



Hearings Office

City of Portland

1900 SW 4th Avenue, Room 3100, Portland, OR 97201 phone: 503.823.7307
www.portlandoregon.gov/hearings fax: 503.823.4347
email: HearingsOfficeClerks@portlandoregon.gov



DECISION OF THE HEARINGS OFFICER

I. GENERAL INFORMATION

File Number: LU 19-137608 HPR AD (Hearings Office 4190022)

Applicant: Jessica Engeman
Venerable Group, LLC
1111 NE Flanders Street, Suite 206
Portland, OR 97232

Owner's Representative: Eric Paine
Alberta Abbey, LLC
3416 Via Oporto, Suite 301
Newport Beach, CA 92633

Hearings Officer: Fred Wilson

Bureau of Development Services (BDS) Staff Representative: Amanda Rhoads

Site Address: 126 NE Alberta Street

Legal Description: BLOCK 3 LOT 1&2, MAEGLY HIGHLAND

Tax Account No.: R526700780

State ID No.: 1N1E22AD 03400

Quarter Section: 2530

Neighborhood: King

Business District: Soul District Business Association

**District
Neighborhood
Coalition:** Northeast Coalition of Neighborhoods

Plan District: None

Other

Designations: Mallory Avenue Christian Church, designated as a Portland Historic Landmark on January 11, 2019

Zoning: R1 – Multi-Dwelling Residential 1,000

Land Use Review: Type III, HPR AD – Historic Preservation Incentive Review with concurrent Adjustment Review

BDS Staff Recommendation to Hearings Officer: Approval with conditions.

Public Hearing: The hearing was opened at 9:00 a.m. on January 15, 2020, in the third floor hearing room, 1900 SW 4th Avenue, Portland, Oregon, and was closed at 9:03 a.m. The hearing was continued to February 26, 2020 at the applicant's request.

On February 26, 2020, the hearing was opened at 9:02 a.m. in the third floor hearing room, 1900 SW 4th Avenue, Portland, Oregon, and was closed at 11:12 a.m. The record was held open until 4:00 p.m. on March 25, 2020 for new evidence; until 4:00 p.m. on April 1, 2020 for response to new evidence; and until 4:00 p.m. on April 8, 2020 for the applicant's final response. The record was closed at 4:00 p.m. on April 8, 2020.

Testified at the Hearings:

January 15, 2020 - Damien Hall

February 26, 2020 - Amanda Rhoads, Damien Hall, Mark Takiguchi, Jessica Engeman, Julia Kuhn, Douglas Hardy, Richard Hunter Sr., and Bob Haley.

II. ANALYSIS

The Staff Report provides an excellent summary of the proposed use and subject property:

"The applicant is seeking Historic Preservation Incentive Review approval of a request to allow up to 100% nonresidential uses in the R1 zone as stipulated in Zoning Code Section 33.445.610.C.8. The applicant seeks to legalize existing Retail Sales and Service and Office uses in the building initiated by previous owners. This includes a performance space in the main auditorium, workspace for artists and arts organizations, a café, and space rental opportunities.

"The building is 29,500 square feet, originally constructed as a church in 1949 on a basement that dates to 1925. The last permitted use in the structure was a Religious Institution. The building was designated as a Portland Historic Landmark January 11, 2019. The parking lot to the north of NE Alberta St is in separate ownership and is not part of the current proposal.

"As part of legalizing the Retail Sales and Service and Office uses, the applicant requests an Adjustment to required parking for the uses. Per Zoning Code Section 33.266.110.B.1, sites within 500 feet of a transit street with 20-minute peak hour service require no parking for Office or Retail Sales and Service uses. The Alberta Abbey site is located 520 feet from NE Martin Luther King, Jr Blvd, the nearest transit street meeting this service definition. Therefore, the site is subject to minimum parking requirements of Table 266-2.

"Based on a breakdown of theater seats and square footage for office, basement gymnasium and café uses as seen in the attached Sheet Ao.02 (Exhibit C.3), the minimum parking required is 133 spaces. With the removal of the parking lot that historically served the church from the site, no parking is proposed to be provided. Therefore, the applicant requests an Adjustment to 33.266.110.B.2 and Table 266-2 to reduce the number of required parking spaces from 133 spaces to 0 spaces.

