

BEFORE THE COUNCIL OF THE
METROPOLITAN SERVICE DISTRICT

AN ORDINANCE ADOPTING A FINAL ORDER) ORDINANCE NO. 84-182
ORDER AND AMENDING THE METRO URBAN)
GROWTH BOUNDARY FOR CONTESTED CASE)
NO. 84-1: RAY PROPERTY)

THE COUNCIL OF THE METROPOLITAN SERVICE DISTRICT HEREBY ORDAINS:

Section 1. The Council hereby accepts and adopts as the Final Order in Contested Case No. 84-1 the Hearings Officer's Report and Recommendations in Exhibit "B" of this Ordinance, revised as provided in Exhibit "C," both of which [is] are incorporated by this reference.

Section 2. The District Urban Growth Boundary (UGB), as adopted by Ordinance No. 79-77, is hereby amended as shown in Exhibit "A" of this Ordinance, which is incorporated by this reference.

Section 3. Parties to Contested Case No. 84-1 may appeal this Ordinance under Metro Code Section 2.05.050 and ORS ch. 197.

ADOPTED by the Council of the Metropolitan Service District
this 20th day of November, 1984.



Presiding Officer

ATTEST:



Clerk of the Council

JH/srs
2202C/402-5
11/09/84

CONTESTED
CASE # 84-1
(RAY)

SEE MAP 2 IE 16C

URBAN

South 860 & 589+33 E
1413108' From T4 Cor
Between Sec 16 & 17

LAKE OSWEGO

CITY

LIMITS

CITY LIMITS - ORD 1282

EXISTING USB

500
2.48 Ac.

600
6.29 Ac.

700
7.05 Ac.

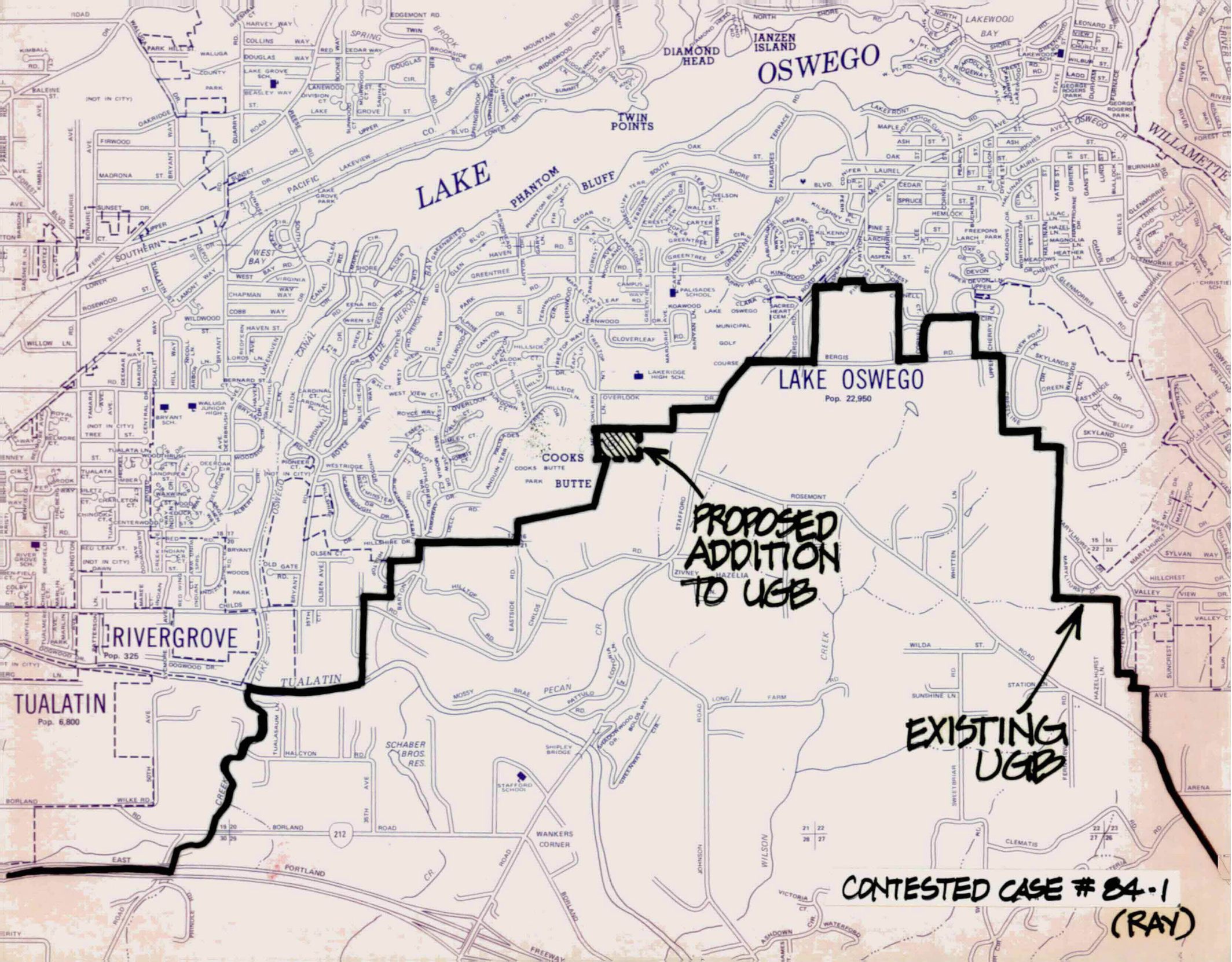
SEE PS 3120

EXISTING USB

7-16

PROPOSED
USB

Exhibit A



CONTESTED CASE # 84-1
(RAY)

STAFF REPORT

Agenda Item No. 7.2

Meeting Date Nov. 20, 1984

CONSIDERATION OF ORDINANCE NO. 84-182, ADOPTING A
FINAL ORDER AND AMENDING THE METRO URBAN GROWTH
BOUNDARY FOR CONTESTED CASE NO. 84-1: RAY PROPERTY
(SECOND READING)

Date: November 9, 1984

Presented by: Jill Hinckley

FACTUAL BACKGROUND AND ANALYSIS

William and Diana Ray have petitioned the Metropolitan Service District (Metro) for a locational adjustment of the UGB to add 8.77 acres along the southern edge of Lake Oswego city limits, as shown on the map attached as Exhibit "A."

Metro Hearings Officer Frank Josselson held two hearings on this case in order to assure all parties a full and fair hearing. After considering the testimony from both sides, the Hearings Officer recommends approval of the Ray's petition. The Hearings Officer's Report and Recommendation is attached as Exhibit "B."

Staff reviewed this report and recommended some revisions to ensure that the findings were complete and appropriate.

At the Council's November 8, 1984, meeting, the Council voted to remand the matter to the Hearings Officer to incorporate the staff changes and two additional changes proposed by Councilor Kelley. The changes approved by the Council are attached as Exhibit "C."

