



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

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[www.portlandoregon.gov/bds](http://www.portlandoregon.gov/bds)

**Date:** September 9, 2020  
**To:** Interested Person  
**From:** Hannah Bryant, Land Use Services  
503-823-5353 / [Hannah.Bryant@portlandoregon.gov](mailto:Hannah.Bryant@portlandoregon.gov)

## **NOTICE OF A TYPE I DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD**

The Bureau of Development Services has 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 20-128876 HR – WINDOW REPLACEMENT IN IRVINGTON***

#### **GENERAL INFORMATION**

**Owner:** Yuri Raku + Elena Stinea  
3016 NE 11th Ave  
Portland, OR 97212

**Applicant:** Yuri Raku  
14212 SE Webster Rd  
Portland, OR 97267

**Site Address:** 3016 NE 11TH AVE

**Legal Description:** BLOCK 87 LOT 17, IRVINGTON  
**Tax Account No.:** R420420390  
**State ID No.:** 1N1E26BA 17700  
**Quarter Section:** 2731  
**Neighborhood:** Irvington, contact Dean Gisvold at [deang@mcewengisvold.com](mailto:deang@mcewengisvold.com).  
**Business District:** Soul District Business Association, contact at [info@nnebaportland.org](mailto:info@nnebaportland.org)  
**District Coalition:** Northeast Coalition of Neighborhoods, contact Jessica Rojas at [jessica@necoalition.org](mailto:jessica@necoalition.org).

**Plan District:** None  
**Other Designations:** Contributing Resource in the Irvington Historic District  
**Zoning:** R5 – Residential 5,000 with Historic Resource Protection Overlay  
**Case Type:** HR – Historic Resource Review  
**Procedure:** Type I, an administrative decision with appeal to the Oregon Land Use Board of Appeals (LUBA).

**Proposal:**

The applicant seeks Historic Resource Review approval for previously completed exterior alterations on a contributing resource in the Irvington Historic District. Existing windows and trim were installed without the benefit of Historic Resource Review. Therefore, an active Code Compliance case is simultaneously under review (CC 19-250785). The applicant has chosen to keep the scope of this review limited to the following:

- Removal of original leaded windows on the front façade;
- Proposed replacement of all front windows with new wood windows;
- Removal of all original wood window trim on all facades;
- Proposed replacement of all window trim with new wood trim on all facades.

The applicant has stated that the existing vinyl windows on the side and rear façades were installed prior to the formation of the Historic District and are therefore exempt from the code compliance review.

Historic Resource Review is required for all non-exempt exterior alterations in the Irvington Historic District.

**Relevant Approval Criteria:**

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

- 33.846.060.G – Other Approval Criteria

**PROCEDURAL HISTORY**

In November 2019, this case began with a code compliance case (CC 19-250785) for windows installed in a Historic District without Historic Resource Review. A notice of violation was mailed December 11, 2019. In March, the applicant spoke with the code compliance planner, and met with the code compliance supervisor. Both explained the process for LU submittal, the fees, and timelines associated with code compliance. On March 10, 2020, the applicant visited the Development Services Center, where a planner provided guidance on how to draw elevations and a site plan, provided a sample of a Historic Resource Review decision of approval, and emailed the applicant the Irvington Historic District nomination.

The applicant submitted a Type I Historic Resource Review for the replacement of only the front four windows. The code compliance officer notified the applicant and the Historic Resource Review planner that the Historic Resource Review must cover all the windows that have been replaced on all facades. In the April 2, 2020 Incomplete Letter, the applicant was asked to clarify the scope of the review and the review type, since the submitted review and review type did not encompass all of the code compliance violations (exhibit G.2).

