



City of Portland, Oregon
Bureau of Development Services
Land Use Services

FROM CONCEPT TO CONSTRUCTION

Amanda Fritz, Commissioner
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Date: June 25, 2014
To: Interested Person
From: Jennifer Kenny, Land Use Services
 503-823-7011 / Jennifer.Kenny@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 14-155978 HR – SOLAR ARRAY
GENERAL INFORMATION

Applicant: Rick McClish, Belmont & Morrison LLC
 807 Josephine Lane / Heraldsburg CA 95448

Site Address: 111 SE BELMONT STREET

Legal Description: BLOCK 45 LOT 1-4 HISTORIC PROPERTY 15 YR 2006 POTENTIAL ADDITIONAL TAX, EAST PORTLAND

Tax Account No.: R226502580, R226502580

State ID No.: 1S1E03AA 04300, 1S1E03AA 04300

Quarter Section: 3031

Neighborhood: Buckman, contact Matthew Kirkpatrick at 503-236-6350.

Business District: Central Eastside Industrial Council, contact Peter Fry at 503-274-1415.

District Coalition: Southeast Uplift, contact Bob Kellett at 503-232-0010.

Plan District: Central City - Central Eastside

Other Designations: Listed in the National Register of Historic Places as the Jones Cash Store

Zoning: IG1, General Industrial 1

Case Type: HR, Historic Resource Review

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

Proposal: The applicant seeks Historic Resource Review approval to install 168 solar panels on the roof of a structure listed in the National Register of Historic Places, known as the Jones Cash Store. Historic Resource Review approval is required because the proposal is for a non-exempt exterior alteration of a Historic Landmark.

Relevant Approval Criteria: In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

- Central City Fundamental Design Guidelines
- 33.846.060.G – Other Approval Criteria
- Special Design Guidelines for the Central Eastside District

ANALYSIS

Site and Vicinity: The full site is occupied by a historic, three-story warehouse. The building is

individually listed in the National Register of Historic Places under eligibility Criterion A, for its association with the rapid growth and development of the Jones Cash Store, which was the first and eventually largest mail-order business headquartered in the Pacific Northwest. The building was completed in 1920.

The Jones Cash Store occupies a typical 100' x 200' lot in the core of one of Portland's oldest intact industrial areas, known as the Inner Eastside for its location along the east bank of the Willamette River. The building is hemmed in at the north and south by the elevated approaches to/from the Morrison Bridge which overhang the rights-of-way of SE Belmont and Morrison Streets. It is adjacent to the main Union Pacific Railroad tracks on its west and in a neighborhood of many buildings of similar type and age.

Zoning: The General Industrial (IG) zones are two of the three zones that implement the Industrial Sanctuary map designation of the Comprehensive Plan. The zones provide areas where most industrial uses may locate, while other uses are restricted to prevent potential conflicts and to preserve land for industry. The development standards for each zone are intended to allow new development which is similar in character to existing development. The intent is to promote viable and attractive industrial areas. IG1 areas generally have smaller lots and a grid block pattern. The area is mostly developed, with sites having high building coverage and buildings which are usually close to the street. IG1 areas tend to be the city's older industrial areas.

The Historic Resource Protection Overlay Zone protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties.

Land Use History: City records indicate that prior land use reviews include the following:

- LU 06-167709 CU, approving more than 12,000 square feet of office space in the IG1 zone within the Central City Plan District
- LU 09-142158 HDZ, approving exterior alterations
- LU 09-172666 HDZ, approving rooftop mechanical equipment and solar arrays

Agency Review: David Jones, a Life Safety Officer, wrote on June 9th, stating that a building permit is required.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on June 2, 2014. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

Section 33.846.060.F. Approval Criteria in the Central City Plan District. In the Central City Plan District, requests for Historic Resource Review will be approved if the review body finds that the applicant has shown that all of the approval criteria have been met.

3. Historic Landmarks and Conservation Landmarks located outside of the Historic Districts and Conservation Districts. When Historic Resource Review of a Historic Landmark or Conservation Landmark located outside of Historic Districts and Conservation Districts is required, the approval criteria are:

- a. Sub-districts with design guidelines. If the resource is in a sub-district of the Central City Plan District that has sub-district design guidelines, the approval criteria are the *Central City Fundamental Design Guidelines*, the sub-district design guidelines and the criteria in 33.846.060.G.

