



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

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

Date: January 29, 2020
To: Interested Person
From: Megan Sita Walker, Land Use Services
 503-823-7294 / MeganSita.Walker@portlandoregon.gov

NOTICE OF A TYPE II DECISION AND NOTICE OF A TENTATIVE APPEAL HEARING DATE FOR A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has denied 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.

If this case is appealed, the hearing for the appeal will be held Monday March 9, 2020 @ 1:30p.m. with the Portland Historic Landmarks Commission. The hearing will take place in Room 2500B (2nd floor) at 1900 SW 4th Avenue, Portland, OR 97201. If a timely and valid appeal is filed by the end of the appeal period at 4:30pm on February 12th, 2020, no supplemental mailed hearing notice will be sent.

If appealed, the appeal will be listed on the online Historic Landmarks Commission hearing agenda no later than 5pm on Thursday February 13th, 2020. Online hearing schedules are available on the BDS web page (www.portlandonline.com/bds → Zoning & Land Use → Notices, Hearings, Decisions... → Public Hearings → Historic Landmarks Commission Agenda). Copies of the appeal filing will be available by contacting the case planner, Megan Sita Walker (contact info. at top of page) on or after Thursday February 13th, 2020.

This tentative appeal hearing date will be cancelled if Portland Public Schools are closed due to inclement weather or other similar emergency. Check local television and radio reports for school closures. The hearing will be rescheduled for the earliest possible date. A renotification notice will not be sent. Please call the Case Planner, Megan Sita Walker (contact info. At top of page) for information regarding cancellations and/or rescheduling

CASE FILE NUMBER: LU 19-171124 HR – WINDOW AND CLADDING REPLACEMENT

GENERAL INFORMATION

Applicant/Owner: Sean McCluskey
 1637 Maple Street
 Lake Oswego, OR 97034
 (503) 502-0336

Site Address: 1984 SE LADD AVE

Legal Description: BLOCK 24 LOT 27&28 TL 7300, LADDS ADD

Tax Account No.: R463305510
State ID No.: 1S1E02DB 07300
Quarter Section: 3232

Neighborhood: Hosford-Abernethy, contact Michael Wade at wade.michael@comcast.net.
Business District: None
District Coalition: Southeast Uplift, contact Leah Fisher at 503-232-0010x313.

Plan District: None
Other Designations: Noncontributing Resource in the Ladd’s Addition Historic District

Zoning: R5 – Residential 5,000 with Historic Resource Protection Overlay

Case Type: HR – Historic Resource Review
Procedure: Type II, an administrative decision with appeal to the Landmarks Commission.

Proposal:

The applicant is seeking Historic Resource Review approval to replace all windows and all cladding on all facades of a noncontributing resource in the Ladd’s Addition Historic District. The subject property, also known as the Lee and Helen Davenport Duplex, is a single-story building constructed in 1923, originally in the Twentieth Century California Mission style. The proposed work has already been completed without the benefit of Historic Resource Review (CC 19-126757) and the applicant is seeking retroactive approval. The windows and cladding already removed were non-original aluminum framed windows and vinyl siding. The proposed replacement windows are white vinyl windows, and the proposed replacement cladding is 5/16” thick fiber cement lap siding with a 7” reveal.

The National Register Nomination for the Ladd’s Addition Historic District (1988), notes the following regarding the windows and cladding on the subject property (at the time of the nomination):

Windows are typically six-over-one double hung sashes; the front elevation has two large fixed wood sash windows with five lights in the upper sash; there are some aluminum sliding windows. The building is stuccoed, with a small round-arched inset in the shaped parapet; the side and rear elevations have been covered with horizontal aluminum siding. Window and siding changes significantly alter the building’s historic character.

The Nomination also notes that the subject duplex is a “twin” of the neighboring duplex at 1974-1978 SE Ladd Ave, immediately north of the property.

Historic Resource Review is required for non-exempt exterior alterations within a Historic District.

