

# Initial Project Review

## Preliminary Plat: Uplands PDD Phase 1

**Application Numbers: 901234, 902976, 903125, 901235**

**Related Application Numbers: 900787, 891846, 767787, 767786, 767782, 725838**

**Parent Tax Parcel Number: 0491361003**

**Child Tax Parcel Numbers: 0419361-035 and -036; 0419362-000 to -007; 0419363006;  
0419364-008, -009, and -010**

**South Hill Advisory Commission (SHAC) Public Meeting: May 6, 2019, at 6:30 p.m.** at the Pierce County Fire Station 69, 17210 110th Ave East, Puyallup, WA 98374

**Proposal:** Applicant requests Preliminary Plat approval of a 279.78-acre parcel for a 374-lot subdivision consisting of:

- 338 single-family detached lots;
- 36 zero-lot-line single-family lots (a residential duplex building divided by a property line) (Lot numbers 1-22 and 79-92);
- A 170.06-acre future development tract for up to 6 additional Moderate Density Single Family (MSF)-zoned preliminary plats and 1 Rural Residential (RR)-zoned preliminary plat;
- 2 active recreation tracts, totaling 2.54 acres;
- 11 passive recreation tracts, totaling 4.61 acres;
- 16 open space tracts, totaling 1.51 acres;
- 6 wetland/wetland buffer tracts, totaling 23.52 acres, plus a wetland and wetland buffer in the northern portion of the future development tract and another wetland and wetland buffer in the southern portion of the same tract;
- 14 linear park tracts, totaling 2.31 acres; and
- 2 shared access facility tracts.

The lots have a minimum lot size of 3,500 square feet, and an average lot size of 5,616 square feet. The plat is to be developed in 8 phased final plats.

The plat will be served by public water, sanitary sewers, and public roads. The plat will be accessed from Sunrise Boulevard East to the west, through an extension of 130th Avenue East and 139th Avenue East.

The proposed plat is subject to the requirements of the November 16, 2017, Rezone/PDD approval of Case No. Z1-13/PDD by the Pierce County Hearing Examiner (Application Numbers: 767782/767786).

**Project Location:** Approximately 1,500 feet SE of Sunrise Blvd. East, in the 17600-19200 Blocks (North/South) and 13500-14600 Blocks (East/West), Puyallup, WA, within the SW ¼ of the NE ¼, the NW ¼, and the W ½ of the SE ¼ of Section 36, T19N, R4E, W.M., in Council District #1.

**Review Summary:** County staff has reviewed this proposal for compliance with all applicable policies, codes, and regulations. The County finds, based on an initial project review, that some version of the proposal could be found to be consistent with the applicable codes and regulations, subject to conditions.

**Zone Classification:** Moderate Density-Single-Family (Rezone/Planned Development District: Z1-13). The proposed plat is also subject to the requirements of November 16, 2017, Rezone/PDD approval of Z1-13 by the Pierce County Hearing Examiner (Appl. Nos. 767782/767786).

**State Environmental Policy Act (SEPA):** Pursuant to the State Environmental Policy Act and the Pierce County Environmental Regulations, Title 18D, an environmental checklist has been submitted since over 20 dwelling units are proposed, i.e., 374. A Determination of Nonsignificance (DNS) was issued on July 11, 2017, in conjunction with review and approval of Z1-13/PDD,

**County Contact: Robert Jenkins**, Current Planning Supervisor, 253-798-7016,  
[rob.jenkins@piercecounitywa.gov](mailto:rob.jenkins@piercecounitywa.gov)

**Pierce County Online Permit Information:**

<https://pals.piercecounitywa.gov/palsonline/#/permitSearch/permit/departementStatus?applPermitId=901234>



**Project Data**

Application Date: January 25, 2019

IPR Mailed Date: May 2, 2019

Property Owners/Applicant: Uplands 320 LLC  
Attn: Dennis Rattie  
c/o Investco Financial Corporation  
1302 Puyallup Street, Suite A  
Sumner, WA 98390  
[DRattie@tarragon.com](mailto:DRattie@tarragon.com)

Agent: AHBL, Inc.  
Attn: Lisa Klein, AICP  
2215 N. 30th Street, Suite 300  
Tacoma, WA 98403  
[lklein@ahbl.com](mailto:lklein@ahbl.com)

## Public and Legal Notice

- *February 14, 2019:* Notice of Application and Public Meeting Notice was sent to property owners within a radius of 300 feet, but not less than two parcels deep, around the exterior boundaries of the subject property.
- *February 18, 2019:* The site was posted with a Public Notice sign, confirmed with a Declaration of Posting.
- *April 22, 2019,* Legal Notice was published in the official County newspaper (*The News Tribune*), advertising the public meeting to be held by the South Hill Advisory Commission.