The Hearings Officer recommends that the ordinance be revised to incorporate these changes.

EXECUTIVE OFFICER'S RECOMMENDATION

Adoption of Ordinance No. 84-182 as amended.

JH/srs
2122C/402-5
11/09/84

1 on the application at Metro's offices. Planning Consultant Richard E.
2 Givens testified on behalf of applicants. No other proponents or
3 opponents appeared or testified.

4 After the hearing, the record was left open for nine days
5 to receive additional written comments. On September 24 and 26, 1984,
6 opponents to the proposed UGB amendment filed written testimony, and
7 on September 27, 1984, applicants filed a lengthy reply.

8 Among the issues raised by opponents was the sufficiency of
9 notice for the September 18, 1984 hearing. Although due notice was
10 given at least 10 days before the hearing, as Metro's ordinances
11 require, opponents stated they either did not receive it, were out of
12 town at the time of notice or hearing, or lacked adequate opportunity
13 to prepare.

14 Because of the opponents' allegation of inadequacy of op-
15 portunity to prepare, and because many of the substantive issues raised
16 by opponents were not considered by the City of Lake Oswego or heard
17 by me, on October 1, 1984, by certified mail, I notified all parties
18 of my intention to re-open the hearing for oral testimony only on
19 October 5, 1984. Applicants and opponents appeared and presented oral
20 testimony on October 5, 1984. The hearing record was then closed.

21 The following documents were either introduced during the
22 course of the hearing or appeared in Metro's public file on this matter.
23 They constitute the record upon which this report and recommendation
24 is based.

25 Exhibit 1 -- List of Person Notified for September 18, 1984 Hearing.

26 Exhibit 2 -- Receipts for Certified Mail (Sept. 18 hearing notice).

OCT 15 1984

BEFORE THE METROPOLITAN SERVICE DISTRICT

In the Matter of the Application)
of WILLIAM and DIANA RAY and)
MRS. ERNESTINE B. CROW for an) Contested Case No. 84-1
AMENDMENT to the District Urban)
Growth Boundary) REPORT AND RECOMMENDATION
OF HEARINGS OFFICER

I. Nature of the Case

This is a request by three property owners to add 8.77 acres to the regional urban growth boundary. The land lies just east of the City of Lake Oswego city limits in Clackamas County. The names of the applicants and their ownerships are:

<u>Name</u>	<u>Description</u>	<u>Size of Parcel</u>
William and Diana Ray	T2S, R1E, NE 1/4 SW 1/4, Sec. 16 CA, TL 500, W.M.	2.48 acres
Mrs. Ernestine B. Crow	T2S, R1E, NE 1/4 SW 1/4, Sec. 16 CA T.L. 501 600, W.M. <i>(correction of typing error)</i>	6.29 acres

Applicants wish to develop this property for a single family residential planned unit development.

The City of Lake Oswego and Clackamas County 1/ have approved the proposed UGB amendment, and the city has approved annexation of the area contingent upon Metro's approval of this amendment.

II. Proceedings and Record

On September 18, 1984, following publication and mailing of notice to fifteen property owners who were identified by applicants as living within 300 feet of applicants' property, a hearing was held

1. See Record, Exhibit 18.

1 Exhibit 3 -- Resolution Nos. R-84-47 and R-84-48 of the City of
2 Lake Oswego.
3 Exhibit 4 -- Letter to the Hearings Officer from Metro Regional
4 Planner Jill Hinckley (August 30, 1984).
5 Exhibit 5 -- Metro staff memorandum regarding M.C. 3.01.040(a)(2).
6 Exhibit 6 -- The tapes of the September 18, 1984 hearing.
7 Exhibit 7 -- The petition for UGB locational adjustment (5 pages)
8 and narrative statement of William and Diana Ray
9 (9 pages).
10 Exhibit ⁸~~11~~ --Memorandum from Lake Oswego Planning Director Sandra
11 Young to Lake Oswego City Manager Peter Harvey
12 (June 20, 1984).
13 Exhibit 9 -- Letter from Ernestine B. Crow authorizing William Ray
14 to apply for annexation and UGB amendment for her
15 property (August 24, 1984).
16 Exhibit 10 --Petition for Annexation (one page).
17 Exhibit 11 --Memorandum from Lake Oswego Planning Director Sandra
18 Young to Lake Oswego City Manager Peter Harvey
19 (June 21, 1984).
20 Exhibit 12 --Three large maps of the site introduced by applicants.
21 Exhibit 13 --October 1, 1984 hearing notice.
22 Exhibit 14 --Receipts for certified mail (Oct. 5, 1984 hearing
23 notice).
24 Exhibit 15 --One-page petition signed by eight individuals opposed
25 to locational adjustment, dated September 24, 1984.
26

1 Exhibit 16 --Three-page letter from six individuals opposed to
2 locational adjustment, dated September 26, 1984.

3 Exhibit 17 --Five-page letter and attachments from Mr. Richard
4 E. Givens dated September 27, 1984.

5 Exhibit 18 --Clackamas County Order No. 84-1098 (August 2, 1984).

6 Exhibit 19 --Tapes of October 5, 1984 hearing.

7 Exhibit 20 --Handwritten testimony of Mr. Don Daly.

8 III. The Site And Surrounding Area

9 Applicants' property is located toward the top of the
10 Palisades Hill south of Oswego Lake at the southeast end of the City
11 of Lake Oswego. It is approximately 1200 feet west of Stafford Road,
12 a two lane arterial running north and south and connecting Lake Oswego
13 to I-205 to the south. Access to the property is via a 30-foot wide
14 easement from Stafford Road. The Ray parcel (TL 500) is bordered on
15 three sides (west, north, and south) by the existing UGB; the north
16 line of the Crow parcel (TL 600) touches the UGB.

17 The property is situate between one of Lake Oswego's resi-
18 dential areas, to the north and northwest, and a Clackamas County
19 rural residential area to the south and southeast. Surrounding zoning
20 is Lake Oswego R-10 and R-15, to the north and west; and Clackamas
21 County RRFF-5, to the south and east. Adjacent county lands were
22 removed from the operation of LCDC's resource goals by a "built and
23 committed" Goal 2 exception taken by Clackamas County. That exception
24 was acknowledged by LCDC, along with the county's comprehensive plan.

25 Applicants' neighbor to the west is a 35-acre, undeveloped
26 city park. To the north is the R-10 Palisades Heights No. 5 subdivision

1 and an undeveloped R-15 parcel owned by the Mormon Church. A local
2 street called Meadowlark Lane is stubbed at the north property line.
3 Land to the south and east is either large lot residential with non
4 commercial cattle or horse pasturing, or is cropped as hay. There is
5 no commercial agriculture in the vicinity. One parcel which touches
6 the southeast corner of applicants' property (TL 600) is in farm deferral.

