

NOTICE OF DECISION

Case File:	T2-2020-13365		
Permit:	Lot of Record Verification and Administrative Decision by the Planning Director		
Applicant:	Peggy Hennessey	Owner:	Skyline View LLC.
Subject	22600 NW Skyline Blvd., North Plains		
Property:	Tax Lot 500 & 700, Section 03, Township 2 North, Range 2 West, W.M. Alt. Acct. #R972030090 & R972030110 Property ID #R325576 & R325578		
Base Zone:	Commercial Forest Use – 1 (CFU-1)		
Overlays:	Significant Environmental Concern – Wildlife Habitat (SEC-h); Streams (SEC-s); Scenic Views (SEC-v); and Geologic Hazards (GH)		
Proposal Summary:	The Applicant requests a Lot of Record Verification to confirm the subject property is a Lot of Record following a series of Lot Line Adjustments authorized in 2016. The Applicant also requests a determination that the property qualifies for a replacement dwelling under the Commercial Forest Use – 1 (CFU-1) zone regulations.		

Determination: **The subject property is a Lot of Record in its current configuration.**

The evidence in the record does not sufficiently demonstrate that the subject property qualifies for a replacement dwelling under the CFU-1 zone regulations.

This decision is final at the close of the appeal period, unless appealed. The deadline for filing an appeal is Tuesday, November 3, 2020 at 4:00 pm.

Opportunity to Review the Record: The complete case file, including the Planning Director Decision containing Findings, Conclusions, Conditions of Approval, and all evidence associated with this application is available for review. Copies of all documents are available at the rate of \$0.35/per page. For further information, contact Chris Liu, Staff Planner at 503-988-2964 or at chris.liu@multco.us

Opportunity to Appeal: 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 office at 503-988-3043. This decision is not appealable to the Land Use Board of Appeals until all local appeals are exhausted.

Issued by: _____

By: Chris Liu, Planner

For: Carol Johnson, AICP
Planning Director

Date: Tuesday, October 20, 2020

NOTICE OF POTENTIAL APPEAL HEARING

**If an appeal of this decision is filed, a public hearing will be held
Friday, November 13, 2020 at 10:30 AM or soon thereafter.**

The hearing will take place virtually before one of the County Hearings Officers. To obtain a link to attend the hearing, email chris.liu@multco.us by 4:00 p.m. on November 12, 2020. If no appeal is filed, a notice canceling this hearing will be posted at <https://multco.us/landuse/public-notices>.

Any issue that is intended to provide a basis for an appeal to the Land Use Board of Appeals (LUBA) must be raised prior the close of the public record. Issues must be raised and accompanied by statements or evidence sufficient to afford the County and all parties an opportunity to respond to the issue.

Vicinity Map

N↑



Applicable Approval Criteria:

Multnomah County Code (MCC):

General Provisions: MCC 39.1515 Code Compliance and Applications

Lot of Record: MCC 39.3005 Lot of Record – Generally, MCC 39.3020 Lot of Record (CFU-1)

Replacement Dwelling: MCC 39.4070 Allowed Uses – (D) Replacement or restoration of an existing lawfully established habitable dwelling (within 100 feet from the existing dwelling), MCC 39.2000 Definitions – Lawfully Established Dwelling; Habitable Dwelling

Copies of the referenced Multnomah County Code sections are available by contacting our office at (503) 988-3043 or by visiting our website at <https://multco.us/landuse/zoning-codes/> under the link:

Chapter 39 - Zoning Code

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*.

1.0 PROJECT DESCRIPTION:

Staff: The Applicant seeks approval of two land use permits for property located at 22600 NW Skyline Blvd., North Plains, which includes two separate parcels referred to as Tax Lot 500 (2N2W03 – 00500) and Tax Lot 700 (2N2W03 -00700) (“the subject property”).

First, the Applicant requests a Lot of Record Verification to confirm the subject property is a Lot of Record following a series of Lot Line Adjustments authorized by Land Use Case nos. T2-2016-6466, T2-2016-6467, and T2-2016-6468 (“the 2016 Lot Line Adjustments”). The 2016 Lot Line Adjustments occurred between the subject property and adjacent property owned by Weyerhaeuser Company.