## Uplands PDD Final Master Development Plan, November 16, 2018 Draft



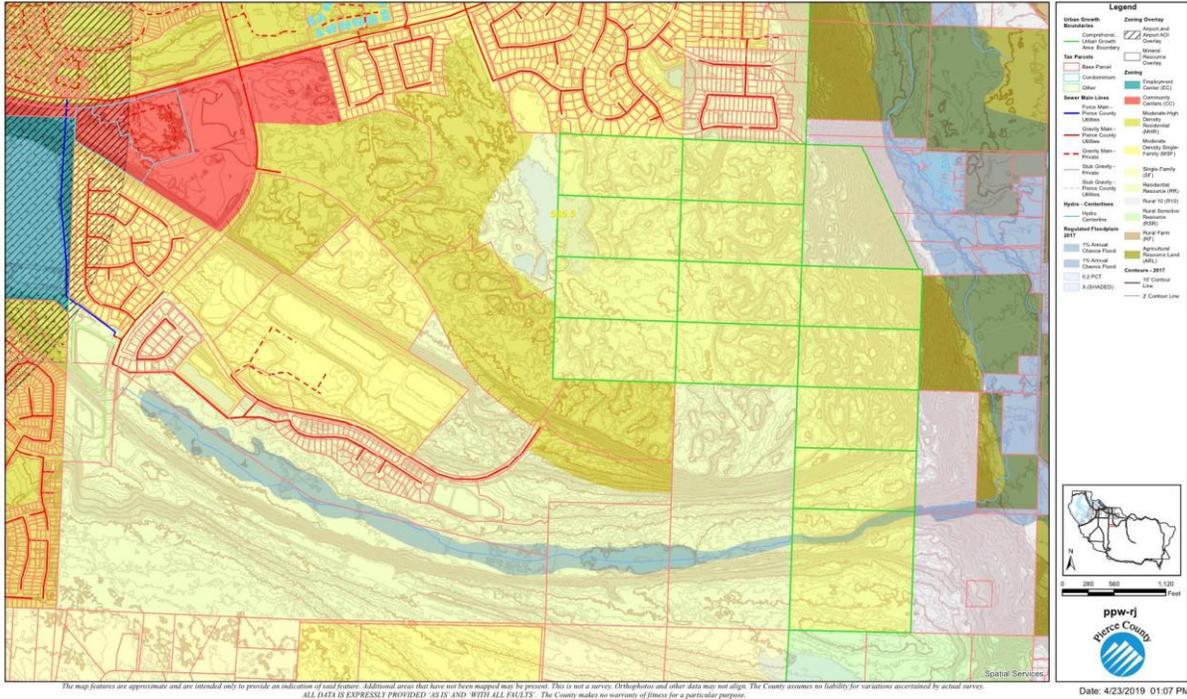
# 2017 County Aerial Photo

Preliminary Plat: Uplands PDD Phase 1  