7 Southwest of applicants' land, within the city limits and
8 existing UGB, is a 6.48 acre parcel, zoned R-15, which is accessible
9 only by virtue of an easement through the city park. The city's ease-
10 ment specifies that no more than two dwellings may use the right of
11 way. Applicants maintain that development of their land would provide
12 additional access and facilitate full R-15 development of this parcel,
13 a matter discussed below.

14 The Crow residence lies on TL 600. The Ray residence is
15 bisected by the southern line of TL 500, which is also the north line
16 of TL 501 (not involved in this application). Metro's UGB follows
17 that tax lot line, so it, too, bisects the home.

18 Both properties are wooded and contain steep slopes, as
19 are characteristic within the Palisades area of Lake Oswego.

20 IV. Standards Applicable

21 The standards applicable to this UGB adjustment are set
22 forth in Metro Ordinance Nos. 81-105 and 82-133, as amended. These
23 ordinances have been acknowledged by LCDC for compliance with the
24 statewide goals. Therefore the statewide goals are inapplicable.

25 Metro's standards require:

- 26 1. That the adjustment not result in an island of urban

1 land outside the contiguous UGB, or create an island of non-urban
2 land within the UGB. This application would do neither.

3 2. That the petition may not request inclusion of more than
4 50 acres. This application is for 8.77 acres.

5 3. That the petition contain the written action of the
6 governing bodies of each city and county having jurisdiction over lands
7 contained in the petition. The record in this case shows that Lake
8 Oswego has approved this UGB adjustment and that Clackamas County has
9 approved, generically, all adjustments of this character.

10 4. That the application be made by 50 percent or more of
11 the property owners of the area proposed to be included. All owners
12 of property proposed to be included are applicants in this case.

13 5. M.C. § 3.01.040(d)(2) incorporates by reference the five
14 standards of subsection (a). They are:

15 "(1) Orderly and economic provision of public
16 facilities and services. A locational adjustment
17 shall result in a net improvement in the efficiency
18 of public facilities and services, including but not
19 limited to, water, sewerage, storm drainage, trans-
20 portation, fire protection and schools in the adjoining
21 areas within the UGB; and any area to be added must
22 be capable of being served in an orderly and economical
23 fashion."

24 Finding. Inclusion of applicants' land within the UGB would
25 result in a "net improvement in the efficiency of public facilities
26 and services...in the adjoining areas within the UGB." Access to a
6.48-acre parcel of property southwest of applicants' is currently over
a very narrow easement through the undeveloped park. The grantor of
the easement, the city, restricted its use to two dwellings. The
property is otherwise land locked. Development of applicants' property

1 would provide access to this parcel, and to the southerly one acre of
2 the Rays' property, which is inside both the UGB and the city. Such
3 access would enable those parcels to develop to full R-15 densities,
4 consistent with Lake Oswego's comprehensive plan.

5 It also appears that development of applicants' properties
6 would enable use of gravity sewers from those two other parcels now
7 within the UGB to a trunk at Meadowlark Lane. Applicants' properties
8 lie between those parcels and the trunk line, and if they are not
9 available, it may be difficult, if not impossible to use the trunk
10 line or to sewer the properties currently within the UGB.

11 Water is proposed to be provided from a large water tank
12 located in the city park. Applicants state that a water line from the
13 tank to their properties to the southwest could be more economically
14 provided if its cost were divided with applicants. Even if true, this
15 assertion does not militate in favor of granting the application. It
16 is generally more economical to serve a greater number with a street,
17 water line, or sewer line than a lesser number. The increased
18 economy does not, however, furnish a justification for converting
19 rural land to urban. Were it otherwise, an argument could be made,
20 for example, that the extension of a street from applicants' p.v.d.
21 to Stafford Road would justify unbanization of the land between the
22 p.v.d. and Stafford Road.

23 Opponents of the UGB adjustment are homeowners who live
24 along a local street called Meadowlark Lane, which is stubbed at appli-
25 cants' north property line. They urge Metro that inclusion of appli-
26 cants' land would not "result in a net improvement in the efficiency

1 of public facilities and services...in the adjoining areas within
2 the UGB" for two reasons:

3 (a) Because the addition of applicants' land and development of
4 the adjoining parcels to urban levels would contribute an unacceptable
5 level of traffic to Meadowlark Lane;

6 (b) Because addition of applicants' land may contribute to an
7 existing stormwater drainage problem at homes at the south end of
8 Meadowlark Lane.

9 As to traffic, opponents correctly state that access to
10 applicants' property is currently by means of an easement from Stafford
11 Road. They are concerned about use of their street, Meadowlark Lane,
12 for access, and would prefer that access to applicants' property
13 continue to be from Stafford Road. Meadowlark Lane is, they believe,
14 too narrow to accommodate the additional traffic, too windy and steep,
15 and that some corners are "sight blind." Opponents request that
16 applicants be required to perform a "proper traffic study" which they
17 would have a chance to review prior to approval of the amendment.
18 See Exhibit 20, page 4.

19 On September 27, 1984, applicants submitted a traffic study
20 for Meadowlark Lane. Included with the study is the city's plan and
21 profile of the street. That study states as follows.

22 There are twelve lots on Meadowlark Lane, eleven of which
23 are currently developed with single-family residences. Applicants'
24 properties and the currently land locked properties southwest of
25 applicants within the UGB are capable of accommodating, at full
26 development densities, 40 additional lots. Thus, if applicants'

1 properties and the properties currently within the UGB which cannot
2 now be fully developed were fully developed, and if all such properties
3 had Meadowlark Lane as their sole access, there would be 52 single
4 family homes using Meadowlark Lane. There are no traffic counts
5 available for Meadowlark Lane, but assuming 10 trips per household
6 per day (source: Trip Generation Manual), the eleven homes on
7 Meadowlark generate 110 trips per day. If applicants' properties and
8 those within the UGB to the southwest were fully developed, those 40
9 residences would contribute an additional 400 daily trips upon
10 Meadowlark Lane.

11 By comparison with similar streets in the vicinity, appli-
12 cants show that 520 trips per day is not unusually high for the
13 neighborhood. The Lake Oswego Comprehensive Plan shows that current
14 traffic volumes on both Treetop Lane and Overlook Drive, to the west
15 of Meadowlark, are approximately 1000 trips per day. On the average
16 weekday in the year 2000, these same roads are projected to carry
17 2000 and 6200 vehicles per day, respectively.

18 Meadowlark Lane is, in my judgment, of adequate width to
19 accommodate this projected traffic volume. It has been constructed
20 roughly to the same standards as Treetop, Overlook and other streets
21 in the newer Palisades subdivisions. It is a paved street with an
22 improved width of 32 feet from curb to curb.

23 Applicants state that if it were determined in the course
24 of Lake Oswego's planning process that Meadowlark could not accommo-
25 date traffic from the proposed developments, the existing easement
26 from Stafford Road to applicants' properties could be used.