Findings: The site is a historic landmark in the Central Eastside Sub-district of the Central City Plan District. It is not within a historic district, therefore, the approval criteria

are the *Central City Fundamental Design Guidelines, Special Design Guidelines for the Central Eastside District* and the criteria in Section 33.846.060.G – *Other Approval Criteria*.

Staff has considered all guidelines and criteria and addressed only those considered applicable to this project.

1) The Central City Fundamental Design Guidelines focus on four general categories. **(A) Portland Personality**, addresses design issues and elements that reinforce and enhance Portland’s character. **(B) Pedestrian Emphasis**, addresses design issues and elements that contribute to a successful pedestrian environment. **(C) Project Design**, addresses specific building characteristics and their relationships to the public environment. **(D) Special Areas**, provides design guidelines for the four special areas of the Central City.

Central City Plan Design Goals

This set of goals are those developed to guide development throughout the Central City. They apply within the River District as well as to the other seven Central City policy areas. The nine goals for design review within the Central City are as follows:

1. Encourage urban design excellence in the Central City;
2. Integrate urban design and preservation of our heritage into the development process;
3. Enhance the character of the Central City’s districts;
4. Promote the development of diversity and areas of special character within the Central City;
5. Establish an urban design relationship between the Central City’s districts and the Central City as a whole;
6. Provide for a pleasant, rich and diverse pedestrian experience for pedestrians;
7. Provide for the humanization of the Central City through promotion of the arts;
8. Assist in creating a 24-hour Central City which is safe, humane and prosperous;
9. Ensure that new development is at a human scale and that it relates to the scale and desired character of its setting and the Central City as a whole.

A6 Reuse/Rehabilitate/Restore Buildings. Where practical, reuse, rehabilitate, and restore buildings and/or building elements.

C2. Promote Quality and Permanence in Development. Use design principles and building materials that promote quality and permanence.

C11. Integrate Roofs and Use Rooftops.

Findings for A6, C2 and C11: The installation of solar panels on the rooftop of this historic structure ensures that the useful life of the building will continue; and, integrates modern technology in a visually unobtrusive way that preserves the historic character of the building.

The proposed solar panels are made of a modern, durable material and will be placed in the least conspicuous way on the rooftop, 3’ from the roof edge and extending no more than 4’ above the parapet. The design will ensure that the primary resource remains the focal point of the site.

Installation of mechanical equipment on rooftops in commercial and industrial settings has historically been a widespread practice, thus a solar array on this site is compatible with historic and modern uses of rooftops. The unobtrusive placement will successfully integrate the modern technology with the historic building. *These guidelines are therefore met.*

2) Central Eastside Design Goals

The following goals and objectives define the urban design vision for new development and other improvements in the Central Eastside:

- Encourage the special distinction and identity of the design review areas of the Central Eastside District.
- Provide continuity between the Central Eastside and the Lloyd District.

- Provide continuity between the Central Eastside and the river, downtown, and adjacent residential neighborhoods.
- Enhance the safety, convenience, pleasure, and comfort of pedestrians.

C3-1. Design to Enhance Existing Themes in the District. Look to buildings from throughout the district for contextual precedent. Innovation and creativity are encouraged in design proposals which enhance overall district character.

C3-2. Respect Adjacent Residential Neighborhoods. Respect the architectural character and development patterns of adjacent residential neighborhoods.

Findings for C3-1 and C3-2: Installation of mechanical equipment on rooftops in commercial and industrial settings has historically been a widespread practice, thus the addition of a solar array is architecturally compatible with the subject property. The solar panels will be placed as discreetly as possible on the rooftop and will not alter the overall massing or historic features so as to maintain the existing character of the building and of the adjacent neighborhoods. *These guidelines are therefore met.*

3) Historic Approval Criteria 33.846.060.G

2. Record of its time. The historic resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.

3. Historic materials. Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

6. Archaeological resources. Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken.

Findings for 2, 3 and 6: The structure is listed in the National Register of Historic Places, and as such, retains significant historic features and materials. The structure will remain a record of time as the proposal only applies to the rooftop, will be minimally visible, and will not alter character-defining features.

