

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

FROM CONCEPT TO CONSTRUCTION

Ted Wheeler, Mayor Rebecca Esau, Interim Director Phone: (503) 823-7300 Fax: (503) 823-5630 TTY: (503) 823-6868 www.portlandoregon.gov/bds

Date: May 26, 2017

To: Interested Person

From: Hannah Bryant, Land Use Services

503-823-5353 / Hannah.Bryant@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 mailed copy of this document is only a summary of the decision.

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 17-138177 HR – COUCH PARK PLAYGROUND

GENERAL INFORMATION

Applicant: Gary Datka | Portland Parks & Recreation

1120 SW 5th Avenue, Suite 1302

Portland, OR 97204

Party of Interest: Bill Bailey | Waterleaf Architecture, LLC

419 SW 11th Avenue #200

Portland, OR 97205

Landscape Architect: Ben Johnson | Greenworks P.C.

24 NW 2nd Avenue, Suite 100

Portland, OR 97209

Owner: School District No 1

PO Box 3107

Portland, OR 97208-3107

Site Address: 1961 NW Glisan Street

Legal Description: BLOCK 273 LOT 1-14 LOT 15-18 EXC W 1', COUCHS ADD

Tax Account No.: R180226290 **State ID No.:** R180226290 1N1E33AC 08200

Quarter Section: 3028

Neighborhood: Northwest District, contact John Bradley at 503-313-7574. Business District: Nob Hill, contact Nob Hill at nobhillportland@gmail.com.

District Coalition: Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.

Plan District: Northwest

Other Designations: Non-contributing Resource in the Alphabet Historic District

Zoning: OS – Open Space

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 for a renovation of the western end of Couch Park. Located in the Alphabet Historic District, the 2.39-acre park is located between NW Glisan Street and NW Hoyt street, immediately east of the Metropolitan Learning Center. The park consists of an open dog park, sloped lawns, hardscaped paths and a public restroom. Due to safety concerns, the wooden play structures were removed in 2012. This proposal will:

- Renovate the previous playground area with ADA-accessible, nature-based play features.
- Replace brick paving with scored, decorative concrete to improve accessibility.
- Convert the existing restrooms to a storage building.
- Add a Portland Loo restroom near the southwest entrance to the park, across from the intersection of NW Glisan & NW 20th.
- Add accessible furnishings.

Because the park is located in the Alphabet Historic District, Historic Resource Review is required.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The relevant approval criteria are:

- Community Design Guidelines
- Historic Alphabet District Addendum

ANALYSIS

Site and Vicinity: The area is characterized by a grid of narrow, tree-lined, east-west residential streets named alphabetically after prominent historic Portlanders. These streets are crossed by generally more robust north-south avenues. Two of these, NW 21st Avenue and NW 23rd Avenue are low-scale business corridors featuring a mix of purpose-built commercial structures and converted houses. NW 19th Avenue is similar in physical character except that institutional uses are more common than commercial ones. It forms the southbound half of a busy traffic couplet with NW 18th as the northbound partner. West of NW 19th the length of the east-west block faces more than doubles, from 200' to approximately 460'.

The subject property is a noncontributing resource in the Alphabet Historic District. It is located west of NW 19th Avenue, between NW Glisan and NW Hoyt Streets. Its west boundary is a vacated portion of NW 20th Avenue. It consists of a 2.4-acre park with grassy hills and meandering paths at the east end, an off-leash dog area in the center, and a playground, restroom facility and plaza at the west end. This wide pathway and hardscaped plaza at the west end separate the grassy park from the adjacent paved play area and sports courts at the Metropolitan Learning Center. The wide hardscaped path, the plaza and playground are the areas included in the scope of this proposal.

Couch Park is named for Captain John Heard Couch, who once owned all the land from the river to approximately NW 23rd Avenue, and from Burnside north for one mile. Captain Couch is responsible for the alphabetical street names in this district, now known as the Alphabet District.

