Department of Community Services
Land Use Planning Division
www.multco.us/landuse

Multnomah County

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

Notice of Hearings Officer Decision

Attached please find notice of the Hearings Officer's decision in the matter of **T2-2021-15041,** issued and mailed **10/18/2022.** This notice is being mailed to those persons entitled to receive notice under MCC 39.1170(D).

The Hearings Officer's Decision is the County's final decision and may be appealed to the State of Oregon Land Use Board of Appeals (LUBA) by any person or organization that appeared and testified at the hearing, or by those who submitted written testimony into the record.

Appeal instructions and forms are available from:

Land Use Board of Appeals
775 Summer Street NE, Suite 330
Salem, Oregon 97301

503-373-1265
www.oregon.gov/LUBA

For further information call the Multnomah County Land Use Planning Division at: 503-988-3043.

BEFORE THE LAND USE HEARINGS OFFICER
FOR MULTNOMAH COUNTY, OREGON

In the Matter of an appeal of a Director's Type II Decision reversing the Director's Lawfully Established Dwelling determination and affirming the Director's Lot of Record determination for a 10.77 acre parcel zoned CFU-4 in unincorporated Multnomah County, Oregon	**FINAL ORDER** **Prince Lot of Record and Lawfully Established Dwelling (applicant's appeal)** **T2-2021-15041**

I. Summary:

This Order is the final opinion of the Multnomah County Land Use Hearings Officer granting the applicant/appellant's appeal, affirming the Director's June 30, 2022 determination that the subject 10.77-acre parcel is a Legal Lot of Record and reversing the Director's determination that the dwelling on the subject parcel was not lawfully established. The preponderance of credible evidence in this record is sufficient to show that Tax Lot 700 is a Legal Lot of Record under MCC 39.3005 and 39.3050, and that the applicants' dwelling on the adjacent Tax Lot 100 was lawfully constructed in compliance with the laws in effect at the time of establishment consistent with the definition of Lawfully Established Dwelling in MCC 39.2000.

II. Introduction to the application and the Director's decision:

Applicant/Appellant/Owner.....Daniel and Jennifer Prince
41029 SE Louden Road
Corbett, OR 97019

Representative.....Ty K. Wyman, Esq.
Dunn Carney LLP
851 SW Sixth Ave., Suite 1500
Portland, OR 97204

Property .....Legal Description: Tax Lot 700 in the North half of the Southeast quarter of Section 6, Township 1 South, Range 5 East of the Willamette Meridian, Alternative Tax Acct: R995060180, Property ID: R342776, Street Address: 41029 SE Louden Road, Corbett.

Applicable Laws.....Multnomah County Code (MCC) 39.1515 (Code Compliance and Applications), MCC 39.2000 (Definitions – Lawfully Established Dwelling), MCC 39.3005 (Lot of Record – Generally), MCC 39.3050 (Lot of Record – Commercial Forest Use - 4)

