

### City of Portland, Oregon

### **Bureau of Development Services**

### Land Use Services

FROM CONCEPT TO CONSTRUCTION

Amanda Fritz, Commissioner Paul L. Scarlett, Director Phone: (503) 823-7300 Fax: (503) 823-5630 TTY: (503) 823-6868 www.portlandoregon.gov/bds

Date: November 5, 2013 To: Interested Person

From: Sheila Frugoli, Land Use Services

503-823-7817 / Sheila.Frugoli@portlandoregon.gov

### NOTICE OF A TYPE II DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The reasons for the decision are included in the version located on the BDS website http://www.portlandonline.com/bds/index.cfm?c=46429. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

### CASE FILE NUMBER: LU 13-207728 AD **GENERAL INFORMATION**

Bill Whitney/ Whitney Architects Applicant:

320 N Main Ave, Suite 203 / Gresham, OR 97030

Joanne Bell / Begin Right Employment Services **Interested Party:** 

10905 NE Sandy Blvd / Portland, OR 97220

Gilbert Enterprises LLC Owner:

8219 SE Lieser Point Dr. / Vancouver, WA 98664-2346

Site Address: 3708 NE 122ND AVE

BLOCK 1 LOT 1&2. BEECHWAY Tax Account No.: Legal Description: R063000020

2643 State ID No.: 1N2E23CC 00700 Quarter Section:

Argay, contact Troy Palmquist at 503-256-5445. **Neighborhood:** 

**Business District:** Parkrose Business Association, David Ableidinger at 503-258-2607. East Portland Neighborhood Office, Richard Bixby at 503-823-4550. **District Coalition:** Zoning:

CO1h: Commercial Office 1 zone with the "h" Aircraft Landing overlay

zone

Case Type: AD, Adjustment Review

Type II, an administrative decision with appeal to the Adjustment Procedure:

Committee.

**Proposal:** The applicant is requesting an Adjustment to increase the required maximum building setback (PCC 33.130.215.C) from 10 feet to 81 feet in order to construct additions to the existing office building. The applicant intends to complete a major remodel of the building, including a 676 square foot, one-story addition on the north side of the existing building. Also, the applicant intends to replace the existing windows with larger ones, replace the siding and apply a stone veneer. The main entrance of the building will be upgraded with a cover, more glazing and a taller, distinctive roof. A new pedestrian connection from the NE 122nd Avenue public sidewalk through the parking area to the building entrance will also be installed.

The Portland Zoning Code requires new buildings and building additions to be located within 10 feet of property lines that abut designated transit streets. Because NE 122<sup>nd</sup> Avenue is a designated transit street, the setback requirement applies.

### Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. Adjustment requests will be approved if the review body finds that the applicant has shown that approval criteria A. through F. of Section 33.805.040, Adjustment Approval Criteria have been met. The relevant approval criteria are as follows:

#### **ANALYSIS**

**Site and Vicinity:** The subject site is corner lot, developed with a one-story office building with a paved and landscaped parking lot. The parking area separates the building from NE  $122^{\rm nd}$  Avenue. On the south side of NE Beech is a 2-story office building. East of the office development are single-dwelling residences. On the west side of NE  $122^{\rm nd}$  Avenue are commercial and apartment developments. North of the site is a home on a relatively large lot and large lots that are in agricultural use. The lots to the north are zoned General Commercial. On the west side of NE  $122^{\rm nd}$  Avenue is the Rossi Farm business and further northwest of the site is the Parkrose High School.

SE 122<sup>nd</sup> Avenue is a major corridor with 4 traffic lanes, sidewalks, bike lanes and bus stops. A new stormwater swale is constructed in the public right of way along the frontage of the site.

**Zoning:** The Office Commercial 1 (CO1) zone is used on small sites in or near residential areas or between residential and commercial areas. The zone is intended to be a low intensity office zone that allows for small scale offices in or adjacent to residential neighborhoods. The allowed uses are intended to serve nearby neighborhoods and/or have few detrimental impacts on the neighborhood. Development is intended to be of a scale and character similar to nearby residential development to promote compatibility with the surrounding area. Development should be oriented to pedestrians along transit streets and in Pedestrian Districts.

The h, Aircraft Landing overlay zone provides safer operating conditions for aircraft in the vicinity of Portland International Airport by limiting the height of structures and vegetation near the airport. The height limit of the CO1 zone is below the height restriction of the "h" overlay zone.

Land Use History: City records indicate there are no prior land use reviews for this site.

