

**MULTNOMAH COUNTY****LAND USE AND TRANSPORTATION PROGRAM**1600 SE 190<sup>TH</sup> Avenue Portland, OR 97233

PH: 503-988-3043 FAX: 503-988-3389

<http://www.multco.us/landuse>

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## NOTICE OF DECISION

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

**Case File:** T2-2012-2621

**Permit:** Property Line Adjustment

**Owners/** **Tract 1:** Phillip and Donna Klindt  
**Location:** 31090 SE Division Drive  
Tax Lot 400, Section 08CA  
Township 1 South, Range 4 East, W.M.  
Tax Account #R751704120

**Tract 2:** Richard and Linda Stone  
31174 SE Division Drive  
Tax Lot 200, Section 08CA  
Township 1 South, Range 4 East, W.M.  
Tax Account#751704124

**Applicants:** Phillip and Donna Klindt

**Base Zone:** Rural Residential (RR)

**Overlays:** Significant Environmental Concern for water resources (SEC-wr) /  
Hillside Development (HD)

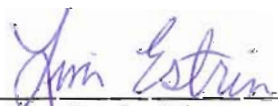


**Summary:** Property line adjustment to transfer 2,409 square feet (0.06 of an acre) from Tract 2 to Tract 1 to correct an encroachment issue.

**Decision:** Approved with Conditions

Unless appealed, this decision is effective Wednesday, April 3, 2013, at 4:00 PM.

Issued by:

By:   
Lisa Estrin, Planner

For: Karen Schilling- Planning Director

Date: Wednesday, March 20, 2013

**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 503-988-3043, ext. 22597.

**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, April 3, 2013 at 4:00 pm.**

**Applicable Approval Criteria:** Multnomah County Code (MCC) and Multnomah County Road Rules (MCRR): Rural Residential Zone: 36.3160(B)...Property Line Adjustment, 36.3170 Lot of Record, 36.3185 Access, 36.7790 Property Line Adjustment

Copies of the referenced Multnomah County Code (MCC) and Multnomah County Road Rules (MCRR) sections can be obtained by contacting our office at 503-988-3043 or by visiting our website at <http://www.co.multnomah.or.us/landuse> or <http://web.multco.us/transportation-planning>.

### **Scope of Approval**

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) as applicable. 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.**

### **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. This approval is based on submitted materials. The proposed property line adjustment shall be completed as shown and described in the application materials submitted by the applicant and as shown on Exhibit A.8 [MCC 37.0580].
2. No additional lot or parcel shall be created through this process. [MCC 36.7790(A)]
3. To finish this property line adjustment, please complete the following steps:

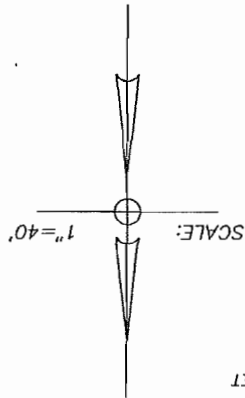


# **SITE PLAN** **PROPOSED PROPERTY LINE ADJUSTMENT** **154E08CA TAX LOTS 00200 AND 00400** **"SECTION LINE ROAD FRUIT TRACTS"**