Relevant Approval Criteria:

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

- *Ladd’s Addition Conservation District Guidelines*

ANALYSIS

Site and Vicinity: The subject property is on a 4,540 square foot lot at the corner of SE Ladd Avenue and SE Harrison Street, with frontage along Ladd’s Circle, the central garden of the Ladd’s Addition Historic District. The existing, 1-story duplex was constructed in 1923 in the 20th Century California Mission Architectural Style and is listed as a non-contributing resource due to the alterations described below. The following language is taken directly from the Ladd’s Addition Historic District Nomination description of the subject property:

This one-story rectangular building has a flat roof and sculpted parapet, unit entry doors at opposite ends and multi-paned french doors in the center have bracketed, tiled, shed-roofed overdoors; the entry doors have small concrete stoops. Windows are typically six-over-one double-hung sashes; the front elevation has two large fixed wood sash windows with five lights in the upper sash; there are some aluminum sliding windows. The building is stuccoed, with a small round-arched inset in the shaped parapet; the side and rear elevations have been covered with horizontal aluminum siding. Window and siding changes significantly alter the building's historic character. It has a concrete foundation. The building is located on the southwest end of the block, at the intersection of Ladd Circle, Harrison Street and the alley. The yards have Port Orford cedars, ivy, camellias, rhododendrons and English laurel.

Cultural Data: This duplex, and its "twin" next door (1974-78 S.E. Ladd Avenue), were designed by Don N. Crooks for J.W. Kimball and widow Helen Davenport, and built by contractor J. Gray. They are identical in plan and detail to the duplexes at the south end of block 17.

Staff notes that in the submittal for the Historic Resource Review, the Owner/ Applicant states that the windows removed/ replaced were non-original aluminum windows and that the cladding removed and replaced consisted of non-original vinyl siding. The description of the subject property in the National Register Nomination (see above) is not consistent with the description of the condition of the property prior to the subject alterations provided by the Owner/ Applicant. Staff was not able to find any records of previous reviews or permits for alterations to the subject property, so it is not clear how the discrepancy in the descriptions of the property occurred. Specifically, it is not clear when the original stucco cladding, sculpted parapet, and remaining original wood windows were removed.

The historic character of the Ladd's Addition neighborhood is one of small to medium-sized houses, set back moderately from tree-lined streets, with five public gardens incorporated into the distinctive layout of the subdivision at significant nodes. A few larger houses, churches, small apartment buildings, and modest commercial properties, similar in character to the single-family housing, are sprinkled throughout the district. Denser traditional storefront commercial and apartment development is concentrated along SE Hawthorne Street at the district's northern edge, SE 12th Avenue at the district's western edge, and SE Division Street at the south edge. These were the streets that were originally designed to accommodate the streetcar lines.

Zoning: The Residential 5,000 (R5) single-dwelling zone is intended to preserve land for housing and to provide housing opportunities for individual households. The zone implements the comprehensive plan policies and designations for single-dwelling housing. Minimum lot size is 3,000 square feet, with minimum width and depth dimensions of 36 and 50 feet, respectively. Minimum densities are based on lot size and street configuration. Maximum densities are 1 lot per 5,000 square feet of site area.

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 no prior land use reviews for the subject site.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **December 9, 2019**. The following Bureaus have responded with no issues or concerns:

1. Life Safety Division of BDS
2. Fire Bureau
3. Site Development Section of BDS

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on December 9, 2019. A total of thirteen (13) written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

1. Karen Hopkins, on December 12, 2019, wrote in in opposition to the proposal. See Exhibit F-1 for additional information.
2. Suzanne Dixon, on December 15, 2019, wrote in in opposition to the proposal. See Exhibit F-2 for additional information.
3. Hanna Newell, on December 15, 2019, wrote in in opposition to the proposal. See Exhibit F-3 for additional information.
4. Bruce Bikle, on December 16, 2019, wrote in in opposition to the proposal. See Exhibit F-4 for additional information.
5. Graydon Miller, on December 16, 2019, wrote in in opposition to the proposal. See Exhibit F-5 for additional information.
6. Joe Nelson, on December 16, 2019, wrote in in opposition to the proposal. See Exhibit F-6 for additional information.
7. Karen Girard, on December 17, 2019, wrote in in opposition to the proposal. See Exhibit F-7 for additional information.
8. Craig Swinford, on December 17, 2019, wrote in in opposition to the proposal. See Exhibit F-8 for additional information.
9. Dale Krenek, on December 19, 2019, wrote in in opposition to the proposal. See Exhibit F-9 for additional information.
10. Judith Brandt, on December 20, 2019, wrote in in opposition to the proposal. See Exhibit F-10 for additional information.
11. Christine Fox, on December 27, 2019, wrote in in opposition to the proposal. See Exhibit F-11 for additional information.
12. Todd Christensen, on December 29, 2019, wrote in in opposition to the proposal. See Exhibit F-12 for additional information.
13. Roseanne Lynch, on December 30, 2019, wrote in in opposition to the proposal. See Exhibit F-13 for additional information.

