



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

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Date: August 20, 2020
To: Interested Person
From: Timothy Novak, Land Use Services
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NOTICE OF A TYPE Ix 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 19-156500 LDP

GENERAL INFORMATION

Applicant: Kelli Grover | Firwood Design Group LLC
359 E Historic Columbia River Hwy
Troutdale OR, 97060
(503) 668-3737 | kg@firwooddesign.com

Owners: Akel, Ritta, & Shaza Karam
16030 SE Gaibler Ln
Portland, OR 97236

Site Address: 16030 SE GAIBLER LN

Legal Description: TL 500 0.50 ACRES, SECTION 24 1S 2E
Tax Account No.: R992241400
State ID No.: 1S2E24DA 00500
Quarter Section: 3846

Neighborhood: Pleasant Valley, contact Steve Montgomery at foxtrotlove@hotmail.com.
Business District: None
District Coalition: East Portland Community Office, contact at 503-823-4550.

Plan District: Johnson Creek Basin - South
Base Zone: Single-Dwelling Residential 10,000 (R10)
Case Type: Land Division - Partition (LDP)
Procedure: Type Ix, an administrative decision with appeal to the Oregon Land Use Board of Appeals (LUBA).

Proposal:

The applicant is proposing to divide a 22,043 square foot corner lot into two parcels. Parcel 1 is proposed at 13,541 square feet and will retain the existing house, ADU, and shed. Parcel 2 is proposed as a 6,344 square-foot corner lot and is currently vacant. The proposal

includes right-of-way dedications along both street frontages. Improvements, including sidewalks, are proposed along both street frontages. The applicant is proposing to retain all trees on proposed Parcel 1 and one tree in the SE corner of proposed Parcel 2.

Relevant Approval Criteria:

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

ANALYSIS

Site and Vicinity: The subject property is a corner lot in outer Southeast Portland; the City boundary is approximately 260 feet to the east. Most of the neighborhood that the site is now part of was platted about 15 years ago. The area is overwhelmingly residential, natural area and farmland. To the east, within the Urban Service Area, the zoning is RF and still includes ample land that appears to be utilized for agricultural use. To the south is a mixture of large undivided parcels and recently divided subdivisions in residential use under the R10 zone. To the north and west is a mix of R10 and natural areas, including the Buttes Natural Area and the Clatsop Butte Park. The nearest environmental resource is a stream mapped about 550 feet to the north and west; the Environmental Protection Zone for the stream corridor begins about 300 feet from the subject site. The stream is a tributary to Johnson Creek.

The vicinity has a relatively gentle topography that slopes NNW towards the stream mentioned above. The vicinity is not in either the regulatory landslide or flood hazard areas. The stream is the only identified water body in the immediate vicinity; there are no identified wetlands, or hydric soils nearby. The tree canopy is well established in the natural areas and stream corridors, but is generally young and light as a result of the new development and extensive agricultural land in the area.

Infrastructure:

- **Streets** – At this location, the City’s Transportation System Plan (TSP) classifies both SE Gaibler and 160th as a Local Service street for all modes. SE Gaibler abutting the lot is improved with a 24-foot wide paved roadway within a 40-foot wide right-of-way; the improved right-of-way abutting the lot at SE 160th Ave is also 24-feet wide, but within a 33-foot wide right-of-way.

Excepting the frontage along the subject site and the two sites at the corner of SE Gaibler Ln and SE 162nd Ave to the east, most frontages are developed with gutter, curb, planter strip, and sidewalk. The subject site and abutting site to the east have a gravel shoulder at their frontage, without curbs. The corner site on the north side of SE Gaibler Ln has curb only along its frontage.

The site is a corner lot that has approximately 219 feet of frontage on SE Gaibler Ln and 101 feet of frontage on SE 160th Ave. There are two adjacent driveways entering the site on SE Gaibler Ln that serve the garage attached to the main house and the detached garage below the ADU.

The subject site is located at the far southeastern limits of the City boundary, where public transportation services are limited. The closest TriMet bus service is located approximately 2 miles away at SE 136th and Foster Rd, where lines 10-Harold and 73-122nd operate. For bicycles, SE 162nd is an identified Shared Roadway, with the remaining surrounding roadways classified for shared use; the Springwater Corridor path is approximately a mile north.

- **Water Service** – There are existing 8-inch water mains in both SE 160th Ave and SE Gaibler Ln. The existing house is served by a 3/4-inch metered service from the main in SE Gaibler Ln; the existing ADU is served by a 1-inch metered service from the main in SE Gaibler Ln.

- **Sanitary Service** - There is an existing 8-inch PVC public sanitary-only sewer line in SE Gaibler Ln. According to City records, the existing structures (*the primary house and ADU*) to remain on proposed Parcel 1 share a sanitary connection to the sanitary-only sewer in SE Gaibler Lane within the frontage of proposed Parcel 1. Parcel 2 will be served by a new connection to the sanitary-only sewer in SE Gaibler Lane within its frontage.
- **Stormwater Disposal** – There is a public 12-inch PVC storm-only sewer in SE Gaibler Lane (BES as-built #7981). Stormwater from the existing main house appears to discharge to a private pipe that runs along SE Gaibler Lane through the adjacent property with a final discharge location to the ditch system in SE 162nd Ave.

Zoning:

- **Base Zone** - The **R10** 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.
- **Plan District** - The **Johnson Creek Basin** plan district provides for the safe, orderly, and efficient development of lands which are subject to a number of physical constraints, including significant natural resources, steep and hazardous slopes, flood plains, wetlands, and the lack of streets, sewers, and water services. At certain locations, the density of development is limited by applying special regulations to new land division proposals. In addition, restrictions are placed on all new land uses and activities to reduce stormwater runoff, provide groundwater recharge, reduce erosion, enhance water quality, and retain and enhance native vegetation throughout the plan district. At other locations, development is encouraged and mechanisms are included that provide relief from environmental restrictions.