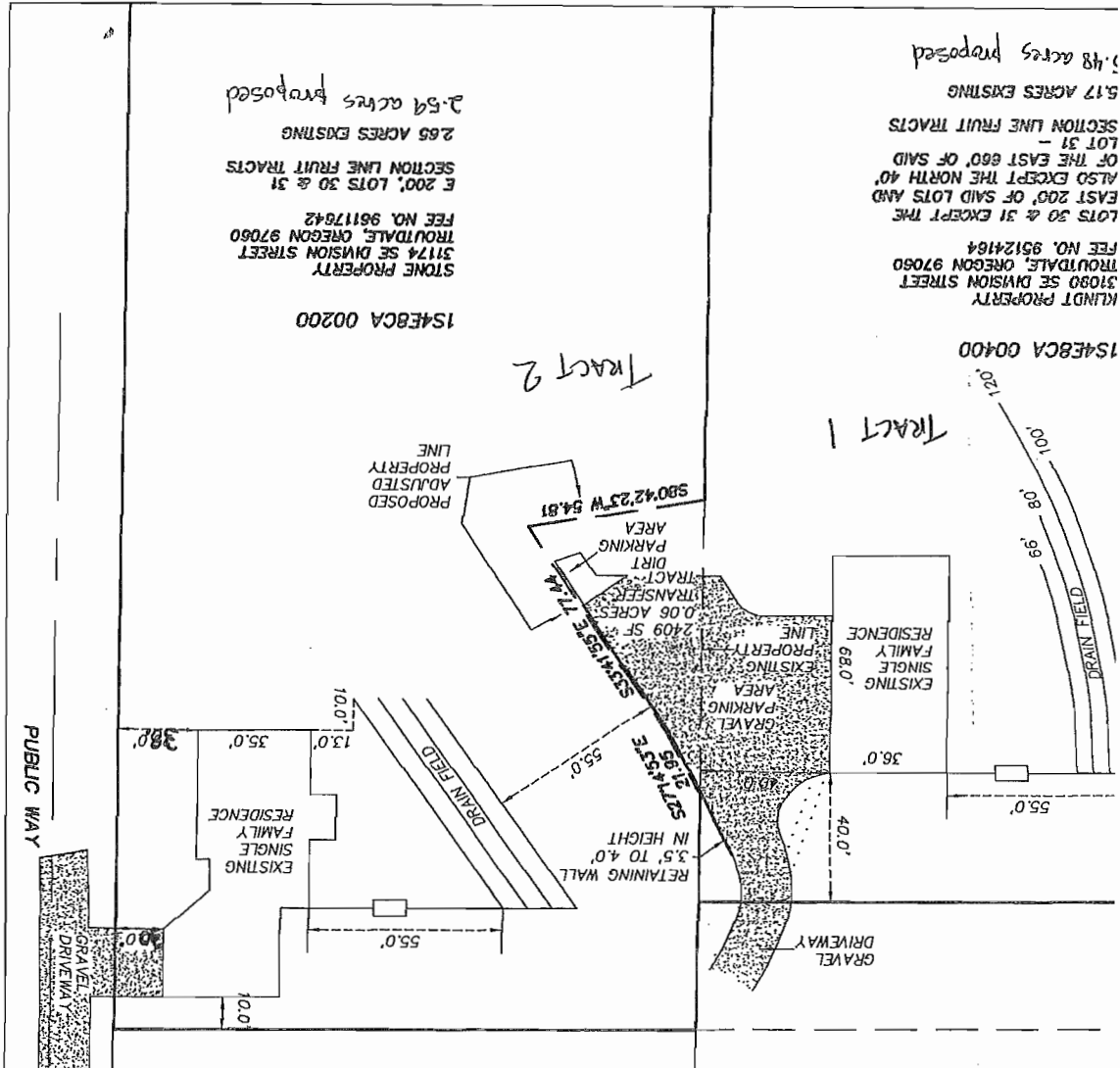
THE SW 1/4 OF SECTION 08, T.1S., R.4E., W.M.  
 MULTNOMAH CO., OREGON

DATE DRAWN: OCTOBER 25, 2012  
 ACCOUNT NO. 12097  
 DRAWING NO. 12097PLAEXHIBIT-1  
 REVISED: NOVEMBER 9, 2012

**MARX ASSOCIATES**  
 18615 E. BURNSIDE STREET  
 PORTLAND, OR 97233  
 TEL: 503-667-5550  
 FAX: 503-666-8666  
 EMAIL: DALE@MARXASSOCOS.NET



**Exhibit A.8**



154E08CA 00500

154E08CA 00100

154E08CA 00400

KLUFT PROPERTY  
 31090 SE DIVISION STREET  
 TROUTDALE, OREGON 97060  
 FEE NO. 95124164  
 LOTS 30 & 31 EXCEPT THE  
 EAST 200' OF SAID LOTS AND  
 ALSO EXCEPT THE NORTH 40'  
 OF THE EAST 660' OF SAID  
 LOT 31 -  
 SECTION LINE FRUIT TRACTS  
 5.17 ACRES EXISTING  
 7.48 acres proposed

154E08CA 00200  
 STONE PROPERTY  
 31174 SE DIVISION STREET  
 TROUTDALE, OREGON 97060  
 FEE NO. 96117642  
 E 200', LOTS 30 & 31  
 SECTION LINE FRUIT TRACTS  
 2.65 ACRES EXISTING  
 2.59 acres proposed

