



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

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**Date:** December 4, 2017  
**To:** Interested Person  
**From:** Puja Bhutani, Land Use Services  
503-823-7226 / [Puja.Bhutani@portlandoregon.gov](mailto:Puja.Bhutani@portlandoregon.gov)

## **NOTICE OF A TYPE Ix 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 17-228521 HR - CHINESE MUSEUM NEW ENTRANCE**

#### **GENERAL INFORMATION**

**Applicant:** Jacqueline Peterson-Loomis | Portland Chinatown History Foundation  
127 NW 3rd Avenue  
Portland, OR 97209  
[Jackie@portlandchinatown.org](mailto:Jackie@portlandchinatown.org)

**Owners:** Louis K C Lee & Hang Fong Lee  
10420 SE Oak Street  
Portland, OR 97216  
[LLCPA@qwestoffice.net](mailto:LLCPA@qwestoffice.net)

**Architect:** Tracy Orvis | Diloreto Architecture, LLC  
200 NE 20th, Ste 200  
Portland, OR 97232  
[torvis@diloretoarchitecture.com](mailto:torvis@diloretoarchitecture.com)

**Site Address:** **127 NW 3RD AVENUE**

**Legal Description:** BLOCK 28 LOT 5&8, COUCHS ADD  
**Tax Account No.:** R180202110  
**State ID No.:** 1N1E34CA 08200

**Neighborhood:** Old Town-China Town, contact Sarah Stevenson 503-226-4368 x2 or Zach Fruchtengarten 503-227-1515.

**Business District:** Old Town Chinatown Business Association, contact at [chair@oldtownchinatown.org](mailto:chair@oldtownchinatown.org), Downtown Retail Council, contact Sandra McDonough at 503-552-6762.

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

<b>Plan District:</b>	Central City Plan District - River District Subdistrict
<b>Other Designations:</b>	Non Contributing Resource, Skidmore Old Town Historic District; New Chinatown/Japantown Historic District.
<b>Zoning:</b>	<b>CXd</b> , Central Commercial with a design overlay
<b>Case Type:</b>	<b>HR</b> , Historic Resource Review
<b>Procedure:</b>	<b>Type Ix</b> , an administrative decision with appeal to the Oregon Land Use Board of Appeals (LUBA).

**Proposal:**

The applicants are requesting Historic Resource Review approval for a new storefront entrance on NW 3<sup>rd</sup> Avenue for the Portland Chinatown Museum. Exterior alterations proposed:

- A new aluminum storefront system with a new canopy, which will replace the existing storefront entry.
- Recessing an existing door and transom on the southeast corner of the building

Historic Resource Review is required for non-exempt alterations in Historic Districts.

*A revised Notice of Proposal was mailed on November 17, 2017 to allow an additional 9 days for public comment. The original Notice was mailed on October 19, 2017 and erroneously specified as a Type II procedure with a 21 day public comment period. The additional time was necessary to complete the 30 day public comment period for a Type Ix process.*

**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:

- Central City Fundamental Design Guidelines
- Skidmore/ Old Town Historic District Design Guidelines

*The New Chinatown/Japantown Guidelines were not yet adopted at the time of submittal.*

**ANALYSIS**

**Site and Vicinity:** The subject building is a single-story structure occupying a quarter block site. It was constructed in 1924 and altered beyond recognition through the brick infilling of most structural bays in 1972. It is a noncontributing resource in both the New Chinatown/Japantown Historic District and the Skidmore/Old Town Historic District.

The New Chinatown/Japantown Historic District is significant under Eligibility Criterion “A” for its association with late Nineteenth and early Twentieth Century commerce; under Criterion “B” for its association with Chinese and Japanese immigrants after the displacement of the original Chinatown; and under Criterion “C” for some of its architectural expressions.

The Skidmore/Old Town Historic District is nationally significant for its association with the initial phase of commercial development of Portland. In addition to listing in the National Register of Historic Places, the district is recognized as a National Historic Landmark (one of only sixteen in Oregon and two in Portland) because of the importance of Portland in the development of commerce and transportation in the western United States from the mid-nineteenth century through the early twentieth. The area is especially rich in Italianate commercial buildings with elaborate cast iron facades, set against a background of less spectacular but nonetheless significant brick buildings.

