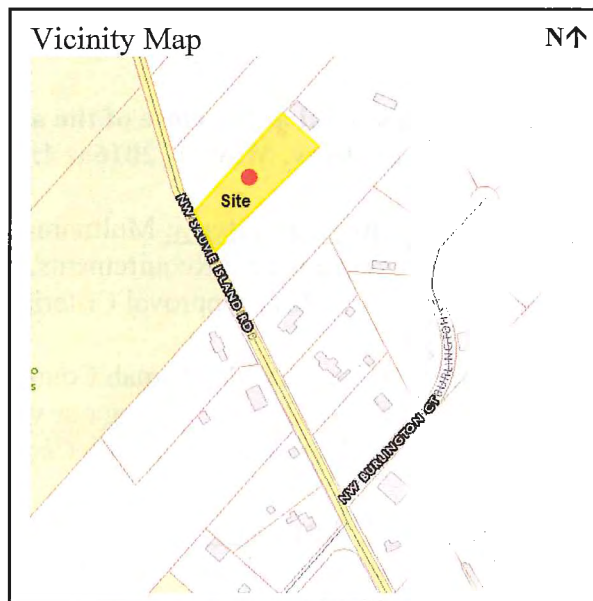


1600 SE 190th Avenue, Portland Oregon 97233-5910 • PH. (503) 988-3043 • Fax (503) 988-3389

NOTICE OF DECISION

This notice concerns a Planning Director Decision on the land use case(s) cited and described below.

Case File: T2-2015-4502 & T2-2016-4776
Permit: Accessory Use Determination and Adjustment
Location: 18846 NW Sauvie Island Rd
Tax Lot 2800, Section 17
Township 2 North, Range 1 West, W.M.
Tax Account #R971170560
**Applicants/
Owners:** Bernie & Susan Kerosky
Base Zone: Multiple Use Agriculture – 20
(MUA-20)

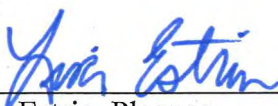


Summary: The applicants have requested an Accessory Use Determination to authorize an existing outbuilding as a garden/artist space workshop. The first floor has a bathroom with bathing facilities and a separate area with a sink, counter tops and cupboards. The second floor is generally open with a closet area. In addition to the Accessory Use Determination, the applicants request approval of an Adjustment to the rear yard setback to allow an existing storage building to remain 20.3 feet from the rear property line.

Decision: Approved with Conditions

Unless appealed, this decision is effective **Wednesday, May 11, 2016**, at 4:00 PM.

Issued by:


Lisa Estrin, Planner

For: Michael Cerbone, AICP
Planning Director

Date: Wednesday, April 27, 2016

Instrument Number for Recording Purposes: # 2011007014

Opportunity to Review the Record: A copy of the Planning Director Decision, and all evidence submitted associated with this application, is available for inspection, at no cost, at the Land Use Planning office during normal business hours. Copies of all documents may be purchased at the rate of 30-cents per page. The Planning Director Decision contains the findings and conclusions upon which the decision is based, along with any conditions of approval. For further information on this case, contact Lisa Estrin, Staff Planner at 503-988-0167 or lisa.m.estrin@multco.us.

Opportunity to Appeal: This decision may be appealed within 14 days of the date it was rendered, pursuant to the provisions of MCC 37.0640. An appeal requires a \$250.00 fee and must state the specific legal grounds on which it is based. To obtain appeal forms or information on the procedure, contact the Land Use Planning offices at 1600 SE 190th Avenue (Phone: 503-988-3043). This decision cannot be appealed to the Land Use Board of Appeals until all local appeals are exhausted.

This decision is final at the close of the appeal period, unless appealed. The deadline for filing an appeal is Wednesday, May 11, 2016 at 4:00 pm.

