Staff Summary Report



Development Review Commission Date: 03/12/08 Agenda Item Number: _____

SUBJECT: Hold a public meeting for a Development Plan Review for JENTILLY LANE located at 1717

South Jentilly Lane.

DOCUMENT NAME: DRCr_JenTilly _031208 PLANNED DEVELOPMENT (0406)

SUPPORTING DOCS: Yes

COMMENTS: Request for **JENTILLY LANE (PL070421)** (NuVida #1 LLC, Rich Amon, property owner; Dana

Burkhardt, BSB Design, applicant) for a new +/- 64,033 s.f. housing development consisting of 33 units on approximately +/- 1.47 net acres located at 1717 South Jentilly Lane, in the R-4,

Multi-Family Residential District, including the following:

DPR08013 – Development Plan Review including building elevations, site plan and landscape

plan.

ZUP08019- Use Permit to allow tandem parking for thirteen (13) units within a new residential

development

PREPARED BY: Sherri Lesser, Senior Planner (480-350-8486)

REVIEWED BY: Lisa Collins, Planning Director (480-350-8989)

LEGAL REVIEW BY: N/A

FISCAL NOTE: N/A

RECOMMENDATION: Staff – Approval, subject to conditions (1-15).

ADDITIONAL INFO:

Location:

East of Rural Road and North of Broadway; on the west side of

JenTilly Lane

Current land use: Residential

Current zoning: R-4, Multi-family Residential District.

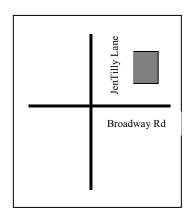
Existing uses: Vacant Land Gross/Net site area 1.47 acres
Total Building area 64,033 s.f.

Lot Coverage 34% (60% maximum in R-4)
Building Height 36 ft (40ft maximum in R-4)
Building setbacks 20' front, 10' side, 10' rear
Landscaped area 35% (25% minimum required)

Vehicle Parking 79 spaces (79 min. required, 7 guest) Bicycle Parking 28 spaces (28 minimum required)

Number of Units 33

A neighborhood meeting is not required with this application.



PAGES: 1. List of Attachments

- 2-3. Comments / Reason for Approval
- 4. Conditions of Approval5. Code Requirements
- 6. History & Facts / Zoning & Development Code Reference

ATTACHMENTS: 1. Location Map(s)

- 2. Aerial Photo(s)
- 3-5. Letter of Explanation(s)
- 5. Site plan A1.1
- 6. Landscape Plan A1.2
- 7. Landscape Plan A1.3
- 8. Floor Plan A2.1
- 9. Floor Plan A2.2
- 10. Floor Plan A2.3
- 11. Elevations A3.1
- 12. Colored Elevations A3.2
- 13. Building Sections A3.3
- 14. Conceptual Grading and Drainage Plan
- 15-20. Context Pictures

COMMENTS:

The applicant is seeking approval of a thirty-three (33) unit "for sale" condominium townhouse project located east of Rural and North of Broadway Road on JenTilly Lane. The request includes Development Plan Review of the building elevations, site plan, landscape plan and preliminary grading and drainage plan plus a use permit to allow thirteen (13) of the units to utilize tandem parking to meet the minimum parking requirements for the site.

USE PERMIT

The Zoning and Development Code Section 4-602 allows tandem parking, in multi-family zoning districts, subject to a use permit. Of the thirty-three (33) units; thirteen (13) will have garages designed to accommodate tandem parking. According to the applicant; the units that utilize tandem spaces are the smallest units with compact efficient floor plans geared toward the entry level homebuyer. All of the other units are designed with garages to accommodate two side by side spaces within the garages. Thirteen on-site surface parking spaces are proposed; with the availability of nine (9) on-street parking spaces in front of the complex.

Evaluating the use permit, the proposal appears to pass the use permit test listed below:

- a. Any significant increase in vehicular or pedestrian traffic in adjacent areas;
 - There will be no significant increase in vehicular or pedestrian traffic in adjacent areas.
- b. Nuisance arising from the emission of odor, dust, gas, noise, vibration, smoke, heat, or glare at a level exceeding that of ambient conditions;
 - This use, with conditions, should not create nuisances for the surrounding area.
- Contribution to the deterioration of the neighborhood or to the downgrading of property values which is in conflict with the goals, objectives or policies for rehabilitation, redevelopment or conservation as set forth in the City's adopted plans, or General Plan;
 - The tandem parking for a portion of the complex will not contribute to neighborhood deterioration or downgrade property values. This use permit request is consistent with the General Plan 2030's Land Use Element. The requested use permit will not be detrimental to the surrounding area. There are surface parking spaces available on site as well as on the street to mitigate any potential nuisance associated with garage tandem parking.
- d. Compatibility with existing surrounding structures and uses;
 - The proposed use appears to be compatible with surrounding uses.

DEVELOPMENT PLAN REVIEW

Site Plan

The site plan layout configures the thirty (33) unit development into four (4) sections of dwellings which front the street; abut the north property line and surround an interior court yard including a pool amenity/recreational area. The three story units feature a front porch entry and individual garages with thirteen (13) on-site surface spaces (seven required to meet guest requirement). A pedestrian paths link the individual units to the street front.

Building Elevations

The proposed development features building elevations designed in the character of traditional neighborhood design with enhanced architectural features at the pedestrian level. The mass of the three story elevations are divided into smaller components which include a front porch with a shade structure over the entries; offsets in the second and third floors; trim to accent windows and upgraded garage doors. The building materials are a sand-finished stucco with metal accents and a brick veneer at varying heights on the first and second floors. Preliminary site plan review comments on the elevations requested that the applicant raise the parapet to screen the mechanical equipment, in lieu, of the secondary screen originally shown on the elevations.