The applicant stated that only the front windows have been replaced, and that all the vinyl windows on the side and rear façade pre-date the formation of the historic district (and are therefore exempt from review). The applicant provided numerous photos showing date stamps on windows that indicate the windows date to the late 1980s and 1990s (exhibit A.4) as well as labeled these windows 'existing' on the elevations (exhibits C.2, C.3, C.4 and C5). Staff cannot verify the location of the windows shown in the photos, or if they are from this property. The applicant was repeatedly urged to make sure all work previously completed without the benefit of Historic Resource Review is included in the scope of the current review. The applicant chose to add in the new wood window trim on all facades (the trim appears to have been added after the code compliance photos were taken) but not any additional windows.

Finally, the applicant was asked to provide at least two window products for staff to review. Staff provided the applicant a list of window products that have recently been approved through similar Historic Resource Reviews (exhibit G.3). Staff additionally provided a list of resources and templates for the applicant to fill out necessary information. The applicant

opted not to utilize the provided window templates, and only provided details for one window product. To facilitate completion of the review, Staff has added numerous conditions of approval that must be met in order to satisfy the code compliance case for only the windows included in this review. This decision does not pre-approve the replacement of side- or rear elevation windows, even if the same window product is proposed, since this Type I review is only available for proposals less than 150 square feet in area.

## ANALYSIS

**Site and Vicinity:** The subject property is on a 5,000 square foot mid-block lot in the Irvington Historic District. Known as the ER & MS Cunningham House, this stucco English Cottage-style home was constructed in 1924.

The property fronts NE 11<sup>th</sup> Avenue. At this location, NE 11<sup>th</sup> Avenue is a local service street.

**Zoning:** The Residential 5,000 (R5) single-dwelling zone is intended to preserve land for housing and to provide housing opportunities for individual households. The zone implements the comprehensive plan policies and designations for single-dwelling housing. Minimum lot size is 3,000 square feet, with minimum width and depth dimensions of 36 and 50 feet, respectively. Minimum densities are based on lot size and street configuration. Maximum densities are 1 lot per 5,000 square feet of site area.

The Historic Resource Protection overlay is comprised of Historic and Conservation Districts, as well as Historic and Conservation Landmarks and protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties.

Irvington Historic District Platted in the late Nineteenth Century as the first addition to Portland that employed restrictive covenants, the Irvington area developed intensely with a mix of middle-class housing types and sizes during the first two decades of the Twentieth Century. The contributing resources in Irvington range in design character from expressions of the late Victorian Era styles, especially Queen Anne, through the many Period Revival modes of the early decades of the Twentieth Century, to a few early modernist examples. There is also a wide diversity in the sizes of lots and houses. In terms of the streetscape, the numbered north-south avenues in Irvington vary dramatically in width, and they mostly form rather long block faces which the houses generally face. The named east-west street block faces are more consistent in length, almost all being traditional 200' Portland blocks. All are lined with mature street trees. These patterns help to lend the neighborhood the distinctive and homogeneous historic character.

**Land Use History:** City records do not indicate any previous land use reviews.

**Agency Review:** A Notice of Proposal in your Neighborhood was mailed on **July 14, 2020**. The Type I Historic Resource Review does not trigger responses from any other Bureaus or review groups.

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on **July 14, 2020**. One response was received from the Neighborhood Association.

- Dean Gisvold, Land Use Chair for Irvington Neighborhood Association, July 20, 2020 – The Irvington Community Association recommends denial of the proposal due to lack of detail on the proposed windows. The ICA recommends new windows are leaded to replicate the original windows removed without review. The ICA recommends that the applicant hire a design professional.

**Staff Response** – *Staff shares the ICA desire to see compatible windows re-installed in the façade. Previous Historic Resource Reviews have approved replacement of*

*leaded windows with high-quality wood windows. Therefore, while replacement leaded windows would be preferable, there is precedent for wood windows in English Cottage-style houses in Irvington, as proposed by the applicant.*

*The work proposed does not require a building permit, and therefore it is common for homeowners to complete this work without the assistance of a design professional. It is the role of staff to provide the necessary support to ensure that all applicants can navigate our process without the added cost of professional consultants.*

## **ZONING CODE APPROVAL CRITERIA**

### **Chapter 33.846.060 - Historic Resource Review**

#### **Purpose of Historic Resource Review**

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

#### **Historic Resource Review Approval Criteria**

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

**Findings:** The site is within the Irvington Historic District and the proposal is for non-exempt treatment. Therefore, Historic Resource Review approval is required. The approval criteria are those listed in 33.846.060 G – Other Approval Criteria.