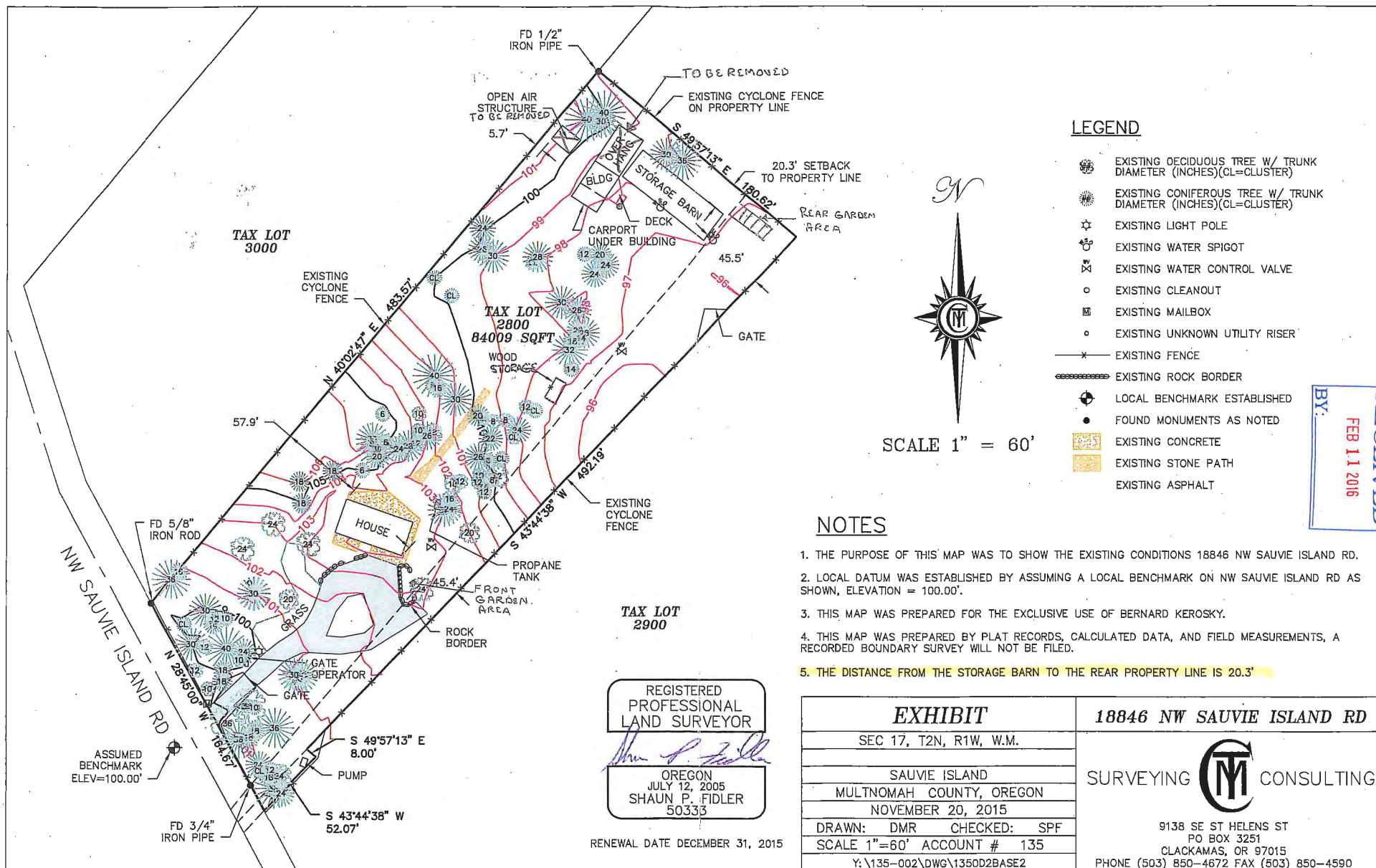
Applicable Approval Criteria: Multnomah County Code (MCC): MCC 34.2825(J) Accessory Uses, MCC 34.2855 Dimensional Requirements, MCC 34.2870 Lot of Record, MCC 34.7606 Adjustment Scope and MCC 34.7611 Approval Criteria.