The site of today's Couch Park was once the estate of 19th century merchant prince Cicero Hunt Lewis, who married Captain Couch's daughter Clementine. The estate consisted of an elegant mansion, stables, and a green house, built in 1881. The Lewises raised eleven children on these grounds. After the Lewis House was demolished, the Portland School District acquired the property in 1913, and constructed a new Couch School. The site of the current park was

originally a playground for the school. In 1974, Couch School was re-named the Metropolitan Learning Center. This school is still in use, immediately to the west of Couch Park.

Couch Park is easily accessible to both local and city residents. Located in the Northwest Pedestrian District, the park's central location between the busy NW 21st Avenue and NW 19th Avenue streets makes it walkable for most neighborhood residents. The #77 bus runs up NW Glisan Street, NW 19th Avenue is a transit street and NW 21st is a traffic street, providing easy access for visitors arriving by bus or car.

Zoning: The <u>Open Space</u> (OS) zone is intended to preserve public and private open, natural, and improved park and recreation areas identified in the Comprehensive Plan. These areas serve many functions including: providing opportunities for outdoor recreation; providing contrasts to the built environment; preserving scenic qualities; protecting sensitive or fragile environmental areas; preserving the capacity and water quality of the stormwater drainage system; and providing pedestrian and bicycle transportation connections.

The "d" overlay promotes the conservation and enhancement of areas of the City with special historic, architectural or cultural value. New development and exterior modifications to existing development are subject to design review. This is achieved through the creation of design districts and applying the Design Overlay Zone as part of community planning projects, development of design guidelines for each district, and by requiring design review. In addition, design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

The <u>Northwest Plan District</u> implements the Northwest District Plan, providing for an urban level of mixed-use development including commercial, office, housing, and employment. Objectives of the plan district include strengthening the area's role as a commercial and residential center. The regulations of this chapter: promote housing and mixed-use development; address the area's parking scarcity while discouraging auto-oriented developments; enhance the pedestrian experience; encourage a mixed-use environment, with transit supportive levels of development and a concentration of commercial uses, along main streets and the streetcar alignment; and minimize conflicts between the mixed-uses of the plan district and the industrial uses of the adjacent Guild's Lake Industrial Sanctuary.

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

- 70-001715 Conditional Use approval of a community center, with the conditions that it not take effect until vacation of NW 20th was granted; two off-street parking spaces shall be provided.
- 76-001225 Conditional Use approval to implement the master plan without requiring conditional use approval each time a new building permit for this site is requested.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **April 11, 2017**. The following Bureaus have responded with no issues or concerns:

- Fire Bureau (exhibit E.1)
- Bureau of Transportation (exhibit E.2)
- Water Bureau (exhibit E.3)

Life Safety responded with the following comment: A Building Permit is required to change the use of a building to a different occupancy classification, and the building must be made to comply with building code requirements for the proposed new use or occupancy. Please see Exhibit E.4 for additional details.

The Bureau of Environmental Services responded with the following comment: BES has not yet received a complete stormwater report, and therefore does not yet approve design review. However, the applicants are in conversations with BES, and have chosen to issue a Decision and complete stormwater review during the building permit process. Please see Exhibit E.5 for

additional details.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on April 11, 2017. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

Chapter 33.846.060 - Historic Resource Review

Purpose of Historic Resource Review

Historic Resource Review ensures the conservation and enhancement of the special characteristics of historic resources.

Historic Resource Review Approval Criteria

Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the approval criteria have been met.

Findings: The site is located within the Alphabet Historic District and the proposal is for a non-exempt treatment. Therefore, Historic Resource Review approval is required. The approval criteria are the *Community Design Guidelines* and the *Historic Alphabet District Community Design Guidelines Addendum*.

