

**Date:** April 22, 2011

To: Interested Person

From: Chris Caruso, Land Use Services 503-823-5747 / Christine.Caruso@portlandoregon.gov

# NOTICE OF A TYPE II DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The reasons for the decision are included in this notice. If you disagree with the decision, you can appeal it and request a public hearing. Information on how to appeal this decision is listed at the end of this notice.

# CASE FILE NUMBER: LU 11-114237 DZ 1129 SW WASHINGTON PLAZA STOREFRONT REMODEL

### **GENERAL INFORMATION**

Applicant:	Brad Simmons Waterleaf Architects 419 SW 11th Ave, #200 Portland, OR 97205
Representative:	Sharon Carver Courtyard Properties 2455 NW Marshall St #1 Portland, OR 97210
Owner:	Alix Nathan Mark Spencer Hotel 409 SW 11 <sup>th</sup> Avenue Portland, OR 97205
Site Address:	1129 SW WASHINGTON ST
Legal Description: Tax Account No.: State ID No.: Quarter Section: Neighborhood: Business District: District Coalition: Plan District: Zoning: Case Type: Procedure:	BLOCK 255 LOT 5&6 S 10' OF LOT 7, PORTLAND R667728290 1N1E33DD 01800 3028 Portland Downtown, contact Jennifer Geske at 503-750-9843. None Neighbors West/Northwest, contact Mark Sieber at 503-823-4212. Central City - Downtown RXd, Central Residential with design overlay DZ, Design Review Type II, an administrative decision with appeal to the Design Commission.

#### **Proposal:**

The applicant requests design review approval for a ground-level storefront remodel on the western half of the former Washington Hotel Building located at 1129 SW Washington Street, in the Downtown subdistrict of the Central City Plan District. The remodel features the following elements:

- Decorative built-up steel column covers;
- Aluminum-clad storefront sliding and fixed windows with transoms above;
  - Glass and metal canopies above two new recessed retail entries; and
- Options for future work including:
  - a. Glass and steel canopies at every ground level window bay;
  - b. New aluminum-clad wood windows and transoms along the eastern portion of the SW Washington Street façade; and
  - c. Louvers in place of transom windows at the middle of the west elevation.

Signs are not part of this proposal. Exterior renovations of buildings within the Central City Plan District must go through design review.

#### **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:

33.825 Design Review
 Central City Fundamental Design Guidelines

### ANALYSIS

**Site and Vicinity:** The Washington Plaza Apartment Building is a five-story, U-shaped structure on a quarter block bounded by SW 12<sup>th</sup> Avenue and SW Washington Street. The building was constructed in 1912 as the Washington Hotel, designed in the Second Renaissance Revival style by Lionel Deane. Detailed brickwork and a heavy cornice band highlight the upper four residential floors while the ground level is a mix of materials that has changed over time, but is now primarily glass and concrete covered with exterior plaster along with a few blacked out windows. The main entrance of this 11,000 sq. ft. site is on SW Washington. Directly to the east is the historic Telegram Building. The Mark Spencer Hotel is at the northeast corner of the block. Across SW SE 12th Avenue to the west and SW Washington to the south are surface parking lots. In general, the "West End" is a mix of older/historic buildings and surface parking. The site is within the Downtown Pedestrian District.

**Zoning:** The <u>Central Residential</u> (RX) zone is a high-density multi-dwelling zone which allows the highest density of dwelling units of the residential zones. Density is not regulated by a maximum number of units per acre. Rather, the maximum size of buildings and intensity of use are regulated by floor area ratio (FAR) limits and other site development standards. Generally the density will be 100 or more units per acre. Allowed housing developments are characterized by a very high percentage of building coverage. The major types of housing development will be medium and high rise apartments and condominiums, often with allowed retail, institutional, or other service oriented uses. Generally, RX zones will be located near the center of the city where transit is readily available and where commercial and employment opportunities are nearby. RX zones will usually be applied in combination with the Central City plan district.

The <u>"d" overlay</u> 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.