1 For the foregoing reasons, I find that there is adequate
2 access to applicants' properties. There is no question that develop-
3 ment at applicants' properties would appreciably increase traffic on
4 Meadowlark Lane, but not to levels that have been demonstrated to
5 approach or exceed Meadowlark's capacity. Opponents have stated
6 that parking along Meadowlark may interfere with proposed traffic
7 volumes; and that the increased volumes may interfere with the
8 Meadowlark-Treetop-Overlook intersection. If this is the case, the
9 city may have to consider restricting parking on Meadowlark, and
10 other measures, including requiring direct access to Stafford Road.
11 Metro is a regional planning agency responsible for the regional
12 aspects of land use planning. This agency has no standards or
13 authority for assessing or dealing with such matters as parking on
14 local streets. If in the course of its review of development
15 applications, the city determines that such restrictions or a separate
16 access to Stafford Road are needed, the city had standards and
17 authority to require them. Applicants have sustained their burden by
18 showing that adequate access, via Meadowlark or the easement to
19 Stafford Road is available, and by showing that the additional traffic
20 contribution will not exceed any street's capacity. It cannot be
21 said that this UGB adjustment would impair the "efficiency" of
22 Meadowlark Lane, as that word appears in the Ordinance.

23 Opponents are also concerned that development of applicants'
24 properties could exacerbate an existing storm water drainage problem
25 at the homes on the south end of Meadowlark Lane. Several properties
26 along Meadowlark Lane, including those of opponents Daly, Austin, and

1 Feld, have experienced water problems. Opponents claim that existing
2 storm drains are inadequate to handle the existing load, and state
3 that applicants should be required to prove that disposal of their
4 storm water can be accomplished without placing additional financial
5 burdens on applicants' neighbors. I believe applicants have made
6 these demonstrations.

7 A topographical map attached as Exhibit "E" to Mr. Givens'
8 September 27, 1984 letter (Record, Exhibit 17) shows the location of
9 an existing drainageway, and the apparent source of the water which
10 flows across opponents' properties. The water seems to be originating
11 in the undeveloped Cooke's Butte Park, west of applicants' and opponents'
12 properties, and flowing through the southerly five or six lots on
13 Meadowlark, then across applicants' properties.

14 Applicants acknowledge that there are drainage problems
15 north of their properties, but state that they can effectively dispose
16 of stormwater from their properties, if developed, and even help
17 alleviate existing problems on Meadowlark. They propose to do this
18 by intercepting surface water from the current terminus of Meadowlark
19 and culverting this water directly to the existing drainageway which
20 parallels Stafford Road. The culvert would run east-west along the
21 easement from Stafford Road to applicants' properties.

22 Applicants state that Lake Oswego requires developers
23 to install stormwater detention systems to provide a controlled
24 release of stormwater from their collection systems. This practice,
25 they say, keeps the rate of runoff from developed properties at
26 the same level, presumably during rainy periods, as naturally would

1 occur on the undeveloped site.

2 It therefore appears that applicants' development will
3 not impair the efficiency of existing storm drains, or aggravate the
4 existing stormwater problem on Meadowlark Lane. Indeed, it appears
5 that applicants can control stormwater from their properties, and
6 possibly help alleviate existing problems their neighbors to the
7 north are experiencing.

8 To summarize and conclude, Metro's ordinances require the
9 applicant to show that a boundary adjustment "shall result in a net
10 improvement in the efficiency of public facilities and services...
11 in adjoining areas within the UGB," and that the area to be added
12 can be served in an orderly and economic fashion. The evidence
13 is that urban development of applicants' properties will facilitate
14 urbanization of 6.48 acres of property to the southwest of applicants',
15 and that necessary public facilities and services are available to
16 applicants' property. Applicants' proposed development would in-
17 crease traffic on Meadowlark Lane, but not to levels which have been
18 shown to approach or exceed that street's capacity. Alternative
19 access to Stafford Road is available over an existing easement, sewer
20 and water are available. I therefore find that these requirements of
21 Metro's ordinance are satisfied by the proposed change.

22 * * * * *

23 "(2) Maximum efficiency of land uses.
24 Considerations shall include existing development
25 densities on the area included within the amend-
ment, and whether the amendment would facilitate
needed development on adjacent existing urban land."

26 Finding. As is indicated above, inclusion of applicants'

1 land within the UGB would facilitate development of 6.48 acres of
2 of adjacent land within the UGB. Development of that area is "needed"
3 within the meaning of the ordinance. The legislative history of
4 this ordinance indicates that "needed" was intended to mean "con-
5 sistent with the local comprehensive plan and/or applicable regional
6 plans." This conclusion is based upon the following documents which
7 were submitted to LCDC at the time of acknowledgment of Ordinance 81-105:
8 Exhibit F-3 (November 3, 1980 Discussion Draft, p.8, item no. 8);
9 Exhibit I-1 (Ordinance 81-105 as first read, Section 4(a)(2) pp.2-3);
10 Exhibit I-2 (December 29, 1980 Staff Report, p.3, item 8 (Standards),
11 first two paragraphs); Exhibit M-2 (January 26, 1981 Explanation of
12 Recommended Amendments to Ordinance 81-105, p.4, item V.A.1.) See
13 McPherson v. Metropolitan Service District, LUBA No. 84-047, slip
14 opinion at p.6 (Sept. 11, 1984).

15 * * * * *

16 "(3) Environmental, energy, economic and
17 social consequences. Any impact on the regional
18 transit corridor development must be positive
and any limitations imposed by the presence of
hazard or resource lands must be addressed."

19 Findings. Opponents state that applicants' site has land
20 slide and erosion potential, and that it would be improper to develop
21 the site without paying due regard to these dangers. They suggest
22 that prior to acting on the UGB amendment, Metro secure a technical
23 report on the site geology.

24 Applicants respond that the area is identified in the
25 Lake Oswego Comprehensive Plan as having "potential" soil hazards,
26 but is not included in an area of "known" hazards. Much of Lake

1 Oswego, they say, contains steep slopes having the potential for
2 erosion and landslides. Lake Oswego is said to and does have ordinances
3 and plan policies requiring geological reports at the time of sub-
4 mission of a development application.

5 Applicants note that opponents' homes were themselves built
6 in areas of potential landslide hazard, and that appropriate develop-
7 ment techniques can often result in the successful development of
8 landslide or erosion prone land. Finally, applicants state that
9 they intend to develop their property under Lake Oswego's planned
10 unit development ordinance, which permits clustering of housing in
11 buildable areas and any hazardous areas to remain undeveloped open
12 space.

13 In the absence of evidence that applicants' property,
14 for geologic reasons, cannot be developed or is severely limited in
15 development potential, the development process in Lake Oswego should
16 be permitted to proceed. If in that process it appears to the city
17 that geologic hazards preclude development of part or all the
18 property, the city has authority to act appropriately. On issues
19 such as this, Metro must paint with a broad, regional brush. The
20 city, by contrast, is equipped with power to condition a development
21 approval to protect against geologic hazards.