*Staff has considered all guidelines and addressed only those applicable to this proposal.*

### **33.846.060 G - Other Approval Criteria**

- 1. Historic character.** The historic character of the property will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the property's historic significance will be avoided.
- 2. Record of its time.** The historic resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.
- 3. Historic changes.** Most properties change over time. Those changes that have acquired historic significance will be preserved.
- 4. Historic features.** Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.
- 7. Differentiate new from old.** New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a property. New work will be differentiated from the old.
- 8. Architectural compatibility.** New additions, exterior alterations, or related new construction will be compatible with the resource's massing, size, scale, and architectural features. When retrofitting buildings or sites to improve accessibility for persons with disabilities, design solutions will not compromise the architectural integrity of the historic resource.
- 9. Preserve the form and integrity of historic resources.** New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic resource and its environment would be unimpaired.
- 10. Hierarchy of compatibility.** Exterior alterations and additions will be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, if located within a Historic or Conservation District, with the rest of the district. Where practical, compatibility will be pursued on all three levels.

**Findings for 1, 2, 3, 4, 7, 8, 9, and 10:** As noted above, under Proposal and in the Procedural History sections, the proposal includes the replacement of four (4) windows on the front façade of a contributing resource in the Irvington Historic District as shown on the front elevation (exhibit C.2). The subject windows, which appear to be leaded windows in historic images (exhibit C.6), were removed and replaced with vinyl windows without the benefit of Historic Resource Review (CC 19-250785). While the applicant originally replaced the original windows with a white vinyl window with interior tape muntins in a Craftsman pattern, for the purposes of this review the applicant has proposed a wood window product (exhibit C.7) for the front four windows.

To maintain and preserve the historic character of the home, the proposed wood windows shall replicate the original multi-lite patterning of the previously removed lead windows, as shown in exhibit C.6. The exterior dimensions of all window openings shall remain the same as the original openings, as dimensioned in exhibit C.2.

Front Façade: Second Level, Southern Window

The upper story 54-inch by 54-inch window shall be divided into sixteen (16) lites, with four (4) across by four (4) vertically. Staff notes that all photos on record from 2010-2019 show that the most recent window in this location was divided into five (5) lites vertically. However, this window appears to be the same size as the northern window on the first level of the front façade, which is divided into four (4) lites vertically. Therefore, to maintain compatibility with the original configuration of the historic resource, Staff approval is for this window to be four (4) lites tall. To ensure compatibility with the historic district, this window shall be a fixed or casement.

Front Façade: Second Level, Northern Windows

The upper story pair of windows dimensioned as a single 39-inch by 42-inch window on exhibit C.2, shall be a *pair* of two equal sized casement windows separated by vertical framing and trim (not a mullied pair), each two (2) lites wide by four (4) lites tall as shown in exhibit C.6.

Front Façade: First Level, Southern Windows

On the first level, the southern windows on the front façade (shown as a single window that is 79-inches by 53-inches on exhibit C.2) shall be a tripartite grouping of three windows. Each window shall be separated by vertical framing and trim (not a mullied set) and each individual window shall be two (2) lites wide by four (4) lites tall, as shown in exhibit C.6. The total window opening for the three windows shall equal 79-inches wide by 53-inches tall. The operational style of these windows may be fixed or casement.

Front Façade: First Level, Northern Windows

On the first level, the northernmost windows on the front façade (shown as a single window that is 53-inches by 54-inches on exhibit C.2), shall be a pair of two windows, separated with vertical framing and trim (not a mullied pair), each two (2) lites wide by four (4) lites tall. The total window opening of the pair shall equal the 53-inches by 54-inches shown on the elevation C.2. The operational style of these windows may be fixed or casement.

