



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

Carmen Rubio, Commissioner
Rebecca Esau, Director
Phone: (503) 823-7310
TTY: (503) 823-6868
www.portland.gov/bds

Date: February 16, 2023
To: Interested Person
From: Amanda Rhoads, Land Use Services
503-865-6514 / Amanda.Rhoads@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 22-205581 AD

GENERAL INFORMATION

Applicant: Elson Nguyen | HM Group, LLC
3036 SE 131st Ave | Portland OR 97236
971-563-2067 | elson.hmgrouppdx@gmail.com

Owner: Alexandru Ianos
11433 SE William Otty Rd | Happy Valley, OR 97086

Site Address: 1806 NW MARSHALL ST

Legal Description: BLOCK 179 E 40' OF N 10' OF LOT 5 E 40' OF LOT 8, COUCHS ADD
Tax Account No.: R180216510
State ID No.: 1N1E33AB 07200
Quarter Section: 2928
Neighborhood: Northwest District, contact Greg Theisen at planningchair@northwestdistrictassociation.org
Business District: Northwest Portland, contact at nobhillportland@gmail.com.
District Coalition: Neighbors West/Northwest, contact Darlene Urban Garrett at darlene@nwnw.org
Plan District: Northwest
Zoning: RM4d – Residential Multi-Dwelling 4 with “d” Design Overlay zoning
Case Type: AD – Adjustment Review
Procedure: Type II, an administrative decision with appeal to the Design Commission.

Proposal:

The applicant proposes to add a driveway with new curb cut on the west side of the site; currently, the property does not have off-street parking. Zoning Code Section 33.266.120.D.1 requires off-street parking spaces to be a minimum dimension of 9 feet wide by 18 feet long, and Zoning Code Section 33.266.120.C.2.a requires off-street parking spaces to be set back at least 10 feet from the NW Marshall St lot line. The applicant proposes to waive the 10-foot

setback, and to provide a parking pad that narrows to 8 feet wide for the final 4 feet of length as shown in the attached site plan.

Therefore, the applicant requests an Adjustment to Zoning Code Section 33.266.120.C.2.a to waive the minimum 10-foot setback for off-street parking spaces; and an Adjustment to Zoning Code Section 33.266.120.D.1 to reduce the required parking space width from 9 feet to 8 feet for the final 4 feet of the space.

The proposal is exempt from Design Review per Zoning Code Section 33.420.045.A.2.

Relevant Approval Criteria:

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

ANALYSIS

Site and Vicinity: The 2,000-square-foot multi-dwelling residential site is developed with a two-and-a-half-story, Foursquare-style house constructed in 1904. While there are six houses/duplexes facing NW Marshall St on this block, much of the surrounding development is larger in scale, with apartment buildings, commercial development, Legacy Health and other office buildings, and accessory surface parking lots in the immediate area located close to downtown Portland. The site is in the Northwest Plan District three blocks west of I-405 and two blocks east of the northern edge of the Alphabet Historic District, in an area that in previous decades was largely industrially zoned but has now moved to a mixture of high-density multi-dwelling, commercial, and employment designations.

In this area, NW Marshall St is Classified as Local Service for traffic, transit, and freight; a Neighborhood Walkway; and a Major City Bikeway. NW 18th Ave is classified as Local Service for traffic and freight; a Transit Access Street; a City Walkway; and a Major City Bikeway. The site is in the Northwest Pedestrian District.

Zoning: The RM4 zone is a high density, urban-scale multi-dwelling zone applied near the Central City, and in town centers, station areas, and along civic corridors that are served by frequent transit and are close to commercial services. It is intended to be an intensely urban zone with a high percentage of building coverage and a strong building orientation to the pedestrian environment of streets, with buildings located close to sidewalks with little or no front setback. This is a mid-rise to high-rise zone with buildings of up to seven or more stories. The Design overlay zone is applied to this zone.

The Design overlay zone ensures that Portland is both a city designed for people and a city in harmony with nature. The Design overlay zone supports the city's evolution within current and emerging centers of civic life. The overlay promotes design excellence in the built environment through the application of additional design standards and design guidelines that:

- Build on context by enhancing the distinctive physical, natural, historic and cultural qualities of the location while accommodating growth and change;
- Contribute to a public realm that encourages social interaction and fosters inclusivity in people's daily experience; and
- Promotes quality and long-term resilience in the face of changing demographics, climate and economy.