**Zoning:** The Central Commercial (CX) zone is intended to provide for commercial development within Portland's most urban and intense areas. A broad range of uses is allowed to reflect Portland's role as a commercial, cultural and governmental center. Development is intended to be very intense with high building coverage, large buildings, and

buildings placed close together. Development is intended to be pedestrian-oriented with a strong emphasis on a safe and attractive streetscape.

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 Historic Resource Protection overlay is comprised of Historic and Conservation Districts, as well as Historic and Conservation Landmarks and 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.

The Central City Plan District implements the Central City Plan and other plans applicable to the Central City area. These other plans include the Downtown Plan, the River District Plan, the University District Plan, and the Central City Transportation Management Plan. The Central City plan district implements portions of these plans by adding code provisions which address special circumstances existing in the Central City area. The site is within the River Subdistrict of this plan district.

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

- LU 10-188872 HDZ - Approval of new storefront area, a new canopy, two new signs, each 10 square feet in face area, and new building lighting.

**Agency Review:** A Notice of Proposal in your Neighborhood was mailed on **October 19, 2017**. The following Bureaus have responded with no issues or concerns about the proposal:

- Fire Bureau, See Exhibit E-1
- Site Development Section of BDS, See Exhibit E-2

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on **October 19, 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, Historic Reviews**

#### **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 Skidmore/Old Town Historic District and the New Chinatown/Japantown Historic District. Therefore, the proposal requires Historic Resource Review approval. The relevant approval criteria are the Skidmore/Old Town Historic District Design Guidelines and the Central City Fundamental Design Guidelines.

### **Central City Fundamental Design Guidelines and Skidmore/Old Town Historic District Design Guidelines**

The Skidmore/Old Town Historic District is a unique asset to Portland and has been recognized nationally by its placement on the National Register of Historic Places. In addition, the Skidmore/Old Town Historic District has been identified as a National Landmark, of which there is only one other in Portland, Pioneer Courthouse. There are certain procedures and regulations the City has adopted for the protection and enhancement of the Skidmore/Old Town Historic District.

The Central City Fundamental Design Guidelines and the River District 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.

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

### **Skidmore/Old Town Historic District Design Guidelines**

#### **General Guidelines**

**A1.b.** Reinforce Pedestrian Scale and Orientation in the District.

**A2.** Maintain and Strengthen the Street Wall in New Construction, Additions, and Improvements to Open Portions of Sites.

**A4.** Select Historically Compatible, High Quality Materials with Finishes and Colors that are Appropriate to the District.

**Findings:** Alterations include lowering the storefront sill to the existing floor, raising the storefront height, and providing a generous entry canopy, all of which reinforce the pedestrian experience and respond to pedestrian realm. High quality materials include steel, aluminum, and glass to match previously approved exterior improvements. The new recessed entry is required to meet Building Code, as all exit doors from the museum must swing in the direction of travel and cannot swing over the sidewalk. However, the building façade at the street wall is maintained and the new entry sequence creates a desirable pedestrian experience. *These guidelines have been met.*

**A5.** Install Lighting that Strengthens the Historic Character and Vitality of the District.

**A7. Integrate Awnings and Canopies within the District in a Manner Sensitive to the Building and District.**

**Findings:** New exterior lighting is proposed at the underside of the overhead canopy and in the ceiling of the egress door recess. A steel canopy at the museum's main entrance will match the existing corner canopy. The proposed exterior lighting is oriented to the sidewalk area adjacent to the building and successfully identifies the new entrance. *These guidelines have been met.*

#### **Guidelines for Alterations**

**B1. Respect the Building's Historic Period, Style, Materials, and Details in the Design of Alterations.**

**B2. Preserve and Repair Historic Exterior Materials and Distinctive Details. Maintain the Vertical Lines of Columns and Piers, the Horizontal Definition of Spandrels and Cornices, and Other Primary Structural Elements.**

**B3. Respect the Shape, Size, Placement, Rhythm, and Trim of the Historic Openings in the Building.**

**Findings:** The building has been radically altered over time; there are no historic windows or openings to be refurbished. The new storefront will match that previously approved for the corner tenant. *These guidelines have been met.*

#### **Central City Fundamental Design Guidelines**

**A4. Use Unifying Elements.** Integrate unifying elements and/or develop new features that help unify and connect individual buildings and different areas.