901234

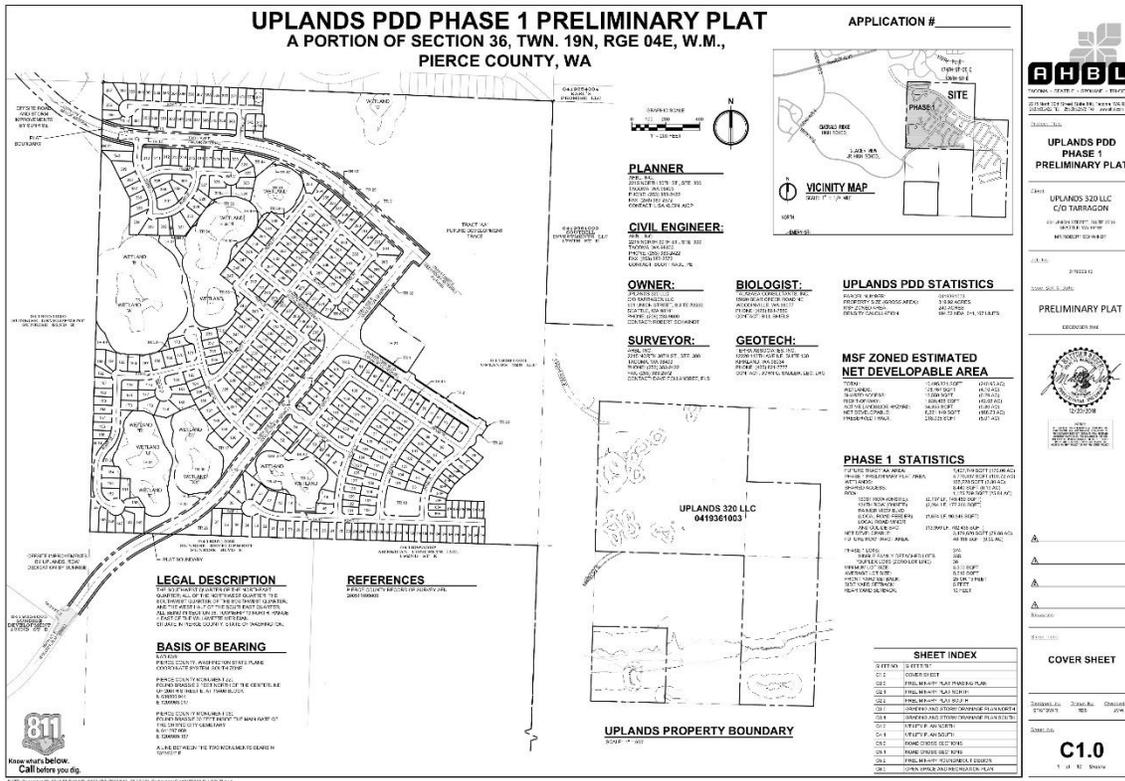


# Zoning Map

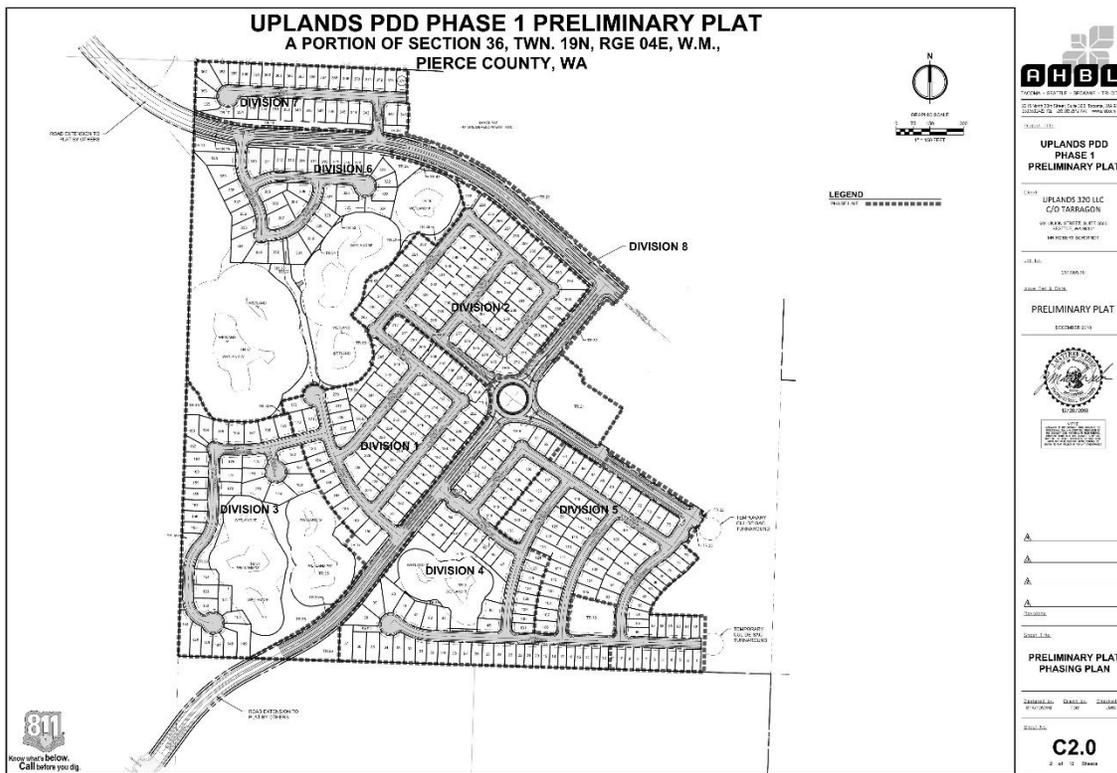
Preliminary Plat: Uplands PDD Phase 1  
901234