**Land Use History:** City records indicate three prior land use reviews for this site (LUR 91-00634 DZ, LUR 98-00714DZ and LUR 02-103133 DZ). Notably, in 2002, The Mark Spencer, The Washington Plaza, and the 1122 Building, all on the same block, received design review

approval for new canopies, new fabric awnings and new lighting (LU 02-103133 DZ). In 1998, design review approval was granted to install thirteen non-illuminated fabric awnings above existing storefronts and entries (LU 98-00714 DZ).

**Agency Review:** A "Notice of Proposal in Your Neighborhood" was mailed March 28, 2011. The following Bureaus have responded with no issues or concerns:

- Site Development Review Section of BDS
- Bureau of Environmental Services
- Bureau of Parks, Forestry Division
- Fire Bureau
- Water Bureau (Exhibit E-1)
- Life Safety Review Section of BDS (Exhibit E-2)
- Bureau of Transportation Engineering and Development Review (Exhibit E-3)

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on March 29, 2011. 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 33.825 Design Review Section 33.825.010 Purpose of Design Review

Design review ensures that development conserves and enhances the recognized special design values of a site or area. Design review is used to ensure the conservation, enhancement, and continued vitality of the identified scenic, architectural, and cultural values of each design district or area. Design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area. Design review is also used in certain cases to review public and private projects to ensure that they are of a high design quality.

#### Section 33.825.055 Design Review Approval Criteria

A design review application will be approved if the review body finds the applicant to have shown that the proposal complies with the design guidelines for the area.

**Findings:** The site is designated with design overlay zoning (d), therefore the proposal requires Design Review approval. Because of the site's location, the applicable design guidelines are the Central City Fundamental Design Guidelines.

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

These guidelines provide the constitutional framework for all design review areas in the Central City.

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.

**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.

**C4.** Complement the Context of Existing Buildings. Complement the context of existing buildings by using and adding to the local design vocabulary.

**Findings for A4, A5, A6 & C4:** The existing facades have windows that are hidden behind fiberboard panels and transoms that have been plastered over. The proposed continuous and consistent window pattern and new transoms along the ground level façade will unify the building with other buildings in the area that have a similar original character as well as with new buildings which have been designed with full glazing in their facades. Proposed steel column detailing will also help unify the ground level facades to the upper portion of the building with a character more in keeping with the original pilasters. The proposed contiguous storefront windows and transoms are a common feature of many older buildings in the area, including the adjacent Telegram Building. Including this feature in the proposed design of the Washington Plaza ground floor facades helps to stitch the base of this building back into the fabric of the neighborhood.

The proposed ground floor façade remodel allows the building to continue operating as a mixed-use residential structure while attracting quality, long-term tenants. With the continuous and consistent proposed window pattern, new transoms where the originals once were, and new detailing of the columns and cornice, the re-design of the Washington Plaza ground floor facades will better compliment other existing buildings in the area by being of a similar visual nature. *These guidelines are therefore 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.

B4. Provide Stopping and Viewing Places. Provide safe, comfortable places where people can stop, view, socialize and rest. Ensure that these places do not conflict with other sidewalk uses.
B7. Integrate Barrier-Free Design. Integrate access systems for all people with the building's overall design concept.

**Findings for A8, B4 & B7:** The proposed new continuous ground level windows, which include a number of sliding windows that open up entire bays to the street, will develop visual and physical connections into active interior spaces from the adjacent sidewalks. The full-height ground floor windows along the sidewalks will provide viewing opportunities for pedestrians to stop and look into the building's active spaces. The new canopies and multi-pane sliding windows will increase pedestrian activity at the street

edge and reinforce the pedestrian scale at the ground level and provide rain protection. The new proposed entry at the west façade will include an ADA accessible door and entry configuration. The south retail entry will also have an accessible door and entry configuration with an accessible ramp to the main floor level. *These guidelines are therefore met.* 

**B1.** Reinforce and Enhance the Pedestrian System. Maintain a convenient access route for pedestrian travel where a public right-of-way exists or has existed. Develop and define the different zones of a sidewalk: building frontage zone, street furniture zone, movement zone, and the curb. Develop pedestrian access routes to supplement the public right-of-way system through superblocks or other large blocks.