No historic materials will be damaged by the proposed project, as the solar panels will be placed on the rooftop and related equipment will be placed inside the building. The historic materials such as windows, siding and parapet will not be affected by the proposal. There will be no ground disturbance, and thus, no risk to potential archeological resources. *These criteria are therefore met.*

7. Differentiate new from old. New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a property. New work will be differentiated from the old.

8. Architectural compatibility. New additions, exterior alterations, or related new construction will be compatible with the resource's massing, size, scale, and architectural features. When retrofitting buildings or sites to improve accessibility for persons with disabilities, design solutions will not compromise the architectural integrity of the historic resource.

9. Preserve the form and integrity of historic resources. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic resource and its environment would be unimpaired.

10. Hierarchy of compatibility. Exterior alterations and additions will be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, if located within a Historic or Conservation District, with the rest of the district. Where practical, compatibility will be pursued on all three levels.

Findings for 7, 8, 9 and 10: The proposed photovoltaic array will be differentiated from the historic building by virtue of their modern materials and technology. No historic materials will be removed or altered by this project and the installation will only affect the rooftop.

The proposed installations are orderly and largely screened from street view by being located 3' away from the edges of the roof and not projecting more than 4' above the parapet. This design ensures that the array will not detract from the historic character of the building. The relatively diminutive size of the panels will not alter the overall massing or form of the much larger structure.

The solar array will be on the rooftop, related equipment will be inside the building, and no historic materials will be altered. In this way, the installation will not affect the character-defining historic features. Therefore, if the panels were to be removed in the future, the resource would retain its historic form, features and integrity. Installation of mechanical equipment on rooftops in commercial and industrial settings has historically been a widespread practice, so the addition of a solar array is architecturally compatible with the subject property and the surrounding industrial zone. *These criteria are therefore met.*

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

The purpose of the Historic Resource Review process is to ensure that exterior alterations to existing buildings protect the integrity of the special characteristics of the historic resources. The proposal meets the applicable historic review guidelines and therefore warrants approval.

ADMINISTRATIVE DECISION

Approval to install 168 solar panels on the roof of a structure listed in the National Register of Historic Places, known as the Jones Cash Store, per the approved site plans, Exhibits C-1 through C-3 signed and dated June 24, 2014, subject to the following conditions:

- A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibits C.1-C.3. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 14-155978 HR. No field changes allowed."

Staff Planner: Jennifer Kenny

Decision rendered by: _____ *Kimberly Tallent* **on June 23, 2014.**

By authority of the Director of the Bureau of Development Services

Decision mailed: June 25, 2014

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 May 13, 2014, and was determined to be complete on **May 23, 2014.**

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 May 13, 2014. *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. Unless extended by the applicant, **the 120 days will expire on September 19, 2014.**

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 Landmarks Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on July 9, 2014** at 1900 SW Fourth Ave. Appeals can be filed at the Development Services Center Monday through Wednesday and Fridays between 8:00 am to 3:00 pm and on Thursdays between 8:00 am to 2:00 pm. After 3:00 pm Monday through Wednesday and Fridays, and after 2:00 pm on Thursdays, appeals must be submitted at the reception desk on the 5th 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 www.portlandonline.com.

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 Landmarks Commission 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, Oregon 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 Landmarks Commission 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 **July 10, 2014**. 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. Zone Change and Comprehensive Plan Map Amendment approvals do not expire.

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:

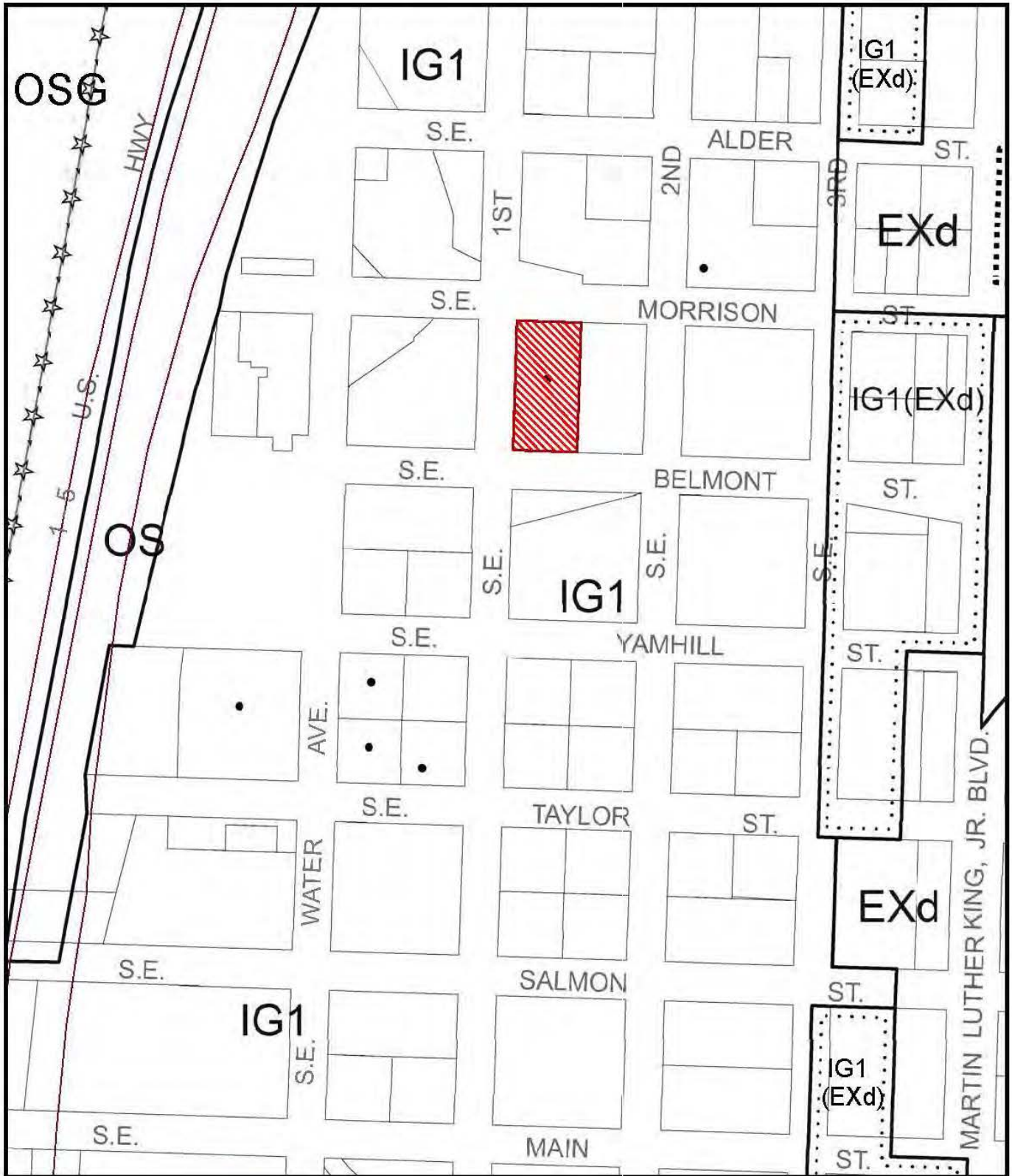
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
 1. Site Plan (attached)
 2. Elevations (attached)
 3. Roof Plan (attached)
- D. Notification information:
 1. Mailing list
 2. Mailed notice
- E. Agency Responses: David Jones, a Life Safety Officer, June 9th, building permit is required.
- F. Correspondence: No responses were received.
- 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).



ZONING

-  Site
-  Historic Landmark
-  Recreational Trail

This site lies within the:
CENTRAL CITY PLAN DISTRICT



File No. LU 14-155978 HR
 1/4 Section 3130
 Scale 1 inch = 200 feet
 State_Id 1S1E03AA 4300
 Exhibit B (June 24, 2014)

FD
 Facility Development
 Corporation
 11111 SW 11th Ave, Suite 201
 Portland, Oregon 97219
 Phone: 503.227.7777
 Fax: 503.227.7778
 www.fdcorp.com

**James Goodman
 Architecture**
 2242 Omega NW, Suite 200
 Portland, Oregon 97210
 Phone: 503.227.7777
 Fax: 503.227.7778
 www.jgarchitecture.com

Miller Consulting Engineers
 11111 SW 11th Ave, Suite 201
 Portland, Oregon 97219
 Phone: 503.227.7777
 Fax: 503.227.7778
 www.millerce.com



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 Structural Engineering
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 Portland, Oregon 97219
 Phone: 503.227.7777
 Fax: 503.227.7778
 www.millerce.com

