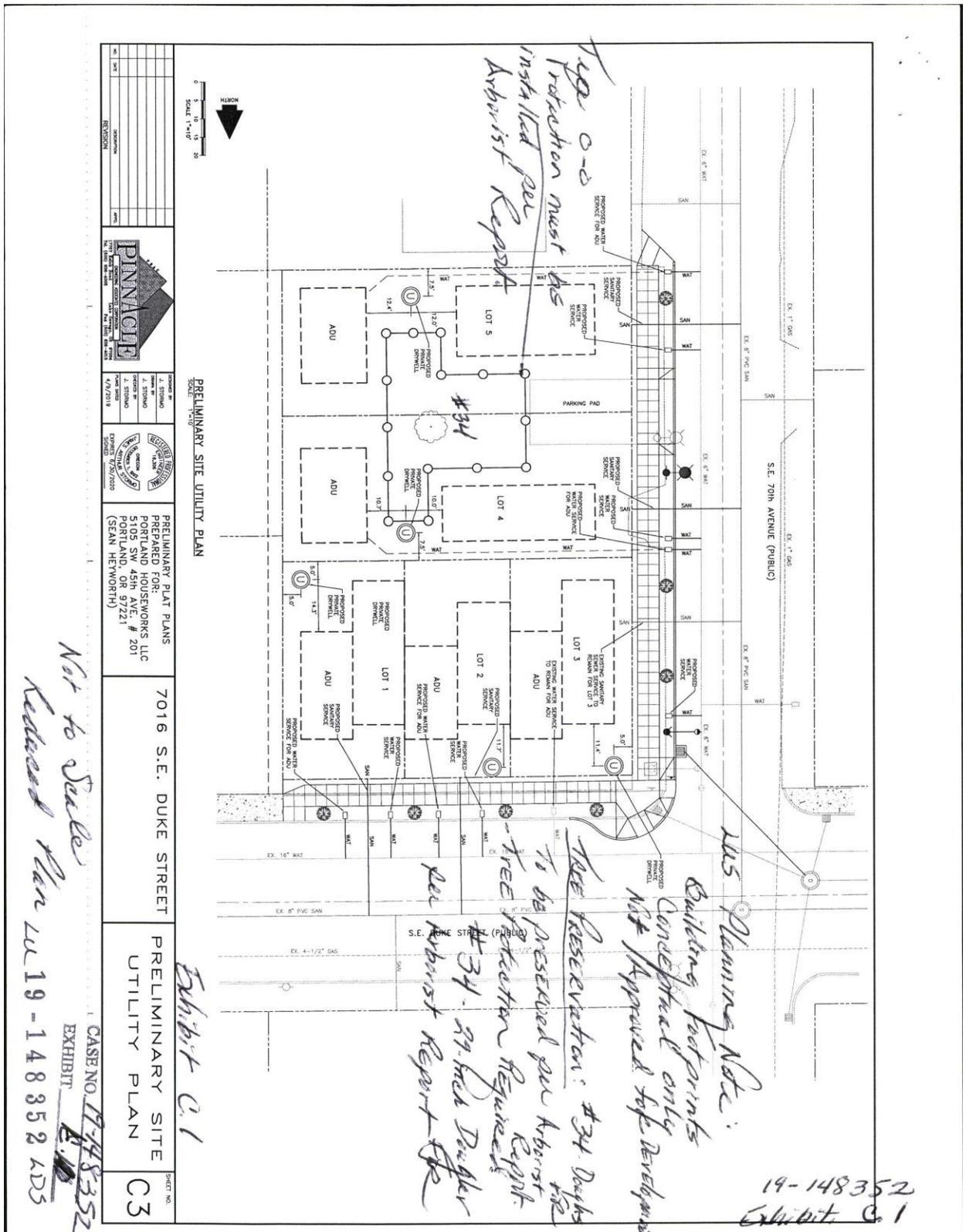
**The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).**



**ZONING**   
NORTH

 Site

File No.	LU 19-148352 LDS
1/4 Section	3737
Scale	1 inch = 200 feet
State ID	1S2E20BA 5000
Exhibit	B Apr 16, 2019

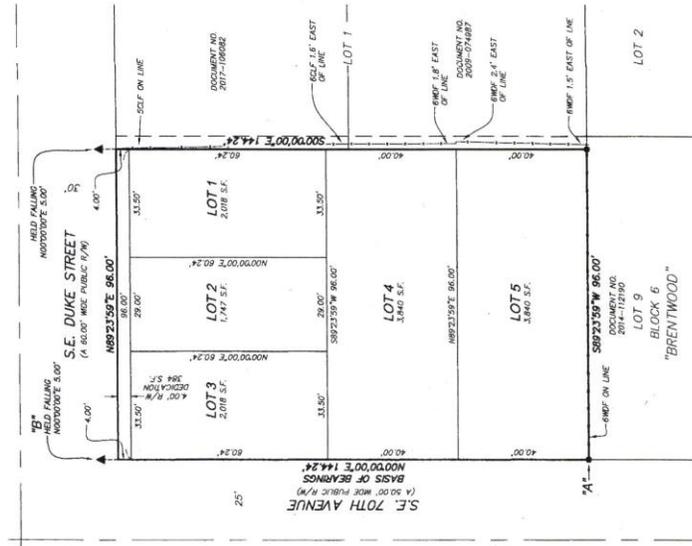


*Not to Scale*  
*Revised Plan LU 19-148352 ADS*

CASE NO. 19-148352  
 EXHIBIT C1

# PRELIMINARY LOT PLAN

A REPLAT OF A PORTION OF LOT 10,  
BLOCK 6, "BRENTWOOD", LOCATED IN THE  
N.W. 1/4 SECTION 20, T.1S., R.2E., W.M.  
CITY OF PORTLAND, MULTNOMAH COUNTY, OREGON  
MAY 22, 2019 SCALE 1"=20'  
PLANNING FILE NO.  
SHEET 1 OF 1



- LEGEND:**
- FOUND AND HELD 5/0" IRON ROD W/ RED PLASTIC CAP MARKED "CENTERLINE CONCEPTS" FROM SN 86519
  - ▲ 1/4" IRON PEGS MARKED "YOUNG 1.5 8037" FROM SN 86519
  - PA = RIGHT OF WAY
  - PL = PLASTERED CONCRETE
  - DOCUMENT NO. = DEED DOCUMENT NUMBER, MULTNOMAH COUNTY, OREGON
  - SN = SURVEYOR'S NUMBER, MULTNOMAH COUNTY, OREGON
  - EMF = 6" WOOD FENCE
  - SCF = 6" CHAINLINK FENCE

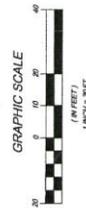
SIGNED ON: 12.14.2019  
**REGISTERED PROFESSIONAL LAND SURVEYOR**  
 JULY 13, 2004  
 10877 S.E. 10TH AVE.  
 PORTLAND, OREGON 97216  
 RENEWS: DECEMBER 31, 2019



**CENTERLINE CONCEPTS**  
 LAND SURVEYING, INC.  
 19376 MCALLA AVE., SUITE 120  
 PORTLAND, OREGON 97228  
 PHONE 503.850.0189

PORTLAND PROJECTS/PORTLAND ROSEBORO-SONE ST.-SE-2019 (copy) PLAN MAP.dwg

LU 19-148352 LDS  
Exhibit C.2



CASE NO. 19-148352  
 EXHIBIT C.2