"No exterior alterations are currently proposed to the building or site, except for maintenance or Life Safety requirements for forthcoming change of occupancy permits, so Historic Resource Review is not expected.

"* * * * *

"The Mallory Avenue Christian Church is a modern church located at the corner of NE Alberta Street and NE Mallory Avenue in Portland's Albina Community Plan Area and the King Neighborhood. The building had an associated surface parking lot across the street to the north on Alberta, which is not included in the current proposal and which has been moved into separate ownership from the church building.

"The church sits on a square-shaped 10,000 square-foot lot that is 100 feet in each direction. This is double the typical 50x100' residential lot size in Portland. The 1949 building is primarily two stories tall, with the corner tower having three levels. It sits on a seven-foot-tall daylight concrete basement foundation that was constructed in 1925. The predominant exterior material is brick in a brown-orange-beige palette. The south wall of the church, which was originally specified to be stucco, has been sided with painted corrugated aluminum siding.

All of the windows on the building's primary elevation are original metal 'Trim-Set' windows, many with original wavy colored glass.

"While the building is generally square-shaped in plan, it has a complex roof form and many changes in the wall plane that disguise the square form. The primary roof form is a north-south gable roof with an east-facing cross gable and corner tower. There is a smaller west-facing gable extension at the northwest corner of the building. All of the gable roofs have a 12-7 roof pitch. A small shed roof extends from the southwest corner at the back of the property at the location of a chimney stack. There are solar panels on the south-facing slopes of the east and west-facing gable extensions and other rooftop equipment on the flat section of roof at the southeast corner of the building. The building retains its original copper gutters, downspouts, and rake moldings that feature verdigris.

"The character of the surrounding blocks is primarily single-family residential with some multi-family buildings. Nonresidential development, including both commercial and institutional uses, are located within a couple of blocks, to the west along North Williams Avenue, and to the east along NE Martin Luther King Boulevard. At this location, NE Alberta is classified as a Transit Access Street, City Bikeway and Local Service Walkway. Northeast Mallory is designated as a Local Service Street for all transportation modes." Staff Report, pages 1-3.

The Staff Report thoroughly explains how all of the applicable approval criteria are satisfied. The overwhelming number of findings in the Staff Report are not challenged. It would be a waste of the City's money and resources to review and repeat all of the unchallenged findings in the Staff Report. I have reviewed the findings in the Staff Report and I agree with those findings. Therefore, I adopt and incorporate the findings in the Staff Report in this decision, except as discussed further.

A number of neighbors oppose the application. Although the neighbors do not cite any specific Portland City Code (PCC) provisions, the objections concern traffic and parking. The neighbors' objections were thoroughly addressed and rejected in the Staff Report. I cannot say it any better than the Staff Report. As discussed earlier, the findings and conclusions from the Staff Report are incorporated in this decision.¹

The crux of this case involves the applicant's objection to two proposed conditions of approval – Condition B and Condition E. Condition B involves the limitation on the number of guests

¹ A number of opponents raised the issue of potential development of a surface parking lot that used to be part of the same ownership as the subject property as a needed housing development. This application does not involve that parking lot or any potential use of that property.

permitted during Abbey events to ensure traffic impacts are acceptable. Condition E involves whether and when the Abbey must obtain building permits.

A. Condition of Approval B

The issue of parking arises under a number of approval criteria. Initially, because the Abbey is more than 500 feet away from a bus line with a 20-minute peak hour service, the Abbey would be required to provide 133 parking spaces.² The Abbey seeks an adjustment under PCC 33.805.010 to eliminate the need for the otherwise required 133 spaces. As the Staff Report explains under its analysis of PCC 33.805.010, parking issues arise under other approval criteria as well. The analysis, however, is the same under all of the applicable approval criteria. The Staff Report explains how that analysis is conducted:

“When evaluating land use requests that require an assessment of on-street parking impacts, PBOT typically utilizes an 85% occupancy threshold for determin[ing] whether the existing supply of on-street parking can accommodate additional demand. 85% occupancy represents a threshold above which drivers will likely begin to circle the block in order to find an unoccupied parking space.