- a. Hire a licensed surveyor to survey and monument the two properties, property lines and draft a new plat including both properties.
  - b. Drop off the plat to your case planner, Lisa Estrin for initial consistency check with this decision.
  - c. Submit the partition plat to the County Surveyor's Office for concurrent review.
  - d. Make any required changes from Land Use Planning or the County Surveyor.
  - e. After the County Surveyor and Land Use Planning approve the plat, pick it up and take it to the County Assessor's office and pay any uncollected taxes, and then record it at the County Recorder's office to finish the property line adjustment.
4. Prior to land use sign off of the property line adjustment, both property owners of Tract 1 and Tract 2 shall demonstrate that a County Access Permit has been issued for their respective driveway connections to a county right of way. If none exists for the driveway connection for the dwelling, the respective property owners shall obtain an Access Permit from the Right-of-Way section of Transportation.

**Note:** For Tract 2 (Stone property), Transportation has indicated that additional right-of-way dedication and/or improvements may be required as a condition of future development of the property based upon impacts to the transportation system.

**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:**

**Staff:** The applicants are proposing to transfer 2,409 square feet from Tract 2 to Tract 1 to correct a parking area encroachment across the shared property line. Tract 1 is currently 5.42 acres and after the adjustment will be increased to 5.48 acres. Tract 2 is currently 2.65 acres and will be reduced to 2.59 acres. No other improvements or development is proposed.

### **2.00 Property Description & History:**

**Tract 1:** Phillip and Donna Klindt, 31090 SE Division Drive is currently 5.42 acres and is occupied by a single family dwelling with an attached garage, on-site sewage disposal system and the parking area with 3.5 to 4 ft high retaining wall that encroaches onto Tract 2. The property has frontage along Oxbow Drive but is accessed via an easement to Division Drive. There are no known land use issues on the property except for the gravel parking area encroachment, which is a civil matter between the two property owners. A property line adjustment or easement could be used to correct the encroachment. The property owners have applied for a property line adjustment as an option to fix the civil issue.

**Tract 2:** Richard and Linda Stone, 31174 SE Division Drive is currently 2.65 acres and is occupied by a single family dwelling with attached garage, on-site sewage disposal system and driveway leading to an un-named public right-of-way. There are no known land use issues on the property except the neighbor’s parking area encroachment.

### **3.00 Rural Residential Criteria:**

#### **3.01 § 36.3125 REVIEW USES.**

**Uses listed in this section may be permitted after required review as Type II decisions pursuant to MCC 37.0510 through 37.0800, or as specified for the use.**

#### **(C) Property Line Adjustment pursuant to the provisions of MCC 36.3160.**

**Staff:** Both Tract 1 and Tract 2 are zoned Rural Residential. In order to fix the parking area encroachment issue, the property owners have decided to apply for a property line adjustment (PLA). The PLA has met the provisions of MCC 36.3160 as required by the Rural Residential zone. *See the supporting findings listed below.*

#### **3.02 § 36.3155 DIMENSIONAL STANDARDS AND DEVELOPMENT REQUIREMENTS.**

**All development proposed in this district shall comply with the applicable provisions of this section.**

#### **(C) Minimum Yard Dimensions - Feet**

<b>Front</b>	<b>Side</b>	<b>Street Side</b>	<b>Rear</b>
<b>30</b>	<b>10</b>	<b>30</b>	<b>30</b>

#### **Minimum Front Lot Line Length - 50 feet.**

**Staff: Tract 1:** The property fronts on to Oxbow Drive and its front lot line length is significantly more than the required 50 ft in length (Exhibit A.8). The dwelling with attached garage is located over 400 ft from Oxbow Drive due to the terrain. The southern property line is over 500 ft from the dwelling. Both the front and southern side yard requirements are met. The dwelling and garage are 40 feet from the east and north property lines. The east property

line qualifies as the rear lot line pursuant to MCC 36.0005 Definitions. The northern property line is an interior side yard. Both the rear and side yards have been met.