Landscape Plan

The landscape plan features a palette of low-water use trees and plants which have a rapid growth rate. The placement to the trees will provide shade for the internal pedestrian paths and surface parking areas.

Section 6-306 D Approval Criteria for Development Plan Review

- 1. The placement of building reinforces the street wall and maximizes natural surveillance and visibility of pedestrian areas (building entrances, pathways, parking areas, etc.), enhances the character of the surrounding area, facilitates pedestrian access and circulation.
- 2. Materials are compatible with the surroundings
- 3. Buildings and landscape elements have proper scale with the site and surroundings
- 4. Large building masses are divided into smaller components that create a human-scale as viewed from the sidewalk
- 5. The building has a distinct base and top, as identified by ground floor elements, roof forms, and detailing.
- 6. Building facades have architectural detail and contain windows at the ground level to create visual interest and to increase security of adjacent outdoor spaces by maximizing natural surveillance and visibility
- 7. Clear and well lighted walkways connect building entrances to one another and to adjacent sidewalks.
- 8. Lighting is compatible with the proposed building and uses, and does not create negative effects.
- 9. Accessibility is provided in conformance with the Americans with Disabilities Act (ADA).
- 10. Vehicular circulation is designed to minimize conflicts with pedestrian access and circulation, and with surrounding residential uses. Traffic impacts are minimized in conformance with the city transportation policies, plans and design criteria.
- 11. Safe and orderly circulation separates pedestrian and bicycles from vehicular traffic.
- 12. Plans appropriately integrate crime prevention principles such as territoriality, natural surveillance, access control, activity support, and maintenance.
- 13. Landscape accents and separates parking, buildings, driveways and pedestrian walkways.

PUBLIC INPUT

No public input received to date.

Conclusion

Based on the information provided by the applicant and the above analysis, staff recommends approval of the requested Development Plan Review and use permit. This request meets the required criteria and will conform to Conditions 1-15.

REASONS FOR APPROVAL:

- 1. The project meets the General Plan Projected Land Use and the goals and objectives of the plan.
- 2. The project will meet the development standards required under the Zoning and Development Code.
- 3. The proposed project meets the approval criteria for a Development Plan Review.
- 4. The proposed project meets the approval criteria for a Use Permit.

ZUP07118 CONDITIONS OF APPROVAL

EACH NUMBERED ITEM IS A CONDITION OF APPROVAL. DEVELOPMENT REVIEW COMMISSION MAY MODIFY, DELETE OR ADD TO THESE CONDITIONS.

- 1. The use permit for tandem parking approved for thirteen (13) units total any intensification or expansion of this use shall require the applicant to return to the appropriate decision-making body for a new use permit.
- 2. If there are any complaints arising from the use permit that are verified by a consensus of the complaining party and the City Attorney's office, the use permit will be reviewed by city staff to determine the need for a public hearing to re-evaluate the appropriateness of the use permit.
- Process CCR's, covenant code and restrictions, for the development which includes language regarding the management of guest and surface parking spaces.

DPR08013 CONDITIONS OF APPROVAL

EACH NUMBERED ITEM IS A CONDITION OF APPROVAL. DEVELOPMENT REVIEW COMMISSION MAY MODIFY, DELETE OR ADD TO THESE CONDITIONS.

General

4. Process a subdivision plat (condominium) and CCR review prior to approval of building permit.

Site Plan

- 5. Provide upgraded paving at entire driveway consisting of clay or concrete unit paving. Detail unit paving to accept weight of emergency vehicles and turn action of full size vehicles maneuvering into the garages and the guest spaces. Provide unit paving of color that contrasts with the uncolored accessible concrete walkway pavement and compliments the color of the buildings. If possible, detail unit pavement to be porous to improve site water retention and potentially reduce heat retention.
- 6. Updated driveway entrance to be coordinated with the property located to the south in order to maintain access for existing parking spaces.

Floor Plans

7. Flexible space shown on floor plans not to become future bedrooms without providing additional parking spaces.

Building Elevations

8. The materials and colors presented are approved as presented:

Main Body sand stucco painted "Pale Beach" DE 6199 (Beige).

Metal pop-outs and accents painted "Teddy Bear" DE 6131 (Brown)

Stucco Veneer- El Dorado Stone Roma Brick, Bracciano (Red)

Except that main colors and materials that exceed light reflectance value of 75 percent shall be revised to be not greater than 75 percent. Specific colors and materials exhibited on the materials sample board are approved by planning staff. Submit any additions or modifications for review during building plan check process. Planning inspection staff will field verify colors and materials during the construction phase.

- 9. Provide rain gutters to convey water off roof and away from pedestrian walkways and entrances. Roof areas that do not directly affect walkways and entrances are not required to be guttered. Incorporate gutters into elevations and conceal downspouts to enhance the character of the residences.
- 10. Incorporate lighting, address signs, incidental equipment attachments (alarm klaxons, security cameras, etc.) where exposed into the design of the building elevations so that the architecture is enhanced by these elements.
- 11. All transformer boxes, meter panels and electrical equipment, backflow valves, and other utility equipment shall be painted to match the adiacent building color.
- 12. Exposed conduit, piping, etc. is not allowed unless a creative conduit surface design that compliments the architecture is reviewed and approved by the Development Review Commission.

Lighting

- 13. Design security (dusk to dawn) lighting that enhances the small-scale residential character of Jentilly Lane.
 - i. As part of the common area security light package, consider the use of unshielded light sources, such as maximum 50 watt incandescent or equivalent lights in "jelly jar" or similar fixtures.
 - ii. Do not install pole lights on site.
 - iii. Illuminate the common tract with building mount lights, and if necessary, with bollards.
 - iv. Generally, keep security light sources below the height of second floor window sills.
- 14. Illuminate each residential front entrance and garage door from dusk to dawn as part of the common area security light package.