“To address the approval criteria associated with on-street parking impacts, the applicant’s traffic engineer conducted a parking study to measure existing parking demand associated with current activities include larger events. * * *

“* * * * *

“The analysis demonstrated that, with the exception of the larger Bluegrass Festival, the impacts upon the on-street parking capacity within the study area was within PBOT thresholds (at or below 85% occupancy). However, the larger, 400-person event caused the occupancy rate to exceed PBOT thresholds. PBOT’s traffic engineer worked with the applicant’s traffic consultant and determined that large-scale special events capped at a maximum attendance of 330 people would generally remain within the 85% thresholds. Events that exceed 330 people should not be permitted due to their potential to negatively impact on-street parking in the study area.” Staff Report, pages 16-17.

The Staff Report proposed Condition of Approval B as follows:

“Maximum capacity of people at all events/activities occurring at the site at any one time is 250 persons. However, up to 8 times a year, this maximum limit may

² Unfortunately for the Abbey it is 520 feet away from bus service, so it misses not being required to provide any parking spaces by 20 feet.

be increased to 251-330 persons. More than 330 persons onsite at any one time is prohibited.”

As the Staff Report explains, the limitation is to ensure that the 85 percent occupancy threshold is not exceeded. The Abbey argues that because the events are of limited duration and sporadic that a 90 percent occupancy threshold should be utilized. While the Abbey’s arguments are not unreasonable, I do not see that I need to decide between the 85 percent and 90 percent threshold, as the Abbey can satisfy the 85 percent threshold and still have the number of guests it wishes.

As the Staff Report explains, the Abbey can meet the 85 percent threshold with a limitation of 330 guests. The Portland Bureau of Transportation (PBOT) explained that if the Abbey had a shared parking agreement (which it did not at the time), then the number of guests could be increased. The Abbey has provided a shared parking agreement for 23 parking spaces. The Abbey and PBOT agree that each additional space translates into 2.5 additional guests. Therefore, with the shared parking agreement, the Abbey would not exceed the 85 percent occupancy threshold until 389 guests. This is more than sufficient to satisfy the Abbey’s request to modify the condition of approval to allow up to 350 guests.

The Abbey also wishes to modify the condition of approval to allow over 350 guests (based on 2.5 additional guests per each additional parking space) if additional parking spaces are available. The Abbey explains that in addition to the 23 parking spaces already included in the shared parking agreement that it is involved in discussions to procure up to 70 potential additional parking spaces. Although there is the potential problem of enforcement of the requirement to procure the additional spaces, I do not think decisions should be made based on the assumption that applicants will willingly violate their conditions of approval. Furthermore, as the Abbey explains, with or without the potential additional parking spaces the process is complaint driven, and the Abbey would have to produce the additional shared parking agreements if there are complaints. Therefore, Condition B is modified as follows:

“The Abbey shall not exceed the following peak occupancy:

- 350 patrons when no off-street parking is available to Abbey patrons;
- When off-street parking is available to Abbey patrons, peak occupancy may exceed 350 patrons by the number of off-street parking stalls available multiplied by 2.5.”³

³ The Abbey’s suggested modification also included language that would allow up to five events that would exceed these limitations – apparently without any limitation at all on the number of guests. I presume that was based on the staff’s recommendation to allow up to eight events that would exceed the originally recommended 250 guests. The staff’s recommendation that would have allowed up to eight events that exceeded the 250 guest limit still capped the number of guests at 330. I do not see any basis for allowing an unlimited number of guests – even if for a small number of events.

B. Condition of Approval E

PCC 33.815.105.C.2 provides:

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

"* * * * *

"2. Privacy and safety issues."

The Staff Report states:

"Safety can refer to risks of neighbors experiencing crime as a result of people brought to a location by an event, but also the safety of the building itself and risk of impact to nearby property and life from fires or other activities at the subject site. * * *

"Safety of the building is usually ensured by requiring that all permits are finalized prior to the approved activity commencing in the building. In this case, prior owners initiated new uses in the historic church building without benefit of required permits, then sold the building to the current owners prior to addressing the required change of occupancy permits. Representatives for the current owners met with BDS Commercial Plans Examiners in a preliminary Life Safety meeting in May 2019 to discuss options for legalizing retail, event, and office occupancies in the church building. Several possible paths were laid out for Alberta Abbey to pursue (Exhibit G.6). Recent conversation with the Plans Examiner at that May meeting confirmed that other than an email exchange in August, no further follow-up with BDS has been initiated by the Abbey since that May meeting (see Exhibit G.7 for the August emails). Complicating the process is an updated Building Code in effect as of January 2020; it is not clear whether an analysis of what will be required of the church building has been completed for the old or new code.