**Tract 2:** The property fronts onto the un-named public right-of-way and its front lot line length is 658.78 ft long (Exhibit A.8). The dwelling with attached garage is 30 ft from the front property line. The northern side property line is 10 ft from the dwelling. The southern side property line is approximately 538 ft to the dwelling. With the completion of the property line adjustment, the rear yard will be reduced from 120 ft to approximately 95 ft at its closest point between the dwelling and rear property line. After the property line adjustment, the dwelling with attached garage will continue to meet the minimum yard requirements. *Criteria met.*

**3.03 (F) On-site sewage disposal, storm water/drainage control, water systems unless these services are provided by public or community source, required parking, and yard areas shall be provided on the lot.**

**(1) Sewage and stormwater disposal systems for existing development may be off-site in easement areas reserved for that purpose.**

**(2) Stormwater/drainage control systems are required for new impervious surfaces that are greater than 400 square feet in area. The system shall be adequate to ensure that the rate of runoff from the lot for the 10 year 24-hour storm event is no greater than that before the development.**

**Staff:** The on-site sewage disposal systems will remain on their respective tracts and will not encroach over any property lines (Exhibit A.8). No new impervious areas are being proposed at this time. After the PLA, each tract will maintain significant areas to handle both stormwater and sewage disposal. *Criteria met.*

**3.04 § 36.3170 LOT OF RECORD.**

**(A) In addition to the Lot of Record definition standards in MCC 36.0005, 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, RR zone applied, Ord. 148 & 149;**

**(5) October 13, 1983, zone change from MUF-19 to RR for some properties, Ord. 395;**

**(6) October 4, 2000, Oregon Administrative Rules Chapter 660 Division 004, 20 acre minimum lot size for properties within one mile of Urban Growth Boundary;**

**(7) May 16, 2002, Lot of Record section amended, Ord. 982.**

**(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 36.3185, 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 36.3160, 36.3175, and 36.4300 through 36.4360, 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.**

**(D) The following shall not be deemed to be 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) An area of land created by court decree.**

#### **§ 36.0005 DEFINITIONS**

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

**Lot of Record – Subject to additional provisions within each Zoning District, a Lot of Record is a parcel, lot, or a group thereof that, when created or reconfigured, (a) satisfied all applicable zoning laws and (b) satisfied all applicable land division laws, or (c) complies with the criteria for the creation of new lots or parcels described in MCC 36.7785. 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**
- 4. By partitioning land under the applicable land partitioning requirements in effect on or after October 19, 1978; and**
- 5. "Satisfied all applicable land division laws" shall also mean that any subsequent boundary reconfiguration completed on or after December 28, 1993 was approved under the property line adjustment provisions of the land division code. (See Date of Creation and Existence for the effect of property line adjustments on qualifying a Lot of Record for the siting of a dwelling in the EFU and CFU districts.)**

**(c) Separate Lots of Record shall be recognized and may be partitioned congruent with an "acknowledged unincorporated community" boundary which intersects a Lot of Record.**

- 1. Partitioning of the Lot of Record along the boundary shall require review and approval under the provisions of the land division part of this Chapter, but not be subject to the minimum area and access requirements of this district.**
- 2. An "acknowledged unincorporated community boundary" is one that has been established pursuant to OAR Chapter 660, Division 22.**



**Staff:**

**Tract 1:** Staff reviewed historic tax maps and surveys for Tract 1 and found that it was established in its current configuration on October 15, 1974. The zoning at the time was F-2 (Agricultural District) which had a minimum lot size of 2 acres. Tract 1 consists of the western portions of Lots 30 and 31 of Section Line Road Fruit Tract with the northern 40 ft by 460 ft of Lot 31 removed. At the time Tract 1 was created, subdivision lots did not remain discrete as specified in ORS 92.017 [adopted 1985] and only a new legal description was required to establish a new parcel. ORS 92.017 states “A lot or parcel lawfully created shall remain a discrete lot or parcel, unless the lot or parcel lines are vacated or the lot or parcel is further divided, as provided by law. While Tract 1 does have a remnant lot line from the original Section Line Road Fruit Tracts subdivision, the 1974 alteration created a single legally created unit of land. *Tract 1 is a single Lot of Record.*

**Tract 2:** In the land use case ZC 3-92, the hearings officer found that the eastern two hundred feet of Lots 30, 31 and 32 were two lots of record based on the MUA-20/RR zone boundary splitting the single unit of land. The Board of County Commissioners approved a zone change shifting the MUA-20 ft to the north to match the subdivision lot line between the eastern 200 ft of Lots 31 and 32. In November 1993, the eastern 200 ft of Lot 32 was divided from the eastern 200 ft of Lots 30 and 31 along the zone boundary. In 1993, the County did not require the recordation of a plat for a partition. Land divisions along zone boundaries were completed by the recordation of new legal descriptions in a deed. The eastern 200 ft of Lots 30 and 31 was subsequently found to be a separate Lot of Record and a single family dwelling constructed. *The Tract 2 is a single Lot of Record.*