Second, the Applicant requests a determination that the property qualifies for a replacement dwelling under the Commercial Forest Use – 1 (CFU-1) zone regulations.

2.0 PROPERTY DESCRIPTION & HISTORY:

Staff: The CFU-1 zoned subject property is located in rural west Multnomah County adjacent to NW Skyline Blvd. in the West Hills Rural area.

Lot Reconfiguration History

As described in Section 5 of this decision, the County authorized the 2016 Lot Line Adjustments to address an incorrectly completed 1981 land division/property line adjustment. The 2016 Lot Line Adjustments affected the subject property and adjacent property owned by Weyerhaeuser Company. Following the 2016 Lot Line Adjustments, 2N2W03 -00800 and 2N2W03 -00700 were consolidated into a single parcel, now referred to as Tax Lot 700). As noted, Tax Lot 700 and Tax Lot 500 form the subject property identified as 22600 NW Skyline Blvd.

In 2018, County Transportation approved the vacation of a right-of-way that previously bisected Tax Lot 500 and 700. The resulting configuration is the current configuration of the subject property.

Single-Family Dwelling History

Between 1967 and 1968, the property owner at the time, Merlin Radke (“Radke”), constructed a single-family dwelling (“Dwelling 1”) on the subject property, per his affidavit submitted as Exhibit A.5. On June 25, 1968, the State Engineer received record of a domestic well for the subject property (Exhibit A.17). In 1971, the property owner built a replacement dwelling (“Dwelling 2”). Multnomah County added Dwelling 2 to the tax records for the subject property in 1972 (Exhibit B.16). Dwelling 2 remains on the subject property today.

3.0 PUBLIC COMMENT:

Staff: Staff mailed a notice of application and invitation to comment to the required parties per MCC 39.1105. (Exhibit C.2.) Staff did not receive any public comments during the 14-day comment period.

4.0 GENERAL PROVISIONS:

4.1 MCC 39.1515 Code Compliance and Applications

Except as provided in subsection (A), the County shall not make a land use decision approving development, including land divisions and property line adjustments, or issue a building permit for any property that is not in full compliance with all applicable provisions of the Multnomah County Zoning Code and/or any permit approvals previously issued by the County.

* * *

Staff: This standard provides that the County shall not make a land use decision approving development, including land divisions and property line adjustments, or issue a building permit for a property that is not in full compliance with County Code or previously issued County approvals, with limited exceptions not relevant here. As noted in Section 1.0 above, this application does not seek approval for any development, land divisions, or property line adjustments. Therefore, this standard is not applicable.

5.0 LOT OF RECORD:

5.1 MCC 39.3005 Lot of Record - Generally

(A) An area of land is a “Lot of Record” if it meets the standards in Subsection (B) of this Section and meets the standards set forth in this Part for the Zoning District in which the area of land is located.

(B) A Lot of Record is a parcel, lot, or a group thereof that, when created or reconfigured, either satisfied all applicable zoning laws and satisfied all applicable land division laws, or complies with the criteria for the creation of new lots or parcels described in MCC 39.9700. Those laws shall include all required zoning and land division review procedures, decisions, and conditions of approval.

(a) “Satisfied all applicable zoning laws” shall mean: the parcel, lot, or group thereof was created and, if applicable, reconfigured in full compliance with all zoning minimum lot size, dimensional standards, and access requirements.