Landscape

15. Top dress planting areas with a rock or decomposed granite application. Provide rock or decomposed granite of 2" uniform thickness or less. Provide pre-emergence weed control application and do not underlay rock or decomposed granite application with plastic.

CODE / ORDINANCE REQUIREMENTS

THE BULLETED ITEMS REFER TO EXISTING CODE OR ORDINANCE THAT PLANNING STAFF OBSERVES ARE PERTINENT TO YOUR CASE. THE BULLET ITEMS ARE INCLUDED TO ALERT THE DESIGN TEAM AND ASSIST IN OBTAINING A BUILDING PERMIT. THESE ITEMS ARE NOT AN EXHAUSTIVE LIST.

Specific requirements of the Zoning and Development Code are not listed as a condition of approval, but will apply to any
application. To avoid unnecessary review time, and reduce the potential for multiple plan check submittals, it is necessary that the
applicant be familiar with the Zoning and Development Code (ZDC), which can be accessed through www.tempe.gov/zoning, or
purchased at Development Services.

LENGTH OF APPROVAL

 Your drawings must be submitted to the Development Services Building Safety Division for building permit by March 12, 2009 or Development Plan approval will expire

SITE PLAN REVIEW:

Verify all comments by the Public Works Department, Development Services Department, and Fire Department given on the
Preliminary Site Plan Reviews dated September 26, 2007 and January 30, 2008. If questions arise related to specific comments,
they should be directed to the appropriate department, and any necessary modifications coordinated with all concerned parties,
prior to application for building permit. Construction Documents submitted to the Building Safety Department will be reviewed by
planning staff to ensure consistency with this Design Review approval prior to issuance of building permits.

PLAT

• A Subdivision Plat is required for Jentilly Lane to create the thirty three (33) "for sale" properties. Separately process the Subdivision Plat through City Council. Complete the drawing format to the satisfaction of Development Services and Public Works Departments staffs. After the Plat is approved by City Council and the exhibits are signed, record the subdivision plat with the Maricopa County Recorder's Office through the Development Services Department. Complete the recordation prior to issuance of building permits, or as allowed by the Building Safety Division.

CC & R

CC&R: Continuing Care Condition, Covenant and Restriction is required for the features of Jentilly Lane that are held in common, including (but not limited to) maintenance of project's common area security lighting, domestic water, private sanitary sewer, site water retention system, landscape and landscape watering system, drive aisles, entrance walkway, guest parking spaces, refuse collection and refuse container storage. The CC&R's shall be reviewed and configured in a form satisfactory to Planning Staff and the City Attorney. After the CC&R's are in a satisfactory configuration, they shall be signed, including by the Development Services Director and City Attorney, and shall be recorded with Maricopa County Recorder's Office through the Development Services Department. Except as allowed by the Building safety Division, a Certificate of Occupancy shall not be granted until CC&R's are completed and recorded.

STANDARD DETAILS:

• Tempe Standard "T" details may be accessed through www.tempe.gov/engineering or purchased from the Engineering Division, Public Works Department.

FIRE: (Jim Walker 480-350-8341)

- Fire lanes need to be clearly defined. Ensure that there is at least a 20'-0" horizontal width, and a 14'-0" vertical clearance from the fire lane surface to the underside of tree canopies; or overhead structure, if allowed by Fire Department. Details of fire lane(s) are subject to approval of the Fire Department.
- Location of roll out containers on collection day not to encroach into fire lanes.

ENGINEERING AND LAND SERVICES:

• 100 year onsite retention required for this property, coordinate design with requirements of the Engineering Department.

LIGHTING:

- Follow requirements of ZDC Part 4 chapter 8
- Follow the guidelines listed under appendix E "Photometric Plan" of the Zoning and Development Code.
- Indicate the location of all exterior light fixtures on the site, landscape (and photometric) plans. Avoid conflicts with lights in order to maintain illumination levels for exterior lighting.
- Indicate locations of accent lighting and security lighting that will be mounted to building or provided in parking areas; provide a photometric plan and cut sheets for fixtures for planning plan check approval.

SIGNS:

Obtain sign permit for any identification signs.

ADDRESS SIGNS:

- Provide minimum 50 percent contrast between address sign and the underlying surface.
- Direct or Halo illuminate (back light) each address sign. Obtain sign permit for halo illumination of address signs.

HISTORY & FACTS:

March 30, 1988 The existing apartment complex constructed, circa 1967, was destroyed by fire.

November 15, 1988 The Hearing Officer approved a use permit for the Villas to a re-build a nonconforming apartment complex

damaged by fire at 1717 S. Jentilly Ln, subject to conditions.

December 21, 1988 The Design Review Board approved building elevations, site plan and landscape plan for The Villas,