The Northwest Plan District 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 there are no prior land use reviews for this site.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **December 27, 2022**. The following Bureaus have responded with no issues or concerns:

- Water Bureau (Exhibit E.1);
- Fire Bureau (Exhibit E.1); and
- Site Development Section of BDS (Exhibit E.1).

The Bureau of Environmental Services (BES) noted that the project appears to create or redevelop less than 500 square feet of impervious area; therefore, pollution reduction and flow control requirements of the Stormwater Management Manual (SWMM) are not triggered. BES did not object to the requested Adjustments (Exhibit E.1).

The Bureau of Transportation analyzed the requests against the purpose of the regulations; PBOT's analysis is included in the findings below. Ultimately PBOT noted no objections to the requested Adjustments (Exhibit E.2).

The Life Safety Plans Examiner did not object to the requested Adjustments and noted that building permits are not required for driveways (Exhibit E.3).

Neighborhood Review: The property owner to the west wrote in opposition to the proposal (Exhibits F.1-F.3). His main concerns were the new parking affecting the curb appeal of his house; and the removal of on-street parking for this curb cut. These concerns will be addressed in the findings below. The letter also suggested the proposed parking be relocated to the rear of the site behind the house off of NW 18th Ave, instead of in the current location. However, that is not the proposal the applicant has forwarded. We must review the proposal that has been made against the applicable approval criteria (though the other location has additional challenges that likely would preclude it from being a viable proposal).

ZONING CODE APPROVAL CRITERIA

33.805.010 Purpose (Adjustments)

The regulations of the zoning code are designed to implement the goals and policies of the Comprehensive Plan. These regulations apply city-wide, but because of the city's diversity, some sites are difficult to develop in compliance with the regulations. The adjustment review process provides a mechanism by which the regulations in the zoning code may be modified if the proposed development continues to meet the intended purpose of those regulations. Adjustments may also be used when strict application of the zoning code's regulations would preclude all use of a site. Adjustment reviews provide flexibility for unusual situations and allow for alternative ways to meet the purposes of the code, while allowing the zoning code to continue providing certainty and rapid processing for land use applications.

33.805.040 Approval Criteria

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

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

Findings: The applicant is requesting an Adjustment to waive the minimum 10-foot setback for off-street parking spaces (33.266.120.C.2.a), and another to reduce the required parking space width from 9 feet to 8 feet for the final 4 feet of the space

(33.266.120.D.1). The purpose for both development standards is found in 33.266.120.A:

Purpose. *The size and placement of vehicle parking areas are regulated in order to enhance the appearance and pedestrian experience of neighborhoods.*

The parking space is proposed to be 18 feet long, the required length for a residential parking space. Additionally, the right-of-way between the street paving and the property for NW Marshall St in this area provides a 4-foot planting strip, 6-foot sidewalk, and 2-foot landscaping strip between the sidewalk and property line. In all, the full-length parking space is 2 feet from the sidewalk and 12 feet from the street. PBOT commented: “The pedestrian experience of neighborhoods can be negatively impacted by vehicles parked in a manner which either blocks the sidewalk or encroaches into the sidewalk. The site plan shows the installation of a parking pad meeting the required 18-foot minimum parking space length without encroaching onto the right-of-way or sidewalk. This is sufficient length to house most passenger vehicles. The proposed 18-ft length makes it very unlikely that anyone would attempt to park a second vehicle in the driveway as the second vehicle would fully block the sidewalk and hang out into the street, which is uncommon behavior. PBOT staff has no objection to the adjustment to waive the 10-ft front setback since the overall parking space length remains the required 18-feet (Exhibit E.2).”

The reduced width is only proposed at the end of the parking space, which is not the typical location for car doors; the driver and passengers will not be impeded from entering or exiting the vehicle due to the one-foot reduction in width in the final four feet of the parking space. PBOT comments: “Presumably, vehicles will pull into this driveway head first. Based on data provided by the National Association of City Transportation Officials (NACTO) a typical passenger sedan is 6.5-feet wide. The 9-ft minimum space width is sufficient room to park a car, open the car door, and exit the vehicle. The doors of most passenger vehicles are at least 4-feet from the front of the vehicle in order to accommodate the engine or battery compartment. Staff concurs with the applicant’s assessment that the 8-ft width for the 4-feet of the space furthest from the street lot line will be wide enough to accommodate the front end of most passenger vehicles including some shy space on either side (Exhibit E.2).”