**A5. Enhance, Embellish, and Identify Areas.** Enhance an area by reflecting the local character within the right-of-way. Embellish an area by integrating elements in new development that build on the area's character. Identify an area's special features or qualities by integrating them into new development.

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

**Findings:** The original architecture of the building has been modified significantly over time and was at one point significantly enclosed with masonry infill. A new storefront system opened the northeast corner of the building in 2011. The proposal to remove masonry infill along SW 3<sup>rd</sup> Avenue and create a welcoming recessed entry, will produce a coherent street-facing façade and work to unify the base of the building as a whole. The Portland Chinatown History Foundation will now occupy all of the building, except the northeast corner tea house space. The new museum space will play an important part in identifying the cultural history of the area. *These guidelines have been met.*

**A8. Contribute to a Vibrant Streetscape.** Integrate building setbacks with adjacent sidewalks to increase the space for potential public use. Develop visual and physical connections into buildings' active interior spaces from adjacent sidewalks. Use architectural elements such as atriums, grand entries and large ground-level windows to reveal important interior spaces and activities.

**B2. Protect the Pedestrian.** Protect the pedestrian environment from vehicular movement. Develop integrated identification, sign, and sidewalk-oriented night-lighting systems that offer safety, interest, and diversity to the pedestrian. Incorporate building equipment, mechanical exhaust routing systems, and/or service areas in a manner that does not detract from the pedestrian environment.

**B6. Develop Weather Protection.** Develop integrated weather protection systems at the sidewalk-level of buildings to mitigate the effects of rain, wind, glare, shadow, reflection, and sunlight on the pedestrian environment.

**B7. Integrate Barrier-Free Design.** Integrate access systems for all people with the building's overall design concept.

**C6. Develop Transitions between Buildings and Public Spaces.** Develop transitions between private development and public open space. Use site design features such as movement zones, landscape elements, gathering places, and seating opportunities to develop transition areas where private development directly abuts a dedicated public open space.

**Findings:** In expanding the storefront window systems on the east façade, the streetscape adjacent to the building will be improved for pedestrian users. In addition to better unifying the east and north façades of the building, the proposed alterations also contribute to the SW 3<sup>rd</sup> Avenue streetscape as a whole, improving the consistency of storefront openings and canopy coverage. The new canopy proposed along NW 3<sup>rd</sup> Avenue will project approximately 5' from the building wall to provide coverage over the right-of-way, while the new recessed entrance provides a transition space from the public street into the building. Increasing the height of the storefront windows and lowering the sill to the floor of the existing storefront will allow for a stronger visual connection between public and private space. Canopy lighting will highlight the entrance and facilitate a safer pedestrian realm. *These guidelines have been met.*

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

**C3. Respect Architectural Integrity.** Respect the original character of an existing building when modifying its exterior. Develop vertical and horizontal additions that are compatible with the existing building, to enhance the overall proposal's architectural integrity.

**C5. Design for Coherency.** Integrate the different building and design elements including, but not limited to, construction materials, roofs, entrances, as well as window, door, sign, and lighting systems, to achieve a coherent composition.

**C12. Integrate Exterior Lighting.** Integrate exterior lighting and its staging or structural components with the building's overall design concept. Use exterior lighting to highlight the building's architecture, being sensitive to its impacts on the skyline at night.

**Findings:** Previous modifications have resulted in extensive brick infill. The proposed alterations will build upon recent efforts to open the façade while maintaining the existing structural rhythm. The storefront and canopy will match the previously approved system at the northeast corner of the building in material, color, and detail.

The proposed steel canopy projects into the public right-of-way to provide pedestrian cover, entry demarcation, and a sense of enclosure. Integrated canopy lighting is employed at the sidewalk level to provide a sense of security and encourage pedestrian activity. Linear strip lighting under the new canopy will light the sidewalk and entry while an exterior ceiling can light will provide well-lit egress. The proposed exterior lighting is oriented to the sidewalk area adjacent to the building and successfully identifies the new entrance. *These guidelines have been 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. This proposal meets the applicable Historic Resource Review criteria and therefore warrants approval.