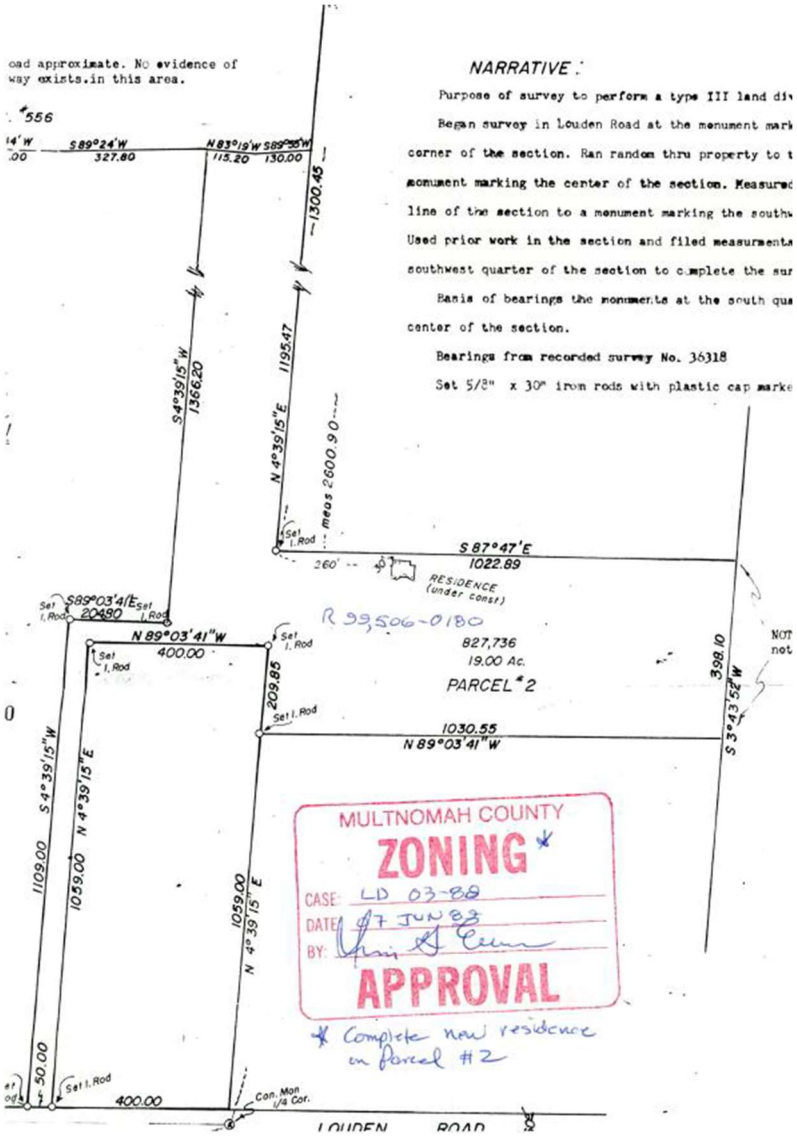
This application and appeal involve the following two parcels, both situated in the Corbett rural planning area of unincorporated Multnomah County, zoned CFU-4 (Commercial Forest Use - 4):

Tax Lot 700 at ~10.75 acres, located in the North half of the Southeast quarter of Section 6, Township 1 South, Range 5 East of the Willamette Meridian, Alternative Tax Acct: R995060180, Street Address: 41029 SE Louden Road, Corbett – referred to in this Final Order and Opinion as "TL 700." This is the property owned by the applicant/appellants.

Tax Lot 100 at ~78.25 acres, located in the North half of the Southeast quarter of Section 6, Township 1 South, Range 5 East of the Willamette Meridian, Alternative Tax Acct: R995060260, Street Address: 41029 SE Louden Road, Corbett – referred to in this Final Order and Opinion as "TL 100" This is the property where the applicant/appellants' home now appears to be located, but they do not own the property.

The applicant/appellants purchased TL 700 in 2006 (Ex. A.15) from Tom Steenson. Mr. Steenson had owned a larger parcel that was reconfigured and reduced in size down to the current TL 700 configuration through a partition in 1988 (Ex. A.5) and a 2005 lot line adjustment (Ex. A.6). The partition decision LD-03-88 (Ex. A.5) makes specific reference to the plan to construct a home on Parcel B, labeled Parcel 2 on the survey, which is today's TL 700. Mr. Steenson apparently reconveyed the property to himself prior to this sale to conform the property description to the newly configured TL 700 (Ex. A.13). Critical to a lot of record determination, the Steenson family owned TL 700 on February 20, 1990 (Ex. A.12), which is the operative date for this determination under MCC 39.3050(A). The record does not indicate that, at that time, the Steensons owned any other properties contiguous with TL 700; therefore, the aggregation requirement in MCC 39.3050(A)(2) is not a factor in this case. No one disputes these facts.