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 March 17, 2020. A total of 9 written responses to the proposal from notified property owners were received within the notification period; another 2 were received after the notification period. (Exhibits F.1-F.11). The responses received within the notification period were forwarded to the owner of the subject property, who submitted a response to the neighbors’ comments and concerns.

Below are a summary of the concerns expressed in the comments from neighbors of the subject site with staff’s response below each one.

1. *The proposed lot is smaller than those in the neighborhood and combined with the duplex development proposed on it, is of a density and character that is inconsistent with the neighborhood’s single-dwelling development, large lots and semi-rural character. In addition, to the character of the neighborhood, allowing the proposed new development could negatively affect the property value of other sites in the neighborhood.*

Staff Response – Per 33.610.200.B, the minimum lot area in the R10 zone is 6,000 square feet, which both proposed parcels exceed. In addition, other lots in the area are of a similar size, such as 7940 SE 160th Avenue, which is exactly 6,000 square feet and 7930 SE 160th Avenue, which is 6,119 square feet and directly abuts the south property line of the proposed 6,344 square-foot parcel.

Regarding density and the proposed duplex development, 33.610.100 does indeed limit density for the whole site to a maximum of two units, but, per

33.110.240.E, corner lots in the R10 zone are allowed one extra dwelling unit (up to two maximum per lot), provided that the minimum lot dimension standards of 33.610 and the additional development standards of 33.110.240.E.4 are met; compliance with these additional development standards will be reviewed during the building permit process and is not a criterion for approval of this land division proposal. The potential effects on future property values in the neighborhood is also not a criterion for approval of this land division proposal.

2. *The current width of the developed right-of-way along the site's frontage is insufficient to accommodate both on-street parking and two-way or emergency vehicle traffic, creating significant safety concerns. Adding more units at the site will exacerbate the safety issue.*

Staff Response - Per the PBOT reviewer, "For low-density Residential zones in which the abutting street classification is Local Service, Portland adopted a "skinny street" standard [in 1991], for which the City's public right-of-way document recommends a 54-ft ROW to accommodate a 26-ft wide roadway with parking on both sides. This is intended not to allow two-way movement as a traffic calming method [while retaining sufficient width for emergency vehicles]. Additionally, on-site parking is required at this location for each single-dwelling or duplex unit.

3. *The existing detached ADU/garage structure at the site was developed by the same individual and was not built to code. It is larger than the code allows, doesn't meet the development standards for detached covered accessory structures over 15 feet in height, doesn't meet minimum setbacks, and is generally out of character with the neighborhood.*

Staff Response - The existing ADU/garage structure was finalized by BDS building inspectors. It's compliance with code standards in effect at the time it was constructed is subject to review under the applicable approval criteria only in that development on the site cannot be brought out of or further out of conformance with development standards in place at the time that this land use application was submitted. To that end, as detailed below in the 'Development Standards' section of these findings, the applicant will be making multiple and significant modifications to the existing ADU/garage structure to conform to current and relevant development standards.

4. *The site is already developed with more than the allowed primary unit and accessory unit. One element leading to this conclusion is the number of vehicles parked at the subject site, which often block the road and create a safety hazard. Another is the amount of unused items stored around the exterior of the property, which creates an eyesore for other residents. Allowing more units at the subject site will likely only exacerbate these issues.*

Staff Response - These concerns are outside of the scope of this review and not within the jurisdiction of Land Use Services to evaluate. Concerns of this manner should be directed to Code Compliance or other authority with the mandate to review and address code compliance concerns that are not relevant to the approval criteria for land divisions.

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.

Criterion	Code Chapter/Section and Topic	Findings: Not applicable because:
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.
I	33.639 - Solar Access	Maintaining existing development on the site limits new parcel configuration (33.610.200 supersedes 33.639).
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.B – Non-local street standards	All frontage abuts local streets.
	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.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 33.610 contains the density and lot dimension requirements applicable in the RF through R5 zones. Based on the applicant's survey, the site area is 21,780 square feet. The maximum density in the R10 zone is one unit per 10,000 square feet. Minimum density is one unit per 10,000 square feet based on 80 percent of the site area.

The site has a maximum density of 2 units and a minimum required density of 2 units. If the minimum required density is equal to or larger than the maximum allowed density, then the minimum density is automatically reduced to one less than the maximum. Therefore, in this case the minimum density is reduced to 1.

Additionally, the site is within the South Subdistrict of the Johnson Creek Basin Plan District and is thus subject to 33.537.140.E, Maximum Density for Land Divisions. Per Table 537-1, density is reduced on sites located on slopes with a grade of 20% or more; the subject site is not on a slope with a grade of 20% or more, therefore the maximum density continues to be determined by the base zone, as detailed above.

Finally, the applicant is proposing 2 single-dwelling parcels, with duplex development on one and the existing single-family house and accessory dwelling unit (ADU) on the other. The ADU is allowed, from a density perspective, by 33.205.050, which states that in the single-dwelling zones, accessory dwelling units are not included in the minimum or maximum density calculations for a site. The proposed development of a duplex on Parcel 2 is allowed on this single-dwelling corner lot per 33.110.240.E.2, which allows one extra dwelling unit, up to a maximum of two units (i.e. the lot can't also have an ADU), on corner lots in the R10 zone that meet the minimum lot dimension standards of the base zone, which proposed Parcel 2 does.

Therefore, the density standards are met.

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

Zone	Min. Lot Area (square feet)	Max. Lot Area (square feet)	Min. Lot Width* (feet)	Min. Depth (feet)	Min. Front Lot Line (feet)
R10	6,000	17,000	50	60	30
Parcel 1	13,541		139	96	139
Parcel 2	6,344		63	95	63

* 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.