Copies of the referenced Multnomah County Code (MCC) sections can be obtained by contacting our office at 503-988-3043 or by visiting our website at multco.us/landuse/zoning-codes at the link *Chapter 34: Sauvie Island/Multnomah Channel Rural Plan Area*

Conditions of Approval

The conditions listed are necessary to ensure that approval criteria for this land use permit are satisfied. Where a condition relates to a specific approval criterion, the code citation for that criterion follows in parenthesis.

1. Approval of this land use permit is based on the submitted written narrative(s) and plan(s). No work shall occur under this permit other than that which is specified within these documents. It shall be the responsibility of the property owner(s) to comply with these documents and the limitations of approval described herein.
2. **This land use permit expires two years from the date the decision is final pursuant to MCC 37.0690(A) if building permits for the garden/artist space outbuilding are not issued and completed. The property owner may request to extend the timeframe within which this permit is valid, as provided under MCC 37.0695, as applicable. The request for a permit extension must be submitted prior to the expiration of the approval period.** [MCC 37.0560]
3. At no time shall the garden/artist space outbuilding be used as a guest house, sleeping quarters, rented for an apartment, used as a residence or vacation rentals/accommodations without first obtaining land use planning approval for the specific land use activity. [MCC 34.2815 Uses]
4. No refrigerator, microwave, oven, cook stove or other food cooking device shall be placed within the confines of the garden/artist space outbuilding.
5. Any and all propane gas line components shall be completely removed from the garden/artist space outbuilding. No piping shall remain within its walls, foundation or interior.



6. The kitchen style sink, countertops and cupboards shall be removed from the garden/artist space outbuilding. A freestanding utility sink such as shown in Exhibit B.3 without a cabinet or adjacent counter tops may be installed in the main floor area. No bathroom or sink may be installed in the second floor area.
7. Prior to land use sign-off for building plan check for the garden/artist space outbuilding:
 - a. The property owner shall remove the freestanding 7' x 5' (35 sq. ft.) open air structure and the 20' x 30' (600 sq. ft.) lien-to attached to the garden/artist space outbuilding from the property. [MCC 34.2825(J)]
 - b. Upon completion of the demolition, the property owner shall contact the Code Compliance section at 503.988.5508 and set up an appointment for a site visit to verify removal of the two structures. In addition, code compliance shall inspect the garden/artist space and verify that the cupboards and countertops have been removed and no refrigerator, stove or cooking appliance or beds exist in the structure.
 - c. The property owner shall add the missing 8-ft by 8-ft small garden shed to the site plan. [MCC 37.0560]
 - d. The property owner shall record this land use decision pages 1 through 8 in the County Records.
8. The property owners shall obtain a building permit for the garden/artist space outbuilding. In addition, the necessary ancillary permits to remove the gas piping and change out the sink shall be obtained and completed.

Note: Once this decision is final, application for building permits may be made with the City of Portland. When ready to have building permits signed off, the applicant shall call the Staff Planner, Lisa Estrin, at (503) 988-0167, for an appointment for review and approval of the conditions and to sign the building permit plans. Please note, Multnomah County must review and sign off the building permits before the applicant submits building plans to the City of Portland. Five (5) sets each of the site plan and building plans are needed for building permit sign off. At the time of building permit review, a fee will be collected. In addition, an erosion control inspection fee may be required.

Notice to Mortgagee, Lien Holder, Vendor, or Seller:

ORS Chapter 215 requires that if you receive this notice it must be promptly forwarded to the purchaser.

Findings of Fact

FINDINGS: Written findings are contained herein. The Multnomah County Code (MCC) criteria and Comprehensive Plan Policies are in **bold** font. Staff analysis and comments are identified as ‘**Staff:**’ and address the applicable criteria. Staff comments may include a conclusionary statement in *italic*.