Staff Response: Staff supports alterations to the structure to better meet the needs of the owner and tenants. However, as noted in the comments received, the alterations made to replace the cladding and windows without necessary review and permits, do not adequately address the applicable approval criteria. See the findings below for additional information.

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 Ladd's Addition Historic District and the proposal is for a non-exempt treatment not requiring a new foundation. Therefore, Historic Resource Review approval is required. The approval criteria are the *Ladd's Addition Conservation District Design Guidelines – Exterior Rehabilitation*.

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

Ladd's Addition Conservation District Guidelines – Exterior Rehabilitation

- 1. Façades Oriented to a Street.** In rehabilitating existing buildings, the architectural integrity of street-oriented façades should be maintained. Additions and structural alterations should be limited to the rear and side yard façades and be minimally visible from the street.
- 3. Exterior Siding Material. Restoration and maintenance of original siding materials is encouraged.** Materials used on additions should match or be compatible with the predominant materials used on the original structure. Most single family residences and duplexes in Ladd's Addition feature stucco, horizontal wood siding, wood shingles, brick or a combination of these materials. Most commercial and multi-family structures feature stucco or brick. The following materials are discouraged: plywood, used brick, shakes, exposed concrete block and metal.
- 4. Roof Form.** Repair and alteration of roofs should retain:
 - a. The original roof shape and pitch;
 - b. Original structural and decorative features such as gables, dormers, chimneys, cornices, parapets, pediments, frieze boards, exposed rafters and other ornamental details; and,
 - c. Whenever possible the original type, size, color, and pattern of roofing materials. New roof features including roof additions and new dormers should be compatible in size, scale, materials, and color with the original building. Skylights, solar, mechanical and service equipment, and new roof features should be inconspicuous from the street.
- 5. Front Façade Detailing.** Original entrances to buildings, front porches and projecting features, such as balconies, bays, and dormer windows should be retained or restored.

Findings 1, 3, 4, and 5: The site is located on the corner of SE Ladd Avenue and SE Harrison Street, with frontage along Ladd's Circle, the central garden of the Ladd's Addition Historic District, a highly visible location at the heart of the district. Additionally, the site is on a corner lot, therefore both the south and southwest facing facades are street facing facades. While staff supports the intention of the proposal to make repairs to failing building systems to better meet the needs of the owner and tenants, the subject alterations were made to the structure without the necessary Historic Resource Review and permits.

The proposal includes the replacement of all exterior cladding with 5/16" thick fiber cement lap siding with a 7" reveal.

- The previous condition is noted by the Owner/ Applicant to have been vinyl siding.
- The previous condition is noted in the nomination description for the property to have been the original stucco cladding with aluminum siding applied on side and rear elevations.

The alterations also include the replacement of windows on all elevations with white vinyl windows mounted flush to the proposed cladding.

- The previous condition is noted by the Owner/ Applicant to have been all non-original aluminum windows.
- The previous condition is noted in the nomination description for the property to have been some aluminum sliding windows with the original wood windows with divided lites on the front facing elevation to match the "twin" resource at 1974-1978 SE Ladd Avenue.