**3.05 § 36.3185 ACCESS.**

**All lots and parcels in this district shall abut a public street or shall have other access determined by the approval authority to be safe and convenient for pedestrians and passenger and emergency vehicles. This access requirement does not apply to a pre-existing lot and parcel that constitutes a Lot of Record described in MCC 36.3170(B).**

**Staff:** Tract 1 fronts onto Oxbow Drive. Access to the dwelling is via an easement over a portion of Lot 32, Section Line Road Fruit Tracts and connects to Division Drive. Tract 2 fronts onto and takes access to Division Drive through an un-named public right-of-way which is developed as a local access road. A Local Access Road is one type of public street pursuant to MCC 36.0005 *Definition, Public Road. Criterion met.*

**4.00 Property Line Adjustment Criteria:**

**4.01 § 36.3160 LOTS OF EXCEPTION AND PROPERTY LINE ADJUSTMENTS.**

**(B) Property Line Adjustment**

**Pursuant to the applicable provisions in MCC 36.7790, the approval authority may grant a property line adjustment between two contiguous Lots of Record upon finding that the approval criteria in (1) and (2) are met. The intent of the criteria is to ensure that the property line adjustment will not increase the potential number of lots or parcels in any subsequent land division proposal over that which could occur on the entirety of the combined lot areas before the adjustment.**

**(1) The following dimensional and access requirements are met:**

**(a) The relocated common property line is in compliance with all minimum yard and minimum front lot line length requirements;**

**Staff:** In finding 3.04 above, staff found both Tracts 1 and 2 to each be a separate lots of

record. After the property line adjustment the minimum yard and front lot length requirements will be met. See finding 3.02 for the supporting finding. *Criteria met.*

**4.02 (b) If the properties abut a street, the required access requirements of MCC 36.3185 are met after the relocation of the common property line; and**

**Staff:** Tract 1 abuts Oxbow Drive, a public street. Tract 2 abuts an un-named Local Access Road, a public street. See finding 3.05 for additional supporting information. *Criterion met.*

**4.03 (2) At least one of the following situations occurs:**

**(a) The lot or parcel proposed to be reduced in area is larger than 5 acres prior to the adjustment and remains 5 acres or larger in area after the adjustment, or**

**(b) The lot or parcel proposed to be enlarged in area is less than 10 acres in area prior to the adjustment and remains less than 10 acres in area after the adjustment.**

**Staff:** Tract 1 is currently 5.42 acres. Tract 2 is currently 2.65 acres. The area to be adjusted from Tract 2 to Tract 1 is 2,409 square feet. After the property line adjustment Tract 1 will be 5.48 acres and Tract 2 will be 2.59 acres. *Criterion met.*

**4.04 § 36.7790 PROPERTY LINE ADJUSTMENT**

**A property line adjustment is the relocation of a common property line between two abutting properties. The Planning Director may approve a property line adjustment based upon findings that the following standards are met:**

**(A) No additional lot or parcel shall be created from any parcel by the property line adjustment; and**

**Staff:** The proposed property line adjustment will transfer 2,409 square feet from Tract 2 to Tract 1. Provided the property line adjustment is completed correctly, no additional parcels or lots will be created. A condition of approval has been included to ensure compliance with this criterion. *As conditioned, criterion met.*

**4.05 (B) Owners of both properties involved in the property line adjustment shall consent in writing to the proposed adjustment and record a conveyance or conveyances conforming to the approved property line adjustment; and**

**Staff:** The property owners of Tract 1, Phillip and Donna Klindt signed the application form (Exhibit A.1). The property owners of Tract 2, Richard and Linda Stone have also signed the application form (Exhibit A.1). *Criterion met.*

**4.06 (C) The adjusted properties shall meet the approval criteria for a property line adjustment as given in the underlying zoning district; and**

**Staff:** After the completion of the property line adjustment, the adjusted properties will meet the approval criteria listed in the Rural Residential zone for property line adjustments. Please see findings 4.01 through 4.03 for supporting information. *Criterion met.*