1.00 Project Description, Property Description & History:

Staff: Application, T2-2015-4502 is a request to authorize an existing two-story outbuilding. The first floor contains an artist space for painting and other crafts and gardening preparation (germinating seeds, raising seedlings and washing, trimming and storing the vegetable harvest), and a bathroom with bathing facilities. The area for washing, trimming and storing the vegetable harvest includes a sink, cupboard and countertops (a.k.a. a kitchen area). The second floor contains additional workspace with a balcony, deck and closet space.

Application, T2-2016-4776 requests an Adjustment to reduce the distance between a storage building and the rear property line from 30 feet to 20.3 feet. The adjustment would grant a 9.7 ft (32.33%) reduction to the minimum rear yard setback.

2.00 Public Comments:

Staff: Public comment was received from three neighbors during the Opportunity to Comment period. Planning staff has summarized concerns/comments received below:

Reid/Adrangi: The building to be used as an artist studio is a two-story house and is a second house on the property. The building was constructed by a prior property owner and was used as an art studio. The building at the time it was purchased by the Keroskys had electricity and plumbing in it. The building is a house and has been used as a residence in the recent past by Keroskys family members. Since the structure is really a primary structure, Reid/Adrangi are concerned that the structure is not incidental to the primary dwelling due to its size, prior use and components. If the structure is permitted, it is important that allowed residential density of one house per legal parcel not be increased. Conditions of approval should be hefty. These should include: (1) Even temporary use as a dwelling (advertised, rented, bed & breakfast, etc) should result in this permit being revoked; (2) The bathroom, septic connections and kitchen facilities must be removed and never replaced; (3) When the property is sold or transferred, the artist studio building must be removed; and (4) No further improvement of the structure can occur beyond maintenance. The Reid/Adrangi are fine with the adjustment of the rear yard. (Exhibit D.1)

Muckens: The Muckens are immediate neighbors and want to preserve the low population density and rural character of the Island. The Muckens are in agreement with the Reid/Adrangi comments and are interested in the total square footage of the outbuildings. The adjustment application is ok provided a condition is included that if the building is ever modified or replaced it must then comply with the normal setback requirements. The Muckens support the Reid/Adrangi proposed conditions. (Exhibit D.2)

Cashdollars: The Cashdollars support the approval of the existing outbuilding as an artist space with a bathroom. In addition, they support the adjustment to the rear yard for the storage building 20.3 feet from the rear property line. The Keroskys have enhanced the buildings by painting and improving the landscaping. The two applications should be approved. (Exhibit D.3)

Stoel/Rives Response to Comments: The applicants are seeking confirmation for a garden and artist workshop as an accessory structure. The applicants’ structure contains a bathroom on the first floor as well as a separate sink, counter tops and storage cupboards in the adjacent room of the workshop, but no stove or refrigerator or 220V circuits. The structure is not a dwelling unit within the meaning of the

code. The applicants have signed a deed restriction agreeing that the structure will not be occupied as a dwelling. The neighbors concerns can be adequately addressed by the deed restriction and a condition of approval that prohibits residential use of the structure. (Exhibit D.4)

3.00 Multiple Use Agriculture - 20 Criteria:

3.01 § 34.2825 REVIEW USES

(J) Structures or uses customarily accessory or incidental to any use permitted or approved in this district, which do not meet the “accessory structures” standard in MCC 34.2820 Allowed Uses.

§ 34.2820 ALLOWED USES

(F) Accessory Structures:

(1) Structures or uses listed below when customarily accessory or incidental to any use permitted or approved in this district:

- (a) Garages or carports;**
- (b) Pump houses;**
- (c) Garden sheds;**
- (d) Workshops;**
- (e) Storage sheds;**
- (f) Greenhouses;**
- (g) Woodsheds;**
- (h) Shelter for pets, horses or livestock and associated buildings such as: manure storage, feed storage, tack storage, and indoor exercise area;**
- (i) Swimming pools, pool houses, hot tubs, saunas, and changing rooms;**
- (j) Sport courts;**
- (k) Gazebos, pergolas, and detached decks;**
- (l) Fences, gates, or gate support structures; and**
- (m) Similar structures.**

(2) If the accessory structure is a building, then to be an “allowed use” the foot print of the building in combination with the footprint of all other accessory buildings on the property shall not exceed 2500 square feet.