## ADMINISTRATIVE DECISION

Approval of exterior alterations to a non-contributing resource in the Skidmore/Old Town and Chinatown/Japantown Historic Districts within the Central City Plan District. Alterations include a new aluminum storefront system, new steel canopy, and recessing an existing door and transom.

Approval per the approved site plans, Exhibits C-1 through C-6, signed and dated November 27, 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 four 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 17-228521 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: Puja Bhutani**

**Decision rendered by:**  **on November 27, 2017**  
By authority of the Director of the Bureau of Development Services

**Decision mailed December 4, 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 August 23, 2017, and was determined to be complete on October 12, 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 August 23, 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. Unless further extended by the applicant, **the 120 days will expire on: April 10, 2018.**

**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.

**This decision, and any conditions associated with it, is final.** It may be appealed to the Oregon Land Use Board of Appeals (LUBA), within 21 days of the date the decision is mailed, as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have submitted written testimony during the comment period for this land use review. Contact LUBA at 775 Summer St NE Suite 330, Salem, OR 97301-1283 or phone 1-503-373-1265 for further 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](http://www.portlandonline.com).

**Recording the final decision.**

If this Land Use Review is approved the final decision will be recorded with the Multnomah County Recorder.

- *Unless appealed*, the final decision will be recorded after **December 5, 2017** by the Bureau of Development Services.

The applicant, builder, or a representative does not need to record the final decision with the Multnomah County Recorder.

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 for the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