22 Opponents also maintain that development of applicants'
23 land will result in a loss of open space. This is, of course, true,
24 but is not a reason to deny the UGB adjustment. The recent acknow-
25 ledgment of Lake Oswego's comprehensive plan suggests that the city
26 has provided sufficient public and recreational land to meet the

1 open space and recreational needs of residents. Applicants cannot,
2 in any event, constitutionally be required to preserve their property
3 for public open space, unless they are compensated.

4 Finally, opponents state that the site is remote from
5 mass transit. While it is desirable that new development be
6 located on an existing mass transit route, it is not necessary.
7 The issue is whether the boundary adjustment would have a positive
8 effect on "transit corridor development." Given the additional
9 population development of applicants' property would introduce, and
10 existing demands in the area (created, for example, by the Lakeridge
11 High School), this UGB change could hasten bus service to this
12 neighborhood and improve the transit corridor.

13 I conclude that the environmental, energy, social, and
14 economic consequences of this development are on balance, positive.

15 * * * * *

16 "(4) Retention of agricultural land.
17 When a petition includes land with Class I-IV
18 soils that is not irrevocably committed to
19 non-farm use, the petition shall not be approved
20 unless it is factually demonstrated that:

21 "-- Retention of the agricultural land would
22 preclude urbanization of an adjacent area
23 already inside the UGB, or

24 "-- Retention of the agricultural land would
25 prevent the efficient and economical
26 provision of urban services to an adjacent
area inside the UGB."

27 Finding. This subparagraph is inapplicable because
28 applicants' land is committed to nonfarm use. In its comprehensive
29 plan, Clackamas County took an exception from LCDC's resource goals

1 for applicants' property and surrounding county lands on the ground
2 that those lands are irrevocably committed to nonfarm and nonforest
3 uses. LCDC has acknowledged the plan, including this exception.
4 That exception is subject neither to challenge nor to review in this
5 proceeding.

6 * * * * *

7 "(5) Compatibility of proposed urban uses
8 with nearby agricultural activities. When a
9 proposed adjustment would allow an urban use
10 in proximity to existing agricultural activities,
the justification in terms of [Sections 8(a)(1)]
through (4) of this subsection] must clearly
outweigh the adverse impact of any incompatibility."

11 Finding. As is indicated above, applicants' land is in
12 proximity to existing agricultural activities -- predominantly pasture
13 with some hay production. There is no evidence of conflict or in-
14 compatibility between applicants' proposed development and those
15 agricultural activities. There is substantial rural residential
16 development in the area, which does not appear to interfere with
17 agricultural activities, and there is nothing in the nature of a
18 residential development which would interfere with nearby cattle or hay
19 production.

20 * * * * *

21 Applicants contend that the locational adjustment is
22 necessary to remedy a mistake in the original boundary. The location
23 of the original boundary was mistaken, they say, first because it
24 went through the Ray's residence, and, second, because inclusion
25 of applicants' land is necessary to provide sewer and transportation
26 to the 6.48-acre area to the southeast of their property, within

1 the UGB.

2 Metro's decision to locate the boundary in its original
3 position may not have been the best decision or even a good one.
4 That does not mean the decision was mistaken. Section 8 of Ordinance
5 81-105, as amended by Section 1 of Ordinance No. 82-133 states
6 that mistake is a ground for adjustment only if there "is clear
7 evidence in the record of specific legislative intent to place the
8 UGB in the particular location requested." The "mistake" to which
9 the ordinance refers therefore is in the nature of a clerical
10 mistake in conforming the boundary to Metro's wishes, for example,
11 a mistake in drawing the line. The fact that there is a better
12 location for the boundary is not evidence of this kind of mistake.

13 Moreover, Metro may remedy a mistake only if a petition
14 to do so is brought within two years of the date of adoption of
15 the boundary. Applicants acknowledge that this portion of the
16 boundary was adopted in 1980, over four years ago.

17 * * * * *

18 Finally, opponents contend that LCDC's acknowledgment of
19 Lake Oswego's comprehensive plan indicates that there is adequate
20 land within the existing urban growth boundary to meet long term
21 population and growth needs. They claim there is no need for this
22 change.

23 The short and complete response to this assertion is that
24 it is true but irrelevant. Need is not a factor to be considered
25 under Metro's ordinances for a change of this small magnitude.

26 //

1 V. Conclusion and Recommendation

2 For the foregoing reasons, I conclude that this application
3 satisfies all standards and requirements of applicable ordinances,
4 and I recommend that it be approved by the Metro council.

5
6 DATE: October 12, 1984.

7 Respectfully submitted,

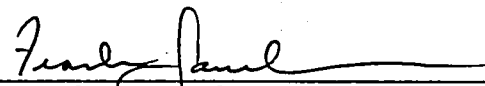
8 
9 _____
10 Frank Josselson
11 Hearings Officer

EXHIBIT "C"

Date: October 26, 1984

To: Metro Council

From: Jill Hinckley, Land Use Coordinator

Regarding: Staff Comments and Recommendations on the Report and
Recommendations of the Hearings Officer in Contested
Case No. 84-1

Staff has reviewed the Hearings Officer's Report and considers his findings generally thorough, clear and appropriate. In three instances, however, staff is requesting some revisions which, though minor, we believe are desirable to provide a complete and appropriate record of the considerations which justify UGB amendment and which may be necessary to sustain the Ordinance on appeal. Each recommended revision is discussed below:

1. ORDERLY AND EFFICIENT SERVICE PROVISION

COMMENT:

The applicable Metro standard includes fire protection and schools in the list of services to be considered. The Hearings Officer's Report does not include the findings regarding these services. There is, however, evidence in the record that these services can be provided for urban level development on the subject site without decrease in efficiency.

1 RECOMMENDATION:

2
3 ON PAGE 12 OF THE PROPOSED FINDINGS, FOLLOWING LINE 7, ADD:

4
5 The applicant's report states that: "Inclusion of the subject
6 property in the UGB would have no significant effect on schools
7 in the area as indicated by the school district's comment on
8 this application. The subject properties are currently within
9 the Lake Oswego School District and would remain so after
10 annexation to the City. The net increase in school service
11 requirements resulting from the additional homes which could be
12 located on the subject property should not be significant due to
13 the relatively small size of the site." The city of Lake Oswego
14 will provide fire protection following annexation. The evidence
15 presented is adequate to demonstrate that the subject site can
16 be provided school service and fire protection without any
17 significant effect on the efficiency of these services.

18
19 2. LAND USE EFFICIENCIES

20
21 COMMENT:

22
23 The applicable standard provides that "considerations shall
24 include existing development densities...." Compliance with
25 this standard requires a consideration of whether the density of
26

1 existing development would interfere with efficient
2 redevelopment at urban densities. The Hearings Officer's Report
3 does not speak to this factor, but evidence in the record shows
4 that the existing development densities are not such as would
5 interfere with efficient urbanization.