**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.

**Findings for B1, B2 & B6:** Existing pedestrian access routes along the adjacent sidewalks will be maintained with this proposal as will the different sidewalk zones. The proposed design creates new deeper recessed entries at several retail spaces and provides new metal canopies over each window bay, creating a consistent weather protection system above the public sidewalks along SW 12<sup>th</sup> Avenue and SW Washington Street. With the inclusion of the future optional canopies, this protection will continue along the entire building's street-facing façade. There is currently no vehicular access to the site and none is proposed so there will be no pedestrian-vehicle conflicts. Recessed light fixtures will be installed in the building soffits above both entries, and light fixtures at the pilasters all along the facades. Both of the proposed light fixture types will provide the sidewalk with ample lighting as well as highlight the entries. This increases the building's vitality and interest. Well-lit streets such as these will be, are safer and more inviting to use by pedestrians, promoting the 24-hour city concept. *These guidelines are therefore 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.

**Findings for C2, C3 & C5:** The proposed aluminum clad wood windows, doors, and transoms, the steel pilaster faces, steel and glass canopies, and cement plaster stucco are all materials proven to hold-up over time in urban environments that promote quality and permanence to the building's remodeled ground level. The proposed remodel will replace nearly all of the materials of the currently non-cohesive ground level façade with materials assembled and detailed in a manner reminiscent of the original design. Existing window bays will be retained along with the divisions between transoms and retail windows, creating a consistent rhythm of vertical and horizontal elements around the base of the building. The new materials do not detract from the remaining original upper floors and the proposed transom patterning replicates the divisions seen on the original building. The proposed development respects the existing structure by embellishing the main entrances with canopies and using exterior lighting to enhance existing architectural details such as the structural rhythm of the pilasters. *These guidelines are* 

#### therefore met.

**C7. Design Corners that Build Active Intersections.** Use design elements including, but not limited to, varying building heights, changes in façade plane, large windows, awnings, canopies, marquees, signs and pedestrian entrances to highlight building corners. Locate flexible sidewalk-level retail opportunities at building corners. Locate stairs, elevators, and other upper floor building access points toward the middle of the block.

**C8.** Differentiate the Sidewalk-Level of Buildings. Differentiate the sidewalk-level of the building from the middle and top by using elements including, but not limited to, different exterior materials, awnings, signs, and large windows.

**C9. Develop Flexible Sidewalk-Level Spaces.** Develop flexible spaces at the sidewalk-level of buildings to accommodate a variety of active uses.

**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 for C7, C8, C9 & C12:** The proposal marks the corner of SW 12<sup>th</sup> Ave and SW Washington St by incorporating large clear-glazed windows on both facades, allowing pedestrians to see through the building at the corner as well as view activity inside the space. An existing lighted corner sign that extends from the building at a 45 degree angle will remain, marking this corner as an important intersection. The proposed ground floor retail spaces are distinct from the upper floors through the use of large panes of clear storefront glazing, demarcation of upper and lower floors with horizontal canopies, and the installation of built-up steel pilaster covers. The upper floors feature regularly placed, smaller punched window openings and brick finishes that are clearly different from the ground level. Ground level spaces are designed to be easily changed in size with plenty of spaces within the structural bays for new doors or windows as uses demand over time. New light fixtures will highlight architectural features at the ground level through the installation of new up-down fixtures at each pilaster and recessed soffit lights at the entries. No new lighting will impact the City skyline. *These guidelines are therefore met.* 

#### **DEVELOPMENT STANDARDS**

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

#### **CONCLUSIONS**

The design review process exists to promote the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. The proposal respects the character and style of the Washington Plaza Building and new additions will positively contribute to the pedestrian streetscape and the nighttime ambiance of Downtown. The proposal meets the applicable design guidelines and therefore warrants approval.

#### **ADMINISTRATIVE DECISION**

Design review approval of a ground-level storefront remodel on the western half of the former Washington Hotel Building located at 1129 SW Washington Street, in the Downtown subdistrict of the Central City Plan District to include the following:

- Decorative built-up steel column covers;
- Aluminum-clad clear-glazed storefront with sliding and fixed windows plus transoms above;
- Glass and metal canopies above two new recessed retail entries; and
- Options for future work including:

- o Glass and steel canopies at every ground level window bay;
- New aluminum-clad wood windows and transoms along the eastern portion of the SW Washington Street façade; and
- Louvers in place of transom windows at the middle of the west elevation.