**Agency Review:** A "Notice of Proposal in Your Neighborhood" was mailed **October 3, 2013**. The following Bureaus have responded with no issues or concerns:

- Life Safety Plan Review Section, BDS (Exhibit E.6)
- Fire Bureau (Exhibit E.4)
- Water Bureau (Exhibit E.3)
- Bureau of Parks-Forestry Division (Exhibit E.7)

The **Bureau of Environmental Services** responded with the following comments:

- 1. Existing Stormwater Infrastructure:
  - a. There is an 18-inch concrete public storm-only sewer located in NE 122<sup>nd</sup> Avenue.
    - 1) There is an existing public stormwater planter located on the west and east sides of NE 122<sup>nd</sup> Avenue that overflow to the public storm-only sewer system.
- 2. General Stormwater Management Requirements: All development and redevelopment proposals are subject to the requirements of the City of Portland Stormwater Management Manual (SWMM). The SWMM is periodically updated; projects must comply with the

version that is adopted when permit applications are submitted. The 2008 SWMM may be obtained at the City of Portland Development Services Center (1900 SW 4<sup>th</sup> Ave) and from the BES website (www.portlandonline.com/bes/2008SWMM).

- 3. Development projects are evaluated using the criteria described in <a href="SWMM">Section 1.3</a> of the SWMM. The Stormwater Hierarchy guides the applicant in determining where stormwater runoff should be conveyed (i.e. infiltrated on-site or discharged off-site). The highest technically feasible category must be used. Regardless of the discharge point, vegetated surface facilities are required to the maximum extent feasible to meet SWMM pollution reduction and flow control requirements.
- 4. *On-Site Stormwater Management Comments*: BES reviews stormwater management facilities on private property for the feasibility of infiltration, pollution reduction, flow control, and off-site discharges. The Site Development Section of BDS determines if stormwater infiltration on private property is feasible when slopes on or near the site present landside or erosion related concerns, or where proximity to buildings might cause structural problems.
  - a. The proposed addition to the existing office building will be greater than 500 square feet. Therefore, the Stormwater Management Manual will be triggered. The applicant will be required to meet the Stormwater Hierarchy for the new development. On-site infiltration is required to the maximum extent feasible. Off-site disposal of stormwater runoff from this project would be challenging.
  - b. A stormwater plan for this development will be reviewed in detail by BES at the time of permit review (permit number 13-215727 CO).
  - c. There appears to be adequate space on the property for an on-site infiltration system. Therefore, the requested Adjustment should not impact BES stormwater management requirements and BES will not require updated plans at this time. (Exhibit E.1)

### The **Portland Bureau of Transportation** responded with the following comments:

Expansion of the building on the site triggers dedications and sidewalk widening per the requirements of Title 17.88.020. The following dedications and sidewalk improvements shall be conditions of building permit approval:

NE 122<sup>nd</sup> Ave: Dedicate 5-ft and construct a 12-ft sidewalk corridor consisting of the existing 0.5-ft curb, 4-ft furnishing zone with street trees, 6-ft sidewalk, and a 1.5-ft frontage zone.

NE Beech Street: Dedicate 2-ft ft and construct an 11-ft sidewalk corridor consisting of the existing 0.5-ft curb, 4-ft furnishing zone with street trees, 6-ft sidewalk, and a 0.5-ft frontage zone.

In addition, the corner ramp will be required to be upgraded to meet current ADA standards with a dual ramp if feasible. A utility pole at the corner may need to be relocated.

NOTE: The dedications and street improvements identified in this report shall be conditions of building permit approval. (Exhibit E.2)

### The **Site Development Section of BDS** responded with the following comments:

<u>Stormwater discharge and treatment</u>. The Bureau of Environmental Services will review the project for conformance to the 2008 Stormwater Management Manual. Site Development has no concerns with the slope/building setbacks.

<u>Septic system</u>. City records show that the existing office building at 3708 NE 122<sup>nd</sup> Avenue was constructed in 1978 and the public sewer system was installed in NE 122<sup>nd</sup> Avenue in 1972. It is assumed that the office building was connected to the public sewer system at the time of construction.