"The building has been operating for some six years without the required permits. In order to ensure the safety of guests and the safety of the wider residential area, this approval will be conditioned on a requirement to apply for and have issued all required change of occupancy permit(s) within six months of the approval of this land use decision, and to final all permit(s) within 12 months of the approval of this land use decision. This approach moves the Abbey toward full compliance with all required permits within a year without requiring

them to cease operations (and their revenue stream) until the work is completed.” Staff Report, page 10.

The Staff Report proposed the following condition of approval to satisfy PCC 33.815.105.C.2:

“Alberta Abbey will apply for all required building permits to accomplish the appropriate change of occupancy/ies of the building. The permit must be issued within 6 months of this land use approval. All permits must be finalized within 12 months of this approval.”

The Abbey argues that this condition of approval is not related to PCC 33.815.105.C.2. I tend to agree with the Abbey that ensuring the “livability of nearby residential zoned lands” due to “privacy and safety issues” does not include considerations of building permits. Livability generally involves day to day impacts that cause inconveniences and disturbances. For instance, PCC 33.815.105.C.1 addresses impacts from “[n]oise, glare from lights, late-night operations, odors, and litter[.]” The only issue the Staff Report identifies as constituting a “safety issue” is the potential for fires. I am skeptical that this is the type of safety issue envisioned by PCC 33.815.105.C.2. I think safety refers more to concerns about crime as the following portion of the Staff Report addresses:

“One commenter did write in with concerns about physical fights people leaving the Abbey allegedly engaged in with one another after an event in August (Exhibit F.16). It’s not clear if security was present at that event or where the alleged fights occurred. There is no evidence in the record indicating that this is a common occurrence. The writer of the letter likewise does not state this has ever happened before.

“The Police Bureau reviewed the proposal and evaluated it on whether police can provide adequate public safety services. They responded concluded the Police Bureau will be able to provide services to the site when 100 percent of the building is nonresidential; no conditions of approval were requested (Exhibit E.7). Staff finds that, despite the letter from the neighbor, the evidence in the record is sufficient to find the criterion is met with respect to public safety.”
Staff Report, page 10.

Even if speculative concerns about potential fires could constitute a “safety issue” for purposes of “livability of nearby residential zoned lands,” there is nothing in PCC 33.815.105.C.2 that requires or even suggests that compliance with building codes must be accomplished in a specific time frame.⁴ The Abbey argues persuasively that the upgrades the City appears to require would cost well over 6 million dollars and could not be completed in 12 months. A

⁴ The Abbey is required to comply with applicable building code provisions independently of this land use application. Thus, any conditions of approval imposed by this decision are in addition to existing requirements.

hypothetical concern about potential fires seems a slender reed to base an over 6 million dollar condition of approval that could not even be accomplished in the required time frame.

The Abbey further argues that it would be an unconstitutional taking to impose Condition E. The Staff Report relies on PCC 33.800.070 to allow the City to impose such conditions. PCC 33.800.070 provides:

“The City *may attach conditions* to the approval of all discretionary reviews. However, conditions may be applied only to ensure that the proposal will conform to the applicable approval criteria for the review or to ensure the enforcement of other City regulations.” (Emphasis added.)