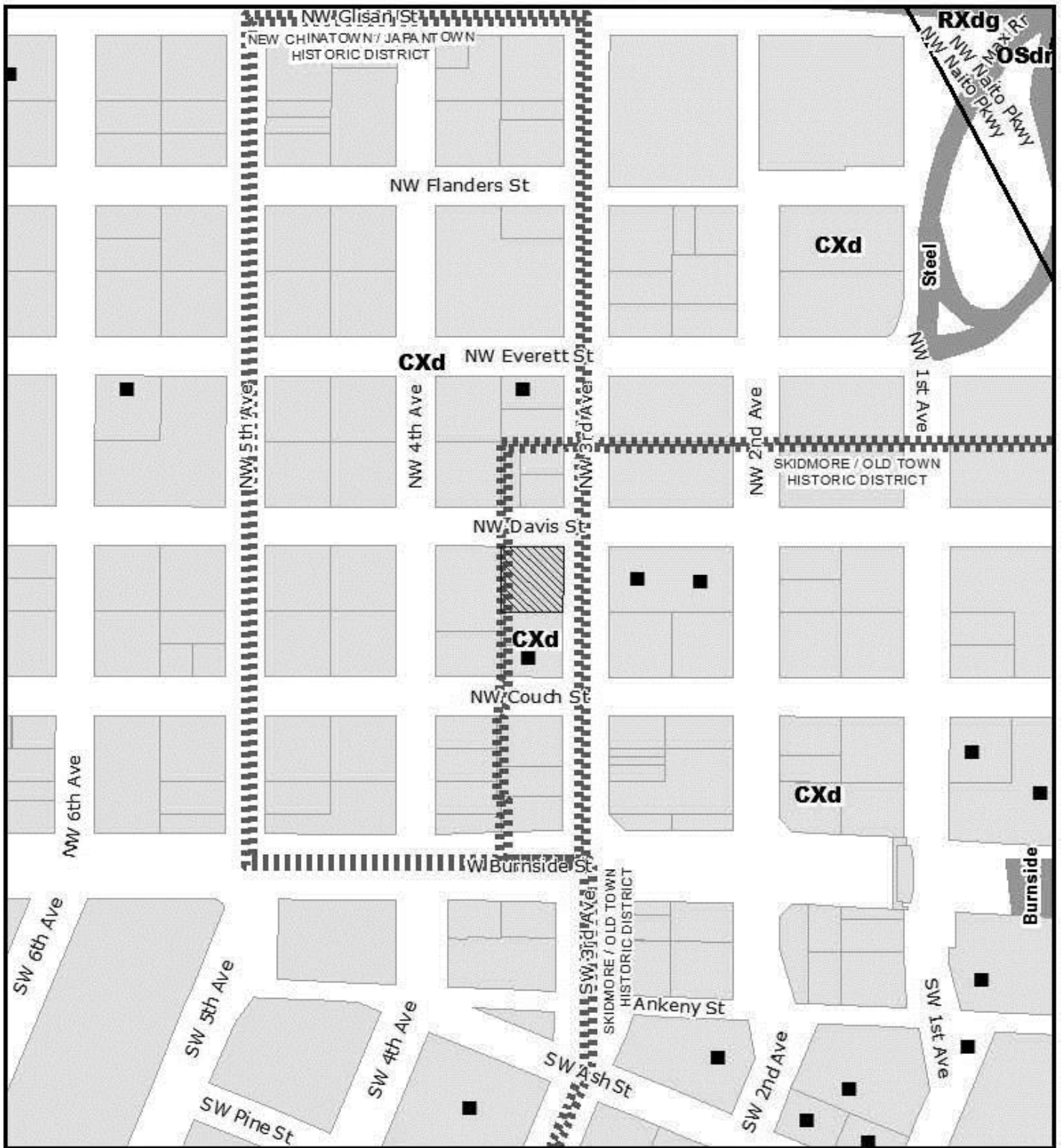


**EXHIBITS**

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Submittal
  - 1. Original Project Narrative
  - 2. Original Drawing Set
  - 3. Applicant Response, dated 9/28/17
  - 4. Revised Storefront Section Details, dated 9/28/17
  - 5. Revised Project Narrative, dated 10/17/17
  - 6. Revised Drawing Set, dated 10/17/17
  - 7. Applicant Response, dated 11/7/17
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Site Plan (attached)
  - 2. Storefront Section Details
  - 3. East Elevation (attached)
  - 4. Linear Lighting Specifications
  - 5. Lighting Specifications
  - 6. Regressed Trim Specifications
  - 7. Storefront System Specifications
- D. Notification information:
  - 1. Mailing list, 10/19/17
  - 2. Revised Notice Mailing list, 11/17/17
  - 3. Mailed Notice, 10/19/17
  - 4. Revised Mailed Notice, 11/17/17
- E. Agency Responses:
  - 1. Fire Bureau
  - 2. Life Safety Review Section of BDS
- F. Correspondence: None
- G. Other:
  - 1. Original LU Application
  - 2. Incomplete Letter
  - 3. Email Correspondence

**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



THIS SITE LIES WITHIN THE:  
 CENTRAL CITY PLAN DISTRICT  
 RIVER DISTRICT SUBDISTRICT  
 SKIDMORE / OLD TOWN NEW CHINATOWN / JAPANTOWN  
 HISTORIC DISTRICT