(3) If the accessory structure has a bathroom or kitchen facilities, then prior to issuance of the building permit the property owner shall record a deed restriction with County Records that states that the owner understands and agrees that the structure cannot be occupied as a dwelling.

(4) Buildings in conjunction with farm uses as defined in ORS 215.203 are not subject to these provisions.

Staff: The applicants' site plan shows a wood storage building, a storage barn, open air structure (to be removed), artist space/workshop/carport (proposed building) with overhang/lien-to (to be removed) and house (Exhibit A.18). The Stoel-Rives Response comments (Exhibit D.4) states that there is a small garden shed near the residence but the shed is not shown on the site plan. The following chart identifies the size and square footage of accessory buildings to remain:

Building	Dimensions	Square Footage
Artist Space/ Workshop	Footprint	789.5 sq. ft.
1 st Floor:	30' x 20'	600 sq. ft.
2 nd Floor:	30' x 21'	630 sq. ft.
Front Deck:	(12' x 3.5') + (9' x 3')	54 sq. ft.
Back Deck:	(18.5' x 4') + (9.5' x 3')	102.5 sq. ft.
Overall Square Footage:		1,386.5 sq. ft.
Storage Barn	20' x 70'	1,400 sq. ft.
Wood Storage	8' x 16'	128 sq. ft.
Small Garden Shed	8' x 8'	64 sq. ft.
Total Footprint		2,381.5 sq. ft.

The total footprint for all accessory buildings is under the 2,500 sq. ft limitation provided the freestanding 7' x 5' (35 sq. ft.) open air structure and 20' x 30' (600 sq. ft.) lien-to attached to the artist space/workshop is removed from the property. A condition of approval has been included to require their removal.

The proposed use for the artist space building as a garden shed/workshop is listed as accessory structures under MCC 34.2820(F). The building does not qualify as an "*Accessory Structure*" under MCC 34.2820(F) as it has a full bathroom (toilet, sink and shower) and a kitchen area. MCC 34.2820(F)(3) limits the improvement within an Allowed Use Accessory Structure to either "*a bathroom or kitchen facilities.*" Allowed Use Accessory Structure cannot have both types of improvements and "*the owner understands and agrees that the structure cannot be occupied as a dwelling*" pursuant to the code language.

Stoel-Rives (the applicants' representative) indicates that the structure contains a sink, countertops and storage cupboards in the main area, but does not contain a stove, refrigerator or any 220V circuits and that there are no permanent facilities for eating or cooking so the structure does not qualify as a dwelling.

The existing structure does not currently qualify as a dwelling. MCC 34.0005 Definitions defines a "*Dwelling Unit*" as "*A single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation.*" The proposed building is connected to the on-site sewage disposal system

(sanitation). The upstairs has closets and is finished with drywall and can be used as a bedroom or sleeping area with a balcony and deck with stairs leading down to the outside for proper fire exiting requirements. The main floor has space available for living and sleeping and contains a bathroom with bathing facilities.

The question is whether it has a kitchen. A kitchen in almost all dwelling units has a sink attached to plumbing for washing dishes, cupboards to store food and dishes attached to the walls, countertops where you can prepare and eat food. Most kitchens do not contain built-in microwaves, built-in stoves or built-in refrigerators. In many dwellings, the stove, microwave, toaster and refrigerator is not permanently attached by hardwire installation to the dwelling, but are plugged into a wall socket. Not all stoves need 220V to work. There are electric slide-in stoves that only use 110/120V of electricity. Gas or propane ranges use 110/120V. Toaster ovens and hot plates function like stoves/ovens. The building previously had a propane gas line. The applicants' narrative states "Please note that the gas hook ups for the stove have been eliminated and the structure has no 240 Volt circuit to support an electric stove." Planning staff is uncertain if the propane line was just capped or completely removed from the building.