While it is not clear when the previous alterations (removal of sculpted parapet, removal of original stucco cladding, removal of all original wood windows) were made it appears they occurred between when the description of the resource in the nomination (in 1988) and prior to when the subject alterations were made (2019). The proposed alterations are subject to review and constitute alterations that are highly impactful to the subject property and the district. Specifically, the installation of a thin (5/16" thick) fiber

cement lap siding with a 7” reveal and the installation of vinyl windows flush with exterior cladding do not respect the documented architectural integrity of the subject property, and do not utilize replacement materials that respond to the character of the subject property or the district.

Additionally, the alterations proposed significantly alter the front façade detailing of the property and are not compatible with the predominant materials used on the original structure. The nomination for the district clearly states that the subject property is a “twin” of the duplex immediately to the north (in addition to two other duplexes on block 17 of the district). The nomination also describes that at the time of the Nomination (1988) the property still had prominent, character defining, original front façade detailing to include: a sculpted parapet, multi-paned french doors at unit entries, bracketed, tiled, shed-roofed overdoors, six-over-one double-hung windows, two large fixed wood sash windows with five lites in the upper sash, stucco cladding with the side and rear elevations covered with horizontal aluminum siding. While historic material does not appear to remain, the alterations made to the resource after the nomination (without review), and the alterations made that resulted in the current Code Compliance Case (CC 19-126757) have resulted in the property losing its remaining character.

The proposed alterations to primary building systems (cladding and windows) on street facing facades do not maintain the documented architectural integrity of street-oriented façades of the property. Specifically, the replacement of cladding and windows, with thin, 5/16” thick fiber cement lap siding with a 7” reveal, and all white vinyl windows, do not match and are not compatible with the predominant materials used on the original structure. *Given that less impactful options are available that would adequately respond to the applicable approval criteria, such as the installation of a cladding system responsive to the subject resource or adjacent contributing resources (such as a stucco or thicker lap siding with a shorter reveal), and the installation of all-wood windows, these guidelines are not met.*

- 2. Foundations.** Changes to the foundation should match or be compatible with the original foundation in height and materials.
- 8. Color.** Restoration of original colors, or colors appropriate to the style and era of the building, is encouraged.
- 13. Crime Prevention.** Crime prevention elements should be included in the design with specific attention to landscaping, parking areas, walkways, lighting, entries, and visibility. Windows and entries should not be obscured. Parking areas, walkways, and entries should be adequately illuminated for visibility.

Findings for 2, 8, and 13: The proposal is compatible with the existing foundation in terms of height and material, and the colors because they appear to be consistent with the style and era of the building. Existing lighting will remain and aid in crime prevention. *Therefore, 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 requirements of Title 11 can be met, and 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

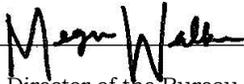
Because the alterations impact all facades including both street facing facades, and because there are alternative options available in terms of the material and detailing of cladding and windows that would create a condition that would comply with the approval criteria, staff has

found that the approval criteria are not met. 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 does not meet the applicable Historic Resource Review criteria and therefore does not warrant approval.

ADMINISTRATIVE DECISION

Denial.

Staff Planner: Megan Sita Walker

Decision rendered by: _____  _____ **on January 24, 2020**

By authority of the Director of the Bureau of Development Services

Decision mailed: January 29, 2020

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 29, 2019 and was determined to be complete on November 25, 2019.

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 29, 2019.

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: March 24, 2020.**

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 February 12, 2020** 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, an appeal hearing will be held at 1:30pm on Monday March 9, 2020 – please see the front page of this notice for additional information.* 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.