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.1d) that shows the location and size of trees on and adjacent to the site. The applicant also provided an arborist report and an updated tree survey (Exhibits A.1d & A.5) that identify each tree, its condition, and suitability for preservation or its exempt status, and specifies tree protection measures per the prescriptive path for each tree to be preserved.

Based on this information, 5 trees, which provide a total of 88.5 inches of tree, are subject to the preservation requirements of this chapter.

The trees proposed for preservation are in fair-to-good condition, include native/non- nuisance species, and include the only non-exempt tree on the site that is 20 or more inches in diameter. The proposed root protection zones for the tree within the vicinity of Parcel 2, where future development is proposed and anticipated, will allow for the type of development proposed and allowed in the R10 zone and will not conflict with any existing utility easements, proposed services or site grading.

Specifically, the applicant proposes to retain Tree # 6, a 24-inch Weeping willow, the only tree 20 or more inches in diameter and Tree #5, a 18.5-inch Japanese maple, for a total of 42.5 inches or 48% of the total tree diameter at the site, so the proposal complies with:

Option 1: Preserve all of the trees that are 20 or more inches in diameter and at least 20 percent of the total tree diameter on the site.

In addition, the applicant's arborist report has also identified 1 tree on adjacent sites that that is within 15 feet of potential disturbance area on proposed Parcel 2. The tree is a Japanese maple, approximately 5 inches in diameter on the western-most of the abutting lots to the south. Because of the location of the tree and its small diameter, the arborist did not believe that additional tree protection measures beyond the existing fence at the property line are needed to protect the off-site tree from construction impacts.

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

In order to ensure that future owners of the parcels 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 Parcels 1 and 2 must be carried out in conformance with the Tree Preservation Plan (Exhibit C.6) and the Arborist Report (Exhibits A.1d & A.5).

With the implementation of the noted condition, the approval criteria of 33.630 will be met.

Staff Note: As noted in the Development Standards section below, additional trees shown to be retained are subject to 33.537.125.C Johnson Creek Basin Plan District tree removal standards.

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. Therefore, no significant clearing or grading will be required on the site to make the new lots developable. In addition, the tree protection plan (Exhibit C.6) demonstrates how tree #5, whose RPZ extends into the potential development area of Parcel 2, can be protected using the prescriptive path detailed in 11.60.030. This criterion is met.

Land Suitability: The site is currently in residential use, and there is no record of any other use in the past. As indicated above, the site is relatively flat and contains no known geological hazards. Therefore, there are no anticipated land suitability issues and the new lots can be considered suitable for new development. This criterion is 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 Development Review Section of the Portland Bureau of Transportation (PBOT) has reviewed the application against the evaluation factors and has provided the following findings (see Exhibit E.2):

Based upon trip generation estimates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, the proposed parcel is projected to generate one additional morning and one evening trip, for approximately ten daily trips for the new parcel. The net addition of a single-family residence added to the transportation system resulting from the development will not adversely impact the operations of area intersections, as the proposed development adds nominal trips to the transportation network compared to existing volumes and is consistent with the zoning of the property. There are no access restrictions affecting the property. The applicant has elected to construct required frontage improvements abutting the property, establishing a 26-ft paved roadway along both frontages and a City standard 10-ft pedestrian corridor including the corner. Therefore, the transportation system is capable of safely supporting the proposed development in addition to existing uses in the area and capable of maintaining acceptable levels of service.

The subject site is located at the far southeastern limits of the City boundary, where public transportation services are limited. The closest TriMet bus service is located approximately 2 miles away at SE 136th and Foster Rd, where lines *10-Harold* and *73-122nd* operate. For bicycles, SE 162nd is an identified Shared Roadway, with the remainder surrounding roadways are classified as *Local Service*, which low-volume conditions provides for safe and comfortable riding conditions to connect to more complete facilities like the Springwater Corridor path approximately a mile north. The proposed project will install a City standard 10-ft sidewalk corridor abutting both frontages, which will connect to the existing pedestrian corridor in the immediate neighborhood. Therefore, the resulting proposed development will not negatively

impact transit access or other transportation modes and will enhance pedestrian environment and safety.

The proposed plan provides for individual driveways accessing each of the proposed houses, with the corner lot possibly being a duplex. In accordance with Title 17, shared driveways are not required for corner lots, provided each driveway is located on a separate frontage and both streets are classified as Local Service Traffic streets and the driveway meets all other dimension and locational requirements, which are to be reviewed at time of building permit. Therefore, the proposal is consistent with the established neighborhood pattern of the area, and with ample space for on-site parking to be provided, the demand for additional on-street parking is expected to be negligible.

PBOT has reviewed and concurs with the information supplied and available evidence. Standard sidewalk corridor improvements will be required to serve the proposed development (see criterion L. 33.654). The applicant has initiated a Public Works Permit (19-264453 WT) for required frontage improvements adjacent to the entire parent parcel and has received 30% approval at this time. Prior to Final Plat, dedication of right-of-way is required and financial guarantees for the frontage improvements must be in place. With these requirements as conditions of approval, 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.