Construction of the home that is now owned by the applicant/appellants was begun by Mr. Steenson in ~1984, apparently without benefit of building permits (A.24). At the County's urging, however, Mr. Steenson soon obtained a building permit (Ex. A.17) for a house on TL 700, based on a 1988 survey that was later recorded (Ex. B.5) correctly showing the house under construction on TL 700 and compliant with the then-applicable 30-foot setback. The drawing associated with the building permit bears the sign-off signatures of the County Surveyor and the County Planning Director (Ex. A.17). Similarly, the 1989 site evaluation for septic was based on drawings that depicted the house on TL 700 (Ex. A.16) in the correct location. Home construction also appears to have included the appropriate electrical permit with inspections (Ex. A.26 & A.27). No one disputes these facts.



From Exhibit A.17 and B.5.

Sometime before 2019, however, the applicant/appellants apparently suspected something was wrong, and they obtained a survey of their property (Ex. B.6) that showed the house situated not on TL 700, but on TL 100, ~36 feet farther north than where they previously believed it to be relative to the boundary between TL 700 and TL 100. Thus, the most recent survey from 2019 shows the applicant/appellant's home on TL 100, ~6.2 feet north of TL 700. The 1988 survey (Ex. B.5) showed the house under construction in the correct location on TL 700, with all of the necessary local permits and local governmental sign-offs. The two surveys conflict. The 1988 survey (Ex. B.5) was the only evidence of home location relative to the TL 700/TL 100 boundary at the time the house was constructed, and the apparent permit violation relative to the 1988 building permit (Ex. A.17) was not documented with any evidence in this record until 30+ years later when the 2019 survey was produced (Ex. B.6).

The applicant/appellants submitted the 2019 survey as part of a lot line adjustment application but subsequently withdrew the application when County planning staff indicated that the development application could not be approved due to the house being on what appeared to be the wrong lot. MCC 39.1515, at the time this application was filed,[1] prohibited the County from approving a development permit when the subject property "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." In staff's view, the 2019 survey was sufficient evidence to establish that the house was constructed on TL 100 (Ex. B.6) in violation of the 1988 building permit, which anticipated the house would be constructed on TL 700. On this basis, the County was unable to process or approve the lot line adjustment, which qualified as a "development." The applicant/appellants then initiated the present application in the hope of eliminating the noncompliant aspect of TL 700, which would then allow them to proceed with a development permit to correct the recently discovered (2019) problem.

In this application, the current owners seek verification from the County that their parcel (TL 700) is a "lot of record," as defined in MCC 39.3005 and 39.3050 and that their home is a "lawfully established dwelling," as defined in MCC 39.2000. No development is proposed in this application; no permit is requested; therefore, MCC 39.1515 was not applicable to this request for legal lot and lawfully established dwelling verification.[2]

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[1] At the time this application was filed, MCC 39.1515, which applies to any application for development, provided:

> §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 or zoning review approval of development or any other approvals authorized by this code 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.
>
> (A) A permit or other approval, including building permit applications, may be authorized if:
>
> (1) It results in the property coming into full compliance with all applicable provisions of the Multnomah County Zoning Code. This includes sequencing of permits or other approvals as part of a voluntary compliance agreement; or
>
> (2) It is necessary to protect public safety; or
>
> (3) It is for work related to and within a valid easement over, on or under an affected property.

[2] MCC 39.1515 was recently revised and renumbered and now provides in pertinent part:

> §39.1250 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 or zoning review approval of development or any other approvals authorized by this code 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.
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> (A) A permit or other approval, including building permit applications, may be authorized if:
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> (1) It results in the property coming into full compliance with all applicable provisions of the Multnomah County Zoning Code. This includes sequencing of permits or other approvals as part of a voluntary compliance agreement; or
>
> (2) It is necessary to protect public safety; or
>
> (3) It is for work related to and within a valid easement over, on or under an affected property; or

N↑

This application was filed on September 8, 2021 ("A" series of exhibits) seeking verification that TL 700 is a "lot of record," and the applicant/appellant's home is a "lawfully established dwelling." The County followed a Type II process, and once the application was complete on March 7, 2022 (Ex. C.3), issued notice of the proposal and solicited comments from property owners within the notice range (Ex. C.4). No comments were received on the proposal. The Director issued a June 30, 2022 decision Ex. C.5) concluding that TL 700 was a "lot of record" under MCC 39.3005 and 39.3050, but that the house was not a "lawfully established dwelling" under MCC 39.2000 because the 2019 survey showed it was constructed on TL 100,not TL 700, and thus violated the 1988 building permit (Ex. A.17).