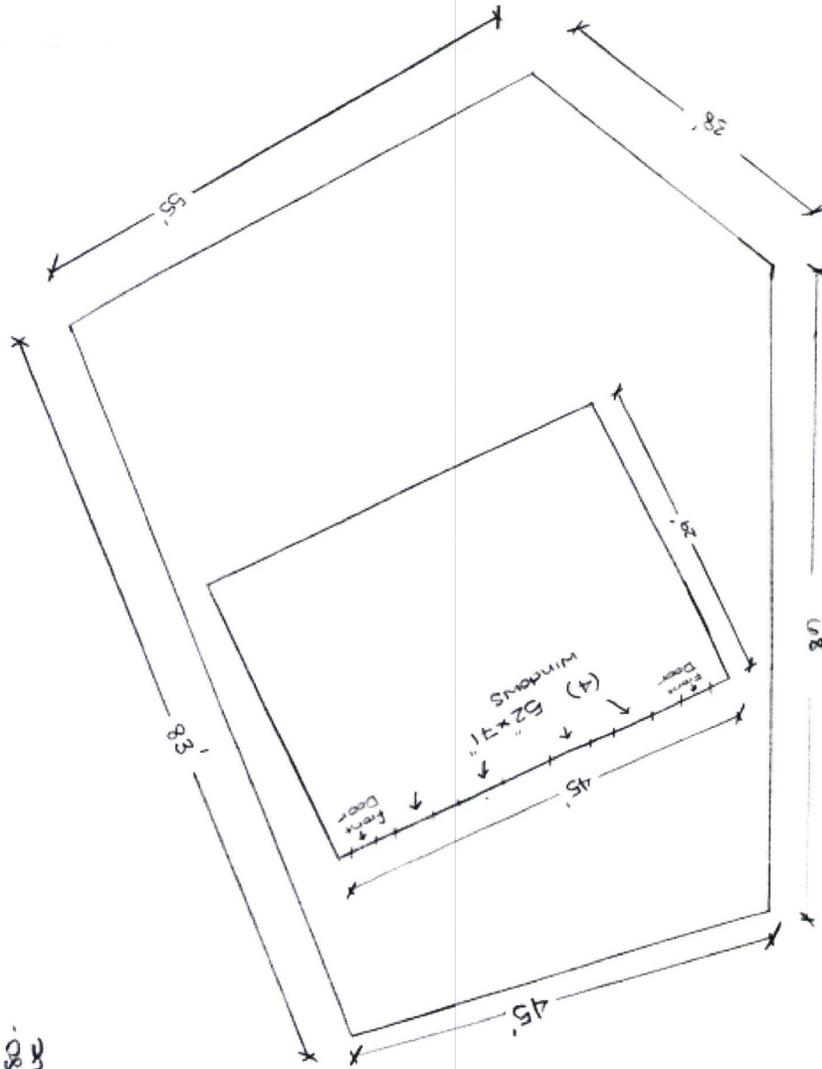
Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Landmarks Commission an opportunity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

EXHIBITS
NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 - 1. Original Narrative
 - 2. Original Project Description
 - 3. Site Photos and Descriptions
 - 4. Window Estimate
 - 5. Restoration Estimate and Photos
 - 6. Applicant's Printed Copy of the Ladd's Addition Guidelines
 - 7. Pictures of Clad Window
 - 8. Copy of Notice of Zoning Violation Letter
 - 9. Revised/ Supplemental Project Description & Response to Approval Criteria, Rec'd November 25, 2019
 - 10. Photos of Elevations, Rec'd November 25, 2019
 - 11. Elevations, Rec'd December 26, 2019 – Not Approved/ For Reference Only
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Southwest/ SE Ladd Avenue Elevation (attached)
 - 3. Northeast/ Rear Elevation (attached)
 - 4. North/ South Elevation (attached)
 - 5. North/ South Elevation
 - 6. Specifications – Vinyl Windows
 - 7. Specifications – Finer Cement Lap Siding
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Life Safety Division of BDS
 - 2. Fire Bureau
 - 3. Site Development Section of BDS
- F. Correspondence:
 - 1. Karen Hopkins, on December 12, 2019, wrote in in opposition to the proposal.
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- G. Other:
 - 1. Original LU Application
 - 2. Code Compliance Case (19-126757 CC) Photos
 - 3. Oregon Historic Site Record
 - 4. Ladd's Addition Historic District National Register Nomination, page 277 of 454
 - 5. Incomplete Letter from staff to applicant, sent June 12, 2019
 - 6. 180-Day Notice Memo from staff to applicant, sent November 14, 2019
 - 7. Email correspondence between staff and the applicant

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).