No other windows on this property are reviewed or approved in this review. To ensure that any additional work receives the benefit of Historic Resource Review, a Condition of Approval states that prior to the conclusion of the pending code compliance case, any non-exempt elements shall require Historic Resource Review approval.

To ensure compatibility with the resource, and the surrounding Historic District, a Condition of Approval states the new all wood windows shall have wood exterior muntins and spacers dividing the glass panes to create shadow lines consistent with other historic windows. To replicate the proportions of the original lead windows,

which had narrow lead glazing bars between glass lites, a Condition of Approval states that the exterior wood muntins shall be no more than 1-1/8 inch wide and both the top rail and bottom rail shall each be at least two (2) inches tall. To maintain compatibility, a Condition of Approval states that the new windows shall be recessed into the wall plane a minimum of three (3) inches from the face of the upper sash to the face of the surrounding window trim, to match the typical shadow lines of historic windows, which were set deeper within wall sections than many contemporary window products today, and that the windows shall not be clad (exhibit C.11).

5.5-inch wide wood trim is proposed to frame all windows on all facades. Unfortunately, this trim has already been installed prior to review, and the original trim has been disposed of. The simple boxed out framing is typical of the English Cottage style, and the lack of ornamentation on this house. The new wood trim will match the original trim – and that of other contributing resources in the historic district – in material and finish.

*With Condition of Approval, 'C' that the new all wood windows shall have exterior wood muntins to create true- or simulated divided lites (not removable grilles), with internal spacers between the glazing to create shadow lines consistent with historic wood windows; Condition of Approval 'D' that the proposed windows shall be all-wood windows set into the wall plane a minimum of three (3) inches from the face of the upper sash to the face of trim as shown on the 'Window Template' sheet (exhibit C.8) and windows shall not be clad; Condition of Approval 'E' that any non-exempt elements other than the front windows and exterior wood window trim shall require Historic Resource Review prior to conclusion of the code compliance case, and Condition of Approval 'F' that the exterior wood muntins shall be no more than 1-1/8 inches wide and the top rail and bottom rail shall be at least 2" tall, these criteria are met.*

**5. Historic materials.** Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

**Findings for 5:** This Historic Resource Review originated as a code compliance case. Unfortunately, the original leaded front windows were removed and disposed of without benefit of review, which prompted the initiation of a code compliance investigation and this subsequent Historic Resource Review. Staff considered requiring new custom-lead windows to match the originals that were removed. However, precedent cases have approved removal of original windows in this Historic District to be replaced by high-quality wood windows. Therefore, Staff provided the applicant with a list of previously approved windows that included both reproduction lead windows and wood windows with historic proportions.

While unfortunate that the original windows have been removed, Staff is confident that with high-quality wood windows that match the original configuration and multi-lite patterning of the original lead windows, the historic character of the resource will be retained.

No additional work is proposed at this time. No chemical treatments or sandblasting is proposed. The original cladding is proposed to be repaired and restored.

*Therefore, this criterion is met.*

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

**Findings for 6:** No ground surfaces will be disturbed. *This criterion is not applicable.*

## DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all requirements of Title 11 can be met, and that all development standards of Title 33 can be met or have received an Adjustment or Modification via a land use review, prior to the approval of a building or zoning permit.

## CONCLUSIONS

The proposed windows will match original windows on comparable homes of the same architectural style within the Irvington Historic District in material, style, and depth in the wall plane. As such the proposal is compatible the building, and the district as a whole. The purpose of the Historic Resource Review process is to ensure that additions, new construction, and exterior alterations to historic resources do not compromise their ability to convey historic significance. With the conditions of approval, the proposal meets the applicable Historic Resource Review criteria and therefore warrants approval.