PCC 33.800.070 is in the General Information on Land Use Reviews section of the PCC – not in any provisions regarding the application in this case. As the emphasized language illustrates, this is a discretionary rather than mandatory provision. While it may be appropriate to use this catch all provision to impose conditions of approval unrelated to the applicable approval criteria in some cases, I do not think it would be appropriate in this case. As discussed, the building permits alleged to be required would be extremely expensive and could not feasibly be completed within 12 months. Given the unfolding situation involving the coronavirus, it would seem unduly harsh to impose time limits when even if the Abbey made every effort to meet the deadline, it may not be possible due to extraneous circumstances. Additionally, as the Abbey conducts events such as concerts that generally involve close quarters, it may be even more financially vulnerable to coronavirus related restrictions. The Abbey has been operating in one capacity or another for a long time, and I am not aware of any fires occurring there that have adversely affected the livability of the neighborhood. The Abbey argues that much of the alleged lack of compliance is erroneous, and this case does not seem like the proper place to decide those issues. Finally, just because the Abbey is not required to obtain all of the potential permits within 12 months does not mean that it will not have to obtain whatever permits may be necessary.

The Abbey suggests the following modified condition of approval:

“Prior to the date 12 months from final approval of this application, Applicant and BDS shall mutually agree upon which, if any, building permits are required and an appropriate timeline to close-out such permits.”

While this does not seem like an unreasonable suggestion, I am concerned about what the result would be if the Abbey and BDS could not “mutually agree” on which permits are required and/or a timeline. Given the large degree of uncertainty surrounding which permits may or may not be required, potential takings issues, potential religious protection claims, and the coronavirus disruptions, I do not think this decision is the proper place to determine when or how building permit(s) decisions should be made. An enforcement action could presumably

be brought at any time as the Abbey has arguably been in violation for years. I think it would be preferable for this issue to be resolved in the building permit arena rather than the land use application arena. Therefore, I am imposing a modified condition of approval suggested by the Abbey at the public hearing that merely requires the Abbey to apply for and obtain any required building permits but does not impose any time limits in this decision.⁵ Therefore, Condition E is modified as follows: "The applicant will apply for and obtain any required building permits to accomplish the appropriate change of occupancy/ies of the building." With the imposed conditions of approval, all of the applicable approval criteria are satisfied.

III. CONCLUSIONS

The applicant has satisfied all of the applicable approval criteria. Therefore, the application is approved with the following conditions of approval.

IV. DECISION

Historic Preservation Incentive Review approval of Retail Sales and Service and Office uses in the entirety of the Portland Historic Landmark Mallory Avenue Christian Church, also called Alberta Abbey, per the attached plans, including office space across three levels; a rentable basement ballroom/gym with accessory kitchen; a café space on the main level; and a rentable auditorium with stage, seating, and lobbies.

Adjustment approval to Zoning Code Section 33.266.110.B.2 and Table 266-2 to waive the minimum required 133 parking spaces for the new uses.

All approvals are subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related conditions (B through E) must be noted on each of the four 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 19-137608 HPR AD." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. The Abbey shall not exceed the following peak occupancy:
 - 350 patrons when no off-street parking is available to Abbey patrons;
 - When off-street parking is available to Abbey patrons, peak occupancy may exceed 350 patrons by the number of off-street parking stalls available multiplied by 2.5.

⁵ That does not mean there is no time limit – just that I am not imposing one.

- C. Alberta Abbey will implement the transportation demand management (TDM) plan outlined in Exhibit A.17, including the following elements:
- TDM page on Alberta Abbey website (currently www.albertaabbey.org) encouraging attendees to walk, bike, take the bus, and if driving, to park only in certain locations;
 - Information on nearby transit services provided on that page, including a map and link to TriMet's Trip Planner (https://trimet.org/ride/m/planner_form.html); and
 - Information on on-site and nearby bike parking opportunities, including a map.
- D. All events and gatherings at Alberta Abbey will cease by 11:00 p.m. However, up to 12 events per calendar year may end by 12:00 Midnight.
- E. The applicant will apply for and obtain any required building permits to accomplish the appropriate change of occupancy/ies of the building.
- F. Within one month of this land use approval, the owner must execute a covenant with the City and record that covenant against the property with Multnomah County that meets the requirements of Zoning Code Section 33.445.610.

Fred Wilson, Hearings Officer

April 23, 2020

Date

Application Determined Complete:	August 26, 2019
Report to Hearings Officer:	January 3, 2020
Decision Mailed:	April 23, 2020
Last Date to Appeal:	4:30 p.m. on May 7, 2020
Effective Date (if no appeal):	May 8, 2020

Conditions of Approval. 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.