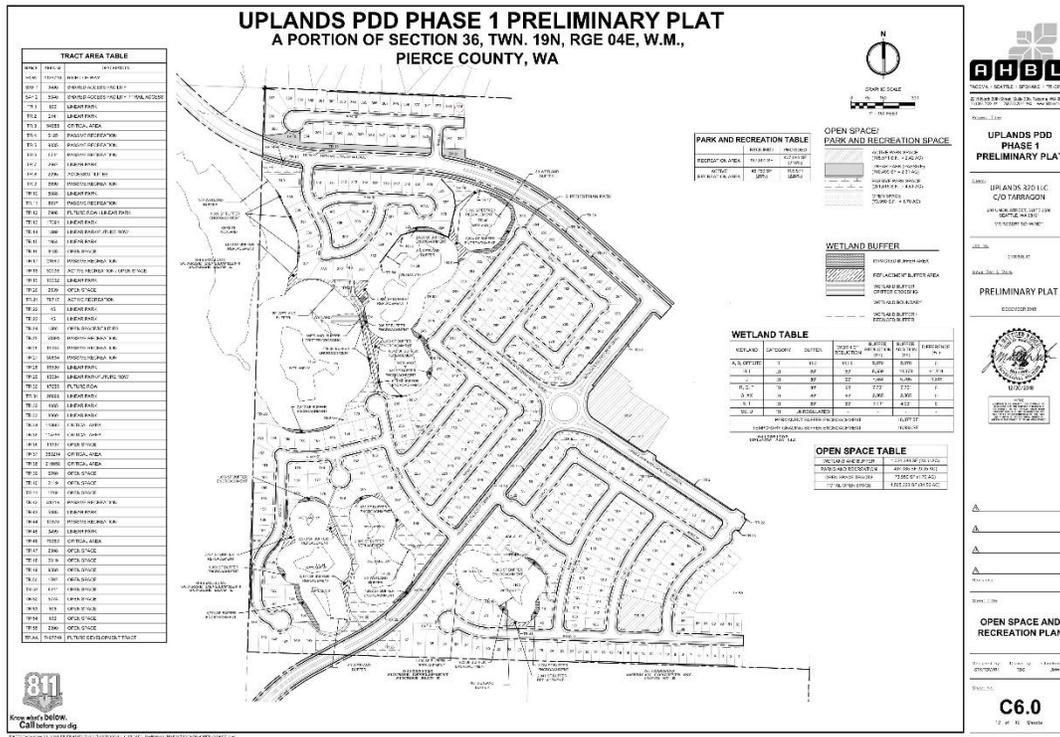
# Overall Preliminary Plat Map, Phase 1, dated December 2018