6
7 RECOMMENDATION:

8
9 ON PAGE 13 OF THE PROPOSED FINDINGS, FOLLOWING LINE 14, ADD:

10
11 There is one house on the Ray property (TL 500) -- or rather, a
12 portion of a house, since it straddles the UGB. Because it is
13 located on the edge of the property, it would not interfere with
14 efficient urbanization of the remainder of the property.

15 Another house is located on the Crow property (TL 600). Because
16 this property would be purchased by the Rays for urbanization,
17 the house could be torn down if necessary for efficient
18 development. The applicant's planning consultant has testified
19 that 25 to 30 homes could be recommodated on the entire site
20 under anticipated R-15 zoning. Existing development densities
21 thus would not interfere with redevelopment consistent with
22 urban zoning.

1 3. ENVIRONMENTAL, ENERGY CONSEQUENCES

2
3 COMMENT:

4
5 In addressing the requirement that "any impact on regional
6 transit corridors shall be positive," the Hearings Officer's
7 Report concludes that "this UGB change could hasten bus service
8 to this neighborhood and improve the transit corridor." Staff
9 disagrees with this conclusion and recommends that it be changed
10 in order to provide an appropriate precedent for future
11 applicants.

12
13 RECOMMENDATION:

14
15 ON PAGE 14 OF THE PROPOSED FINDINGS, DELETE LINES 4 THROUGH 12
16 AND REPLACE WITH:

17
18 Opponents have objected that the site is remote from mass
19 transit. This does not, however, constitute a negative impact
20 on regional transit corridors. It is impossible for all urban
21 lands -- particularly lower density residential lands -- to be
22 served directly by mass transit. A negative impact would result
23 only when urbanization would allow development of a size and
24 density so great as to in itself require transit service where
25 that service was not currently available or planned. This is
26

1 not the case here. Because of the small size of the property
2 (8.77 acres) and the low residential density proposed (25 to 30
3 units), development will not be on a large enough scale to
4 require transit service and, therefore, will have no impact on
5 regional transit corridors.

6
7 In making this finding, the Council takes notice of the Regional
8 Transportation Plan (RTP), adopted by Metro Ordinance No. 82-135
9 and amended by Ordinance No. 83-163, which forecasts a total of
10 621,000 person trips per day in the southwest portion of the
11 region in which the subject site is located. Four percent of
12 all trips regionwide are expected to be by transit in the year
13 2000, and this mode split would generally apply in the southwest
14 area. The applicant's planning consultant has testified that
15 400 daily trips are estimated to result from urbanization of the
16 subject property. Applying the RTP mode split of 4 percent, 16
17 daily transit trips could be generated. Sixteen transit trips
18 would have no measurable impact on the regional transit corridor.

19
20 4. CONCLUSION

21
22 COMMENT:

23
24 The Hearings Officer's Report does not include direct and
25 explicit findings on compliance with Metro Code standard
26 3.01.040(d)(2).

1 RECOMMENDATION:

2
3 ADD TO THE FINDINGS ON PAGE 16 FOLLOWING LINE 20:

4
5 "The proposed UGB must be superior to the UGB as presently
6 located based on consideration of the factors in subsection
7 (a). The minor addition must included all similarly
8 situated contiguous land which could also be appropriately
9 included within the UGB as an addition based on the factors
10 in subsection (a)." (MC 3.01.040(d)(2))
11

12 Finding

13
14 Lake Oswego' staff report noted that except for the northeast
15 corener of an adjacent the lot, "all other property to the east
16 and south would be served as part of a different sewer basin."
17 The applicant has provided a topographic map that shows the
18 ridge line separating the two drainage basins. In addition,
19 only the two subject lots need be included in the UGB in order
20 to efficiently provide road access and sewers to the land-locked
21 urban lands to the southwest.

22
23 These two circumstances are pertinent to compliance with
24 standard (a)(1). No other contiguous priorities are similarly
25 situated in these respects.
26

1 In summary, the UGB proposed is superior to the existing UGB
2 because: (1) it allows for more efficient urbanization of
3 existing urban lands to the southwest, in compliance with
4 standards (a) (1) and (a) (2); and (2) does not create any
5 counterbalancing negative impacts under standard (a) (3)-(a) (5).

6 ****

7
8 JH/srb

9 2122C/402-4

10 10/26/84

EXHIBIT "C"

REVISIONS TO HEARING OFFICER'S REPORT
AND
RECOMMENDATIONS FOR CONTESTED CASE NO. 84-1

ON PAGE 12 OF THE FINDINGS, FOLLOWING LINE 7, ADD:

The applicant's report states that: "Inclusion of the subject property in the UGB would have no significant effect on schools in the area as indicated by the school district's comment on this application. The subject properties are currently within the Lake Oswego School District and would remain so after annexation to the City. The net increase in school service requirements resulting from the additional homes which could be located on the subject property should not be significant due to the relatively small size of the site." The city of Lake Oswego will provide fire protection following annexation. The evidence presented is adequate to demonstrate that the subject site can be provided school service and fire protection without any significant effect on the efficiency of these services.

ON PAGE 13 OF THE FINDINGS, FOLLOWING LINE 14, ADD:

There is one house on the Ray property (TL 500) -- or rather, a portion of a house, since it straddles the UGB. Because it is located on the edge of the property, it would not interfere with efficient urbanization of the remainder of the property. Another house is located on the Crow property (TL 600). Because this property would be purchased by the Rays for urbanization, the house could be torn down if necessary for efficient development. The applicant's planning consultant has testified that 25 to 30 homes could be recommodated on the entire site under anticipated R-15 zoning. Existing development densities thus would not interfere with redevelopment consistent with urban zoning.

ON PAGE 14 OF THE FINDINGS DELETE LINES 13-21 AND REPLACE WITH THE FOLLOWING:

The presence of hazards is a matter of regional concern only when their extent and severity, in conjunction with the applicable local regulations, would preclude efficient urban-level development. Such is not the case here. Lake Oswego's code provisions requiring a geologic study prior to development in hazard areas and allowing clustering of development on non-hazard lands are adequate to ensure that the property can safely be developed at urban densities.

ON PAGE 15 OF THE FINDINGS, DELETE LINES 4 THROUGH 12 AND REPLACE WITH:

Opponents have objected that the site is remote from mass transit. This does not, however, constitute a negative impact on regional

transit corridors. It is impossible for all urban lands -- particularly lower density residential lands -- to be served directly by mass transit. A negative impact would result only when urbanization would allow development of a size and density so great as to in itself require transit service where that service was not currently available or planned. This is not the case here. Because of the small size of the property (8.77 acres) and the low residential density proposed (25 to 30 units), development will not be on a large enough scale to require transit service and, therefore, will have no impact on regional transit corridors.