Approved per the approved site plans, Exhibits C-1 through C-10 signed and dated April 19, 2011, subject to the following conditions:

A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibits C.1-C.10. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 11-114237 DZ. No field changes allowed."

#### Staff Planner: Chris Caruso

Decision rendered by: Chris Cause on April 19, 2011. By authority of the Director of the Bureau of Development Services

#### Decision mailed: April 22, 2011

**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 February 17, 2011, and was determined to be complete on **March 24, 2011**.

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 February 17, 2011.

*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: July 22, 2011.** 

**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 Design Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on May 13, 2011** at 1900 SW Fourth Ave. Appeals can be filed Tuesday through Friday on the first floor of the Development Services Center until 3 p.m. After 3 p.m. and Mondays, appeals must be submitted to the receptionist at the front desk on the fifth floor. An appeal fee of \$250 will be charged. The appeal fee will be refunded if the appellant prevails. There is no fee for ONI recognized organizations appealing a land use decision for property within the organization's boundaries. The vote to appeal must be in accordance with the organization's bylaws. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Please see the appeal form for additional information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at <a href="https://www.portlandonline.com">www.portlandonline.com</a>.

**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 Design 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 550 Capitol St. NE, Suite 235, Salem, Oregon 97301, 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 Design 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 May 16, 2011 (the day following the last day to appeal).
- A building or zoning permit will be issued only after the final decision is recorded.

The applicant, builder, or a representative may record the final decision as follows:

- By Mail: Send the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to: Multnomah County Recorder, P.O. Box 5007, Portland OR 97208. The recording fee is identified on the recording sheet. Please include a self-addressed, stamped envelope.
- In Person: Bring the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to the County Recorder's office located at 501 SE Hawthorne Boulevard, #158, Portland OR 97214. The recording fee is identified on the recording sheet.

For further information on recording, please call the County Recorder at 503-988-3034 For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625. **Expiration of this approval.** An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

Zone Change and Comprehensive Plan Map Amendment approvals do not expire.

**Applying for your permits.** A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

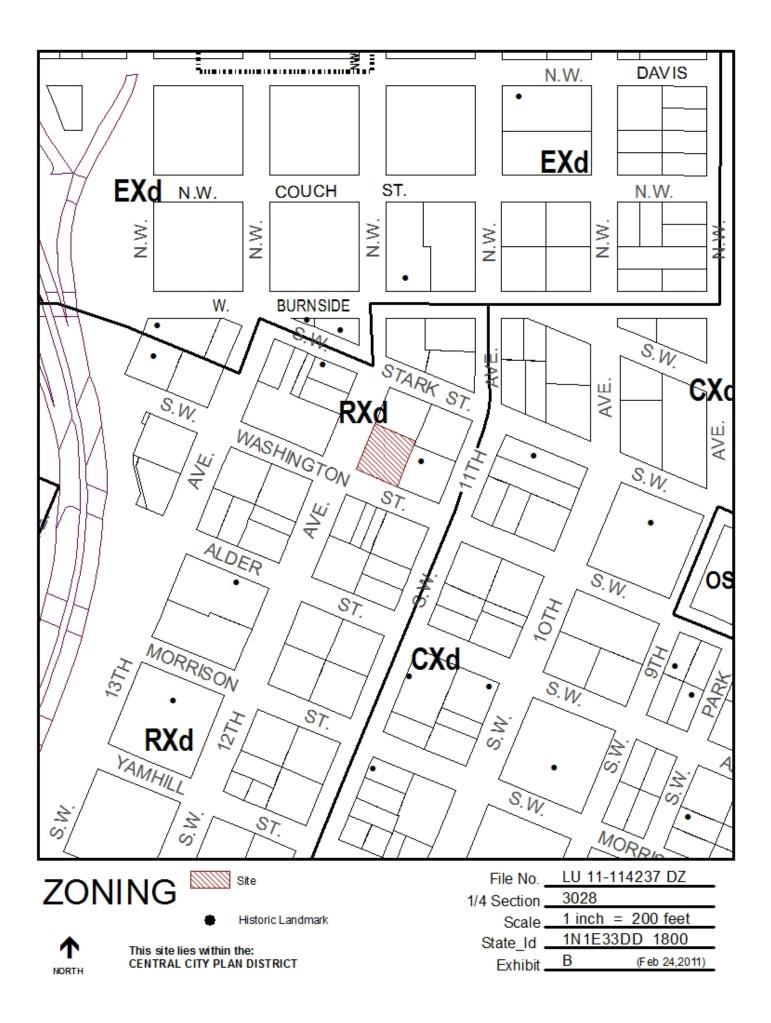
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations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