The Engineering Partnership
 Mechanical & Plumbing Engineering
 11111 SW 11th Ave, Suite 201
 Portland, Oregon 97219
 Phone: 503.227.7777
 Fax: 503.227.7778
 www.millerce.com

Ray S. Stuchler & Associates
 Electrical Engineering
 11111 SW 11th Ave, Suite 201
 Portland, Oregon 97219
 Phone: 503.227.7777
 Fax: 503.227.7778
 www.millerce.com

**A New
 Self-Storage
 Facility for
 Rose City
 Storage**

111 SE Belmont Street
 Portland, Oregon 97214

FD/Project/0010

Project Number: 11111 SW 11th Ave, Suite 201
 Drawing Number: 01
 Date: 6/24/14
 Project Location: 111 SE Belmont Street
 Portland, Oregon 97214
 Revision: 1.0
 Date: 6/24/14

Site
 Plan

A-1.0



UNION PACIFIC RAILROAD

Union Pacific Railroad

Site Plan

*** Approved***
 City of Portland - Bureau of Development Services
 Planner: Jimmy Kuning Date: 6/24/14
 This approval applies only to the reviews requested and is subject to conditions of approval. Additional zoning requirements may apply.

L14-155978

Exhibit C-1



MJR Consulting Engineers
 Structural Engineering
 1111 SE Belmont Street
 Portland, Oregon 97214
 503.255.1111
 www.mjr-engineers.com

The Engineering Partnership
 Mechanical/Electrical/Plumbing
 1111 SE Belmont Street
 Portland, Oregon 97214
 503.255.1111
 www.theep.com

Ry E. Slaughter & Associate
 Structural Engineering
 1111 SE Belmont Street
 Portland, Oregon 97214
 503.255.1111
 www.ryeslaughter.com

A New Self-Storage Facility for Rose City Storage

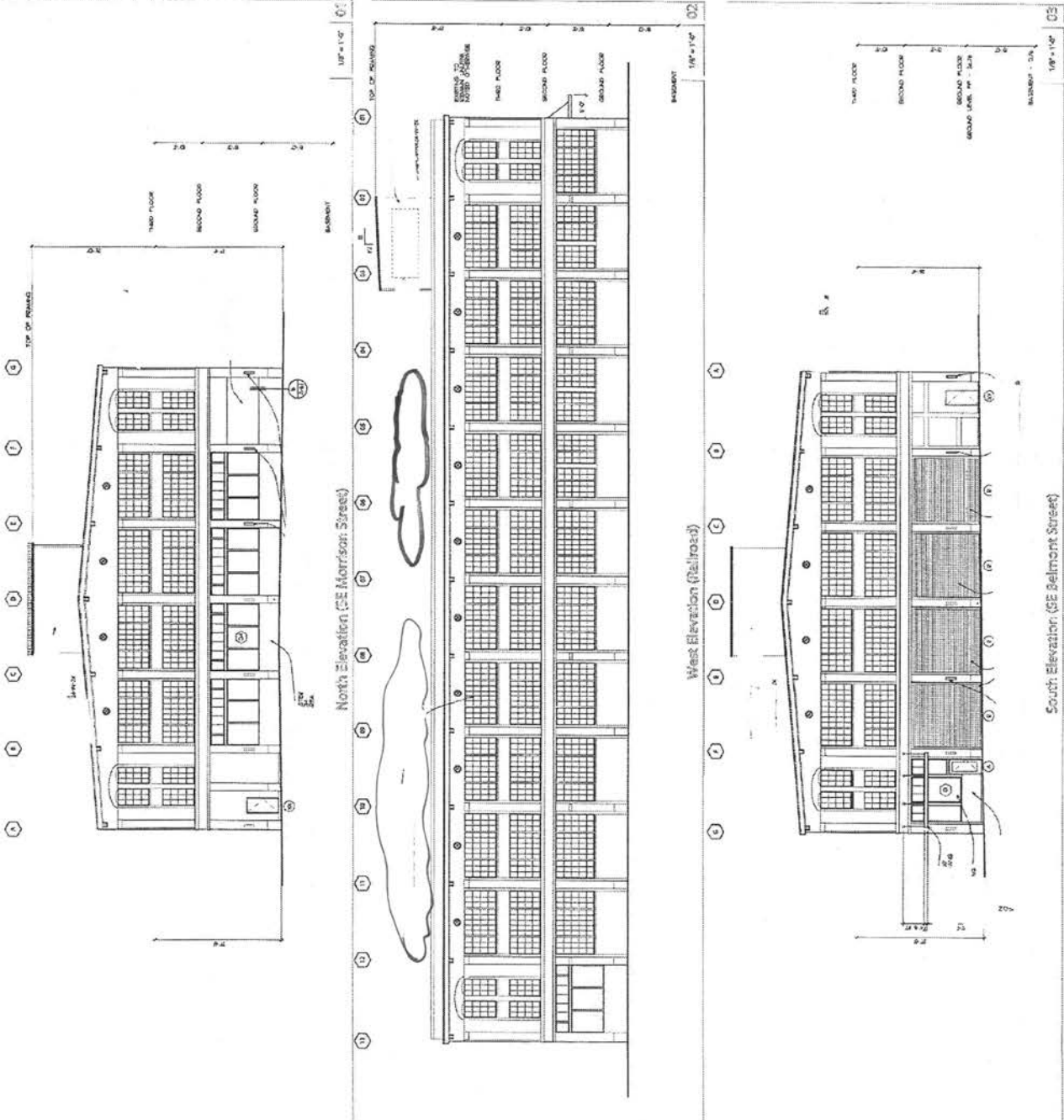
111 SE Belmont Street
 Portland, Oregon 97214