(b) “Satisfied all applicable land division laws” shall mean the parcel or lot was created:

- 1. By a subdivision plat under the applicable subdivision requirements in effect at the time; or**
- 2. By a deed, or a sales contract dated and signed by the parties to the transaction, that was recorded with the Recording Section of the public office responsible for public records prior to October 19, 1978; or**

3. By a deed, or a sales contract dated and signed by the parties to the transaction, that was in recordable form prior to October 19, 1978; or

*** * ***

MCC 39.3020 Lot of Record – Commercial Forest Use -1 (CFU-1)

(A) In addition to the standards in MCC 39.3005, for the purposes of the CFU-1 district a Lot of Record is either:

(1) A parcel or lot which was not contiguous to any other parcel or lot under the same ownership on February 20, 1990, or

(2) A group of contiguous parcels or lots:

- (a) Which were held under the same ownership on February 20, 1990; and**
- (b) Which, individually or when considered in combination, shall be aggregated to comply with a minimum lot size of 19 acres, without creating any new lot line.**

*** * ***

(D) The following shall not be deemed a Lot of Record:

- (1) An area of land described as a tax lot solely for assessment and taxation purposes;**
- (2) An area of land created by the foreclosure of a security interest;**
- (3) A Mortgage Lot;**
- (4) An area of land created by court decree.**

Staff: Pursuant to Land Use Case No. T2-2016-6466, the subject property is a Lot of Record. The purpose of Land Use Case No. T2-2016-6466 was to reorganize the subject property into a Lot of Record in anticipation of the replacement dwelling determination sought as part of the current application.

In particular, in Land Use Case No. T2-2016-6466, the County made the following finding in relation to the subject property:

“Full compliance means any structures on site were properly reviewed or permitted, a property is a Lot of Record and any conditions from previous land use decisions have been satisfied. The only known land use application associated with the property was the 1981 land division/property line adjustment that was approved, but incorrectly completed. The incorrect completion resulted in the properties not being lots of record. However, approval of this land use application will correct the lot of record issues and bring the properties into full compliance once completed.”

The applicant provided a narrative and supporting documents to demonstrate all requirements and conditions of the T2-2016-6466 were completed, satisfied, and perfected (Exhibit A.2,

pages 1-8 and Exhibits A.13 – A.14). Because all requirements and conditions of T2-2016-6466 have been completed, satisfied, and perfected, the subject property is a Lot of Record.

The subject property consisting of Tax Lot 500 (2N2W03 -00500) and Tax Lot 700 (2N2W03 -00700) is a Lot of Record in its current configuration.

6.0 ADMINISTRATIVE DECISION BY THE PLANNING DIRECTOR:

6.1 MCC 39.4070 Allowed Uses – Commercial Forest Use Zone

The following uses and their accessory uses are allowed, subject to all applicable supplementary regulations contained in MCC Chapter 39.

*** * ***

(D) Alteration, maintenance, replacement or restoration of an existing lawfully established habitable dwelling as defined in MCC 39.2000 and located within 100-feet from an existing dwelling.

(1) In the case of a replacement dwelling, the existing dwelling shall be removed, demolished or converted to an allowable nonresidential use within three months of the completion or occupancy of the replacement dwelling.

(2) Restoration or replacement due to fire, other casualty or natural disaster shall commence within one year from the occurrence of the fire, casualty or natural disaster.

Staff: In the Commercial Forest Use Zone, replacement of an existing lawfully established habitable dwelling is an allowed use where the replacement dwelling is located within 100 feet of the existing dwelling. In this case, the applicant is seeking a retroactive determination regarding whether Dwelling 1 qualified as “an existing lawfully established habitable dwelling” eligible for a replacement dwelling. (Exhibit A.2, page 7). When an applicant seeks a retroactive determination, the County treats it as a proposal to build under the current standards. In other words, although the replacement dwelling is already on the property, the County views the request as though the original dwelling were still existing on the property, with the applicant seeking to replace that dwelling.

As noted, in order for the County to be able to authorize the replacement of an existing dwelling in the CFU zone, the existing dwelling must be a ‘lawfully established habitable dwelling’ as defined in MCC 39.2000. Sections 6.2 – 6.4 below discuss the ‘lawfully established habitable dwelling’ requirements as defined in MCC 39.2000.

6.2 MCC 39.2000 Definitions

As used in this Chapter, unless the context requires otherwise, the following terms and their derivations shall have the meanings provided below:

*** * ***

Habitable Dwelling – 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.