<p>33.651 Water Service standard – See Exhibit E.3 for detailed bureau comments.</p>
<p>The Water Bureau has indicated that service is available to the site, as noted on page 2 of this report. The water service standards of 33.651 have been verified.</p>
<p>33.652 Sanitary Sewer Disposal Service standards – See Exhibit E.1 for detailed comments.</p>
<p>The Bureau of Environmental Services has indicated that service is available to the site, as noted on page 3 of this report. The sanitary sewer service standards of 33.652 have been verified.</p>
<p>33.653.020 & .030 Stormwater Management criteria and standards – See Exhibit E.1</p>
<p>No stormwater tract is proposed or required. Therefore, criterion A is not applicable.</p> <p>The applicant has proposed the following stormwater management methods:</p> <ul style="list-style-type: none"> • Public Street Improvements: Stormwater from the public right-of-way will be managed with the existing stormwater pipe detention system in SE Gaibler Lane. Improvements will be made to this system to manage the additional stormwater flows from the frontage improvements proposed with this land division. BES Development Engineering approved the Concept Development plans (i.e. 30% design) for the right-of-way stormwater improvements on 3/25/2020; therefore, BES finds that public stormwater facilities can be constructed as shown on the applicant's Preliminary Site Utility Plan. Please note that additional information and/or revised plans will need to be reviewed through the Public Works Permit process based on details regarding the new storm connection and stormwater discharge from the existing home on Parcel 1. Prior to final plat approval BES will require approved plans, a financial guarantee, receipt of all outstanding fees, and a signed permit document. • Parcel 2: Due to poor infiltration in the area, the applicant proposes for runoff from the new development on Parcel 2 to be discharged offsite to the storm-only sewer in SE Gaibler Lane after pollution reduction and flow and volume control standards are met with a vegetated facility (rain garden or planter) sized per the Simplified

Approach.

- **Parcel 1 (the existing house):** Stormwater from the main house appears to discharge to a private pipe that runs along SE Gaibler Lane through the adjacent property with a final discharge location to the ditch system in SE 162nd Ave. This information has been provided on a supplemental site utility plan. Prior to final plat approval, the applicant must demonstrate that the stormwater management for existing development will meet applicable SWMM requirements as described below:
 - a. *Storm Lateral Connection:* Stormwater from the existing main house on Parcel 1 currently discharges to a private pipe, that with the required property dedication on SE Gaibler Lane, will be located in the public right-of-way. Therefore, the main house must disconnect from this private pipe and provide a new storm lateral connection to the storm-only sewer in SE Gaibler Lane. This connection must be completed with any required permits finalized prior to final plat approval.
 - b. *Stormwater Retrofit:* The existing main house may be allowed to connect to the public storm-only sewer in SE Gaibler Lane without the addition of a private stormwater facility. For BES to approve this approach, the project engineer must show that the public storm-only system in SE Gaibler Lane can accommodate stormwater discharge from the existing main house and driveway without the need for additional flow control from an onsite private stormwater facility. Therefore, prior to final plat, the project engineer must provide revised calculations based on the additional impervious area and/or make changes to the orifice size in the flow control manhole as part of the Public Works Permit design submittal (see below). If the storm sewer in SE Gaibler Lane cannot accommodate the additional impervious area to the satisfaction of BES, the applicant will be required to retrofit the stormwater system for the existing main home on Parcel 1 according to SWMM standards for flow control, with all required permits finalized prior to final plat approval.
- **Parcel 1 (the existing ADU):** According to City records (stormwater as-builts from building permit 16-119970-RS), stormwater from the existing ADU on Parcel 1 is managed by a flow through planter that discharges to a soakage trench. This information has been provided on a supplemental site utility plan.

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

SE Gaibler Lane and SE 160th Avenue are improved with a paved roadway. There are sidewalk and curb improvements opposite the subject site on both streets, with the ROW along both streets that abut the subject site improved only with a gravel shoulder; there are no curbs, planter strips, or sidewalks. 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. In this case, PBOT has determined that curb and sidewalk improvements must be made in order to meet City standards ensure that safe pedestrian travel is possible to and from the proposed development. To accommodate these improvements, additional right-of-way must be dedicated along both frontages of the site. With those improvements, additional dwellings allowed per 33.610 and 33.110.240 can be safely served by this existing street without having any significant impact on the level of service provided.

Based on the foregoing, the width of the right-of-way will be sufficient to accommodate the expected users. This criterion is met, with the condition that curb and sidewalk improvements are made, and the required right-of-way dedication is shown on the Final Plat.

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-ways 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:

- Duplex Development on Corner Lots-- special requirements apply to development on new lots created using the provisions of Section 33.110.240.E.
 1. The address and main entrance of each unit must be oriented to a separate street frontage.
 2. The height of the two units must be within 4 feet of each other
 3. The exterior finish material must be the same, or visually match in type, size and placement.
 4. The predominant roof pitch must be the same.
 5. Roof eaves must project the same distance from the building wall.
 6. Trim must be the same in type, size and location.
 7. Windows must match in proportion and orientation.

Existing development that will remain after the land division. The existing development on the site will remain and be located on Parcel 1. The division of the property may not cause the structures to move out of conformance or further out of conformance to any development standard applicable in the R10 zone. Per 33.700.015, if a proposed land division will cause conforming development to move out of conformance with any regulation of the zoning code, and if the regulation may be adjusted, the land division request must include a request for an adjustment (Please see section on Other Technical Standards for Building Code standards.)

In this case, there are several Zoning Code standards that will impact the conformance of existing development on the site, particularly the detached garage/ADU. Specifically, as a result of the land division, the front lot line that applies to the existing development will move from SE 160th Ave, to SE Gaibler Ln*; this affects the detached garage/ADU structure in a number of ways, each addressed below. Prior to Final Plat approval, development permit(s) must be obtained and receive final approval to address compliance with the following standards:

**See 33.910.030 Definitions, Lots Line -> Front Lot Line.*

33.205.040.C.4 Detached ADU setbacks. First, the ADU will no longer meet Standard 33.205.040.C.4, which states that detached ADUs must be located behind the rear wall of the house or setback 40 feet from the front lot line; the ADU is more than 40 feet from SE 160th, but is less than that from SE Gaibler Ln. To resolve this issue, the applicant proposes to attach the ADU to the house, thus making it subject to the same development standards as the house.

In order to attach the house, the applicant is proposing to construct a breezeway between the garage of the ADU and the garage of the main house, as allowed per the definition of

'attached structure' in 33.910.030. New doors will be installed in the walls of each garage to create the pedestrian connection under the breezeway.