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

Historic Alphabet District - Community Design Guidelines Addendum

- **1. Historic Changes.** Most properties change over time; those changes that have acquired historic significance will be preserved.
- 2. Differentiate New from Old. New additions, exterior alterations, or related new construction will retain historic materials that characterize a property to the extent practicable. Replacement materials should be reasonable facsimiles of the historic materials they replace. The design of new construction will be compatible with the historic qualities of the district as identified in the Historic Context Statement.

Findings for 1 & 2: The existing hardscaped western portion of Couch Park is notable for its wide brick hardscaping path filling the vacated portion of NW 20th Avenue that separates the grassy portion of Couch Park from the adjacent Metropolitan Learning Center school yard. The fields of brick, separated by irregular bands of concrete, are an atypical paving material in Portland parks, and helps to differentiate this park from other city parks, and tie it in with the character-defining brick architecture of the surrounding Alphabet Historic district. Despite its character-defining role in shaping the identity of this park, the uneven settling of the brick results in a surface that is difficult to navigate and not safe for all users. Preserving the brick may not be the best path to meeting approval criteria.

The applicant proposes to replace the brick with equal sized fields of concrete, divided by bands of acid etched concrete in a pattern similar to the existing decorative concrete bands. The hardscape replacement is necessary to maintain the durability, safety and usability of the park. Its pattern and aesthetic are reminiscent of the existing hardscape pattern it replaces, while clearly differentiated from the small brick areas at the top of the stairs up to the Metropolitan Learning Center that are proposed to remain. Other proposed elements include new playground features and soft paving material, new seating, and a new 'Portland Loo' restroom. These elements are easily differentiated from the original park materials and the surrounding historic structures and district. Play elements are primarily constructed of natural materials or finished in single-color, muted tones. Ground surfaces will include solid-surface rubber, artificial turf, and crushed rock paving to facilitate year-round safe use. These materials are not historic,

but are visually benign and will not detract from the historic district.

The proposed 'Portland Loo' restroom structure will be set back at least 25' from the property line. Detached accessory structures of less than 200 square feet, set back at least 25 feet from the property line are exempt from historic resource review, but are still subject to the development standards of other Bureaus. *These guidelines are met.*

3. 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. New development will seek to incorporate design themes characteristic of similar buildings in the Historic Alphabet District.

Findings: The proposed concrete hardscape will match existing concrete elements including the west raised planters that divide the park area from the Metropolitan Learning Center's raised basketball courts and play yard, and concrete retaining walls along the sidewalk at NW Hoyt Street. Remaining brick elements will continue to tie the park to brick elements in the surrounding neighborhood, including the adjacent school, and numerous historic brick apartment buildings found throughout the Alphabet Historic District.

Other proposed elements are typical and appropriate for a non-contributing park located in a historic district. New site furnishings, including cedar park benches, ADA accessible picnic tables and playground equipment are chosen to be visually unobtrusive while enhancing the comfort, safety and use of this community resource. *This guideline is met.*

Community Design Guidelines

- Plan Area Character. Enhance the sense of place and identity by incorporating site and building design features that respond to the area's desired characteristics and traditions.
 P2. Historic and Conservation Districts. Enhance the identity of historic and conservation districts by incorporating site and building design features that reinforce the area's historic
- districts by incorporating site and building design features that reinforce the area's historic significance. Near historic and conservation districts, use such features to reinforce and complement the historic areas.

Findings for P1 & P2: The Alphabet Historic District is known for its concentration of brick multi-family structures. It was one of the earliest concentrations of multi-family housing developed in Portland. The proposed park updates serve to facilitate the long term livability of this district by providing a safer, more engaging and more inclusive park and play area for the public. The proposal has considered the historic district in its site planning, locating the new Portland Loo restroom 25' into the site. The play area is carefully designed to retain the large existing trees, with materials and play elements that will not detract from the historic architectural streetscape. The hardscape will continue to evoke the existing detailing. *These quidelines are met.*