Multnomah County Code does not contain a definition for a "Kitchen". The American Heritage Dictionary (second college edition) defines a "Kitchen" as "*A place where food is cooked or prepared*". The space is available to prepare food and the applicant's narrative states that the kitchen sink is needed to "wash fruits/vegetables". The fact that the facilities do not contain a plug-in refrigerator, microwave or stove does not by itself disqualify the building as having a kitchen. In fact, the applicants' state that the "Removal of the permanent stove and refrigerator, both have already been accomplished..."

MCC 34.0005 Definitions defines a "*Habitable Dwelling*" as "*An existing dwelling that: (a) Has intact exterior walls and roof structure; (b) Has indoor plumbing consisting of a kitchen sink, toilet and bathing facilities connected to a sanitary waste disposal system; (c) Has interior wiring for interior lights; (d) Has a heating system; and (e) Was lawfully established.*" This definition is used in the Commercial Forest Use zones to determine if a building qualifies as a "dwelling" and can be replaced or altered. In the MUA-20 zone, only one single family dwelling is permissible per Lot of Record [MCC 34.2820(C)]. The County is not able to approve a second dwelling unit, sleeping quarters, guest house, rental unit, etc as an Accessory Use in the zone. Assessment and Taxation lists this building as an Accessory Dwelling Unit (Exhibit B.4) and states that its date of establishment as 2013. The question is whether the building can be modified so that it does not qualify as a dwelling.

In the comments received from various neighbors, concern that the building has been used as guest quarters or a second dwelling has been expressed. At present, the building contains components that make it readily usable as a second dwelling unit. If the propane gas line and kitchen components were removed from the building completely, its use as a garden workshop and artist space could still be facilitated by the installation of a large utility sink for filling of watering cans and washing of fruits and vegetables separate from the bathing facilities. Planning staff has included conditions to require the building's modification so that it will no longer contain the basic functionality as a dwelling unit. As conditioned, the building would qualify as an Accessory Structure allowed under MCC 34.2825(J).

3.02 § 34.2855 DIMENSIONAL REQUIREMENTS

(C) Minimum Yard Dimensions – Feet

Front	Side	Street Side	Rear
30	10	30	30

Maximum Structure Height – 35 feet

Staff: The existing house and wood storage building meets the above minimum yard requirements as shown on Exhibit A.18. The Open Air Structure, Storage Barn and Garden/Artist Space building with an existing lien-to attachment do not. The applicant has indicated that the Open Air Structure and Lien-to attached to the Garden/Artist Space building will be demolished. A condition of approval has been included requiring their removal. The Garden/Artist Space building will then meet the minimum yard requirements as shown on the site plan (Exhibit A.18). The Storage Barn is only 20.3 feet from the rear property line. The applicant has applied for an Adjustment to reduce the minimum yard requirement by 32%. Planning staff has reviewed the Storage Barn under the Adjustment Approval Criteria listed in Section 4.00 below and finds that the adjustment criteria have been met. The storage barn through the granting of an Adjustment meets the minimum yard requirements as shown on Exhibit A.18.

The Garden/Artist Space building is 27 feet tall from the top of the gable to the bottom of the footing. It is below the maximum structure height of 35 feet as shown on Exhibit A.2 and A.3. The Storage Barn is less than 35 feet in height as shown in the pictures in Exhibit A.14.

Criteria met.