33.110.220 Minimum Building Setbacks. With the garage/ADU attached to the house, it is subject to the 20-foot minimum front building setback for the R10 zone (33.110.220). With the dedication along SE Gaibler Ln, the enclosed stairway at the front of the garage/ADU will be less than 20 feet from the front lot line. The applicant has proposed to remove all but three feet of the enclosed stairway so that it meets the minimum front setback of 20 feet.

33.110.225 Building Coverage. The breezeway that will be constructed to attach the primary and accessory structures on Parcel 1 will add building coverage to the parcel. At 13,541 square feet, Parcel 1 is allowed 3,531 square feet of building coverage. Based on the Site & Utility Plan, which includes eaves in the coverage calculations for each of the structures on Parcel 1 (Exhibit C.4) proposed building coverage is less than 3,350 square feet, which meets this standard.

33.205.040.C.1 Location of ADU Entrances. The enclosed stairway that will be reduced to meet the minimum front building setback currently houses the stairway that provides access to the ADU. In removing the majority of the enclosure, the space will no longer be able to accommodate the stairs to the front entrance to the ADU and will become more of a bump-out for the unit. Additionally, per 33.205.040.C.1, the main entrance to an attached ADU cannot be on the same street-facing façade as the main entrance of the house. To address the issues noted, the applicant proposes to move the main entrance of the ADU over to the west side of the structure with access provided via a raised deck that will be constructed over the breezeway.

Base Zone Design Standards. As noted above, in attaching the garage/ADU to the primary house, both structures are subject to the development standards for primary structures and are, in fact, treated as a singular structure for purposes of complying with said standards and in particular, the base zone design standards:

33.110.232 Street-Facing Facades in R10 through R2.5 zones. This standard applies to primary structures and requires that at least 15 percent of the area of each facade that faces a street lot line must be windows or main entrance doors. The total combined façade of the garage/ADU and main house must meet this standard. The applicant has submitted a conceptual drawing (Exhibit A.3, pg. 9) showing how compliance with this standard can be achieved by adding an additional window to the façade of the ADU. There are some apparent minor discrepancies between the conceptual drawing and what staff witnessed and photographed during a site visit that make it difficult to assess with certainty the extent to which additional windows will be needed to comply (a primary discrepancy is the location of grade at the base of the main house at its western edge). As part of the building permit(s) to add to or modify the structures to comply with the standards mentioned in this section, the applicant will need to submit complete and accurate drawings demonstrating how this standard is being met.

33.110.253.D Length of Street-Facing Garage Wall. This standard applies to primary structures and, like the street-facing facades standard, thus applies to the total combined length of the street-facing wall of the garage/ADU and main house. It allows the length of the garage wall facing the street to be no more than 50% of the length of the street-facing building façade. Currently, with the whole of the first floor of the accessory structure as garage, the combined length of the garage wall for both structures is 43.5 feet; the length of the total façade is 80 feet. In order to bring development on Parcel 1 into conformance with this standard, the applicant is proposing to decommission the eastern half of the garage below the ADU by walling it in and turning it into a storage room, which will bring the house and attached accessory structure into compliance with this standard.

33.266.120.C.2 Parking Spaces. There is a portion of the driveway for the primary house that is unpermitted and is unable to meet the standards of this section, which only allows a parking space in the front setback if it is directly behind a required parking space that is

outside of the front building setback. The portion of the pad at issue here is streetward of the area between the primary and accessory structures on Parcel 1. Prior to final plat approval, unpermitted and non-conforming parking area must be removed from Parcel 1.

Johnson Creek Basin Plan District, South Subdistrict Development Standards. The subject site is in the South Subdistrict of the Johnson Creek Basin Plan District. There are at least two of the development standards in this section that clearly apply to existing and/or proposed development on both parcels at the site:

33.537.125.C Tree Removal Standards. The subject site is in the South Subdistrict of the Johnson Creek Basin Plan District and tree removal must meet these standards. Even trees not subject to the Tree Preservation approval criteria, for example, trees 7, 8, and 9, cannot be removed unless these standards are met. Compliance with these standards will be determined at the time of permit.

33.537.140.D Impervious Surface. This standard states that no more than 50% of a site may be developed in impervious surface; building eaves are included in the calculation of impervious surface. At the time of development, Parcel 2 will be subject to this standard. At the time of building permit application for the required alterations described above and in Condition C.1, the applicant will be required to demonstrate compliance with this standard; based on the Site and Utility Plan, Parcel 1 will meet this standard.

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

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.

- **Fire Bureau** - The applicant must meet the requirements of the Fire Bureau in regards to addressing requirements and fire apparatus access, including 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 2-parcel partition, as shown on the attached preliminary plan, Exhibit C.2. 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: tree preservation, dedication of right-of-way, development of right-of-way and pedestrian corridor improvements, and alterations to existing development on Parcel 1 to maintain conformance with development standards under the new configuration and location of the front lot line.

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

ADMINISTRATIVE DECISION

Approval of a two-parcel partition for single-dwelling residential development, per the approved plans, Exhibits C.2, C.4, C.5, & C.6, and subject to the following conditions:

A. Supplemental Plan. An additional supplemental plan shall be submitted with the final plat survey for Land Use Services and BES review and approval. That plan must portray how the conditions of approval listed below are met. In addition, the supplemental plan must show the surveyed location of the following:

- Any buildings or accessory structures on the site at the time of the final plat application;
- Any driveways and off-street vehicle parking areas on the site at the time of the final plat application;
- All stormwater management facilities, existing and proposed.
- Any other information specifically noted in the conditions listed below.