III. Summary of the local proceeding and Record:

On July 14, 2022, the applicants timely appealed the Director's decision (Ex. D.1), challenging the Director's determination that the house was not a "lawfully established dwelling" and that such a finding was sufficient to deny the verification request. The County issued notice of a July 22, 2022 public hearing, which was rescheduled twice at the applicant's request, finally convening on September 9, 2022.

The September 9, 2022 hearing was held remotely via a Zoom internet platform, in which everyone participating via video or via telephone audio could testify and could

(4) It brings a non-conforming structure or non-conforming use into compliance with current regulations; or
(5) The Planning Director determines the development qualifies as a minor project.

hear everything that everyone said. At the commencement of the hearing, the Hearings Officer made the disclosures and announcements required by ORS 197.763(5) and (6) and 197.796 and disclaimed any *ex parte* contacts, conflict of interest or bias. No one raised any procedural objections or challenged the Hearings Officer's ability to decide the matter impartially, or otherwise challenged the Officer's jurisdiction. No one requested that the record be left open or that the hearing be continued.

At the hearing, Lisa Estrin, Land Use Planner for the County, provided a verbal summary of the Director's June 30th decision (Ex. C.5). The applicant/appellant appeared through his attorney Ty Wyman, who elaborated upon the appeal arguments in his Notice of Appeal (Ex. D.1). The applicant/appellants requested that the record remain open following the hearing and agreed to toll the 150-day clock (Ex. J.1). Multiple neighbors, including the owners of TL 100 testified in support of the application and appeal and promised to help the applicants find and perfect a solution to their predicament, including one or more lot line adjustments: Dennis Wiancko, Michael Arion, Klaus Heyne, John Chamberlin (Ex. A.24), and Peter Finley Fry (Ex. A.28). No one testified or submitted comments in opposition to the application or appeal. At the hearing's conclusion, the Hearings Officer ordered the following open-record schedule:

- 14 days (Sept 23) applicant's written summary of legal arguments
- 7 days (Sept 30) staff response to the applicant's written summary
- 7 days (Oct 7) applicant/appellant's final rebuttal, no new evidence

During the first post-hearing open-record period, however, the applicant's attorney requested that the open-record process and the application be continued indefinitely to allow the applicant/appellants time to craft a new legal strategy (Ex. J.1). The Examiner, however, denied the request and directed the applicant/appellants to complete any submissions they wished to make. The applicant/appellants acquiesced and submitted their final rebuttal on Oct 3, at which point the record closed.

III. Findings:

Only issues and approval criteria raised in the course of the application, appeal, during the hearing, or before the close of the record are discussed in this section. All approval criteria or issues not raised by staff, the applicant or a party to the proceeding have been waived as contested issues, and no argument with regard to these issues can be raised in any subsequent appeal. The Hearings Officer finds those criteria to be met, even though they are not specifically addressed in these findings. The Hearings Officer adopts the following findings related to the issues and approval criteria that were preserved during the proceeding while the record was open:

A. The 2-part lot of record test in MCC 39.3005(B) and 39.3050(A). Pertinent to this matter, MCC 39.3005(B) (Lot of Record - Generally) provides a 2-prong test for verification of a legal "lot of record." To be deemed a legal lot of record, the parcel in question, at the time of its creation, must have: (a) satisfied all dimensional requirements

of the then-applicable zoning and (b) satisfied the procedural requirements for creation of a lot under the then applicable zoning, *i.e.,* at the time it was created. In particular:

> *"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."*
>
> *"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 … By a deed, or a sales contract dated and signed by the parties to the transaction, that was recorded … prior to October 19, 1978;"*

MCC 39.3005(B), *see also* MCC 39.3050(A), which provides additional requirements for lots of record in the CFU-4 zone, most notably:

> *(A) In addition to the standards in MCC 39.3005, for the purposes of the CFU-4 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.*

The record shows and County staff and the applicant/appellants agree that the first time TL 700 was described in its current form was Mr. Steenson's January 27, 2006 reconveyance to himself (Ex. A.13) in which changes wrought by the previous partition and lot line adjustment were reflected in a new description for what is now TL 700. That description was then used by Steenson to convey TL 700 to the Princes on February 2, 2006 (Ex. A.15). The Steenson family owned TL 700 on February 20, 1990 (Ex. A.12), and the record does not indicate that the Steensons owned any property contiguous to TL 700 at that time. Therefore, TL 700 was not aggregated with any contiguous parcels or lots by operation of MCC 39.3050(A), and TL 700 was and remains a discrete legal lot of record today. ORS 92.017. On that issue and conclusion, the Director was correct and is hereby affirmed

B. Lawfully established dwelling under MCC 39.2000. In addition to the lot being a lot of record, the dwelling must be a "lawfully established dwelling," and the only standard for this requirement is the following definition:

> *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.* MCC 39.2000.

The Director concluded that the house was supposed to be constructed on TL 700 according to the 1988 building permit (Ex. A.17), but ended up being constructed on TL 100, which the Director equated with a permit violation and failed to meet the definitional requirements. According to the Director (Ex. C.5), the 2019 survey (Ex. B.6) was more persuasive and credible on the question of where the house was located than was the 1988 survey (Ex. B.5). Also, the Director concluded that a determination under MCC 39.2000 for a house built between 1984 and 1988 could legitimately use retrospective or recently derived evidence of whether a house built in the late 1980s was "constructed in compliance with the laws at the time" it was established. The Director concluded that the definitional requirements of a "lawfully established dwelling" were not met solely because of the 2019 survey. I respectfully disagree with the Director's interpretation of MCC 39.2000, what evidence is permissible, and how compliance with the definitional requirements is determined.

This case rests upon the proper interpretation of MCC 39.2000, an exercise that is controlled by the interpretive rules from *PGE v. Bureau of Labor and Industries*, 317 Or 606, 610-12, 859 P2d 1143 (1993), as modified by *State v. Gaines*, 346 Or 160, 171-72, 206 P3d 1042 (2009). That interpretive exercise starts with an examination of the text and context of the definition of "lawfully established dwelling" in MCC 39.2000, and allows consideration of any useful legislative history in an ultimate effort to construe the code provision to effectuate the intent of the Board of Commissioners. *State v. Giron-Cortez*, __ Or App __ (CA Nos. A173814, A173815, A173813, slip op Oct. 5, 2022).

The operative element of this definition is cast in the time frame of the dwelling's construction: "A dwelling that was constructed in compliance with the laws in effect at the time of establishment." This requires research into the codes and permits in effect at the time of establishment of the house, *i.e.*, in the mid to late 1980s, and it requires review of the evidentiary record to see what evidence exists from that period about compliance at that time with the then-applicable "zoning, land division and building code requirements." This case, therefore, turns on whether there is sufficient credible evidence in this record from which a reasonable person can conclude that, "at the time of establishment," the dwelling in question "was constructed in compliance with the laws in effect" at that time.