Site plan for 1980-
1984 SE LADD AVE



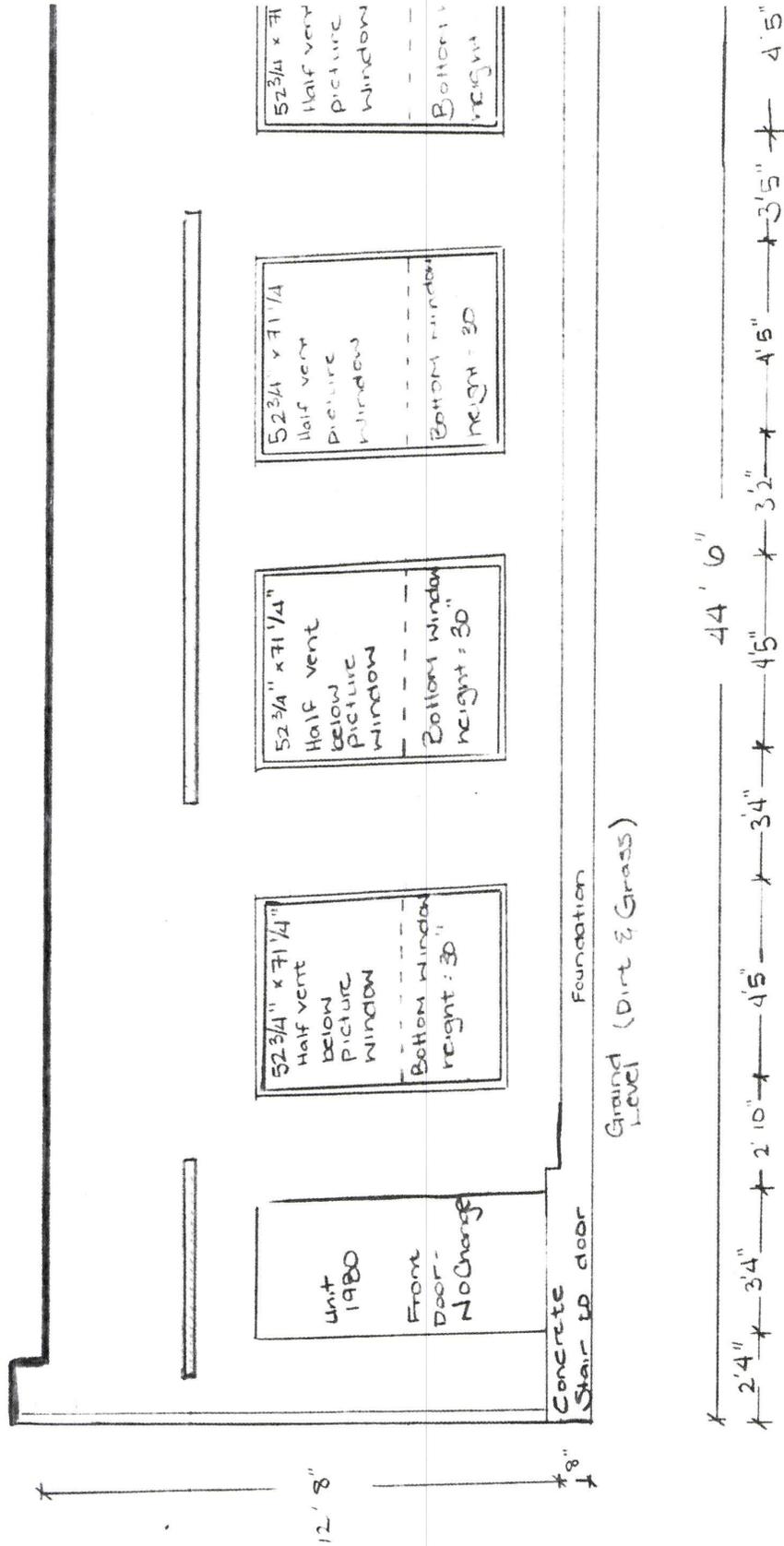
↑ North

SE Ladd Ave

SE Harrison St

EXH. C-1
W 19-171124 HR

White around window
 Khaki Brown at corners
 Siding - 7" reveal & 5/16" thick Hardie Lap Siding
 with Cedar Mill grain pattern
 in Khaki Brown