B. The final plat must show the following:

1. The applicant shall meet the street dedication requirements of the City Engineer for SE Gaibler Lane and SE 160th Avenue. 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 an acknowledgement of special land use conditions, as required by Condition C.4, below. The recording block(s) shall, at a minimum, include language substantially similar to the following example: "A Acknowledgement of Special Land Use Conditions for Tree Preservation has been recorded as document no. _____, Multnomah County Deed Records."

C. The following must occur prior to Final Plat approval:

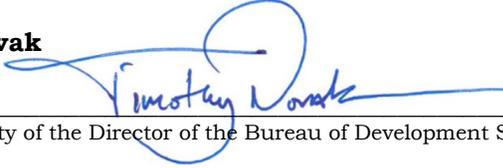
1. The applicant must receive final inspection and approval of development permit(s) for the following alterations to the existing residence and garage/ADU to remain on Parcel 1 so that Title 33 development standards continue to be met after the land division. The following modifications have been identified:
 - a. Construction of a breezeway between the garage of the ADU and the garage of the main house, as allowed per the definition of 'attached structure' in 33.910.030. New doors will be installed in the walls of each garage to create the pedestrian connection under the breezeway.
 - b. Removal of a sufficient portion of the enclosed stairway at the front of the garage/ADU so that it meets the minimum front setback of 20 feet (33.110.220).
 - c. Alteration of location of the main entrance of the ADU from its current location to the west side of the structure to comply with 33.205.040.C.1, with access to the new main entrance provided via a raised deck that will be constructed over the breezeway noted in 'a', above.
 - d. Modification of the combined front façade of the two existing structures to provide fenestration (windows and main entrance door) sufficient to meet street-facing façade requirements, as currently stated in 33.110.232.

- e. Decommission some portion of the garage below the ADU by walling it in and repurposing to another use, sufficient to bring the combined length of the street-facing façade into compliance with the length of the street-facing garage wall standard, currently stated in 33.110.253.D.
 - f. Removal of unpermitted and non-conforming parking area from Parcel 1 to comply with 33.266.120.C.2.
2. The applicant must meet BES requirements to submit a revised supplemental plan that depicts how the stormwater management requirements identified in Exhibit E.1 for the main house to remain on Parcel 1 will be addressed. The applicant must modify the existing system, with finalized permits as necessary.
 3. The applicant shall meet the requirements of the City Engineer for right of way improvements along the site's street frontage. The applicant shall achieve 30% Concept approval for Public Works permit (TH0978-EP583 | 19-264453 WT) or similar, provide financial assurances, pay all outstanding fees, and provide a signed permit document to the satisfaction of the Portland Bureau of Transportation and the Bureau of Environmental Services for required street frontage improvements.
 4. The applicant shall execute an Acknowledgement of Tree Preservation Land Use Conditions that notes tree preservation requirements that apply to Parcel 1 and Parcel 2. A copy of the approved Tree Preservation Plan must be included as an Exhibit to the Acknowledgement. The acknowledgment shall be referenced on and recorded with the final plat.

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

1. Development on Parcels 1 and 2 shall be in conformance with the Tree Preservation Plan (Exhibit C.6) and the applicant's arborist reports (Exhibit A.1d & A.5). Specifically, trees numbered 5 and 6 are required to be preserved in accordance with tree protection measures as specified in 11.60.030. The Tree Preservation plan (Exhibit C.6) demonstrates how this can be accomplished for Tree 5 during the development of Parcel 2. 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. Encroachment into the specified root protection zones may only occur if it meets the Tree Protection Specifications of 11.60.030.
2. 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.

Staff Planner: Timothy Novak

Decision rendered by:  **on 8/18/2020**

By authority of the Director of the Bureau of Development Services

Decision mailed (within 5 days of dec.) 8/20/2020

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 26, 2019, and was determined to be complete on October 18, 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 26, 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 requested that the 120-day review period be extended a total of 187 days, as demonstrated in Exhibits G.4a-c. Unless further extended by the applicant, **the 120 days will expire on: August 20, 2020.**

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.

This decision, and any conditions associated with it, is final. It may be appealed to the Oregon Land Use Board of Appeals (LUBA), within 21 days of the date the decision is mailed, as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have submitted written testimony during the comment period for this land use review. Contact LUBA at 775 Summer St NE Suite 330, Salem, OR 97301-1283 or phone 1-503-373-1265 for further information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at www.portlandonline.com.