The site is 40 feet wide. The proposed 9-foot-wide driveway will make up only 22.5 percent the width of the front yard, and will not be located in front of the house. The rest of the yard is grassy, with a path directly from the street to steps up to the front porch, and low fence around the yard. The subject site also has three mature street trees that, while in the public right-of-way, work to soften the appearance of the site.

Driveways are not uncommon in the area. While the two narrower lots to the west of this house do not have on-street parking, the three houses across the street all have driveways, two of which are connected, leading to a larger curb cut across from the subject site. With this context, the new driveway, in a typical location on the side of the house, will not become the predominant feature of the site due to this Adjustment being granted.

The person who owns the property west of the subject site noted concerns that a car parked in this space will negatively impact the appearance of the adjacent house. The original proposal retained the required 10-foot setback for parking spaces; but instead proposed an 18-foot-long parking space that was only 8 feet wide for its entire length. Staff had concerns that this 8-foot-wide parking space would be challenging to use adjacent to the house in terms of entering and exiting vehicles, and that the front 10 feet would de facto become the parking space most often used to accommodate doors opening. Staff therefore encouraged the applicant to create a workable parking space that would limit paving onsite. Staff believes limiting paving while creating a usable parking space will not negatively impact the appearance of the area beyond what a

driveway and parking pad allowed by right would cause. The existing fence at the property line between the two sites will also prevent any incursion onto the adjacent property by vehicles using the new driveway. For these reasons, staff concludes the proposal will not compromise the appearance of the neighborhood nor pedestrians' safety.

Given the above, staff finds the proposal equally meets the purpose of the standard. This criterion is met.

- B.** If in a residential, CI1, or IR zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, I, or CI2 zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and

Findings: Since the site is zoned residential, the applicant must demonstrate the proposal will not significantly detract from the livability or appearance of the residential area. As noted above, many nearby house/duplex sites in the area have driveways that are available to park cars close to the street. The immediate area also has a wide variety of uses, zones, and intensity of uses. Staff concluded under Criterion A that no reduction in residential area appearance would result from the addition of this parking space over what might be expected for a site installing a new driveway allowed by right.

The neighbor raised concerns about the loss of on-street parking that would result with the new curb cut (Exhibit F.1). While on-street parking will be interrupted, there will be no net loss of parking spaces – the proposed apron will be less than 20 feet long (the equivalent of one parking space) and will provide one parking space onsite. While onsite parking is no longer required for single-dwelling residential development, it is still allowed by right if all standards can be met. This Adjustment is looking at the waiver of the 10-foot distance between the front property line and the parking space and a reduction of one foot in width for the final 4 feet of the parking pad only, not whether a parking space should be allowed at all.

As noted in criterion A, the driveway will not become a predominant feature of the site, and as PBOT notes, the waiver of the front setback will not compromise safety nor the pedestrian experience since vehicles can be fully located on the subject site without overhanging the sidewalk. No privacy or other livability impacts are expected as a result of this Adjustment being approved. Therefore, staff finds this criterion is met.

- C.** If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and

Findings: The applicant has requested two Adjustments; therefore, this criterion must be addressed. The overall purpose for the development standards in multi-dwelling zones is stated in Zoning Code Section 33.120.010:

33.120.010 Purpose

The multi-dwelling zones are intended to preserve land for urban housing and to provide opportunities for multi-dwelling housing.

- A. Use regulations.** *The use regulations are intended to create and maintain higher density residential neighborhoods. At the same time, they allow for institutional, limited commercial, and other nonresidential uses, but not to such an extent as to sacrifice the overall residential neighborhood character of the multi-dwelling zones and their intended role as places for housing.*

B. Development standards. *The six multi-dwelling zones are distinguished primarily by their allowed scale and development standards. The development standards work together to create desirable residential areas by promoting aesthetically pleasing environments, safety, privacy, energy conservation, and recreational opportunities. The development standards generally assure that new development will be compatible with the City's character and contribute to the intended characteristics of each zone. At the same time, the standards allow for flexibility for new development. In addition, the regulations provide certainty to property owners, developers, and neighbors about the limits of what is allowed. The development standards are generally written for development on flat, regularly shaped lots. Other situations are addressed through special standards or exceptions.*

The proposal results in a site that is still consistent with the overall purpose of the zone. The site is reserved for residential development that will remain aesthetically pleasing, with no additional impacts to safety, privacy, energy conservation, or recreational opportunities over what would be allowed by right. The placement of a driveway is compatible with other houses in the immediate area. The driveway will not impact the density on the site; the house will remain nonconforming in residential density whether or not the proposal is constructed. Staff finds this criterion is met.