- **D1. Outdoor Areas.** When sites are not fully built on, place buildings to create sizable, usable outdoor areas. Design these areas to be accessible, pleasant, and safe. Connect outdoor areas to the circulation system used by pedestrians;
- **D3.** Landscape Features. Enhance site and building design through appropriate placement, scale, and variety of landscape features.
- **D5. Crime Prevention.** Use site design and building orientation to reduce the likelihood of crime through the design and placement of windows, entries, active ground level uses, and outdoor areas.
- **E1.** The Pedestrian Network. Create an efficient, pleasant, and safe network of sidewalks and paths for pedestrians that link destination points and nearby residential areas while visually and physically buffering pedestrians from vehicle areas.

- **E2. Stopping Places.** New large-scale projects should provide comfortable places along pedestrian circulation routes where people may stop, visit, meet, and rest.
- **E5.** Light, Wind, and Rain. Enhance the comfort of pedestrians by locating and designing buildings and outdoor areas to control the adverse effects of sun, shadow, glare, reflection, wind, and rain.

Findings for D1, D3, D5, E1, E2 & E5: The proposed park renovations include an ADA accessible restroom, hardscape, ramps into the play area, and wheelchair-accessible picnic tables. These updated elements are visually attractive, and serve to unify this park with other local public parks. They also dramatically increase the usability of this park for public visitors of all ages and abilities. The new hardscape enhances the pedestrian connectivity between NW Glisan Street and NW Hoyt Street, aligned with NW 20th Avenue, creating an efficient, pleasant, and safe path for pedestrians and bikers. The new tables and benches ringing the play area allow for visitors to stop, visit, meet and rest in a safe and well-lit space, sheltered from hot sun by the canopies of large existing trees. *These guidelines are met*.

- **D6. Architectural Integrity.** Respect the original character of buildings when making modifications that affect the exterior. Make additions compatible in scale, color, details, material proportion, and character with the existing building.
- **D7. Blending into the Neighborhood.** Reduce the impact of new development on established neighborhoods by incorporating elements of nearby, quality buildings such as building details, massing, proportions, and materials.
- **D8. Interest, Quality, and Composition.** All parts of a building should be interesting to view, of long lasting quality, and designed to form a cohesive composition.

Findings for D6, D7 & D8: The concrete hardscape is proposed to replace existing brick hardscape squares, separated by decorative bands of concrete. The details of the existing surface are attractive, but not conducive to maintaining a level and safe surface. The proposed concrete will be a more permanent and durable material. To respect the original character of the existing patterning, the new concrete will be separated by bands of acid etched concrete to resemble the existing concrete bands separating the fields of brick. This enhances the visual interest, and helps to blend the new material in with the historic neighborhood by providing a richer detail and more high-quality finish. *These guidelines are 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 additions, new construction, and exterior alterations to historic resources do not compromise their ability to convey historic significance. The proposed plaza hardscape replacement and playground renovation expands the building's usable space with the rejuvenation of an attractive and durable community outdoor space. With the proposed conditions of approval, this proposal meets the applicable Historic Resource Review criteria and therefore warrants approval.

ADMINISTRATIVE DECISION

Approval of playground and plaza restoration at Couch Park, per the approved site plans, Exhibits C-1 through C-6 and C.8, signed and dated May 24, 2017, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related conditions (B through C) must be noted on each of the 4 required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE Case File LU 17-138177 HR." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. At the time of building permit submittal, a signed Certificate of Compliance form (https://www.portlandoregon.gov/bds/article/623658) must be submitted to ensure the permit plans comply with the Design/Historic Resource Review decision and approved exhibits.
- C. No field changes allowed.

Staff Planner: Hannah Bryant

Decision rendered by: ______ on May 24, 2017

By authority of the Director of the Bureau of Development Services

Decision mailed: May 26, 2017

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 March 21, 2017, and was determined to be complete on April 4, 2017.

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 March 21, 2017.