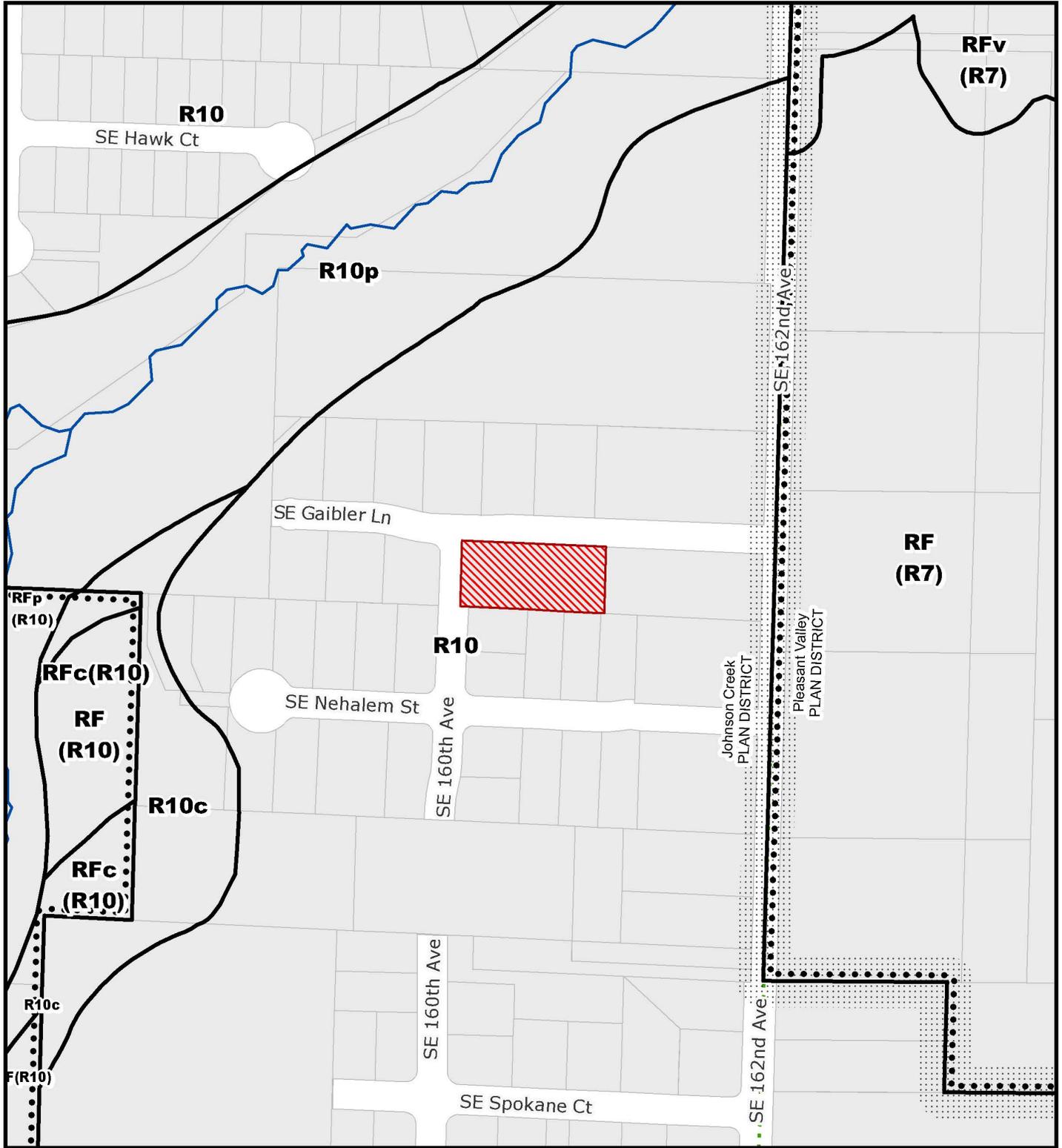
Recording the land division. The final land division plat **must** be submitted to the City **within three years** of the date of the City’s final approval of the preliminary plan. This final plat must be recorded with the County Recorder and Assessors Office after it is signed by the Planning Director 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. Original Submittals
 - a. Narrative
 - b. Plans
 - c. Stormwater Report
 - d. Arborist Report
 - 2. Revised Submittals
 - a. Narrative
 - b. Plans
 - c. Stormwater Report 05/06/2020
 - 3. Response and drawings to address elements of development on Parcel 1 that will become non-conforming with the partition
 - 4. Applicant's response to neighborhood comments (F exhibits).
 - 5. Addendum to Arborist Report with updated Tree Table
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Cover Sheet & Vicinity Map
 - 2. Preliminary Plat
 - 3. Existing Conditions
 - 4. Proposed Development/Site & Utility Plan (attached)
 - 5. Grading & Clearing
 - 6. Tree Preservation (attached)
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Bureau of Environmental Services
 - 2. Bureau of Transportation Engineering and Development Review
 - 3. Water Bureau
 - 4. Fire Bureau
 - 5. Site Development Review Section of BDS
 - 6. Bureau of Parks, Forestry Division
 - 7. Fire/Life Safety Review Section of BDS
- F. Correspondence:
 - 1. Ron Young, received 04/06/2020
 - 2. Susan Li & C K Li, received 04/06/2020
 - 3. Ryan Wilde, received 04/07/2020
 - 4. Michael & Suzanne Lehne, received 04/10/2020
 - 5. Kimberly Holloway, received 04/13/2020
 - 6. Mark Hill, received 04/14/2020
 - a. Photographs submitted with letter.
 - 7. David Brown & Heidi Suess, received 04/14/2020
 - 8. Edward & Etsuko Richardson, received 04/15/2020
 - 9. Tamara Hill, received 04/16/2020
 - 10. Misty & Dennis Washburn, received 04/16/2020 *(received after 4:30pm, end of notification period)*
 - 11. Yeshi Tharchen & Yangchen Dolker, received 04/22/2020 *(after end of notification period)*
- G. Other:
 - 1. LU Application
 - a. Original Application
 - b. Revised 2nd page of application with all owners listed
 - 2. Incomplete Letter
 - 3. Correspondence regarding making alterations to existing development vs. AD review
 - 4. Request to extend 120-day processing time
 - a. 1st Extension, 90 days, 10/21/2019
 - b. 2nd Extension, 90 days, 01/13/2020
 - c. 3rd Extension, 7 days, 08/06/2020