Appeal of the decision. ANY APPEAL OF THE HEARINGS OFFICER'S DECISION MUST BE FILED AT 1900 SW 4TH AVENUE, PORTLAND, OREGON 97201. Appeals can be filed at the 5th floor reception desk, Monday through Friday between 8:00 a.m. and 4:30 p.m. **An appeal fee of \$4,159.00 will be charged (one-half of the application fee for this case, up to a maximum of \$5,000.00).** Information and assistance in filing an appeal can be obtained from the Bureau of Development Services at the Development Services Center.

Who can appeal: You may appeal the decision only if you wrote a letter which is received before the close of the record on hearing or if you testified at the hearing, or if you are the property owner or applicant. If you or anyone else appeals the decision of the Hearings Officer, only evidence previously presented to the Hearings Officer will be considered by the City Council.

Appeal Fee Waivers: Neighborhood associations recognized by the Office of Neighborhood Involvement may qualify for a waiver of the appeal fee provided that the association has standing to appeal. The appeal must contain the signature of the Chairperson or other person authorized by the association, confirming the vote to appeal was done in accordance with the organization's bylaws.

Neighborhood associations, who wish to qualify for a fee waiver, must complete the Type III Appeal Fee Waiver Request for Organizations Form and submit it prior to the appeal deadline. The Type III Appeal Fee Waiver Request for Organizations Form contains instructions on how to apply for a fee waiver, including the required vote to appeal.

Recording the final decision.

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

Recorder. 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. Applicant Narrative Responding to 33.846.050.C
 - 2. Chart: Current and Proposed Uses
 - 3. Transportation Impact Study (see also Exhibits A.8 and A.17)
 - 4. Applicant Narrative Responding to 33.815.105.A
 - 5. Applicant Email, April 15, 2019
 - 6. Applicant Email, July 15, 2019
 - 7. Applicant Narrative Responding to Adjustment Approval Criteria 33.805.040, Received July 15, 2019
 - 8. Supplement to Transportation Impact Study, received July 15, 2019
 - 9. Applicant Narrative Responding to 33.815.105.A-E, received August 7, 2019
 - 10. Applicant Narrative Responding to 33.846.050.C, received August 7, 2019
 - 11. Quality Counts parking, light and noise data from May 11 bluegrass festival, submitted August 7, 2019
 - 12. List of Events at Alberta Abbey from mid-2017 through 2019, received August 7, 2019
 - 13. Request for Extension of 120-Day Review Period by 7 days, received August 28, 2019
 - 14. Request for Extension of 120-Day Review Period by an additional 2 days, received September 5, 2019
 - 15. Draft website and signage language addressing parking, submitted October 3, 2019
 - 16. Request for Extension of 120-Day Review Period by 41 days, received October 10, 2019
 - 17. Supplement to Transportation Impact Study, received November 7, 2019
 - 18. Memo on Alberta Abbey occupancy permit issues, received November 18, 2019
 - 19. Statewide Planning Goals Narrative, received November 19, 2019
 - 20. Request for Extension of 120-Day Review Period by 51 days, received November 22, 2019
 - 21. Email exchange between applicant's transportation engineer and PBOT, received January 2, 2019. Contains error regarding status of adjacent parking lot, which is not included in proposal.
 - 22. Original Plan Set
- B. Zoning Map
 - 1. Existing Zoning
 - 2. Proposed Zoning
- C. Plans and Drawings
 - 1. Site Plan
 - 2. North and East Elevation Drawings
 - 3. Parking Requirements by floor/area
- D. Notification information
 - 1. Request for response