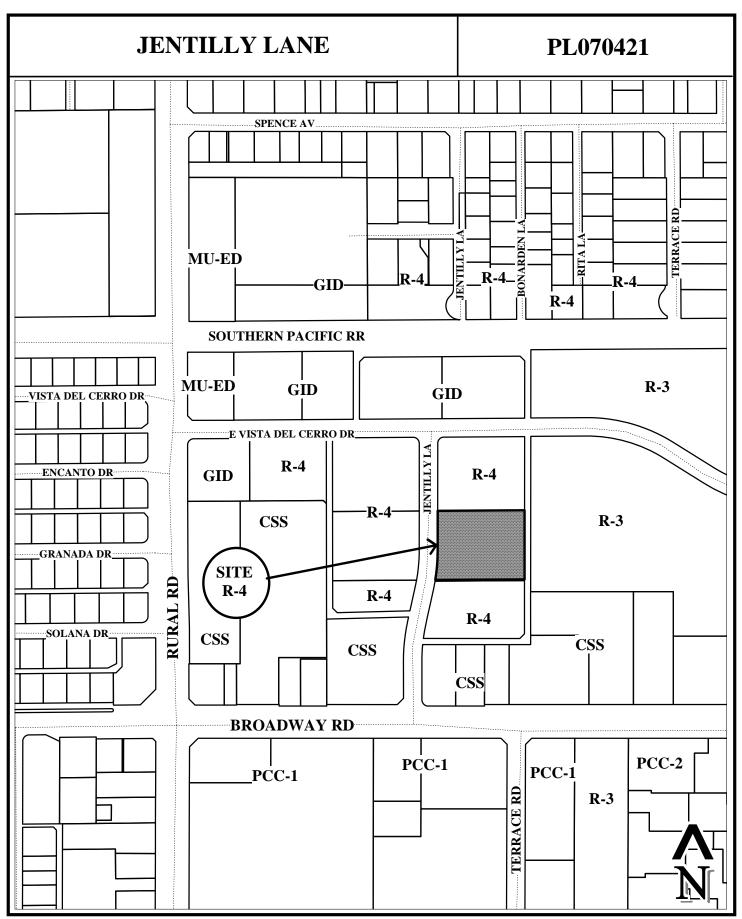
subject to conditions.

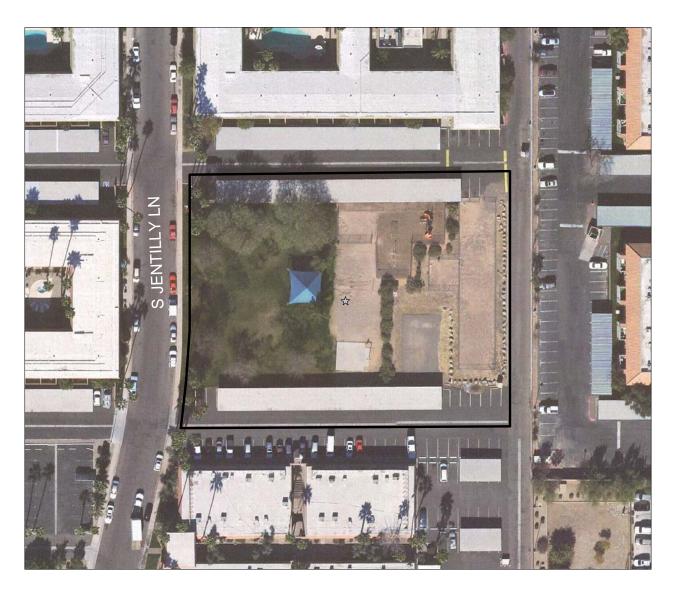
*the use permit expired after one year and the land remained vacant.

ZONING AND DEVELOPMENT CODE REFERENCE:

Section 6-306, Development Plan Review







JENTILLY LANE (PL070421)



January 22, 2008

Chairman & Commissioners
Development Review Commission
City of Tempe
31 E. Fifth St.
Tempe, AZ 85280

RE: "Jentilly Lane" Development Plan Review; Letter of Explanation

Dear Chairman & Commissioners:

BSB Design, acting on behalf of Jentilly Lane, LLC, is pleased to submit a Development Plan Review Application for the property consisting of approximately 1.47 acres located north of the NEC of Broadway Road and Jentilly Lane, aka Assessor Parcel Number 133-11-011B. We respectfully submit this letter of explanation as part of the Development Plan Review Application. A proposed site plan and conceptual building elevations are also included with this application.

The goal for this project is to create a vibrant "for sale" urban townhome community for students, young professionals, and active empty nesters. The proposed residential project includes a total of 33 (three-story townhome style) condominium units for a total density of 22.5 units per acre, where zoning allows up to 25 dwelling units per acre. The site is centrally located to the university, public transportation, and within walking distance to shopping and entertainment.

The design concept presents a traditional neighborhood design utilizing three story townhome condominiums with front porch entries along Jentilly Lane and the abutting development drive aisle to the north. The internal drive aisle design provides a traditional neighborhood alley load concept where each front porch entry either fronts the abutting street/drive aisle or the internal open space amenity. Each building orientation exposes the front porches and entries of each unit to the public and maximizes natural surveillance and visibility of the pedestrian areas. In addition, the proposed building architecture, orientation, and site design enhances the character of the surrounding 30 to 40 year old apartments and commercial office building, and facilitates pedestrian access and circulation and mitigates heat gain and retention through:

- a. The majority of the proposed townhome condominium units are oriented north-south and have window awnings to minimize the solar heat gain;
- b. Materials shall include sand-finished stucco with metal accents;
- c. Proposed three story buildings are consistent with new development in this area and provide a variety of building mass situated within the surrounding two story apartments and commercial office building. All sidewalks are shaded with drought tolerant tree species;
- d. Large building masses are divided into smaller components by use of covered entries and one and two story brick veneer accent elements that create a human scale as viewed from the sidewalk;
- e. Buildings have a clear base and top, ground floor elements are predominately brick veneer, central building elements are typically recessed balconies and metal accent panels, and building tops are primarily sand finished stucco with some metal panel accents and a trim capped undulating roof parapet, with mechanical screen wall beyond;
- f. Building facades have architectural detail and contain windows at the ground level and porches to create visual interest and to increase security of adjacent outdoor spaces by maximizing natural surveillance and visibility;