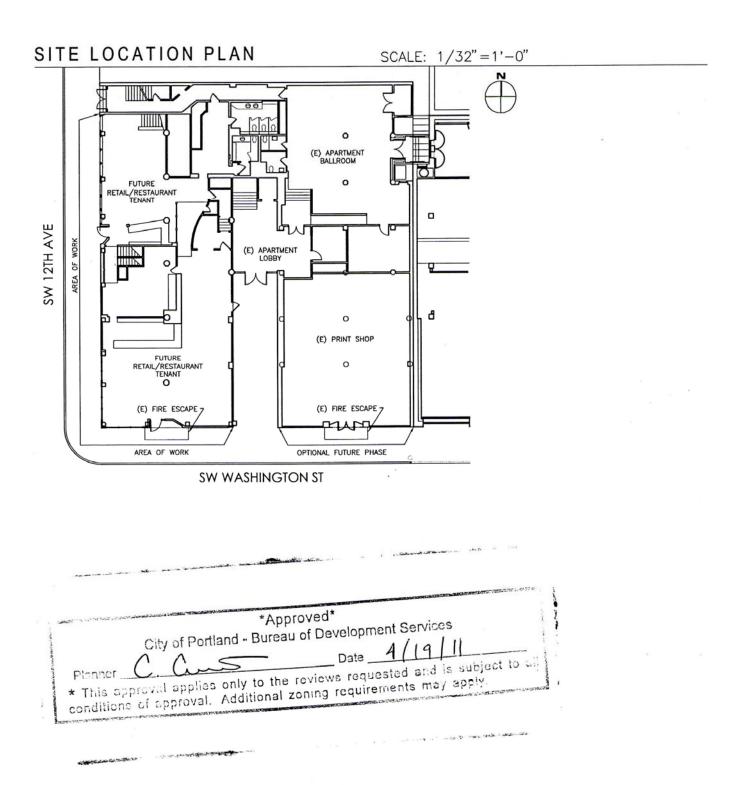
#### EXHIBITS

#### NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
  - 1. Site Plan (attached)
  - 2. Existing Photos, Exterior Renderings
  - 3. Proposed Plan & Elevations –West (attached)
  - 4. Proposed Plan & Elevations South (attached)
  - 5. Wall Sections, Enlarged Elevation
  - 6. Miscellaneous Details
  - 7. Sliding Window Details
  - 8. 3-D Details
  - 9. Lighting Cut Sheet & Colors
  - 10. Interior Long-Term Bicycle Room Plan
- D. Notification information:
  - 1. Mailing list
  - 2. Mailed notice
- E. Agency Responses:
  - 1. Water Bureau
  - 2. Life Safety Review Section of BDS
  - 3. Bureau of Transportation Engineering and Development Review
- F. Correspondence: none received
- G. Other:
  - 1. Original LU Application
  - 2. Site History Research
  - 3. Incomplete Letter
  - 4. Historic Resources Inventory listing

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).





## PROJECT TEAM

## PROJECT DE

OWNER

Washington Plaza Oregon Limited Represented by: Courtyard Properties 2455 NW Marshall, Suite 1 Portland, Oregon 97210 Contact: Sharon Carver Phone: 503-223-6260

#### ARCHITECT

Waterleaf Architecture 419 SW 11th Ave Suite 200 Portland, Oregon 97205 Contact: William S. Bailey, Partner Phone: 503-278-7571 Fax: 503-273-8891

#### CONTRACTOR

Bremik Construction, Inc. 1026 SE Stark Street Portland, Oregon 97214 Contact: Ben Carlson Phone: 503-688-1000 Fax: 503-688-1005 Exterior renovations to the sto the existing 1960's era exterior Remodel and restore exterior character and create a more appearance. Installation of u

Total Building Area:63,Area of Work:14

EXH. C-1