* * *

Lawfully Established Dwelling – A dwelling that was constructed in compliance with the laws in effect at the time of establishment. The laws in effect shall include zoning, land division and building code requirements. Compliance with Building Code requirements shall mean that all permits necessary to qualify the structure as a dwelling unit were obtained and all qualifying permitted work completed.

Staff: Under MCC 39.4070, a dwelling may be replaced if it is habitable, meaning it has the amenities listed in the definition in MCC 39.2000, and was lawfully established.

As discussed in Sections 6.3 and 6.4 below, Dwelling 1 had the amenities listed in (a)-(d). However, the evidence in the record does not sufficiently demonstrate that Dwelling 1 was lawfully established.

6.3 Habitable Dwelling Analysis

Staff: The following documentary and photographic evidence establishes that, prior to removal, Dwelling 1 had the required amenities of a habitable dwelling because each of the following were established and remained intact up to the time of replacement:

1. Intact Exterior Walls and Roof Structure

Exhibits A.18 and A.20 are historic assessor records confirming the foundation. Exhibits B.2, B.3, and B.4 show large intact sections of removed foundation. Exhibits B.5 and B.6 show intact, functional windows removed from Dwelling 1. Exhibit B.7 shows an intact section of foundation still in original the location. Exhibits B.10 and B.11 show intact window framing within portions of the deconstructed exterior walls from Dwelling 1. A statement from Andrew Pederson, the son of a friend of Radke, provides Pedersen's recollection of interior walls and a roof structure (Exhibit A.16).

2. Indoor Plumbing/Sanitary Waste Disposal

Exhibit A.5 is a statement of the former property owner, Radke, attesting to the installation of a well and septic system circa 1968. Exhibit A.17 is the 1968 state-approved well log. Exhibits A.18 and A.20 are historic assessor records confirming plumbing. Exhibit B.8 shows the electrical powered pump house. Exhibit B.12 shows the establishment of a well house as of 1970. A statement from Andrew Pedersen, the son of a friend of Radke, provides Pedersen's recollection of indoor plumbing and a Sanitary Waste Disposal system (Exhibit A.16).

3. Interior Wiring for Interior Lights

Exhibits A.18 and A.20 are assessor records confirming the presence of electrical. Exhibits B.8 and B.12 combine to create the implication of establishment of

electrical power as of 1970. Exhibit B.9 shows continued electrical power to the property to the present. A statement from Andrew Pedersen, the son of a friend of Radke, provides Pedersen's recollection of interior lighting (Exhibit A.16).

4. Heating System

Exhibits A.18 and A.20 are historic assessor records confirming heating. Exhibits B.10 and B.11 show a large intact section of the removed Dwelling 1 and insulation (intact framing visible), establishing the implication of heating. A statement from Andrew Pedersen, the son of a friend of Radke, provides Pedersen's recollection of a functional heating system (Exhibit A.16).

The documentary and photo evidence described above suffices to establish that Dwelling 1 had the required amenities of a habitable dwelling. Therefore, the evidence suffices to find that the Dwelling 1 was habitable.

6.4 **Lawfully Established Dwelling Analysis**

Staff: As defined in MCC 39.2000, a *Lawfully Established Dwelling* is a dwelling that was constructed in compliance with the laws in effect at the time of establishment. The laws in effect shall include *zoning, land division and building code requirements*. Compliance with Building Code requirements shall mean that *all permits necessary to qualify the structure as a dwelling unit were obtained and all qualifying permitted work completed*.

A. Dwelling 1

1. Establishment of Dwelling 1

The Applicant's narrative states that Dwelling 1 was constructed prior to 1975, and likely between 1967-1968 (Exhibit A.2). The 1970 Aerial Photo for 2N2W03, which includes the subject property, shows a single building on the subject property, which generally aligns with the timeline noted by the Applicant (Exhibit B.12).

2. Applicable Laws in effect at the time of establishment (1967 – 1968)

In 1967, the subject property was zoned 'F-2' per historic county zoning maps (Exhibit B.13). The F-2 zoning regulations allowed single-family dwellings as a permitted use; hence, a discretionary land use decision was not required. There were no setback requirements for buildings in the F-2 zone.