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

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

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

Findings: There are no discernible impacts that would result from granting the requested adjustment. This criterion is met.

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

Findings: Environmental overlay zones are designated on the Official Zoning Maps with either a lowercase "p" (Environmental Protection overlay zone) or a "c" (Environmental Conservation overlay zone). As the site is not within an environmental zone, this criterion is not applicable.

DEVELOPMENT STANDARDS

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

CONCLUSIONS

The applicant has demonstrated that waiving the 10-foot setback for parking pads (33.266.120.C.2.a); and reducing the width of the parking pad from 9 feet to 8 feet for the last four feet (33.266.120.D.1) will in this case equally meet the purpose of the parking standards for homes and not detract from the appearance and livability of the area. Additionally, the proposal will not adversely impact historic, scenic or environmental resources. As the application has met the approval criteria, the proposal must be approved.

ADMINISTRATIVE DECISION

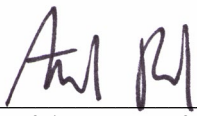
Approval of the following two Adjustments:

- Zoning Code Section 33.266.120.C.2.a to waive the minimum 10-foot setback for off-street parking spaces; and
- Zoning Code Section 33.266.120.D.1 to reduce the required parking space width from 9 feet to 8 feet for the final 4 feet of the space.

Approval is per the approved plan, Exhibit C.1, signed and dated February 14, 2023, subject to the following conditions:

- A. As part of the zoning permit application submittal, each of the required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibit C.1. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 22-205581 AD."

Staff Planner: Amanda Rhoads

Decision rendered by:  **on February 14, 2023**
By authority of the Director of the Bureau of Development Services

Decision mailed: February 16, 2023

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 November 22, 2022, and was determined to be complete on December 21, 2022.

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 November 22, 2022.

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 20, 2023.**

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

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

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

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

Appealing this decision. This decision may be appealed to the Adjustment Committee, and if appealed a hearing will be held. The appeal application form can be accessed at <https://www.portlandoregon.gov/bds/45477>. Appeals must be received **by 4:30 PM on March 2, 2023. The completed appeal application form must be emailed to LandUseIntake@portlandoregon.gov and to the planner listed on the first page of this decision.** If you do not have access to e-mail, please telephone the planner listed on the front page of this notice about submitting the appeal application. **An appeal fee of \$250 will be charged.** Once the completed appeal application form is received, Bureau of Development Services staff will contact you regarding paying the appeal fee. The appeal fee will be refunded if the appellant prevails. There is no fee for Office of Community and Civic Life recognized organizations for the appeal of Type II and IIx decisions on property within the organization’s boundaries. The vote to appeal must be in accordance with the organization’s bylaws. Please contact the planner listed on the front page of this decision for assistance in filing the appeal and information on fee waivers. Please see the appeal form for additional information.

If you are interested in viewing information in this file, please contact the planner listed on the front of this notice. The planner can email you documents from the file. A fee would be required for all requests for paper copies of file documents. Additional information about the City of Portland, and city bureaus is available online at <https://www.portland.gov>. A digital copy of the Portland Zoning Code is available online at <https://www.portlandoregon.gov/zoningcode>.

Attending the hearing. If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Adjustment Committee is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 775 Summer St NE, Suite 330, Salem, 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 Adjustment Committee an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

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

- *Unless appealed*, the final decision will be recorded after **March 2, 2023** 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.

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:

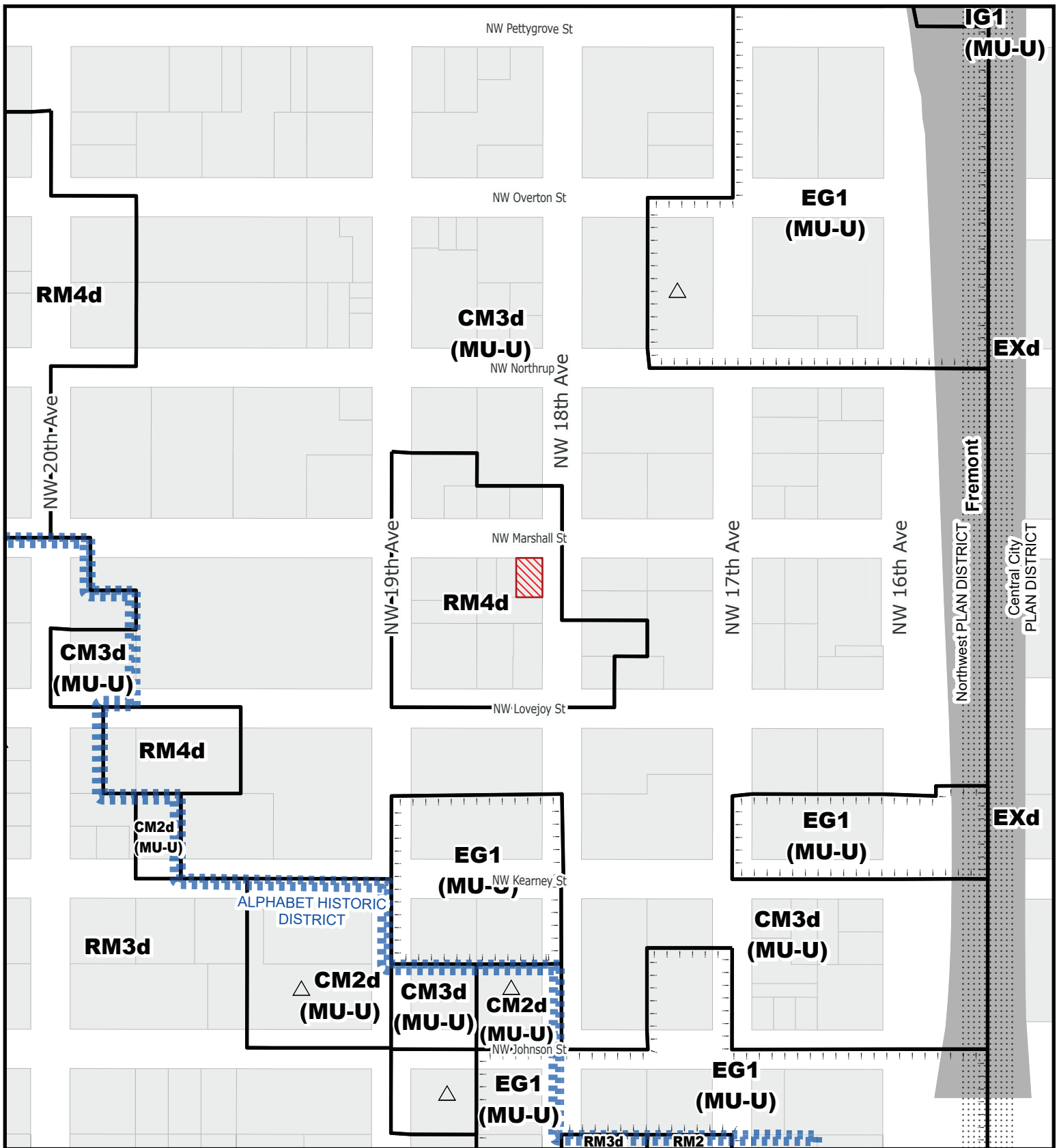
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 - 1. Original Site Plan
 - 2. Updated Site Plan
 - 3. Applicant Narrative
 - 4. Applicant Email, January 13, 2023
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Bureau of Environmental Services; Water Bureau; Fire Bureau; and Site Development Review Section of BDS
 - 2. Bureau of Transportation
 - 3. Life Safety Plans Examiner of BDS
- F. Correspondence:
 - 1. Jarrett Altman, January 11, 2023, in opposition to proposal
 - 2. Jarrett Altman, January 13, 2023, with additional comments
 - 3. Jarrett Altman, January 13, 2023, with additional comments
- G. Other:
 - 1. Original Land Use Application
 - 2. Incomplete Letter, December 9, 2022
 - 3. Planner Email, December 9, 2022
 - 4. Billing Statement for Second Adjustment


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).