Site

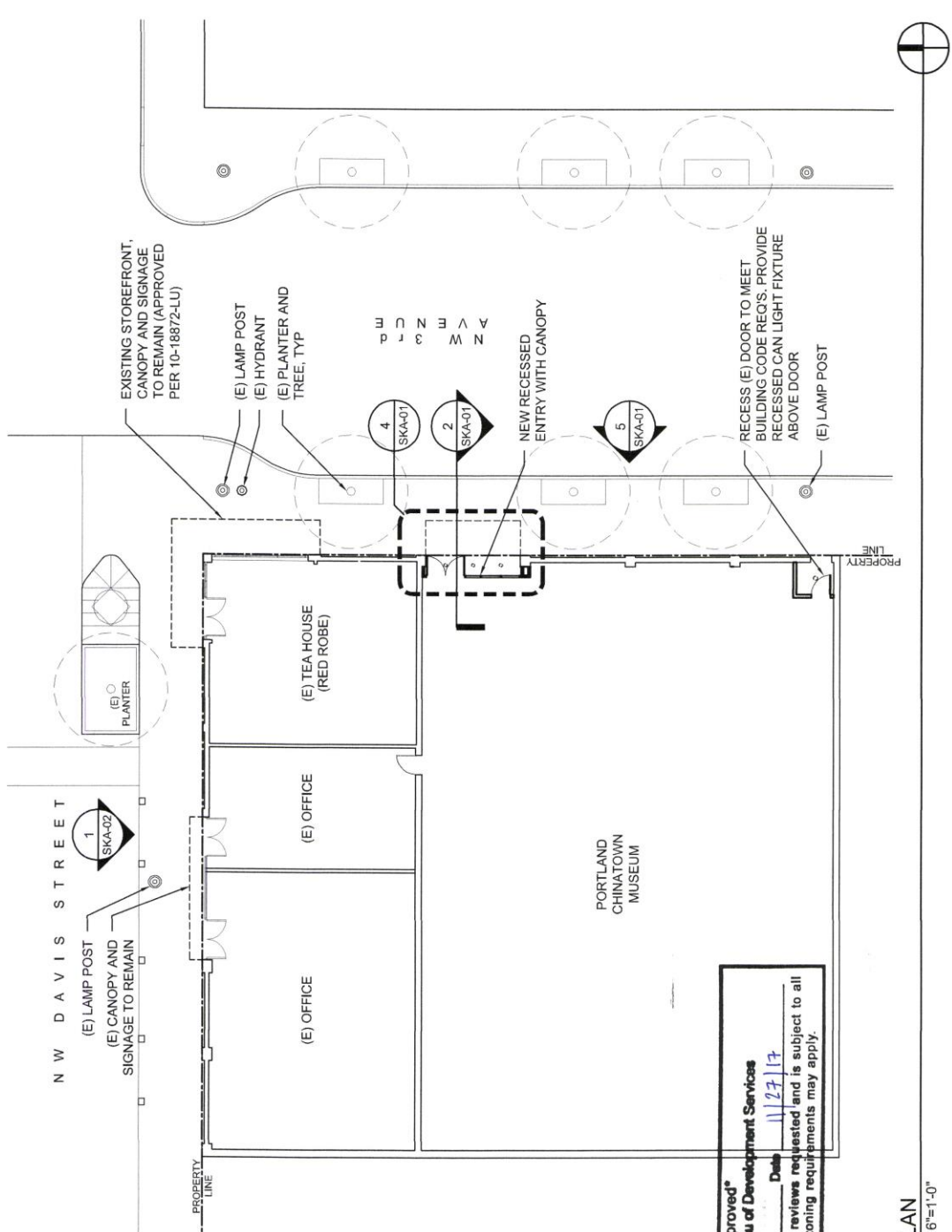


Historic Landmark



Bridge

File No.	LU 17-228521 HR
1/4 Section	3029
Scale	1 inch = 200 feet
State ID	1N1E34CA 8200
Exhibit	B Aug 24, 2017



N W D A V I S S T R E E T

(E) LAMP POST  
(E) CANOPY AND SIGNAGE TO REMAIN

EXISTING STOREFRONT, CANOPY AND SIGNAGE TO REMAIN (APPROVED PER 10-18872-LU)

(E) LAMP POST  
(E) HYDRANT  
(E) PLANTER AND TREE, TYP

(E) TEA HOUSE (RED ROBE)

(E) OFFICE

(E) OFFICE

PORTLAND CHINATOWN MUSEUM

NEW RECESSED ENTRY WITH CANOPY

RECESS (E) DOOR TO MEET BUILDING CODE REQ'S; PROVIDE RECESSED CAN LIGHT FIXTURE ABOVE DOOR

(E) LAMP POST

(E) PLANTER

4 SKA-01

2 SKA-01

5 SKA-01

W  
D  
N  
Z  
M  
N  
V

**\*Approved\***  
City of Portland - Bureau of Development Services  
Planner *AB* Date *11/27/17*  
\* This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply.

1 SITE PLAN  
A1.0 SCALE: 1/16"=1'-0"

PORTLAND CHINATOWN MUSEUM  
127 NW 3RD AVENUE  
PORTLAND, OR 97209

di loreto ARCHITECTURE, llc  
200 NE 20TH AVENUE, SUITE 200  
PORTLAND, OR 97232

ISSUANCE: HISTORIC DESIGN REVIEW  
DATE: 10.10.17 REVISED  
SCALE: AS NOTED

LU 17-228521 HR C1