- g. Special treatment to front doors has been given by providing a forward entry floor plan and a side entry floor plan, both doors have a panel design and are painted in the accent color. Also, where a side entry door is provided, a lower level 6030 window is designed for viewing onto the porch and to allow light into the ground level. All pedestrian ways are bordered by low level shrubs and accent plantings;
- On-site utilities are provided and are placed underground;
- i. Walkways are well lighted by use of wall sconces on each porch and along the side elevations. The garage side is illuminated by a combination of pendulum lights over the garages and recessed can lights where the second floor cantilevers over the garage door;
- j. Accessibility is provided in conformance with the Americans With Disabilities Act (ADA);
- k. Plans take into account pleasant and convenient access to multi-modal transportation options along Broadway Road and Vista del Cerro Road, and support the potential for transit patronage:
- I. Vehicular circulation is designed to minimize conflicts with pedestrian access and circulation, and utilizes the existing curb cuts and access ways abutting the site. Traffic impacts are minimized, in conformance with city transportation policies, plans, and design criteria within reasonable expectations.
- m. Safe and orderly circulation separates pedestrian and bicycles from vehicular traffic. The proposed project is consistent with the Tempe Pedestrian and Bicycle Facility Guidelines, contained in the Comprehensive Transportation Plan. Bicycle storage is provided in the ground level of each residence;
- n. Plans appropriately integrate crime prevention principles such as territoriality by use of definitive project boundaries delineated by the abutting street, alley, and shared access way. Natural surveillance is addressed by the introduction of outdoor livable areas such as balconies and porches and also windows on all sides of the buildings. Access control is established by obvious points of entry to the site, all of which are clearly visible from the residences. The open spaces, pool amenity, and pedestrian connections provide passive activity support. A homeowners association will be created to enforce deed restrictions and to maintain the property in good repair;
- o. Landscaping accents and planters separate parking, buildings, driveways and pedestrian walkways;
- p. Lighting is compatible with the proposed buildings and adjoining buildings and uses, and does not create negative effects.

In conjunction with this Development Plan Review Application, the applicant also requests a special use permit to allow tandem garage parking for 9 of the 33 dwelling units.

The proposed design is consistent with the density, building height, intensity, and general land use as designated by the City of Tempe zoning and land use maps and policies. Accordingly, the applicant believes the request set forth above is consistent with the goals and policies adopted by the city as well as the surrounding land uses. If you have any questions, I can be reached by email at dburkhardt@bsbdesign.com or by telephone at (480) 663-2104.

Respectfully,

Dana Burkhardt, AICP



February 1, 2008

Chairman & Commissioners **Development Review Commission** City of Tempe 31 E. Fifth St. Tempe, AZ 85280

RE:

Jentilly Lane; SPR #08005 Tandem Parking Use Permit Request

Dear Chairman & Commissioners,

BSB Design, acting on behalf of Jentilly Lane, LLC, is pleased to submit this "Letter of Explanation" for a use permit request to allow tandem vehicle parking at our Jentilly Lane project. Section 4-602(D)(1) of the City of Tempe Zoning and Development Code requires a use permit for tandem parking in zoning districts other than single family residential districts. The Zoning Ordinance permits tandem parking in single family residential districts.

The overall project provides a total of 33 condominium "townhome" style units, each designed with a fully enclosed two car garage. Thirteen (13) of the units consist of two bedrooms with a two car tandem garage condition. The site design conforms to the required on-site number of parking spaces designated for residents and guests and the stall design is consistent with the standards of the Zoning Code.

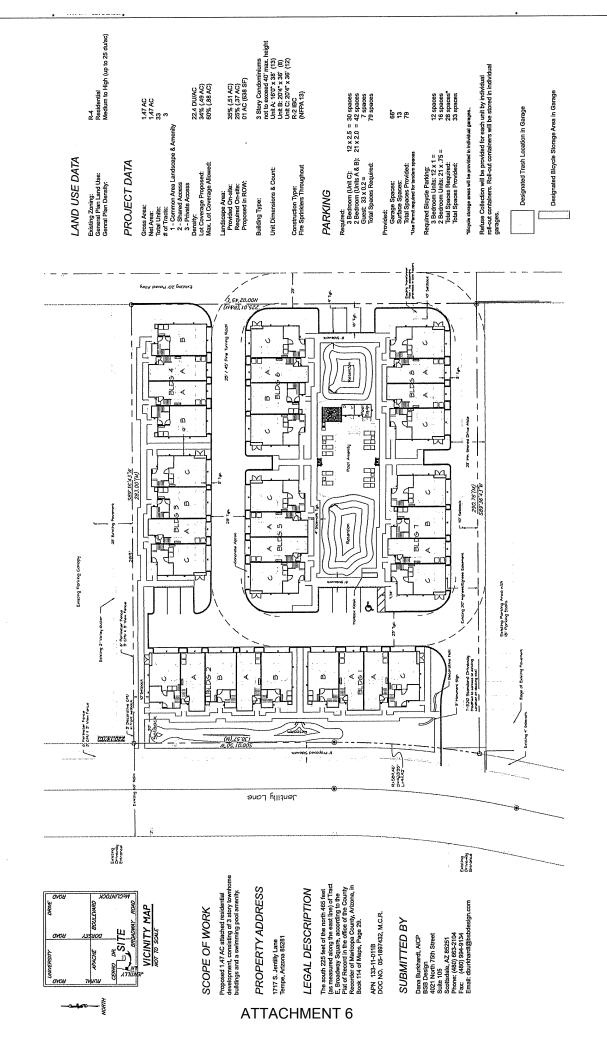
The project is designed to provide three (3) varied condominium floor plans for perspective owners to choose from. Floor Plan A is a 1,231 sf two bedroom, two car tandem garage unit; Floor Plan B is a 1,338 sf two bedroom, two car side-by-side garage unit, and; Floor Plan C is a 1,590 sf three bedroom, two car side-by-side garage unit. The smallest unit (Plan A) was designed with a two car tandem garage to introduce a compact and efficient floor plan for the entry level homebuyer. The tandem parking spaces are solely designated for the units they serve and are not necessary to meet the required guest parking. It should also be noted that approximately nine (9) on street parallel parking spaces can be accommodated along the abutting Jentilly Lane street frontage.