<u>Erosion control</u>. Erosion prevention and sediment control requirements found in Title 10 apply to both site preparation work and development. Full compliance with the erosion control requirements of Title 10, as well as maintenance of the erosion control elements, such as silt fences on private property, storm drain inlet protection and bio bags in the public right-of-way, is the responsibility of the property owner, the developer of the land division and the builders of structures on the individual lots. Please refer to the City of Portland *Erosion and Sediment Control Manual* for additional information regarding erosion and sediment control requirements. (Exhibit E.5)

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on October 3, 2013. One written response has been received. A letter of support was submitted from a Valerie Curry, representing the Argay Neighborhood Association. The letter states:

The Argay Neighborhood Association arranged a meeting with the surrounding and nearby Beechway homeowners, and Joanne Bell (potential tenant), her architects (Whitney and Associates Architects PC), and contractor regarding re-development of the property at 3708 NE 122<sup>nd</sup>, Portland Oregon, which will serve as the location for Ms. Bell's business – Begin Right Employment Services. Development plans stated at the meeting met with general approval of the Beechway residents who attended and were as follows:

- It was stated and understood that there were no plans to add a second story to the building.
- The existing building would be enlarged by moving the front of building forward (west) into parking lot a short distance to form a new entry.
- Interior and exterior would be renovated and made more attractive
- The lot would be landscaped. Greenery now existing between the lot and the adjacent property to the east would remain to ensure privacy for that property.
- The steep driveway entrance into the parking lot would be modified.
- The neighbors agreed that signage for the business should be permitted.

The neighbors present accepted the proposed renovation as described and see the renovation as a positive and welcome improvement to their neighborhood. (Exhibit F.1)

### ZONING CODE APPROVAL CRITERIA

### 33.805.040 Approval Criteria

Adjustment requests will be approved if the review body finds that the applicant has shown that approval criteria A. through F. below, have been met.

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

**Findings**: The applicant is requesting an adjustment to increase the maximum building setback for additions to an existing commercial building. The purpose for the maximum required building setbacks, as stated in Section 33.130.215 A (Purpose) of the Zoning Code, is as follows:

The required building setbacks promote streetscapes that are consistent with the desired character of the different commercial zones. The setback requirements along transit streets and in Pedestrian Districts create an environment that is inviting to pedestrians and transit users.

The site is on NE 122<sup>nd</sup> Avenue, which is a Major City transit street. There is a maximum setback of 10 feet from the street property line for buildings along transit streets. The proposed additions will align with the building and be set back approximately 81 feet from the property line along NE 122<sup>nd</sup> Avenue, a transit street.

Without a significant change to the internal floor plan and a reduction of on-site parking, the configuration of the existing building leaves little opportunity to place additional office space closer to the transit street. The building is located approximately 16 feet from the north property line and over 20 feet from the south property line. The applicant is proposing to use this area for the modest additions to the building. This will allow the applicant to improve the west facing façade, construct a prominent main entrance and construct a pedestrian connection from the NE  $122^{\rm nd}$  public right-of-way to the entrance, while still maintaining the existing parking area. These improvements will make the site more inviting to pedestrians and transit users.

The design of the west elevation of the building includes a covered entry, additional glazing, and new, larger ground-floor windows. These improvements will clearly identify it as the front of the structure and the destination for pedestrians who will access the building from the street. Although it will be set back, the building will be fairly visible from NE 122<sup>nd</sup> Avenue.

The CO1 zone is also intended to be a low intensity zone that allows for small scale offices in or adjacent to residential neighborhoods. The allowed uses are intended to serve nearby neighborhoods and/or have few detrimental impacts on the neighborhood. Development is intended to be of a scale and character similar to nearby residential development to promote compatibility with the surrounding area. The site is located along a corridor that is auto-accommodating. The applicant's proposal continues to accommodate the safe, efficient circulation and parking of vehicles on the site, while still addressing the needs of pedestrians and transit users. As proposed, there will be a well-defined, direct, and safe pedestrian connection from the street to the main entrance.

This proposal satisfies this approval criteria.

## B. If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, or I zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and

**Findings:** The site has frontage on NE 122<sup>nd</sup> Avenue and NE Beech Street. NE 122nd is classified as a Major City Traffic Street, Transit Access Street, City Bikeway, City Walkway, Major Truck Street, and a Major Emergency Response Street. NE Beech Street is classified as a Local Service Street for all modes. Portland Bureau of Transportation staff has reviewed the proposal and determined that the proposal is acceptable.

The Zoning Code defines the term "desired character" as being based on the purpose statement of the base zone, overlay zone and plan district and the preferred and envisioned character included in adopted area plans (Section 33.910.030). As explained above, the proposal is in the C01, Office Commercial 1 zone. This zone is intended to be a low intensity zone that allows for small scale offices in or adjacent to residential neighborhoods. The allowed uses are intended to serve nearby neighborhoods and/or have few detrimental impacts on the neighborhood.