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 Landmarks Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on June 9, 2017** at 1900 SW Fourth Ave. Appeals can be filed at the 5th floor reception desk of 1900 SW 4th Avenue Monday through Friday between 8:00 am and 4:30 pm. **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 **June 12, 2017.**
- 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:

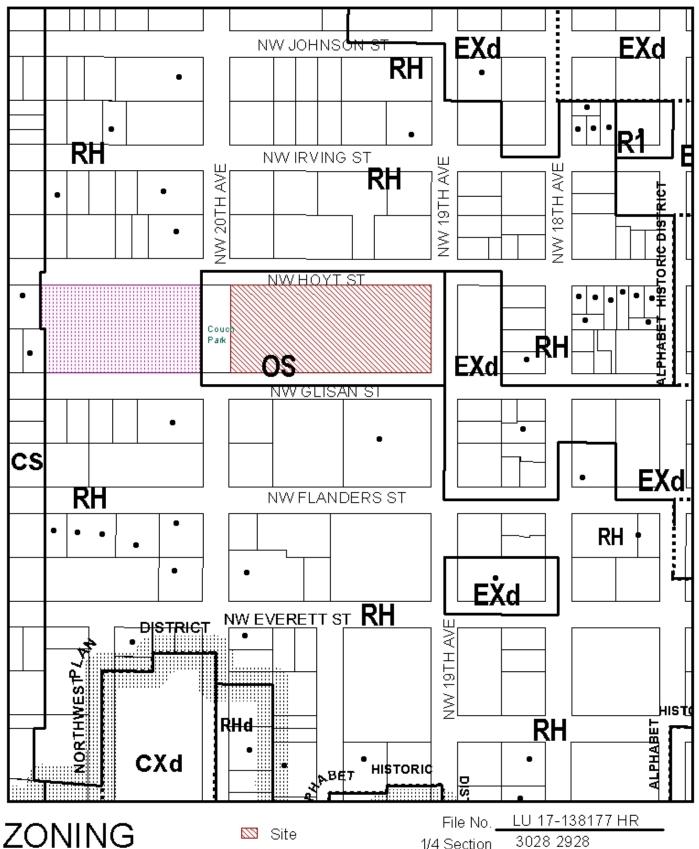
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Submittals
 - 1. Original Submittal Photos, Existing Conditions Plan
 - 2. Applicant's Narrative
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Plaza Site Plan
 - 3. Playground Site Plan
 - 4. Site Sections
 - 5. Stormwater Sections
 - 6. Playground Plan
 - 7. Playground Rendering (not used)
 - 8. Cutsheets Playground Equipment, Surface Materials, Site Furnishings
- 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. Bureau of Parks, Forestry Division
- F. Correspondence: None
- G. Other:
 - 1. Original LU Application
 - 2. Site Photo, taken by planner

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).





NORTH

This site lies within the: NORTHWEST PLAN DISTRICT ALPHABET HISTORIC DISTRICT Also Owned Parcels

Historic Landmark

3028 2928 1/4 Section 1 inch = 200 feet Scale. 1N1E33AC 8200 State_ld . В (Mar 24, 2017) Exhibit_

W 17-138177 H

Fig 7: Illustrative Renderings **EXISTING BRICK PAVING** STORMWATER PLANTER CIP CONCRETE WITH ACCENT BANDS EXISTING DRINKING Fountain TRASH RECEPTACLE PLANTING BED PICNIC TABLE BENCHES LEGEND Planner Planner Annies only to the reviews requiseled and is subject to all a subject to all the *Approved* City of Portland - Bureau of Development Services -2 EXISTING CHERRY TREES NEW TREES RE-PURPOSED STORAGE FACILITY PORTLAND LOO RESTROOM RELOCATED MONUMENT **BIKE RACKS** PLAYGROUND PLAYGROUND NW GLISAN ST. NW HOYT ST. 1 STAIRS 0 0 MEC

PLAZA DESIGN