Tandem parking is an efficient design solution that allows developers to build tandem garages, rather than the traditional two-door garage, which provides an opportunity for residential complexes to be more creatively built. This project is conveniently located near the university, shopping, and public transportation. Automobiles are not a necessity for mobility in this area, conceivably, not all residents of this development will use an automobile every day or own an automobile.

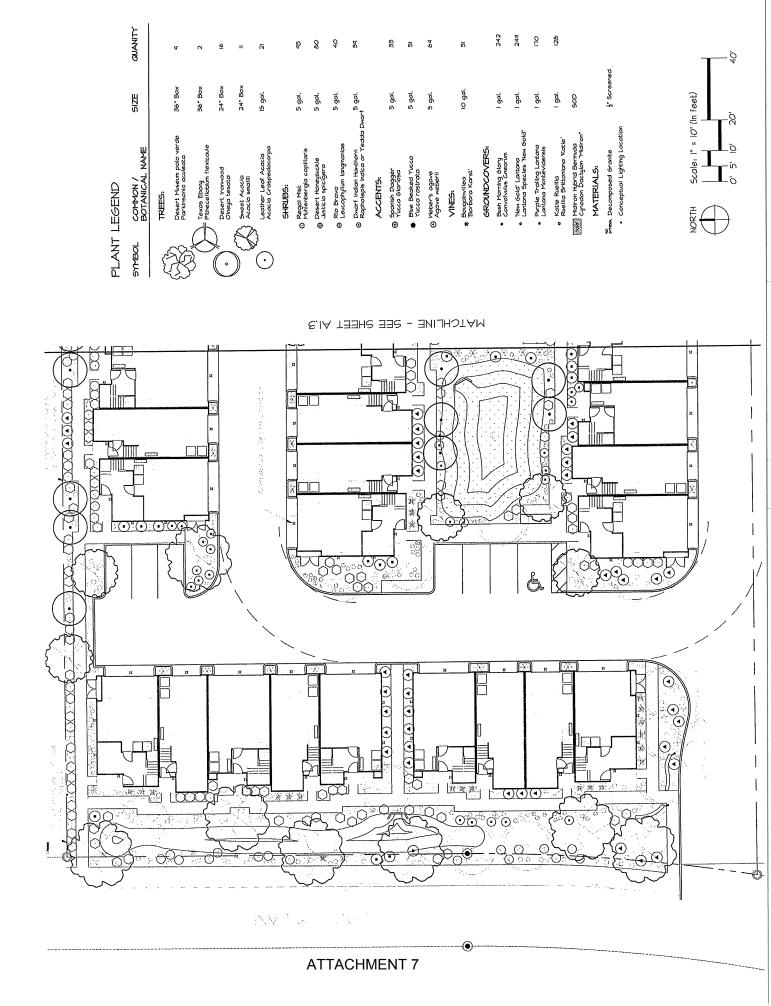
Approval of tandem parking clearly will not cause significant vehicular or pedestrian traffic in adjacent areas, nuisance from odor, noise, heat, dust, gas, vibration, smoke, or glare in excess of ambient conditions, contribute to the deterioration of the neighborhood or property values, and will not result in any disruptive behavior inside and outside the premises. The proposed development and use is compatible with the existing surrounding structures. The use of tandem parking is simply a space efficient design compatible with urban residential projects. We respectfully request a use permit for tandem parking.

Respectfully,

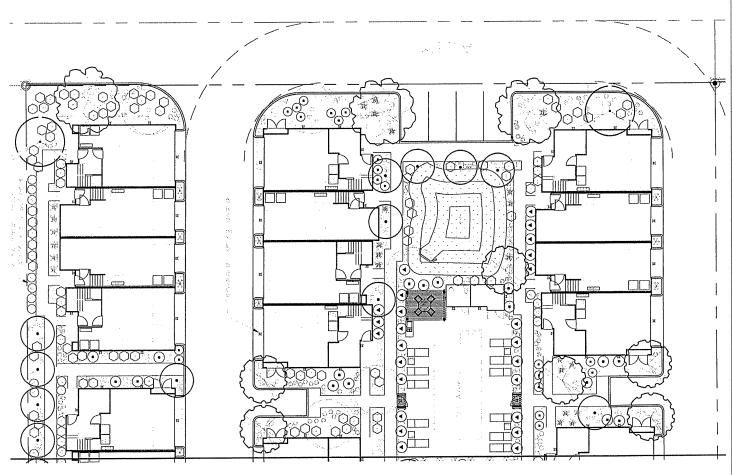
Dana Burkhardt, AICP



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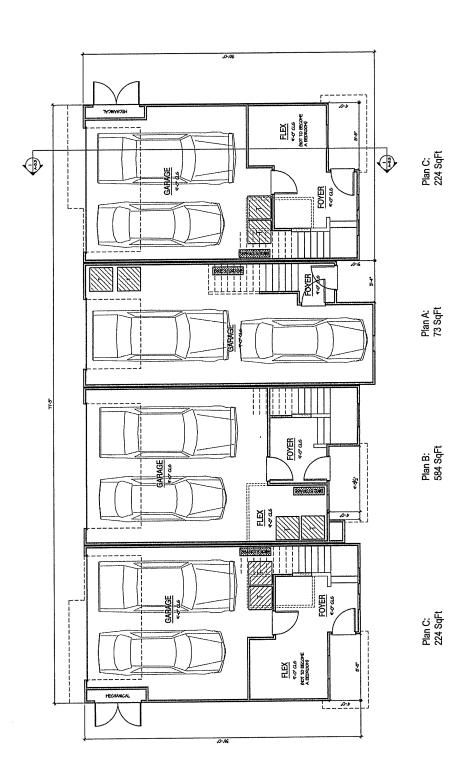
QUANITY 242 249 249 5 SIZE Scale: 1" = 10' (In feet) Conceptual Lighting Locatio Desert Museum palo verde Parkinsonia aculeata COMMON / BOTANICAL NAME O Rio Bravo Leucophylium langmanlae Purple Trailing Lantana Lantana Montevidensis O Regal Mist Muhlenbergia copillaris GROUNDCOVERS New Gold' Lantana Lantana Species 'New Dwarf Indian Hawthon Rapholepis Indica or Bush Morning Glory Convolvulus Cneorum Desert HoneysuckleJusticia spicigera MATERIALS: ⊕ Spanish Dagger Yucca Glorlosa Weber's agave
 Agave weber!! ACCENTS: PLANT LEGEND SYMBOL