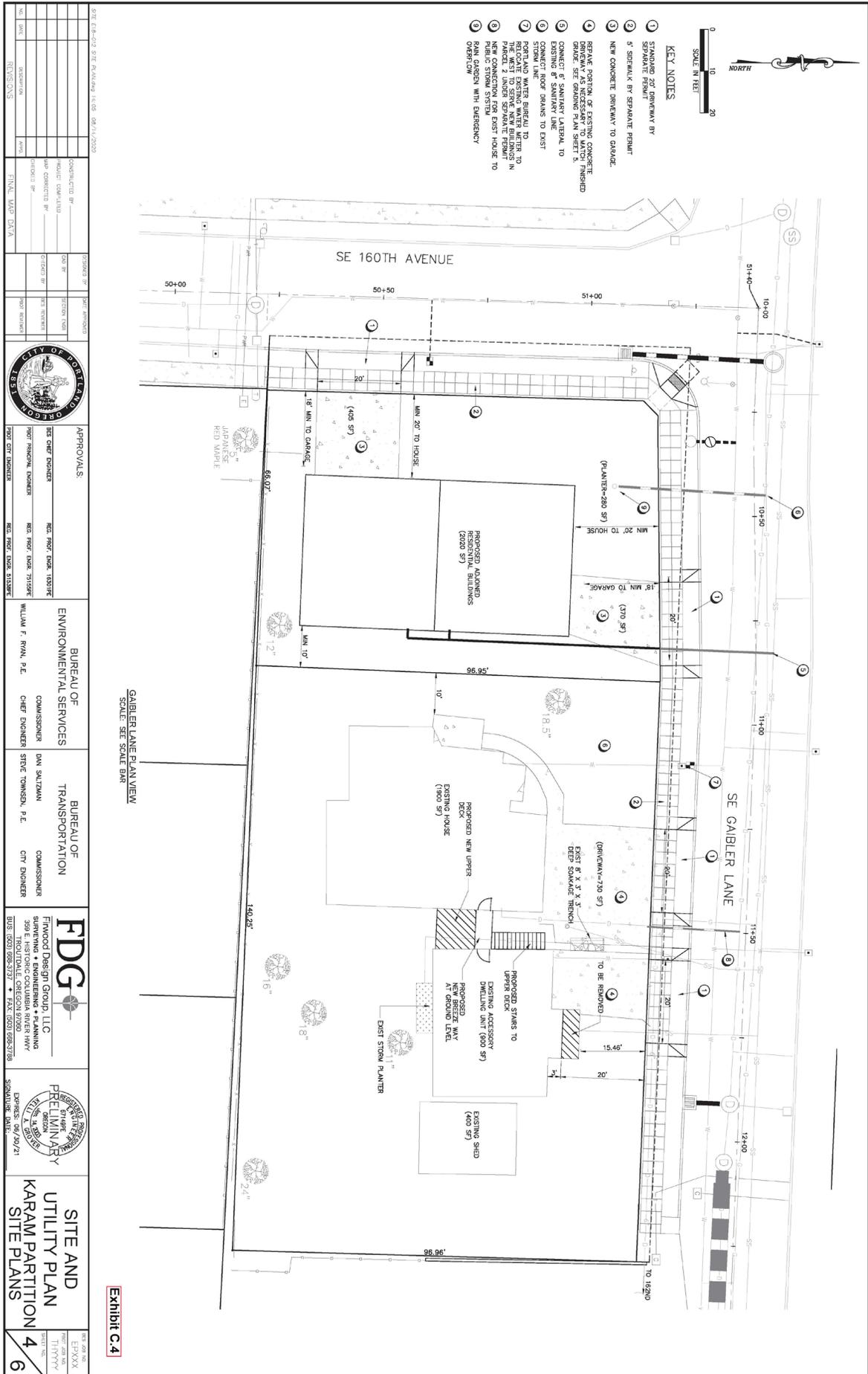
The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).



ZONING 
 NORTH
 THIS SITE LIES WITHIN THE:
 JOHNSON CREEK PLAN DISTRICT
 SOUTH SUBDISTRICT

-  Site
-  Stream
-  Recreational Trails

File No.	LU 19-156500 LDP
1/4 Section	3846
Scale	1 inch = 200 feet
State ID	1S2E24DA 500
Exhibit	B Apr 29, 2019



GABRIEL LANE PLAN VIEW
SCALE: SEE SCALE BAR

Exhibit C.4

PREPARED BY: FDG DATE: 09/20/21		CHECKED BY: [Signature] DATE: 09/20/21	
DESIGNED BY: [Signature] DATE: 09/20/21		APPROVED BY: [Signature] DATE: 09/20/21	
PROJECT NO.: 19-156500		SHEET NO.: 4 OF 6	
CLIENT: KARAM PARTITION 4		LOCATION: SE 160TH AVENUE & SE GABRIEL LANE	
PREPARED BY: [Signature] DATE: 09/20/21		CHECKED BY: [Signature] DATE: 09/20/21	
DESIGNED BY: [Signature] DATE: 09/20/21		APPROVED BY: [Signature] DATE: 09/20/21	
PROJECT NO.: 19-156500		SHEET NO.: 4 OF 6	
CLIENT: KARAM PARTITION 4		LOCATION: SE 160TH AVENUE & SE GABRIEL LANE	
PREPARED BY: [Signature] DATE: 09/20/21		CHECKED BY: [Signature] DATE: 09/20/21	
DESIGNED BY: [Signature] DATE: 09/20/21		APPROVED BY: [Signature] DATE: 09/20/21	
PROJECT NO.: 19-156500		SHEET NO.: 4 OF 6	
CLIENT: KARAM PARTITION 4		LOCATION: SE 160TH AVENUE & SE GABRIEL LANE	
PREPARED BY: [Signature] DATE: 09/20/21		CHECKED BY: [Signature] DATE: 09/20/21	
DESIGNED BY: [Signature] DATE: 09/20/21		APPROVED BY: [Signature] DATE: 09/20/21	
PROJECT NO.: 19-156500		SHEET NO.: 4 OF 6	
CLIENT: KARAM PARTITION 4		LOCATION: SE 160TH AVENUE & SE GABRIEL LANE	

FDG
 FAVORITE DESIGN GROUP, LLC
 500 N. TROUDDALE, OREGON 97080
 BUS: (503) 998-9727 • FAX: (503) 998-9788
 SIGNATURE DATE:

PRELIMINARY
 EXPIRES: 09/20/21

**SITE AND UTILITY PLAN
 KARAM PARTITION 4
 SITE PLANS**

SHEET NO. 4 OF 6
 DATE: 09/20/21