Multnomah County adopted the 1964 Edition of the Uniform Building Code in 1965 (Exhibit B.17). Section 301 of the 1964 Edition of the Uniform Building Code required a building permit from the Building Official in order to erect, construct, enlarge, alter, repair, move, improve, convert, or demolish a building / structure (Exhibit B.18). Under Section 8.90 General Provisions of Zoning Ordinance 100 effective as of January 6, 1966, Land Use Permits were required for uses and structures (Exhibit B.14). Section 8.90 further states that when a building permit is required under the Multnomah County Building Code, such building permit shall be deemed a Land Use Permit (Exhibit B.14)

3. Historical Evidence for Dwelling 1

The documentary evidence described below does not suffice to find that Dwelling 1 was lawfully established:

- The applicant did not provide any building permit records demonstrating Radke obtained all building permits necessary to qualify Dwelling 1 as a dwelling unit and that all qualifying permitted work was completed. A search of the City of Portland's Resource Records did not return any historical building permits for the subject property. Due to the transfer of Multnomah County's building permit division to the City of Portland in 1986, the City of Portland serves as a repository for historic building permits issued in Multnomah County.
- Per the Applicant's narrative, Radke complied with law in establishing the well and was willing to attest to further details surrounding the well and septic system (Exhibits A.5 and A.15). The Applicant did not provide further details regarding the septic system nor did they provide any septic permit records. A search of the City of Portland's Resource Records did not return any historical permits authorizing the installation of a septic system on the subject property.

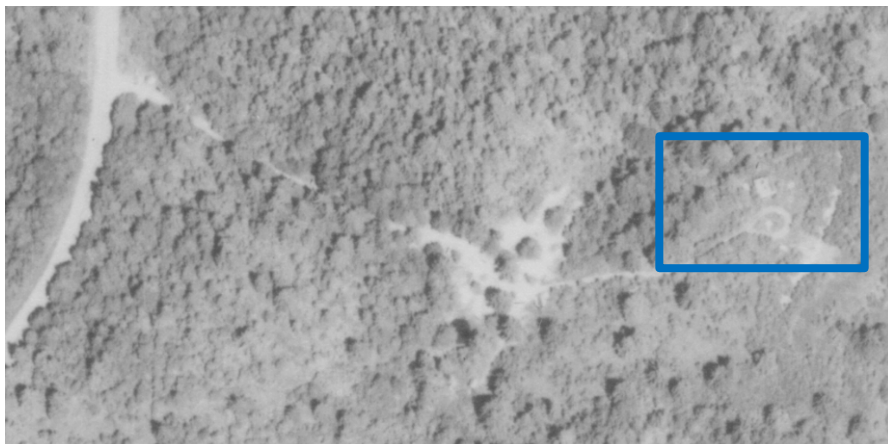
The documentary evidence does not suffice to establish that Dwelling 1 was constructed in compliance with the laws in effect at the time of its establishment in 1967-1968. Therefore, the evidence does not suffice to find that Dwelling 1 was Lawfully Established.