**4.07 (D) The procedure and forms shall be submitted for obtaining approval of a property line adjustment as provided for by the Planning Director.**

**Staff:** The applicants have provided the necessary information and forms for a property line adjustment and have followed the procedures as documented in Exhibits A.1 through A.9. *Criterion met.*

## 5.00 Transportation Standards

### MCRR 4.000 Access to County Roads.

**4.100 Required Information:** Applicants for a new or reconfigured access onto a road under County Jurisdiction may be required to provide all of the following:

- A. Site Plan;
- B. Traffic Study-completed by a registered traffic engineer;
- C. Access Analysis-completed by a registered traffic engineer;
- D. Sight Distance Certification from a registered traffic engineer; and
- E. Other site-specific information requested by the County Engineer

**Staff:** Transportation has reviewed the two tracts for Access Permits authorizing access to the public road. No permits were found for either tract. Transportation has placed a condition of approval on the property line adjustment requiring that the property owners demonstrate that prior authorization has been granted or an Access Permit be obtained for each dwelling. *As conditioned, criterion met.*

**Note:** For Tract 2 (Stone property), Transportation has indicated that additional right-of-way dedication and/or improvements may be required as a condition of future development of the property based upon impacts to the transportation system.

## 7.00 Conclusion

Based on the findings and other information provided above, the applicant has carried the burden necessary for the property line adjustment to transfer 2,409 square feet from Tract 2 to Tract 1 to resolve an encroachment issue in the Rural Residential 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

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 T2-2012-2621 at the Land Use Planning office.

Exhibit #	# of Pages	Description of Exhibit	Date Received/ Submitted
A.1	2	Property Line Adjustment Application	11/20/2012
A.2	1	Site Plan for Proposed Property Line Adjustment Date drawn October 25, 2012, Revised November 9, 2012	11/20/2012
A.3	5	Title Report for Tract 1 (Klindt) – 1 page a. Reference Parcel Number 1S4E08CA – 00400 – 2 pages b. Statutory Warranty Deed Recorded October 10, 1995 – 2 pages	11/20/2012
A.4	13	Title Report for Tract 2 (Stone) – 1 page a. Statutory Warranty Deed Recorded August 5, 1996 – 1 page b. Warranty Deed Recorded November 15, 1993 – 1 page	No Date

		c. Statutory Warranty Deed Recorded May 15, 1991 – 2 pages d. Marshal's Deed on Foreclosure Recorded June 4, 1986 – 5 pages e. Bargain and Sale Deed Recorded February 7, 1985 – 1 page f. Deed Creating Estate by the Entirety Recorded January 16, 1984 – 1 page g. Warranty Deed Recorded July 2, 1970 – 1 page	
A.5	8	Title Report for Tract 1 (Klindt) – 1 page a. Statutory Warrant Deed Recorded October 10, 1995 – 2 pages b. Statutory Warranty Deed Recorded September 14, 1994 – 2 pages c. Warranty Deed Recorded July 19, 1974 – 3 pages	No Date
A.6	3	Certification of On-Site Sewage Disposal	11/20/2012
A.7	1	Letter Requesting that the Permit be Expedited due to Sale	11/20/2012
A.8	1	Revised Site Plan for Proposed Property Line Adjustment	12/28/2012
A.9	1	Note Regarding Conversation with Dale Marx Regarding Lot of Record Issue	12/28/2012
'B'	#	Staff Exhibits	Date
B.1	2	A&T Property Information for 1S4E08CA – 00400 (Klindt)	11/1/2012
B.2	2	A&T Property Information for 1S4E08CA – 00200 (Stone)	11/26/2012
B.3	1	Section Line Road Fruit Tract recorded in 1909	No date
B.4	15	ZC 3-92 for 31132 SE Division Drive – Zoning Map Correction	No date
B.5	1	Parcel Record Card for Tract 1 (Klindt)	No date
B.6	1	Parcel Record Card for 1S4E08CA – 00500 (Greisen)	No date
'C'	#	Administration & Procedures	Date
C.1		Incomplete Letter	12/17/2012
C.2	1	Applicant's Acceptance of 180 Day Clock	12/20/2012
C.3	1	Complete Letter (Day 1)	2/11/2013
C.4	5	Opportunity to Comment	2/13/2013
C.5	10	Administrative Decision	3/20/2013