This definition appears to call for a snap-shot in time determination covering the period during which the dwelling was established, not today. The text of this definition does not suggest a retrospective view based on what recent evidence might tell us today about the dwelling's compliance with then-applicable requirements at the time it was established. Put differently, resolution of this case, given the text of the operative definition in MCC 39.2000 does not allow Monday morning quarter-backing based on

later-discovered or modern evidence, but rather what evidence from the snap-shot tells us about the dwelling. Resolution of this case under this definition should not take into account recently derived evidence outside of the snap-shot of what we may now believe to be the true state of affairs. Instead, this determination about a house constructed between 1984 and 1988 should be based on evidence from the mid to late 1980s and whether that evidence demonstrates the house was constructed in compliance with the laws in effect at the time of establishment. This snapshot in time interpretation of the definition of "lawfully established dwelling" is supported by its clarification that "compliance with Building Code requirements" means "that all permits necessary to qualify the structure as a dwelling unit were obtained and all qualifying permitted work completed." This requires evidence from the time the dwelling was established.

In this light, a determination of whether the house was lawfully established is an evidentiary determination, but the evidence must be credible and relevant to the question of whether the dwelling was constructed in compliance with the laws in effect at the time of establishment. To be credible, the evidence must show a good faith effort at the time of establishment to construct the house consistent with the then-applicable requirements, not that the builder managed to skirt the rules at the time and can now get away with it despite recent evidence of the builder's willful avoidance of the code or permit requirements. To the contrary, to validate a lawfully established dwelling, a preponderance of credible evidence from that period must show that the dwelling, in fact, was constructed in good faith compliance with the laws in effect at the time of establishment, despite recent conflicting evidence that might suggest that regulators, property owners and builders at the time were perhaps mistaken, albeit in good faith, about facts on the ground.

Evidence in this record from the period during which the applicant/appellants' home was being constructed – evidence from the snapshot in time – includes the 1988 recorded survey (Ex. B.5) that was signed-off by the Multnomah County Surveyor and Planning Director (Ex. A.17) and the 1989 site evaluation for septic that includes a drawing that depicting the house on TL 700 (Ex. A.16) in the correct location. This evidence contemporaneous with the "time of establishment" of the dwelling shows a good faith understanding by the builder, all affected property owners, Multnomah County and City of Gresham regulators that the house was fully permitted, lawful, and constructed on TL 700. The evidence from this period suggests no violation of any local code provisions or permits and good faith compliance with all applicable requirements.

Under my "snapshot in time" interpretation of MCC 39.2000, this evidence, contemporaneous with the home's establishment, is sufficient to find that the home meets the definitional requirements of a "lawfully established dwelling," despite subsequent evidence indicating that everyone at the time the home was established may have been mistaken. This contrary evidence that the home may have been constructed on the wrong property, and possibly a violation of the 1988 building permit, is the 2019 survey (Ex. B.6) more than 30 years later. While qualifying as credible evidence, the 2019 survey was not contemporaneous with the "time of establishment" of the dwelling, and therefore does not detract from the contemporaneous evidence of everyone's good faith

understanding at the time and for the next 30 years that the home was constructed on TL 700.

This interpretation of MCC 39.2000 and determination that the applicant/ appellants' home qualifies as a "lawfully established dwelling" does not mean that the applicant/appellants do not have a problem. The 2019 survey at least suggests the house is situated on the wrong parcel – one they do not own, and must be remedied, at a minimum, because of the practical difficulties it presents if the applicant/appellants ever wish to sell their property or home. My interpretation and decision today relies on the evidence of good faith compliance with the then-applicable code and permit requirements – evidence that is contemporaneous with at the time period during which the house was established, and nothing more. This determination will allow the County to accept and process a subsequent development application from the applicant/appellants through MCC 39.1515 to correct the problem shown in the 2019 survey.

IV. CONCLUSION AND DECISION:

Based on the foregoing, I grant the appeal and affirm the Director's June 30, 2022 determination that TL 700 is a lot of record under MCC 39.3005 and 39.3050. I reverse the Director's determination regarding the dwelling and conclude, based on the record in this matter and the foregoing interpretation, that the applicant/appellants' house meets the definitional requirements of MCC 39.2000 and qualifies as a "lawfully established dwelling."

Date of Decision: October 18, 2022.