AATCHLINE - SEE SHEET AI.2



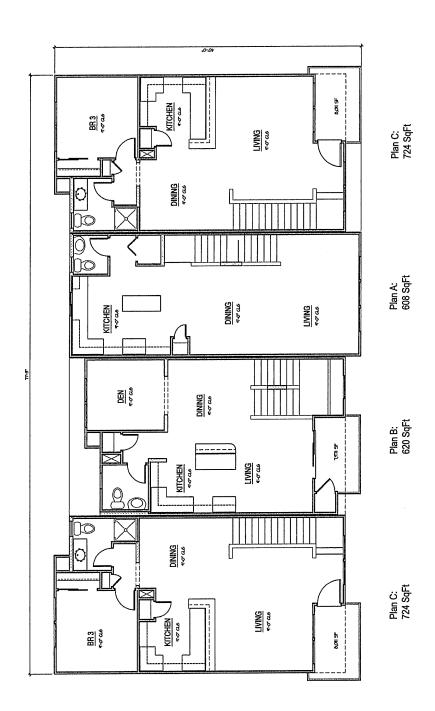
Total SqFt Per Unit Type
Unit Type 1,231
Unit B 1,338
Unit C 1,590



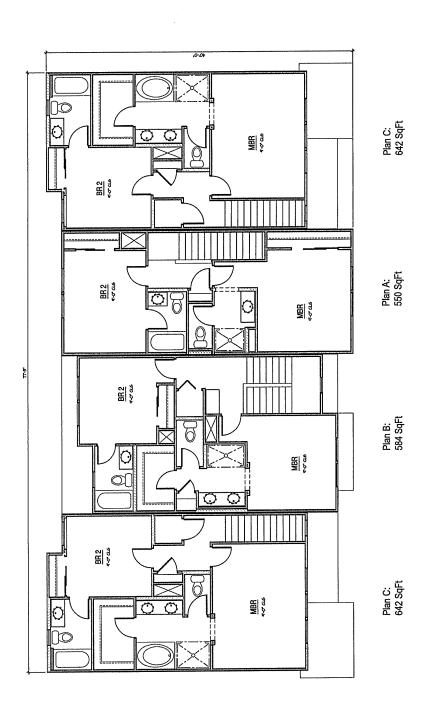
4-Unit Building - Total Livable SqFt FIRST FLOOR







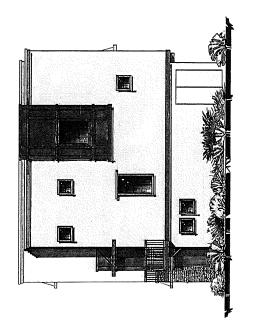
4-Unit Building - Total Livable SqFt SECOND FLOOR



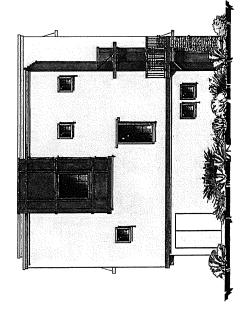
4-Unit Building - Total Livable SqFt THIRD FLOOR



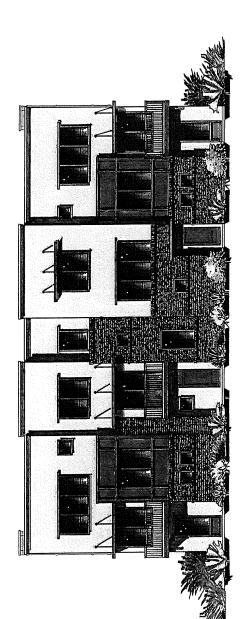




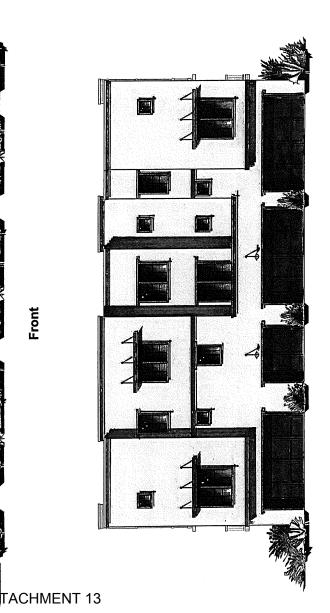
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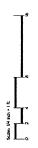
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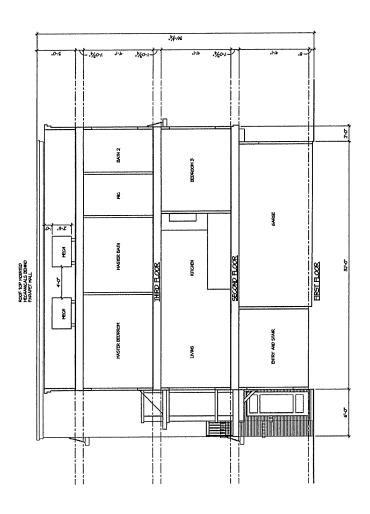