3.03 § 34.2870 LOT OF RECORD

(A) In addition to the Lot of Record definition standards in MCC 34.0005, for the purposes of this district the significant dates and ordinances for verifying zoning compliance may include, but are not limited to, the following:

- (1) July 10, 1958, SR zone applied;**
- (2) July 10, 1958, F-2 zone applied;**
- (3) December 9, 1975, F-2 minimum lot size increased, Ord. 115 & 116;**
- (4) October 6, 1977, MUA-20 zone applied, Ord. 148 & 149;**
- (5) October 13, 1983, zone change from EFU to MUA-20 for some properties, Ord. 395;**
- (6) May 16, 2002, Lot of Record section amended, Ord. 982, reenacted by Ord. 997.**

(B) A Lot of Record which has less than the minimum lot size for new parcels or lots, less than the front lot line minimums required, or which does not meet the access requirement of MCC 34.2885, may be occupied by any allowed use, review use or conditional use when in compliance with the other requirements of this district.

(C) Except as otherwise provided by MCC 34.2860, 34.2875, and 34.4300 through 34.4360, no sale or conveyance of any portion of a lot other than for a public purpose shall leave a structure on the remainder of the lot with less than minimum lot or yard requirements or result in a lot with less than the area or width requirements of this district. ...

Staff: The County has previously determined the subject tax lot is a Lot of Record prior to issuing land use permits for installation of the photovoltaic system onto the existing primary residence.

4.00 Adjustment Criteria:

4.01 § 34.7606 SCOPE

(A) Dimensional standards that may be modified under an Adjustment review (modified no more than 40 percent) are yards, setbacks, forest practices setbacks, buffers, minimum front lot line length, flag lot pole width, cul-de-sac length, cul-de-sac turnaround radius, and dimensions of a private street, except the following:

(1) Reduction of resource protection setback requirements within the Significant Environmental Concern (SEC) and Willamette River Greenway (WRG) overlay districts are prohibited. Additionally, reductions to the fire safety zones in the Commercial Forest Use zones are not allowed under the Adjustment process; and

(2) Reduction of yards and setback requirements within the Hillside Development overlay shall only be reviewed as a Variance; and

(3) Reduction of yards/setback/buffer/resource protection setback requirements within the Large Fills, Mineral Extraction, and Radio and Television Transmission Towers Code Sections and any increase to the maximum building height shall only be reviewed as Variances; and

(4) Minor modification of yards and setbacks in the off-street parking and design review standards are allowed only through the “exception” provisions in each respective Code section.

Staff: The applicants have requested a reduction to the rear yard for an existing storage building. The existing building was constructed 20.3 ft from the rear property line. MCC 34.2855(C) requires a 30-ft rear yard between a building/structure and the rear property line. The proposed reduction would equal a 33% reduction to this required yard. Criteria (1) through (4) are not applicable to the subject property and proposed project. *Criterion met.*

4.02 § 34.7611 ADJUSTMENT APPROVAL CRITERIA

The Approval Authority may permit and authorize a modification of no more than 40 percent of the dimensional standards given in MCC 34.7606 upon finding that all the following standards in (A) through (E) are met:

(A) Granting the adjustment will equally or better meet the purpose of the regulation to be modified; and

Staff: One of the purposes of the rear yard is to provide private outdoor space for the enjoyment of the subject property, as well as privacy for the neighbor’s backyard. The Storage Barn helps to screen the Kerosky property from the property to the northeast. The 20.3 ft between the building and rear property line provide adequate open space for additional screening if necessary. A comment of support was received from the neighbor most directly affected by the reduced setback. The Kerosky property has adequate open space between the existing house and the storage barn for outdoor activities. These measures equally or better meet the purpose for the 9.7-ft reduction to the 30-ft minimum rear yard setback. *Criterion met.*

4.03 (B) Any impacts resulting from the adjustment are mitigated to the extent practical. That mitigation may include, but is not limited to, such considerations as provision for adequate light and privacy to adjoining properties, adequate access, and a design

that addresses the site topography, significant vegetation, and drainage; and

Staff: The existing building was constructed prior to 1977. The distance to the rear property line continues to be 20.3 ft, therefore there are no impacts requiring mitigation. *Criterion met.*

4.04 (C) If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zoning district; and

Staff: The applicants are only requesting a reduction to the rear yard setback. No other setback modification is proposed.