2. Posting letter sent to applicant, September 16, 2019
 3. Notice to be posted
 4. Applicant's statement certifying posting – dated September 20, 2019
 5. Mailing list – October 2, 2019 notice
 6. Mailed notice – October 2, 2019 notice
 7. Posting letter sent to applicant, October 28, 2019
 8. Notice to be posted - repost
 9. Applicant's statement certifying posting – dated October 30, 2019
 10. Mailing list – November 12, 2019 notice
 11. Mailed notice – November 12, 2019 notice
 12. Posting letter sent to applicant, December 5, 2019
 13. Notice to be posted – second repost
 14. Applicant's statement certifying posting – dated December 12, 2019
 15. Mailing list – December 24, 2019 notice
 16. Mailed notice – December 24, 2019
- 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 Bureau of Development Services
 6. Life Safety (Building Code) Plans Examiner
- F. Letters and emails
1. Jacquie Walton, April 3, 2019
 2. Jacquie Walton, April 9, 2019
 3. Ashley Lakovic, April 20, 2019
 4. Libby Deal, April 22, 2019
 5. Tom Lakovic, April 24, 2019
 6. Jacquie Walton, May 11, 2019 (superseded by F.8, below)
 7. John Kim, May 12, 2019
 8. Jacquie Walton, May 13, 2019 (with revised photos first sent in F.6)
 9. John Kim, May 13, 2019
 10. Margaret O'Hartigan, May 13, 2019
 11. Ashley Lakovic, July 12, 2019
 12. Scott Jones, July 13, 2019
 13. Ursula Kienbaum, July 13, 2019
 14. Ayesha Hankins, July 31, 2019
 15. Alexa Pengelly, August 11, 2019
 16. Margaret O'Hartigan, August 12, 2019
 17. Mark Takiguchi, Executive Director, Alberta Abbey Foundation, with forms signed by 76 individuals supporting the application, received September 3, 2019

18. Email conversation between Jacquie Walton and PBOT Senior Planner Robert Haley, dated September 13, 2018 through September 24, 2019
 19. Scott Erwin, November 5, 2019
 20. Fiona Taylor, November 5, 2019
 21. Douglas Burns, November 8, 2019
 22. Kymberly Jeka, Chair of Humboldt Neighborhood Association, November 10, 2019
- G. Other
1. Original Land Use Application and Receipts
 2. Incomplete Letter, sent April 16, 2019
 3. Email from planner, April 17, 2019
 4. Email from planner, August 21, 2019
 5. Summary of Preliminary Life Safety Meeting, May 15, 2019, provided by applicant's architect
 6. Email exchange between Portland Life Safety Plans Examiner Geoff Harker and Ian Flood, applicant's architect regarding change of occupancy process.
- H. Received in the Hearings Office
1. Request to Reschedule - Rhoads, Amanda
 2. Request for Reschedule - Rhoads, Amanda
 3. Request for Extension of 120-Day Review Period - Rhoads, Amanda
 4. Hearing Notice - Rhoads, Amanda
 5. Request to Reschedule - Rhoads, Amanda
 6. Request to Reschedule - Rhoads, Amanda
 7. Request for Extension of 120-Day Review Period - Rhoads, Amanda
 8. Hearing Notice - Rhoads, Amanda
 9. Request to Reschedule to 1/15/20 or 1/22/20 - Rhoads, Amanda
 10. Request for Extension of 120-Day Review Period to 4/3/20 - Rhoads, Amanda
 11. Second Revised Notice of a Public Hearing - Rhoads, Amanda
 12. Staff Report - Rhoads, Amanda (**attached**)
 13. Request for Continuance Letter - Hall, Damien
 14. 1/13/20 Email from Damien Hall - Rhoads, Amanda
 - a. 1/13/20 Letter from Damien R. Hall - Rhoads, Amanda
 15. 1/13/20 Email from Sarah Moses - Rhoads, Amanda
 16. 1/10/20 letter - King Neighborhood Association
 17. Record Closing Information - Hearings Office
 18. Letter in support - Moses, Sarah
 19. Letter in support - Beck, John
 20. Letter in support (2 pages) - Walton, Jacqueline
 21. PowerPoint presentation printout Rhoads, Amanda Received
 22. Request for Extension of 120-Day Review Period - Rhoads, Amanda
 23. Change of Use or Occupancy - Rhoads, Amanda
 24. Permit history - Rhoads, Amanda
 25. Record Closing Information - Hearings Office

26. Historic Preservation Incentive Review - Rhoads, Amanda
27. Shared Parking Agreement - Rhoads, Amanda
28. Additional Evidence - Hall, Damien
29. Response to New Evidence - Hall, Damien
30. Redemption Church Overview - Hall, Damien
31. Applicant's final argument received at 4:01 p.m. - Hall, Damien