For Zoning Code in Effect Post October 1, 2022

ZONING

THIS SITE LIES WITHIN THE:
NORTHWEST PLAN DISTRICT

-  Site
-  Plan District
-  Historic District
-  Historic Landmark

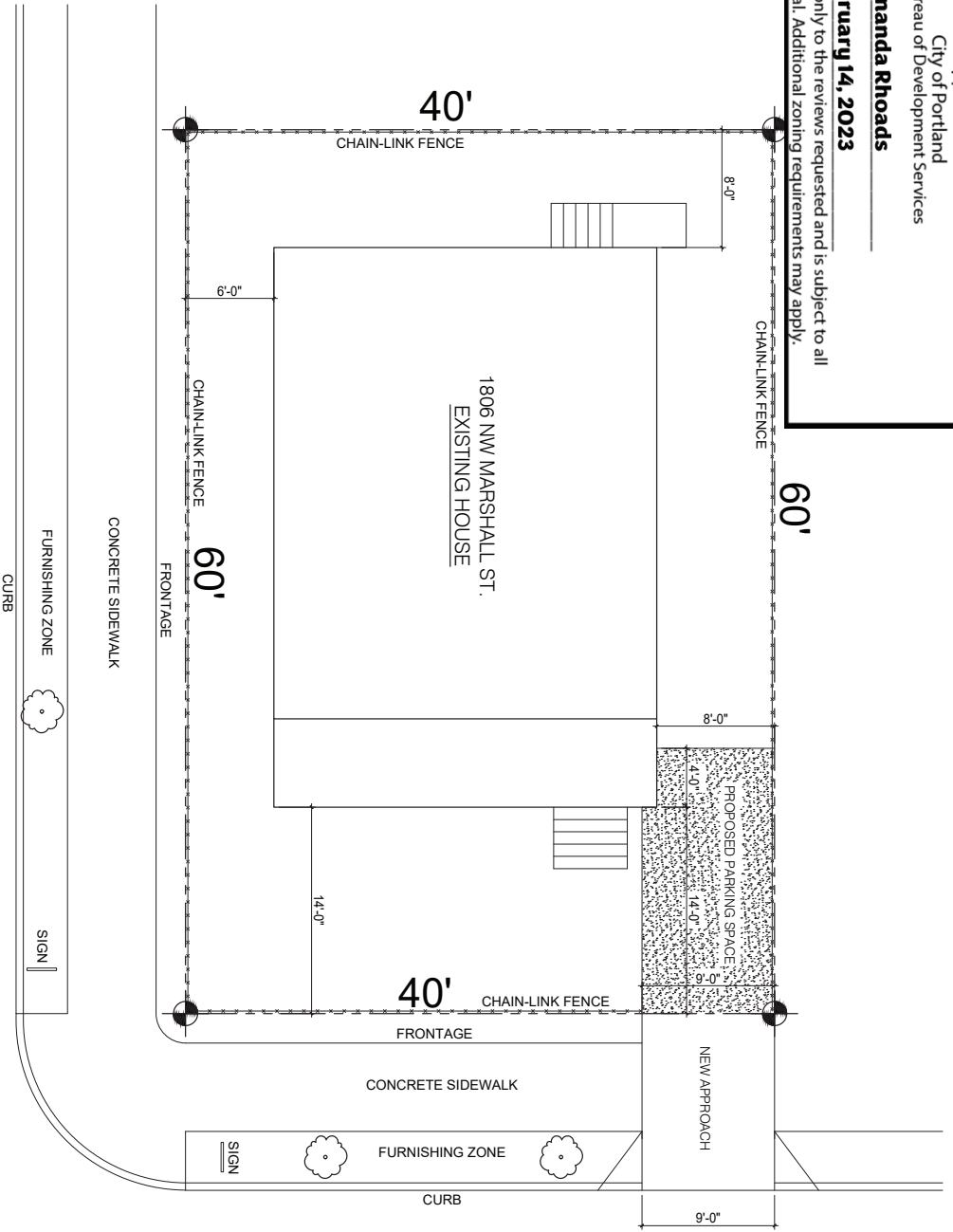
| | |
|-------------|------------------------------|
| File No. | <u>LU 22 - 205581 AD</u> |
| 1/4 Section | <u>2928</u> |
| Scale | <u>1 inch = 200 feet</u> |
| State ID | <u>1N1E33AB 7200</u> |
| Exhibit | <u>B</u> <u>Nov 22, 2022</u> |

Approved
 City of Portland
 Bureau of Development Services

Planner **Amanda Rhoads**

Date **February 14, 2023**

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



1

SITE PLAN

SCALE: 1/8" = 1'-0"



NW MARSHALL ST.

SITE PLAN

PROJECT NAME:
 The Adjustment
 1806 NW Marshall St.
 Portland, OR 97209
 OWNER:
 Alexandru Iaros

Revisions

Drawn & Checked By: Elson N.

Project Number:

Issue Date: 11-13-2022

Drawing File Name:

Sheet Number:

LU 22-205581 AD
 Exhibit C.1
A0



HM GROUP
 Architectural Design
 Elson Nguyen
 (971) 565-2067
 Elson.nguyen@hmg.com