By: _____
Daniel Kearns,
Land Use Hearings Officer

Notice of Appeal Rights

This is the County's final decision on this application and appeal. Anyone with standing may appeal any aspect of the Hearings Officer's decision, to the Oregon Land Use Board of Appeals within 21 days of the date of this decision pursuant to ORS Chapter 197.

Exhibit List for T2-2021-15041

Exhibit #	Description	Date
A Exhibits	**Application Documents**	
A.1	General Application Form	09.08.2021
A.2	Cover Letter	09.08.2021
A.3	Applicant Narrative	09.08.2021

A.4	Applicant Declaration	09.08.2021
A.5	Exhibit 1 – Copy of LD 3-88	09.08.2021
A.6	Exhibit 2 – Copy of T2-05-079	09.08.2021
A.7	Exhibit 3 – Map of Property	09.08.2021
A.8	Exhibit 4 – 1978 Tax Map	09.08.2021
A.9	Exhibit 5 – 1988 Deed	09.08.2021
A.10	Exhibit 6 – Parcel Record Card for R995060180	09.08.2021
A.11	Exhibit 7 – 1998 Tax Map	09.08.2021
A.12	Exhibit 8 – 1989 Deed	09.08.2021
A.13	Exhibit 9 – Deed 2006-015964	09.08.2021
A.14	Exhibit 10 – Deed 2006-015962	09.08.2021
A.15	Exhibit 11 – Deed 2006-23014	09.08.2021
A.16	Exhibit 12 – Copy of LFS 83-89	09.08.2021
A.17	Exhibit 13 – Copy of 1989 Zoning Review	09.08.2021
A.18	Exhibit 14 – Copy of BES Permit	09.08.2021
A.19	Exhibit 15 – Copy of Email from Gresham Building Dept. employee	09.08.2021
A.20	Exhibit 16 – Copy of Applicant Declaration	09.08.2021
A.21	Exhibit 17 – Parcel Record Card for R995060300	09.08.2021
A.22	Exhibit 18 – Copy of Email from Multnomah County DART employee	09.08.2021
A.23	Applicant's Supplemental Narrative	03.07.2022
A.24	Exhibit 19 – Chamberlin Declaration	03.07.2022
A.25	Exhibit 20 – PGE Email	03.07.2022
A.26	Exhibit 21 – Copy of City of Gresham Electrical Inspection	03.07.2022
A.27	Exhibit 22 – Copy of 2016 Electrical Permit	03.07.2022
A.28	Exhibit 23 – Memo from Land Use Consultant	03.07.2022
B Exhibits	**Description**	**Date**
B.1	Division of Assessment, Recording, and Taxation (DART): Property Information for <State ID> (Alt Acct#)	09.08.2021

B.2	Division of Assessment, Recording, and Taxation (DART): Map for	09.08.2021
B.3	1980 Historic Zoning Map for 1S5E06	03.07.2022
B.4	MUF Zoning Regulations in MCC 11.15 as adopted March 23, 1982	03.07.2022
B.5	Copy of Survey record no. 50584	06.10.2022
B.6	Proposed Property Line Adjustment Maps from Surveyor Chase, Jones & Associates, Inc. dated Jan 30, 2019	06.27.2022
C Exhibits	**Administration & Procedures**	**Date**
C.1	Incomplete letter	10.06.2021
C.2	Applicant's acceptance of 180 day clock	11.02.2021
C.3	Applicant's Response to Incomplete Letter	03.07.2022
C.4	Opportunity to Comment	05.18.2022
C.5	Director's Decision	06.30.2022
D Exhibits	**Post-Decision Doc**	**Date**
D.1	Applicant's Notice of Appeal	07.14.2022
H Exhibits	**County Exhibits**	**Date**
H.1	MCC 11.15.1115 Land Use Permits (1982)	
H.2	Variance Regulations from Zoning Ord. (1982)	
J Exhibits	**Post Hearing Documents**	**Date**
J.1	Applicant's Continuance Toll letter	09.22.2022
J.2	HO's Continuance Order	09.28.2022
J.3	Applicant's Final Rebuttal Argument	10.04.2022