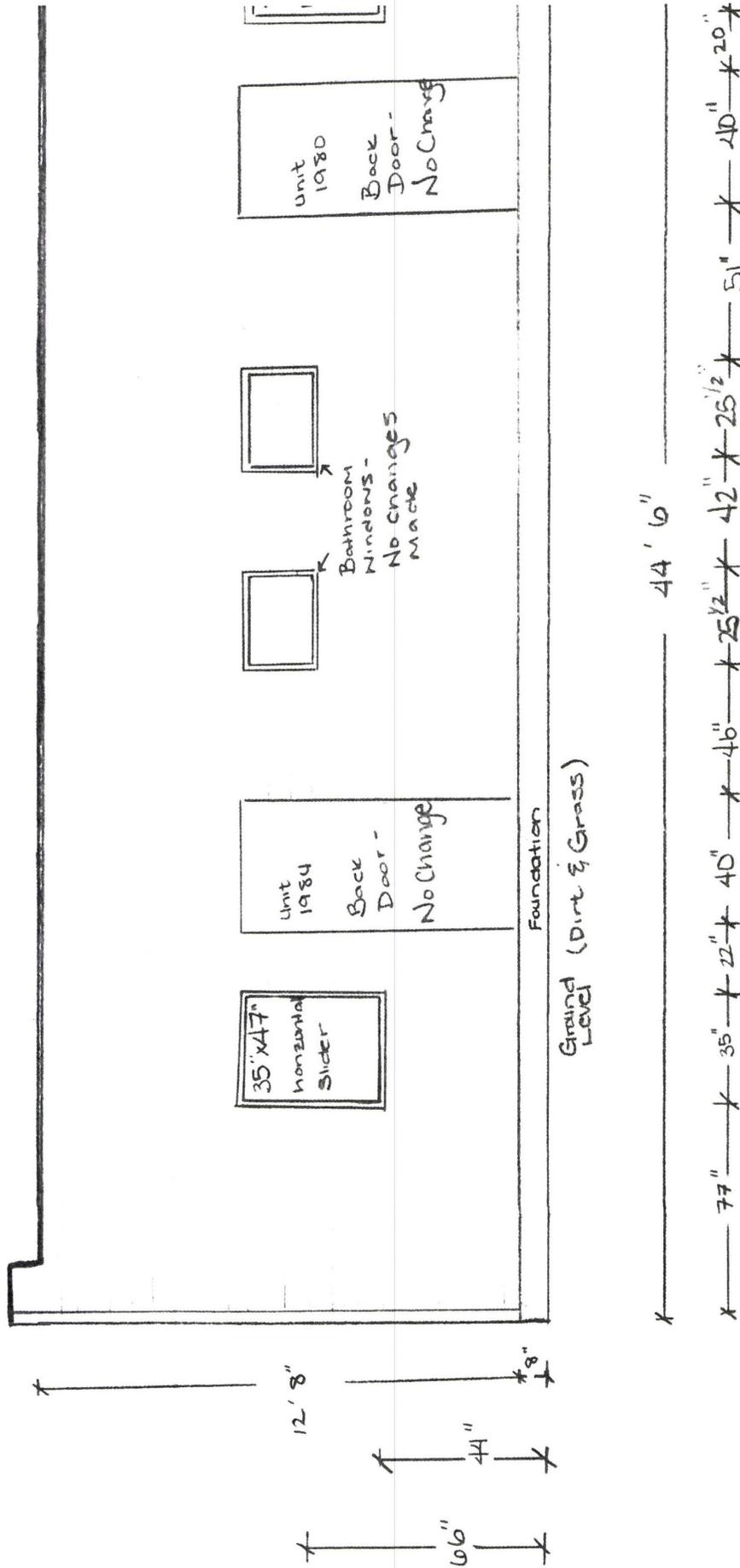
SOUTHWEST ELEVATION (SE LADD AVE.)