Further, the site is within the plan boundary of the adopted Cully/Parkrose Community Plan (adopted August 27, 1986). The community plan does not speak to development requirements such as building setbacks or an emphasis in transit utilization. However, Policy 2 states, "Commercial enterprises providing consumer goods and services to the community are encouraged at NE 122<sup>nd</sup> Avenue and Sandy". The subject site is within the commercial corridor south of NE Sandy. The Argay Neighborhood Association, representing nearby residents,

supports the proposal and finds the changes to the building will be a positive improvement. (Exhibit F.1)

The proposal is consistent with the classifications of the adjacent streets and the desired character of the area. This criterion is met.

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 zone; and

**Findings:** Only one Adjustment is requested. Therefore, this approval criterion does not apply.

D. City-designated scenic resources and historic resources are preserved; and

**Findings:** City designated resources are shown on the zoning map by the 's' overlay; historic resources are designated by a large dot, and by historic and conservation districts. There are no such resources present on the site. Therefore, this criterion is not applicable.

E. Any impacts resulting from the adjustment are mitigated to the extent practical; and

**Findings:** There are no discernible impacts that would result from granting the requested Adjustment. The neighborhood association supports the proposal. The adjustment request will allow a modest addition and continued use of the accessory parking area, without creating impacts to adjacent sites. This criterion is met.

F. If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable;

**Findings**: The site is not within an environmental zone, which is designated on the zoning map by either a "c" or "p" overlay. Therefore, this criterion is not applicable.

### **DEVELOPMENT STANDARDS**

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

### **CONCLUSIONS**

As reflected in the findings of this report, the proposal addresses the approval criteria and therefore should be approved.

#### ADMINISTRATIVE DECISION

Approval of an Adjustment to increase the required maximum building setback (PCC 33.130.215.C) from 10 feet to 81 feet in order to construct additions to the existing office building, per the approved plans, Exhibits C.1 and C.2, signed and dated November 1, 2013, subject to the following condition:

A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must substantially conform with the information and design approved by this land use review as indicated in Exhibits C.1 and C.2. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 13-207728 AD."

Staff Planner: Sheila Frugoli

Decision rendered by: \_\_\_\_\_\_\_ / Mully / Mull on November 1, 2013

By authority of the Director of the Bureau of Development Services

Decision mailed: November 5, 2013

**About this Decision.** This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

**Procedural Information.** The application for this land use review was submitted on September 20, 2013, and was determined to be complete on September 30, 2013.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on September 20, 2013.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant did not waive or extend the 120-day review period.

### Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

**Conditions of Approval.** If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

**Appealing this decision.** This decision may be appealed to the Adjustment Committee, which will hold a public hearing. Appeals must be filed **by 4:30 PM on November 19, 2013** at 1900 SW Fourth Ave. Appeals can be filed Tuesday through Friday on the first floor of the Development Services Center until 3 p.m. After 3 p.m. and Mondays, appeals must be submitted to the receptionist at the front desk on the fifth floor. **An appeal fee of \$250 will be charged**. The appeal fee will be refunded if the appellant prevails. There is no fee for ONI recognized organizations appealing a land use decision for property within the organization's boundaries. The vote to appeal must be in accordance with the organization's bylaws. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Please see the appeal form for additional information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at <a href="https://www.portlandonline.com">www.portlandonline.com</a>.

**Attending the hearing.** If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Adjustment Committee is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 775 Summer St NE, Suite 330, Salem, OR 97301-1283, or phone 1-503-373-1265 for further information.

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Adjustment Committee an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

### Recording the final decision.

If this Land Use Review is approved the final decision must be recorded with the Multnomah County Recorder. A few days prior to the last day to appeal, the City will mail instructions to the applicant for recording the documents associated with their final land use decision.

- Unless appealed, The final decision may be recorded on or after **November 20, 2013.**
- A building or zoning permit will be issued only after the final decision is recorded.

The applicant, builder, or a representative may record the final decision as follows:

- By Mail: Send the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to: Multnomah County Recorder, P.O. Box 5007, Portland OR 97208. The recording fee is identified on the recording sheet. Please include a self-addressed, stamped envelope.
- In Person: Bring the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to the County Recorder's office located at 501 SE Hawthorne Boulevard, #158, Portland OR 97214. The recording fee is identified on the recording sheet.