# Detailed Preliminary Plat and Phasing Map, Phase 1, dated December 2018



# Open Space and Recreation Plan, Pahse 1, dated December 2018



# Overall Tree Conservation Plans, dated November 15, 2018

Uplands - Overall Tree Conservation Plan

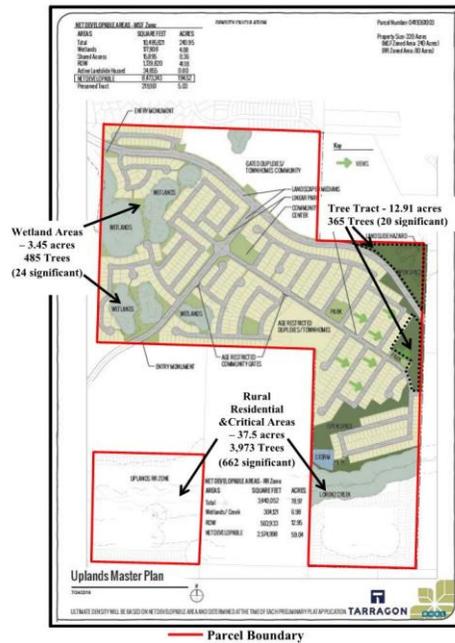
Uplands - Overall Tree Conservation Plan

Attachment 1. Aerial Photo of Uplands Project Area

(2015 Pierce County GIS)



Attachment 2. Site Plan with tree retention areas and tree counts.



## Public and Agency Review Comments – Final Master Plan

- Current Planning Section of Planning and Public Works (PPW):
  - The following are comments and requests related to the November 2018 resubmittal of the Master Plan:
    - Housing Mix:
      - Proposed duplex and townhouse housing types on a single lot of record provide housing opportunities for younger and moderate-income groups similar to original small lot concept.
      - Owner occupied housing for younger and moderate non-age qualified income groups should still be provided. Revision of Tract L to include a range of lot widths starting at 40 feet would be consistent with the preliminary PDD approval.
      - Future incorporation of alley-loaded product is encouraged but not required to be reflected on the master plan.
    - Open Space:
      - Applicant believes that the requirement for 39%/126 acres of open space was a clerical mistake and the preliminary PDD approval was for 35.63%/113.97 acres. This issue will need to be clarified by the Hearing Examiner during the first preliminary plat approval.
      - Need to confirm the square footage of the "open space" areas shown in dark green on the Master Development Plan and Open Space-Recreation Plan.
    - Recreation:
      - Need to connect the cul-de-sacs in the Tract K and L neighborhoods with pervious pathways connections and show this on the Open Space-Recreation Plan and Trails and Connectivity Plan.
      - Need to correct the legend on the Open-Space-Recreation Plan to show the color and cross-hatch of active parks - it is missing.
      - Need to make sure that the active and passive park tracts are consistent between plans - there is a discrepancy between the Open Space-Recreation Plan, the Phasing Plan, and the Trails and Connectivity Plan.
      - Staff would support the “linear park” concept only under these conditions: 1) Design the facility per the Urban Trail standard in the Parks, Recreation and Open Space (PROS) plan; and 2) credit for the right-of-way area between back of curb and a minimum of 23 feet to the outer edge of the right-of-way line for the north side of 176<sup>th</sup> Street East Extension (130<sup>th</sup> Avenue East) and the north side of Rainier View Blvd. East.
      - Need to revise the Master Plan and Park Plan to locate additional active or passive recreation areas since the staff supported linear park concept will not equal the 2.92 acres of linear park proposed by the applicant.

- Development Engineering Section of PPW:
  - A revised Traffic Impact Analysis for the overall Uplands PDD, submitted on March 21, 2019, was reviewed and approved by the Traffic Section and Development Engineering Sections of PPW on April 13, 2019.
  - A series of deviations from road standards were reviewed and most were denied.
  - A landslide hazard geotechnical report/erosion hazard area review, dated September 5, 2018, was found acceptable on February 19, 2019. The Final Master Plan and all future site plans shall clearly show and delineate the active landslide hazard areas and associated 50-foot active landslide area buffers as recommended in the geotechnical report. Any future development activity within 300 feet of the landslide hazard area will require the submittal of additional geotechnical analysis to ensure development does not adversely impact the critical area.
- Resource Management Section of PPW:
  - Wetland approval has been pending applicant's posting of buffer notices and recording of Approval on Title.
  - PDD design has changed considerably since time of Approval issuance. As such, please add the following note to the face of the Final Master Plan: "Proposed residential development in Tract L-southeast portion of project, near Lorenz Creek, has not been reviewed at a development level pursuant to PCC 18E.30. and 18E.40. Proposed lot placement, density, and road configuration are subject to change when a preliminary plat application is submitted for review."