## ADMINISTRATIVE DECISION

Approval of wood windows in the front façade only, and wood window trim on all facades, per the approved site plans, Exhibits C-1 through C-11, signed and dated September 4, 2020, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related conditions (B through G) 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 20-128876 HRA." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. At the time of building permit submittal, a signed Certificate of Compliance form (<https://www.portlandoregon.gov/bds/article/623658>) must be submitted to ensure the permit plans comply with the Design/Historic Resource Review decision and approved exhibits.
- C. All wood windows shall have exterior wood muntins to create true- or simulated divided lites (not removable grilles), with internal spacers between the glazing to create shadow lines consistent with historic wood windows.
- D. The proposed windows shall be all-wood windows set into the wall plane a minimum of three inches from the face of the upper sash to the face of trim as shown on the 'Window Documentation Sheet' (Exhibit C.8). Windows shall not be wood clad.
- E. Prior to the conclusion of the pending code compliance case, any non-exempt elements shall require Historic Resource Review approval.
- F. The exterior wood muntins shall be no more than 1 1/8" wide, and the top rail and bottom rail shall both be at least 2" tall.
- G. No field changes allowed.

**Staff Planner: Hannah Bryant**

Decision rendered by:  on September 4, 2020

By authority of the Director of the Bureau of Development Services

**Decision mailed September 9, 2020**

**Procedural Information.** The application for this land use review was submitted on March 11, 2020 and was determined to be complete on July 1, 2020.

*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 March 11, 2020.

*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 extended the review by 245 days (exhibit A.2). Unless further extended by the applicant, **the 120 days will expire on: July 1, 2021.**

**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.

If you are interested in viewing information in the file, please contact the planner listed on the front of this decision. The planner can provide some information over the phone. Please note that due to COVID-19 and limited accessibility to paper files, only digital copies of material in the file are available for viewing. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at <https://www.portlandoregon.gov/citycode/28197>.

**Recording the final decision.**

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

- *Unless appealed*, the final decision will be recorded after **September 9, 2020** by the Bureau of Development Services.