4.05 (D) If the properties are zoned farm (EFU) or forest (CFU), the proposal will not force a significant change in, or significantly increase the cost of, accepted forestry or farming practices on the subject property and adjoining lands; and

(E) If in a Rural Residential (RR) or Rural Center (RC) zone, the proposal will not significantly detract from the livability or appearance of the residential area.

Staff: The subject property is zoned Multiple Use Agriculture – 20 (MUA-20). The above criteria are not applicable.

5.00 Conclusion.

Based on the findings and other information provided above, the applicant has carried the burden necessary for the Adjustment to the Rear Yard setback and as conditioned that the Garden/Artist Space building will be accessory to the existing single family dwelling in the MUA-20 zone. This approval is subject to the conditions of approval established in this report.

6.00 Exhibits

‘A’ Applicant’s Exhibits

‘B’ Staff Exhibits

‘C’ Procedural Exhibits

‘D’ Comments Received

Exhibits with a “*” after the exhibit # have been included as part of the mailed decision. All other exhibits are available for review in Case File T2-2015-4502 at the Land Use Planning office.

Exhibit #	# of Pages	Description of Exhibit	Date Received/ Submitted
A.1	1	General Application Form	8.20.2015
A.2	1	Building Elevations – Kerosky Plan Page 1	8.20.2015
A.3	1	Main and Second Floor Plans – Kerosky Plan Page 2	8.20.2015
A.4	1	Submission Package List	8.20.2015
A.5	1	Narrative	8.20.2015
A.6	1	Topographic Survey for Landscape Design	8.20.2015
A.7	7	Certification of Onsite Sewage Disposal	8.20.2015
A.8	2	Fire Service Agency Review	8.20.2015
A.9	1	Storm Water Certificate	8.20.2015
A.9	1	Email from George Plummer Regarding 1979 Property Line	8.20.2015

		Adjustment	
A.10	1	Warranty Deed recorded in Book 1047, Page 1587 on June 24, 1975 a. A&T map highlighted with property from the above deed	8.20.2015
A.11	1	Quit Claim Deed recorded in Book 1385, Page 2810 on September 23, 1979	8.20.2015
A.12	1	Bargain and Sales Deed recorded in Book 1388, Page 385 on October 3, 1979 a. A&T Map highlighted with adjusted property from the above deed	8.20.2015
A.13	2	Covenant – Notice of Zoning Compliance – Accessory Structure recorded December 20, 2012	8.20.2015
A.13	1	General Application Form for Adjustment application T2-2016-4776	2.11.2016
A.14	6	Photographs of Proposed Art Studio, Rear Garden Area and Other Outbuilding	2.11.2016
A.15	3	Adjustment Approval Criteria Narrative	2.11.2016
A.16	1	Revised Floor Plan for Art Studio	2.11.2016
A.17	1	Floor Plan for Storage Barn & Utility Workshop	2.11.2016
A.18	1	Revised Site Plan	2.11.2016
'B'	#	Staff Exhibits	Date
B.1	2	A&T Property Information for 2N1W17A - 02800	8.20.2015
B.2	2	A&T Property Information for 2N1W17A – 02800	2.11.2016
B.3	1	Utility Sink Exhibit	n/a
B.4	2	A&T Improvement Information Sheet	4.13.2016
'C'	#	Administration & Procedures	Date
C.1	4	Incomplete Letter	9.17.2015
C.2	1	Complete Letter (Day 1)	3.02.2016
C.3	3	Opportunity to Comment	3.07.2016
C.4	11	Administrative Decision	4.27.2016
'D'	#	Comments Received (if needed)	Date
D.1	4	Reid/Adrangi Comments	3.16.2016
D.2	2	Muckens Comments	3.21.2016
D.3	1	Cashdollars Comments	3.14.2016
D.4	7	Stoel Rives Response to Comments	4.5.2016



Exhibit B.3