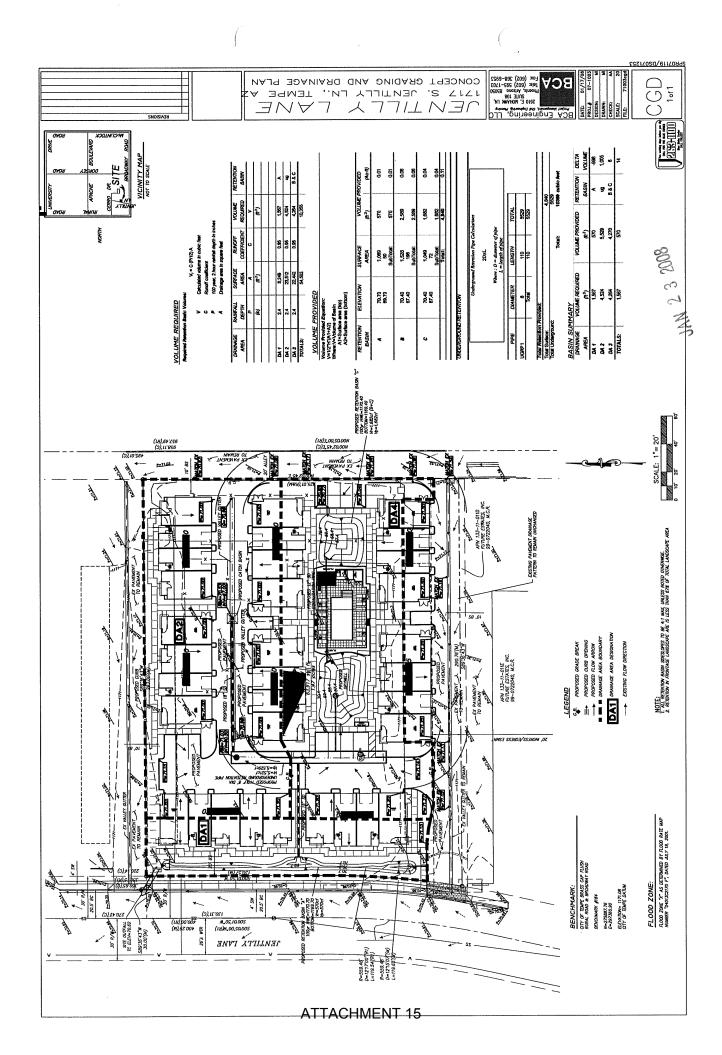
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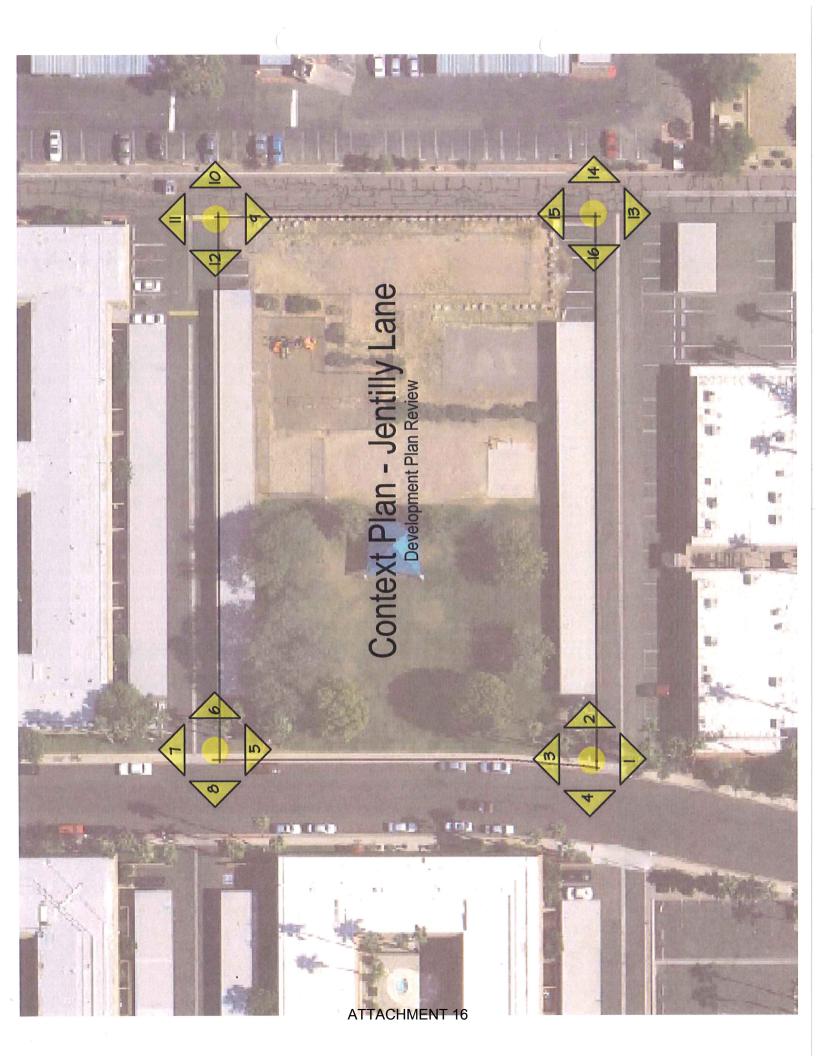


Rear



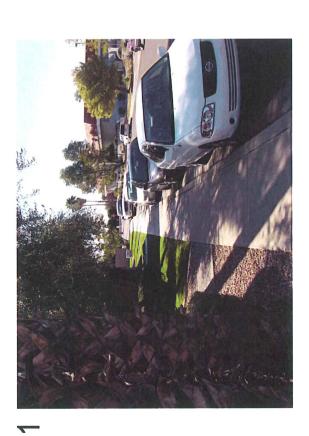






















ATTACHMENT 18







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