In making this finding, the Council takes notice of the Regional Transportation Plan (RTP), adopted by Metro Ordinance No. 82-135 and amended by Ordinance No. 83-163, which forecasts a total of 621,000 person trips per day in the southwest portion of the region in which the subject site is located. Four percent of all trips regionwide are expected to be by transit in the year 2000, and this mode split would generally apply in the southwest area. The applicant's planning consultant has testified that 400 daily trips are estimated to result from urbanization of the subject property. Applying the RTP mode split of 4 percent, 16 daily transit trips could be generated. Sixteen transit trips would have no measurable impact on the regional transit corridor.

ADD TO THE FINDINGS ON PAGE 16 FOLLOWING LINE 20:

"The proposed UGB must be superior to the UGB as presently located based on consideration of the factors in subsection (a). The minor addition must include all similarly situated contiguous land which could also be appropriately included within the UGB as an addition based on the factors in subsection (a)." (MC 3.01.040(d)(2))

Finding

Lake Oswego's staff report noted that except for the northeast corner of an adjacent lot, "all other property to the east and south would be served as part of a different sewer basin." The applicant has provided a topographic map that shows the ridge line separating the two drainage basins. In addition, only the two subject lots need be included in the UGB in order to efficiently provide road access and sewers to the land-locked urban lands to the southwest.

These two circumstances are pertinent to compliance with standard (a)(1). No other contiguous properties are similarly situated in these respects.

In summary, the UGB proposed is superior to the existing UGB because: (1) it allows for more efficient urbanization of existing urban lands to the southwest, in compliance with standards (a)(1) and (a)(2); and (2) does not create any counterbalancing negative impacts under standard (a)(3)-(a)(5).

ON PAGE 17 OF THE FINDINGS DELETE LINES 23-25 AND REPLACE WITH THE FOLLOWING:

Under Metro's standards for locational adjustments, "need" is not a relevant consideration. These standards were designed, and acknowledged by LCDC, for the purpose of allowing small adjustments to the UGB, even when no additional urban land is needed to accommodate projected growth, in order to improve UGB efficiency or effectiveness.

Metro Code 3.01.080 provides review procedures to ensure that the total amount of land added under these standards does not significantly affect the UGB's overall effectiveness. These procedures, rather than those for the review of individual petitions, provide the appropriate mechanism for ensuring that locational adjustments do not, in sum, increase the total area of the UGB to a point that overall land-use or service efficiencies would be affected.

JH/srs
2122C/402-6
11/09/84

BEFORE THE METROPOLITAN SERVICE DISTRICT

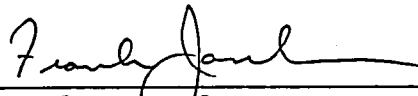
In the Matter Of the Application)	Contested Case No. 84-1
of WILLIAM and DIANA RAY and)	
MRS. ERNESTINE B. CROW for an)	SUPPLEMENTAL REPORT AND
AMENDMENT to the District Urban)	RECOMMENDATION OF
Growth Boundary)	HEARINGS OFFICER

This came before the Council the evening of November 8, 1984, upon the Report and Recommendation of the Hearings Officer, the record of proceedings before the Hearings Officer, and upon two reports containing comments of Metro Land Use Coordinator Jill Hinckley dated October 26 and November 8, 1984. After hearing testimony and comments of the Hearings Officer and staff upon Miss Hinckley's reports, upon motion duly made and seconded, the Council voted to instruct the Hearings Officer to revise his Report and Recommendations to incorporate the modifications and additions suggested by Miss Hinckley.

Accordingly, I recommend that my Report and Recommendations be amended as suggested in the written comments of Miss Hinckley.

DATE: November 9, 1984.

Respectfully submitted,



Frank Josselson
Hearings Officer

STAFF REPORT

Agenda Item No. _____

Meeting Date _____

CONSIDERATION OF ORDINANCE NO. 84-182, ADOPTING A
FINAL ORDER AND AMENDING THE METRO URBAN GROWTH
BOUNDARY FOR CONTESTED CASE NO. 84-1: RAY PROPERTY
(FIRST READING)

Date: October 26, 1984

Presented by: Jill Hinckley

FACTUAL BACKGROUND AND ANALYSIS

William and Diana Ray have petitioned the Metropolitan Service District (Metro) for a locational adjustment of the UGB to add 8.77 acres along the southern edge of Lake Oswego city limits, as shown on the map attached as Exhibit "A."

Metro Hearings Officer Frank Josselson held two hearings on this case in order to assure all parties a full and fair hearing. After considering the testimony from both sides, the Hearings Officer recommends approval of the Ray's petition. The Hearings Officer's Report and Recommendation is attached as Exhibit "B."

Staff has reviewed this report and recommends some revisions to ensure that the findings are complete and appropriate. Staff recommended changes are presented and explained in the memo attached as Exhibit "C."

If the Council wants the staff recommendations incorporated in the Hearings Officer's report, it must remand the matter to him to do so.

EXECUTIVE OFFICER'S RECOMMENDATION

The Executive Officer recommends that the Council adopt the Hearings Officer's Report and Recommendation in Case No. 84-1, subject to the revisions recommended by staff in Exhibit "C," and that the Council remand the matter to the Hearings Officer to amend his report and the accompanying Order to incorporate those or other appropriate findings for the standards cited.

JH/srb
2122C/402-3
10/26/84

BEFORE THE COUNCIL OF THE
METROPOLITAN SERVICE DISTRICT

AN ORDINANCE ADOPTING A FINAL ORDER) ORDINANCE NO. 84-182
ORDER AND AMENDING THE METRO URBAN)
GROWTH BOUNDARY FOR CONTESTED CASE)
NO. 84-1: RAY PROPERTY)

THE COUNCIL OF THE METROPOLITAN SERVICE DISTRICT HEREBY ORDAINS:

Section 1. The Council hereby accepts and adopts as the Final Order in Contested Case No. 84-1 the Hearings Officer's Report and Recommendations in Exhibit "B" of this Ordinance, which is incorporated by this reference.

Section 2. The District Urban Growth Boundary (UGB), as adopted by Ordinance No. 79-77, is hereby amended as shown in Exhibit "A" of this Ordinance, which is incorporated by this reference.

Section 3. Parties to Contested Case No. 84-1 may appeal this Ordinance under Metro Code Section 2.05.050 and ORS ch. 197.

ADOPTED by the Council of the Metropolitan Service District
this _____ day of _____, 1984.

Presiding Officer

ATTEST:

Clerk of the Council

JH/srb
2202C/402-3
10/26/84

7. ORDINANCES

7.1 Consideration of Ordinance No. 84-182, for the Purpose of Adopting a Final Order and Amending the Metro Urban Growth Boundary for Contested Case No. 84-1: Ray Property (First Reading)

The Clerk read the Ordinance by title only.

Motion: Councilor Kafoury moved to adopt the Ordinance.
Councilor Waker seconded the motion.