B. Dwelling 2

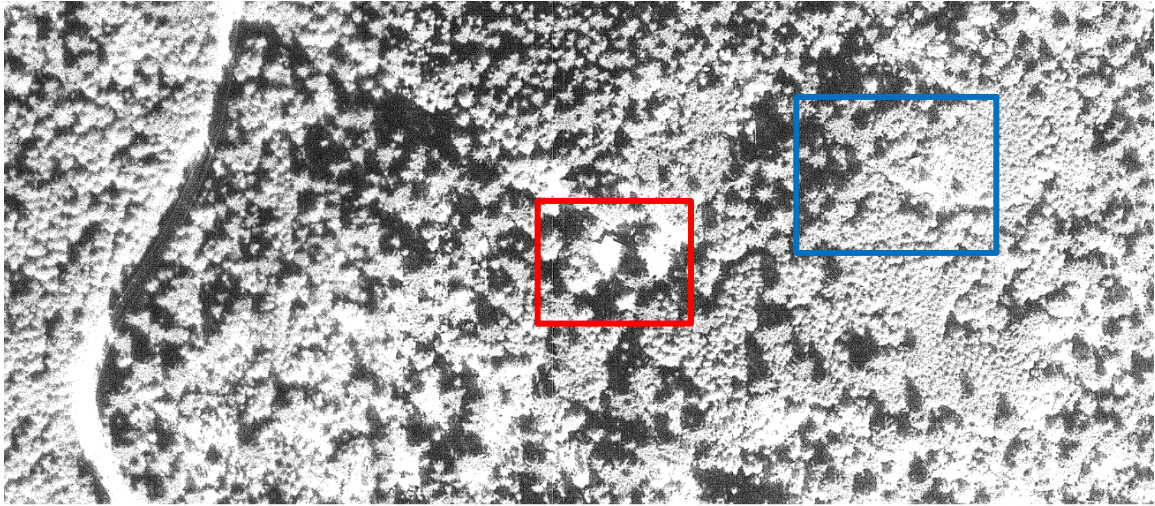
1. Date of Construction for Dwelling 2

Historic assessor records list a date of construction as 1971, with an improvement noted on the property for the first time on the 1972 tax roll (Exhibit B.16). Staff compared the 1970 Aerial Photo and 1977 Aerial Photo for 2N2W03 below. These historic photos appear to support the assessor records for the construction year of Dwelling 2. The applicant provided a copy of an appraiser card for the subject property, which also supports this timeline (Exhibit A.18).

1970 Aerial Photo (zoomed-in): The Blue Box is the area of the subject property that contained a single building, which appears to be Dwelling 1. A driveway appears to take access from NW Skyline Blvd. and ends at what appears to be a turnaround area immediately south of the building. The full photo is included as Exhibit B.12.



1977 Aerial Photo (zoomed-in): Dwelling 1 no longer appears to be located on the subject property, with only the turnaround area visible in the Blue Box. The Red Box highlights the area of the subject property where Dwelling 2 is located. The outline of a building in this area is apparent as of 1977. The full photo is included as Exhibit B.15.



2. Applicable Laws in effect (1971)

Based on the information noted in Section ‘1.’ above, the timeline for the construction of Dwelling 2 indicates that the F-2 zoning regulations applied. Therefore, Dwelling 2 was subject to the same regulations discussed in Section ‘A.’ above. Said regulations required a building permit to construct a new dwelling and the issuance of a building permit served as a land use permit (Exhibit B.14).

3. Historical Evidence for Dwelling 2

The documentary evidence described below does not suffice to find that Dwelling 2 was lawfully established:

- The Applicant did not provide any permit records demonstrating Radke obtained all building permits necessary to qualify Dwelling 2 as a dwelling unit and that all qualifying permitted work was completed. A search of the City of Portland’s Resource Records did not return any historical building permits for the subject property.
- A search of the City of Portland’s Resource Records did not return any historical permit records authorizing a connection to the original septic system (installed in 1967-1968) nor any permit records authorizing the installation of a new septic system for Dwelling 2.
- Dwelling 2 is located within the portion of the subject property previously dedicated as a public right-of-way. County Transportation vacated the aforementioned public right-of-way in 2018 (Exhibit A.15). Staff is unaware of any records from the 1970s authorizing the encroachment of Dwelling 2 into the public right-of-way.

The documentary evidence does not suffice to establish that Dwelling 2 was constructed in compliance with the laws in effect at the time of its establishment in 1971. Therefore, the evidence does not suffice to find that Dwelling 2 was Lawfully Established.

7.0 EXHIBITS:

- ‘A’ Applicant’s Exhibits
- ‘B’ Staff Exhibits
- ‘C’ Procedural Exhibits

Exhibits with a “*” after the exhibit # have been included as part of the mailed decision. Those exhibits have been reduced to a size of 8.5” x 11” for mailing purposes. All other exhibits are available for review in Case File T2-2020-13365.