FD3 Project Number
 Project Number: 155978
 Date: 6/24/14
 Project Name: A New Self-Storage Facility for Rose City Storage
 Location: 111 SE Belmont Street, Portland, Oregon 97214
 Prepared by: James Goodwin Architects

Exterior Elevations
 A-4.1

Approved
 City of Portland - Bureau of Development Services
 Planner Jennifer Kenny Date 6/24/14
 This approval applies only to the reviews requested and is subject to conditions of approval. Additional zoning requirements may apply.

Notes & Legends



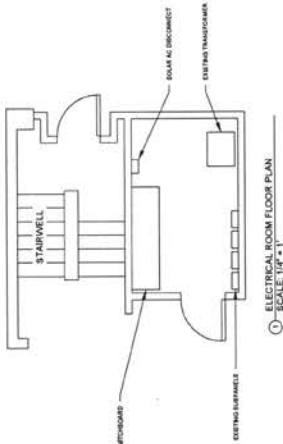
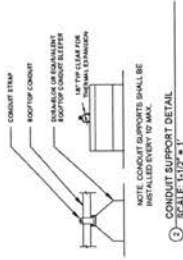
L114-155978
 EXHIBIT C-2

Approved
City of Portland - Bureau of Development Services

Planner Johnny Kinsky Date 6/24/14

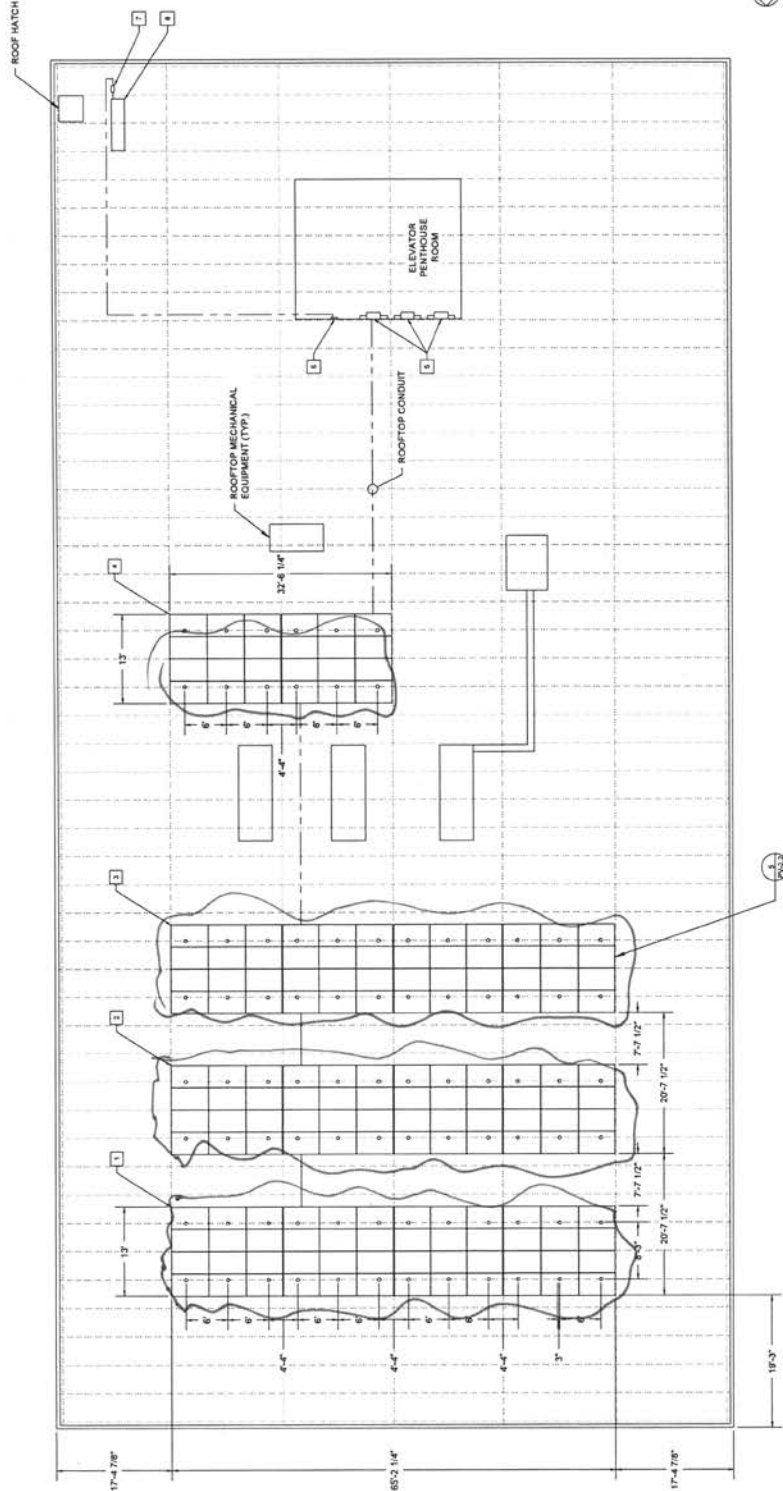
* This approval applies only to the reviews requested and is subject to the conditions of approval. Additional zoning requirements may apply.