Eleanore Baxendale explained this case had been heard before Hearings Officer Frank Josselson with ample opportunity for public comment. She said the matter now before the Council was to consider the Hearings Officer's final report and no further public testimony and presentation of new facts would be allowed. Staff, in assistance to Counsel, prepared comments on the Hearings Officer's report which pointed out some changes that Council may want to consider making to the report.

Ms. Baxendale explained that if the Council wished to adopt staff's proposed amendments or any of their own, the correct procedure would be to make a motion to remand the Hearings Officer's Report back to the Hearings Officer with direction to make specific amendments. If such a motion carried, she said the Hearings Officer would make the necessary corrections to the report and would then submit to the Council an amended order, which would become a part of the amended Ordinance, to be reviewed at the next Council meeting.

Mr. Josselson, the Hearings Officer, then explained the background of the request to amend the Urban Growth Boundary, particularly the public hearing process and the opportunity all parties had to participate. Mr. Josselson said he approved of all the amendments to his report recommended by staff. Mr. Josselson also recommended staff and the Council review the Ordinance that addressed matters relating to the regional transit corridor. It was difficult to interpret the document to the public because of the way it was worded, he said.

Richard Gibbons, 15800 S.W. Boones Ferry Road, Lake Oswego, said he was a planning consultant and had reviewed the application on behalf of the applicant. He said he had also reviewed staff's suggested amendments to the Hearings Officer's Report and had no problems with those amendments.

Councilor Kelley circulated to the Council, Mr. Josselson and Mr. Gibbons, a memo from Ms. Hinckley outlining some proposed changes to the report. She explained her proposed changes would not

substantially alter the intent of staff's amendments but would make the language more clear. Mr. Josselson and Mr. Gibbons said they had no problems with these proposed changes.

Motion: Councilor Kelley moved to remand to the Hearings Officer the changes proposed in Jill Hinckley's memo dated November 8, 1984. Councilor Waker seconded the motion.

Councilor Van Bergen expressed concern about the process for adequate public review of the proposed changes. Ms. Baxendale explained the Metro Ordinance provided for the Council to make changes to the Hearings Officer's Report by remanding amendments back to the Hearings Officer. The Hearings Officer could then make the changes and bring them back before the Council. She explained that, after the Ordinance is adopted, there would be an opportunity for the applicants to ask for rehearing or reconsideration of the Ordinance.

Jill Hinckley said she and Ms. Baxendale were in the process of drafting suggested changes to improve the Metro contested case hearings procedures. She said she would take Councilor Van Bergen's comments into consideration when proposing these changes and encouraged other Councilors' comments.

After receiving comment from Councilor Williamson, Councilor Kelley agreed to the following substitute motion:

Motion: Councilor Kelley moved to remand to the Hearings Officer the changes proposed in Jill Hinckley's memo dated November 8, 1984, and the changes proposed by staff in the staff report dated October 26, 1984. Councilor Waker seconded the motion.

Vote: A vote on the motion resulted in:

Ayes: Councilors Banzer, Cooper, Kafoury, Kelley, Van Bergen, Waker, Williamson and Kirkpatrick

Absent: Councilors Bonner, Deines, Hansen and Oleson

The motion carried and the Ordinance was remanded back to the Hearings Officer to make the above changes.

7.2 Consideration of Ordinance No. 84-181, for the Purpose of Amending the Disadvantaged Business Program (First Reading)

The Clerk read the Ordinance by title only.

7.2 Consideration of Ordinance No. 84-182, for the Purpose of Adopting a Final Order and Amending the Metro Urban Growth Boundary for Contested Case No. 84-1: Ray Property (Second Reading)

Motion: The motion to adopt the Ordinance was made at the Council meeting of November 8, 1984, by Councilors Kafoury and Waker.

Jill Hinckley reported the document being considered for adoption had been amended per the Council's instructions of November 8, 1984.

Councilor Deines asked if any citizens had objected to this proposed action. Ms. Hinckley said eight residents living on Meadowlark Lane had opposed the action but as a result of the hearing, decided not to file acceptations and would address the matter before the Lake Oswego City Council during that approval process.

Vote: A vote on the motion resulted in:

Ayes: Councilors Banzer, Bonner, Deines, Kelley, Waker, Williamson and Kirkpatrick

Absent: Councilors Cooper, Hansen, Kafoury, Oleson and Van Bergen

The motion carried and Ordinance No. 84-182 was adopted.

7.3 Consideration of Ordinance No. 84-183, for the Purpose of Amending the Personnel Rules for Appointments and Employment Contracts, Code Sections 2.02.040 and 2.02.270 (First Reading)

The Clerk read the Ordinance by title only.

Ms. Baxendale presented the staff report information explaining the Council had previously approved a resolution that placed the Solid Waste and Zoo Director positions in the Classification Plan. This Resolution had been adopted with the understanding the Personnel Rules would be revised to provide for Council confirmation of the two positions, she said, regardless of whether supplemental employment contracts were in force. She explained that in the past, the Council had powers of confirmation only if the positions were covered under an individual employment contract of \$50,000 or more.

Ms. Baxendale said two amendments to the Personnel Rules were being proposed: 1) to add the Zoo and Solid Waste Director positions to the list of positions confirmed by the Council; and 2) to change the procedures to allow the Council to approve all employment contracts,



METROPOLITAN SERVICE DISTRICT
Providing Zoo, Solid Waste and Local Government
Services

527 S.W. Hall Street, Portland, Oregon 97201-5287

Rick Gustafson
Executive Officer

Metro Council

Corky Kirkpatrick
Presiding Officer
District 4

Ernie Bonner
Deputy Presiding
Officer
District 8

Bob Oleson
District 1

Richard Waker
District 2

Charlie Williamson
District 3

Jack Deines
District 5

George Van Bergen
District 6

Sharron Kelley
District 7

Cindy Banzer
District 9

Larry Cooper
District 10

Marge Kafoury
District 11

Gary Hansen
District 12

November 21, 1984

2425C/D4 - Merge List for 2424C/D4

Dear :

Enclosed are true copies of the following ordinances
adopted by the Council of the Metropolitan Service
District on November 20, 1984:

Ordinance No. 84-180, Establishing a
Local Officials Advisory Committee for
the Intergovernmental Resource Center.

Ordinance No. 84-182, Adopting a Final
Order and Amending the Metro Urban
Growth Boundary for Contested Case
No. 84-1: Ray Property.

Please file these ordinances in the Metro ordinance files
maintained by your county.

Sincerely,

Marie Nelson
Clerk of the Council

MN/srs
2424C/D4-1

Enclosures

Mr. Don Stilwell
County Administrator
Washington County
150 N. First Avenue
Hillsboro, OR 97123
Mr. Stilwell

Ms. Juanita Orr
County Clerk
Clackamas County Courthouse
8th & Main
Oregon City, OR 97045
Ms. Orr

Ms. Jane McGarvin
Clerk of the Board
Multnomah County
1021 S.W. 4th Avenue
Portland, OR 97204
Ms. McGarvin

2425C/D4 - Merge List for 2424C/D4