Exhibit #	# of Pages	Description of Exhibit	Date Received / Submitted
A.1	1	General Application Form	06.04.2020
A.2	12	Applicant Narrative	06.04.2020
A.3	2	Exhibit 1: Warranty Deed recorded May 7, 1979 in Book 1349, Page 2473 – 2474	06.04.2020
A.4	1	Exhibit 2: Warranty Deed recorded 1971 in Book 822, Page 614	06.04.2020
A.5	1	Exhibit 3: 2007 Affidavit from Merlin Radke	06.04.2020
A.6	1	Exhibit 4: Tax Lot Map for 2N2W03	06.04.2020
A.7	1	Exhibit 5: 2006 Aerial	06.04.2020
A.8	2	Exhibit 6: Warranty Deed recorded September 16, 2004 as instrument no. 2004-169525	06.04.2020
A.9	4	Exhibit 7: Warranty Deed recorded July 19, 2005 as instrument no 2006-132761	06.04.2020
A.10	1	Exhibit 8: Copy of the cover page of the decision for Land Use Case no. T2-2016-6467	06.04.2020
A.11	4	Exhibit 9: Property Line Adjustment Deed recorded April 25, 2019 as instrument no. 2019-040919	06.04.2020
A.12	1	Exhibit 10: Copy of the cover page of the decision for Land Use Case no. T2-2016-6468	06.04.2020
A.13	1	Exhibit 11: Copy of the cover page of the decision for Land Use Case no. T2-2016-6466	06.04.2020
A.14	3	Exhibit 12: Property Line Adjustment and Consolidation Deed recorded October 01, 2019 as instrument no. 2019-105019	06.04.2020

A.15	10	Exhibit 13: Copy of Resolution Vacating a Portion of a Public Road recorded July 12, 2018 as instrument no. 2018-073286	06.04.2020
A.16	1	Exhibit 14: Statement of Andrew Pedersen	06.04.2020
A.17	1	Exhibit 15: 1968 State Engineer Well Report	06.04.2020
A.18	2	Exhibit 16: Historic Tax Assessor Notes	06.04.2020
A.19	4	Exhibit 17: Aerial Photos	06.04.2020
A.20	2	Exhibit 18: Metroscan Property Profile	06.04.2020
A.21	3	Exhibit 19: Metro Map Property Information 22600 NW Skyline Blvd.	06.04.2020
‘B’	#	Staff Exhibits	Date
B.1	2	Division of Assessment, Recording, and Taxation (DART): Property Information for 2N2W03 -00500 (R972030090)	06.04.2020
B.2	1	Dwelling 1 Photo 1	08.28.2020
B.3	1	Dwelling 1 Photo 2	08.28.2020
B.4	1	Dwelling 1 Photo 3	08.28.2020
B.5	1	Dwelling 1 Photo 4	08.28.2020
B.6	1	Dwelling 1 Photo 5	08.28.2020
B.7	1	Dwelling 1 Photo 6	08.28.2020
B.8	1	Dwelling 1 Photo 7	08.28.2020
B.9	1	Dwelling 1 Photo 8	08.28.2020
B.10	1	Dwelling 1 Photo 9	08.28.2020
B.11	1	Dwelling 1 Photo 10	08.28.2020
B.12	1	1970 Aerial 2N2W03	08.28.2020
B.13	1	1962 Historic Zoning Map for 2N2W03	08.28.2020
B.14	12	F-2 Zoning Regulations & General Provisions, Zoning Ordinance 100 as amended May 21, 1968	08.28.2020
B.15	1	1977 Aerial 2N2W03	08.28.2020
B.16	3	Historic Tax Roll Records 1971, 1972, and 1977	09.09.2020
B.17	1	Effective Dates Document	09.09.2020
B.18	6	Chapter 3 – 1964 Edition Uniform Building Code	09.09.2020

'C'	#	Administration & Procedures	Date
C.1	1	Complete letter (day 1)	06.30.2020
C.2	2	Opportunity to Comment and Mailing List	08.14.2020
C.3	14	Administrative Decision	10.20.2020