For further information on recording, please call the County Recorder at 503-988-3034 For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

**Expiration of this approval.** An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

**Applying for your permits.** A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and

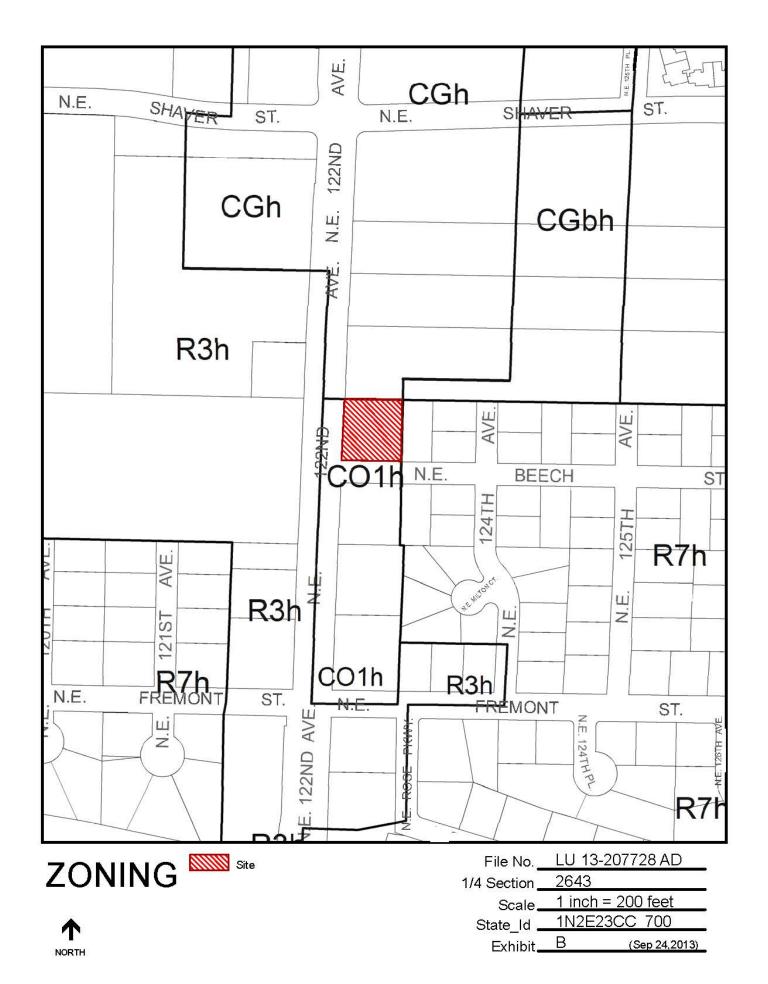
• All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

#### **EXHIBITS**

### NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Site Plan/Utilities and Landscaping Plan (attached)
  - 2. Exterior Alterations (attached)
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice
- E. Agency Responses:
  - 1. Bureau of Environmental Services
  - 2. Bureau of Transportation Engineering and Development Review
  - 3. Water Bureau
  - 4. Fire Bureau
  - 5. Site Development Review Section of BDS
  - 6. Life Safety Plan Review Section of BDS
  - 7. TRACS print-out showing "no concerns" response from the Bureau of Parks, Forestry Division
- F. Correspondence:
  - 1. Valerie Curry, Argay Neigh. Assoc. representative, Oct. 24, 2013, supports proposal
- G. Other:
  - 1. Original LU Application

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).



ADJ-1 SITE & UTILITIES PLAN / LANDSCAPE PLAN 3308 NE 122ND ST., PORTLAND, OREGON 97220 REGIN RIGHT EMPLOYMENT SERVICES WHITNEY & ASSOCIATES **ADJUSTMENT** 0 ANDSCAPE PLAN ONE STORY ADDIN OFFICE BUILDING PROPOSED Charle Capel .0 BRIA CRANEA, BPRINGHOOD P (66) 1 - GAL EX. TREES S SERVICE 學學 LANDSCAFE LEGEND DIATETER AT BREADT ARBORNTAE EMPLOYMENT 1500 BAY UNZZI BN REMODEL & ADDITION 3708 NE 122ND PORTLAND, OREGON <u>a</u> 0 reviews requested and is subject 0 \* This approval applies only to the reviews requested and is subjected to approval. Additional zoning requirements may apply BITE PLAN / UTILITIES EXISTING ONE STORY City of Portland - Bureau of Development, Services PARCOS PA RIGHT (1) EGIN 494 494 \*Approved\* 0 0 . B 1 . DE ECH EXIST, LANDSCAPING TO DE TREPTIED NOR DETTER BOATLINES AND SECUR ш 0 UTILITIES LEGEND Planner 1/2 m !

W 13-207728AD

Exhibit C.1

# S SERVICE EMPLOYMENT REMODEL & ADDITION 3708 NE 122ND PORTLAND, OREGON RIGHT BEGIN

WHITNEY & ASSOCIATES

STATE OF STATE

3308 NE 135ND VAE" KORTLAND, OREGON 97230

SEKAICES

BEGIN KICHT EMPLOYMENT



Planner

LU13-207728AT Exhibit C.2