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

For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

**Expiration of this approval.** An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

**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 for the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

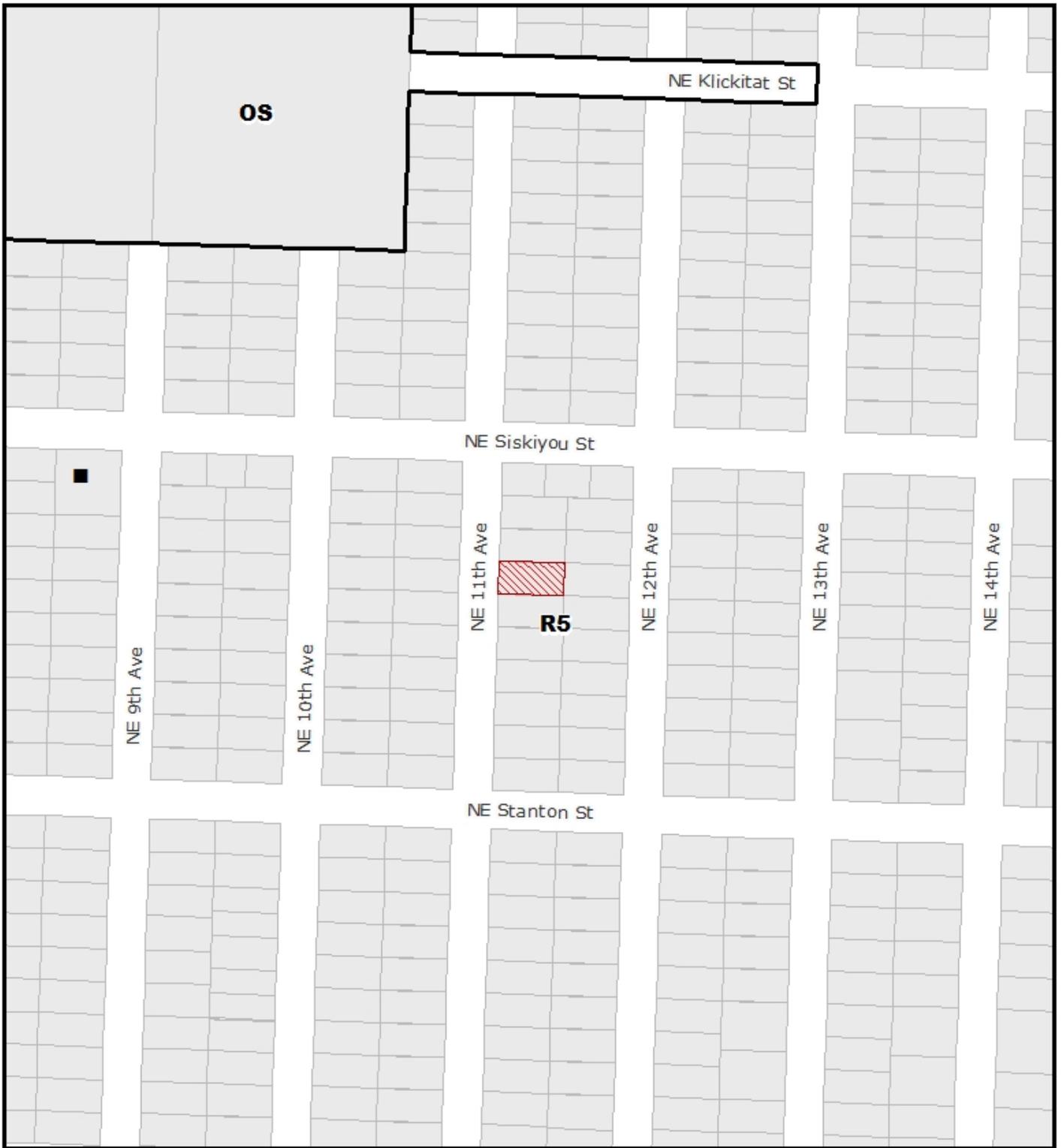
#### **EXHIBITS**

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Submittals
  1. Original Submittal
  2. Extension, dated
  3. Email from applicant deeming application complete
  4. Photos of existing windows from applicant
  5. Additional photos from applicant
  6. Email from applicant regarding windows and trim, May 11, 2020
  7. Email from applicant stating windows pre-date Historic District, April 22, 2020
- B. Zoning Map (attached)
- C. Plans/Drawings:
  1. Site Plan (attached)
  2. Front Elevation (west)
  3. Side Elevation (south)
  4. Side Elevation (north)
  5. Rear Elevation (east)
  6. Photos of Original Front Windows (supplied by staff)
  7. Wood Window Details
  8. Blank Window Template for condition of approval reference
  9. Trim Area Template
  10. Window Trim Dimensions
  11. Photo of window depth in wall section
- D. Notification information:
  1. Mailing list
  2. Mailed notice
- E. Agency Responses: None
- F. Correspondence:
  1. Dean Gisvold, July 20, 2020, The ICA requests denial of this application due to insufficient details and replacement of leaded windows with wood, rather than new reproduction lead windows.
- G. Other:
  1. Original LU Application
  2. Incomplete Letter, dated, April 2, 2020
  3. Letter from Staff, dated July 24, 2020
  4. Code compliance photos (CC 19-250785)

5. Letter from Staff to Crystal Fox, dated September 3, 2020
6. Letter from Staff to Yuri Raku, dated July 27, 2020
7. Letter from Staff to Yuri Raku, dated May 8, 2020
8. Letter from Staff to Yuri Raku, dated April 29, 2020
9. Letter from Staff to Crystal Fox, dated April 23, 2020
10. Example decisions and window documents provided by Staff to Applicant