PROJECT PHOTOVOLTAIC SYSTEM	PROPERTY OWNER NATIONAL STORAGE PARTNERS 807 JOSEPHINE LANE HEALDSBURG, CA 95488 PHONE: (707) 953-6196
ROSE CITY STORAGE 111 SE BELMONT ST PORTLAND, OR 97214	INSTALLATION CONTRACTOR GLOBAL ELECTRIC INC. 609 LEVENCE 16838 CONTACT: JUSTIN SPROLLING PHONE: (503) 847-5648 FAX: (503) 847-5648 CELL: (971) 962-7214
DATE: 2/19/2014	ROOF PLAN
DRAWN: MSP	CHECKED: JK
VERSION: 1.0	SHEET NO.
SCALE: AS NOTED	PV-2.0



- SHEET NOTES**
- ROOF IS TO BE MEMBRANE IN GOOD CONDITION, 3 STORY (40' HIGH).
 - ALL PENETRATIONS SHALL BE FLASHED AND SEALED BY A LICENSED ROOFER TO NRCA STANDARDS.
 - PV MODULES ARE (170) LG ELECTRONICS LQZ58SR-CQ3 (MONOCRYSTALLINE SILICON) WITH 1.33\"/>

- ROOF PLAN KEY/NOTES**
- PV ARRAY 1
 - PV ARRAY 2
 - PV ARRAY 3
 - PV ARRAY 4
 - INVERTERS ARE (3) SOLECTRIA PI
 - NEW SOLAR SUBPANEL
 - SOLAR AC DISCONNECT IN ELECTRICAL ROOM ON MAIN FLOOR.
 - MAIN SWITCHBOARD IN ELECTRICAL ROOM ON MAIN FLOOR.



ROOF PLAN - SCALE: 1/8" = 1'

AREA OF WORK

L14-155978
EXHIBIT C-3