EX C-2

Dr-1

LV19-171124 HR

corner trim Same
 as description on
 page 1



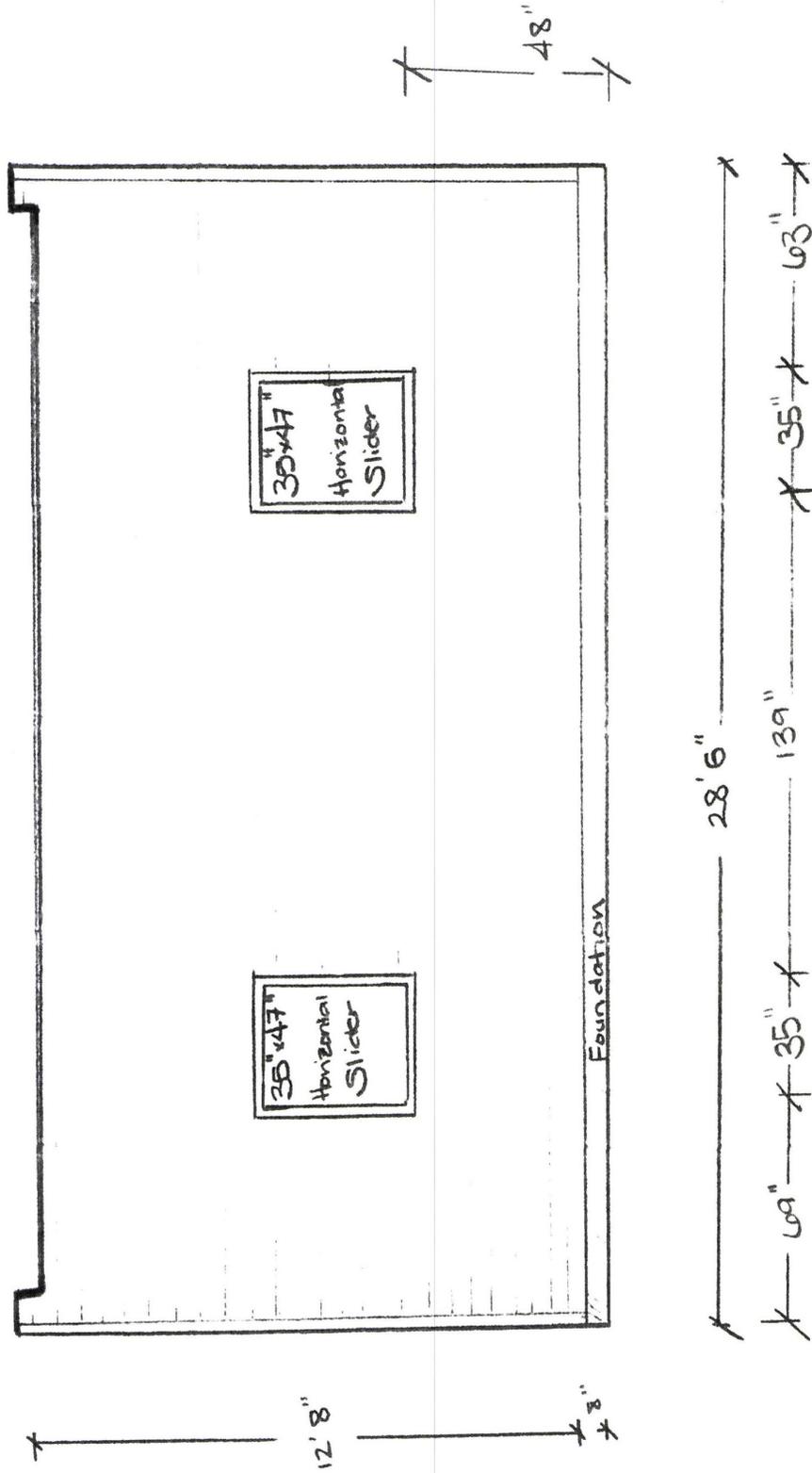
NORTHEAST / REAR ELEVATION

EXH C-3

Page 2.

LU 19-171124 HR

Siding, Window and
corner trim same
as description on
page 1



NORTH/SOUTH ELEVATION

EXH C-4

June 3

LV 19-171124 HR