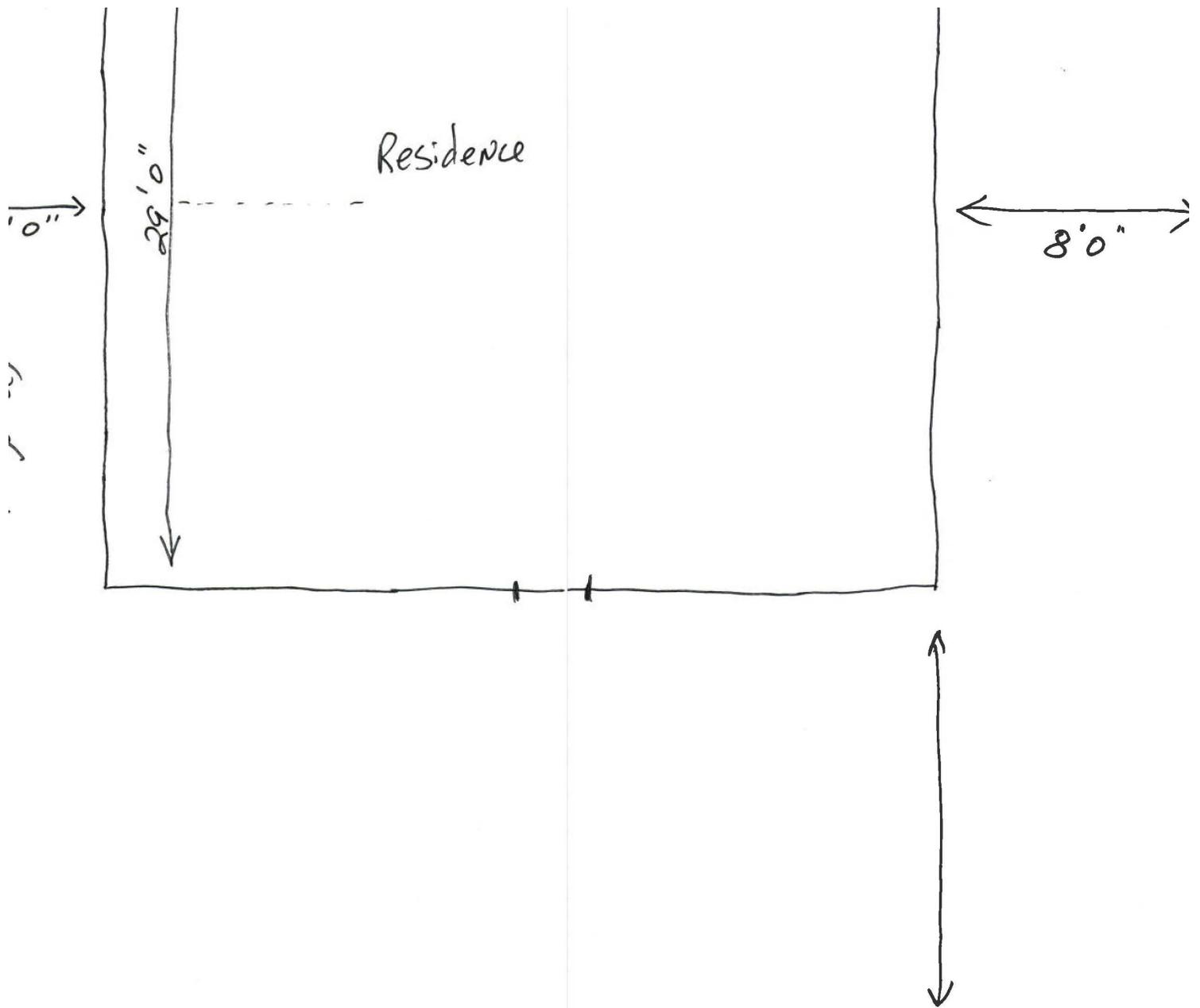
**The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).**



**ZONING**   
 IRVINGTON HISTORIC DISTRICT

-  Site
-  Historic Landmark

File No.	LU 20 - 128876 HR
1/4 Section	2731
Scale	1 inch = 200 feet
State ID	1N1E26BA 17700
Exhibit	B Mar 31, 2020



Residence

10'0"

29'0"

8'0"

50'

sidewalk

216 NE 11<sup>th</sup> ave  
Wetland OR 97267

existing street