### **Public and Agency Review Comments – Preliminary Plat**

Three comments have been received from members of the general public to date. Written comments have been received from an abutting property owner to the east. They were concerned over what the potential impact of the 176<sup>th</sup> Street Extension into the Orting Valley might have on the development potential of their property.

Comments have been received to date on the plat from the following departments and agencies:

- Central Pierce Fire and Rescue:
  - Request minimum of 26-foot road widths for emergency response units. The 26-foot width is the minimum needed for aerial apparatus to navigate turns and deploy outriggers.
  - Request that all roads be public and provide adequate on-street guest parking, not located in the travelled way. Request a road width increase to 34 feet to allow for parking on one side of the roadway. Public roadways are easier to enforce parking restrictions than if private roads.
  - Lots with setbacks less than 10 feet or 20 feet between structures should require full fire resistive exterior construction as defined by the Fire Prevention Bureau. Lots with setbacks less than 5 feet or 10 feet between structures should require residential sprinklers.
  - This project is in the far southeast corner of the fire district. Due to its location, increased response times are expected.
  - Construction shall be limited to 200 units until a second access road is fully completed.
  - No roundabouts should be allowed unless designed to meet the turning radius of all of fire apparatus.

- Nisqually Indian Tribe:
  - The Nisqually Indian Tribe deferred to the Puyallup Tribe in terms of recommended conditions. There was a survey done in 2006. The archaeologist recommended further testing be done if there was any major development. There were several Precontact Culturally Modified Trees documented in the 2006 survey. No comments have been received from the Puyallup Tribe to date.
- Pierce County Fire Prevention Bureau:
  - Fire flow requirements for single-family lots is a minimum of 750 gpm for 45 minutes. The minimum fire flow for commercial buildings is 1,500 gpm for 120 minutes. Actual fire flow requirements are based on the fire area, type of construction, use of the building and fire sprinklers.
  - A separate permit for the installation of fire hydrants and mains installation is required.
  - Two separate access roads are required for a multi-family development over 200 dwelling units per IFC D107 as referenced by PCC 17C.60.150 F.3. It is not clear where the multi-family units are located.
  - Two separate access roads are required for a one- or two-family development over 30 dwelling units per IFC D107 as referenced in PCC 17C.60.150 F.3. Portions of the plat have more than 30 lots served by only one access and others do not meet the requirement of remoteness between access roads. This may be mitigated with fire sprinklers.
  - There does not appear to be any parking provided. This is a concern when cars are parked on roads and streets not designed to accommodate parking and Emergency Vehicle Access becomes obstructed. Need to provide a calculation of the number of parking spaces provided and an evaluation supporting that adequate parking is provided.
- Orting Public Schools:
  - No comments have yet been received.
- Cartography Section of Planning and Public Works (PPW):
  - Road names have been assigned to the proposed plat streets.
- Current Planning Section of PPW:
  - This plat will be impacted by the comments and requests made on the November 2018 draft of the Uplands Final Master Development Plan under the PDD application, #767786. The Final Master Development Plan is to be approved with the first preliminary plat within the PDD. Refer to Master Plan comments above.
  - Retaining walls of up to 13 feet in height are proposed along the rear of Lots 321-330. Section 18J.15.015.D.5 does not permit walls exceeding 8 feet in height. The applicant needs to explain why the road and lot layout west of Wetlands H and J cannot be designed to slope toward the wetland and avoid use of walls or at least be restricted to walls less than 4 feet in height, per 18J.15.015.D.2. and D.4. All walls exceeding 4 feet will need to be screened with an L1 landscape buffer, per 18J.15.015.D.7. The proposed walls will require application for Site Plan Review approval if exceeding 8 feet in height. Applicant needs to explain how resident and child safety will be maintained with tall walls at the rear of homes and abutting a wetland.
  - Applicant needs to clarify if there will be a two-unit duplex placed on the "duplex" lots or if the intention is for these lots to be "zero-lot-line single family" instead, i.e., a duplex building divided by a lot line.

- Development Engineering Section of PPW:
  - A Traffic Impact Analysis (TIA) review for this first plat is required and under review. Comments and requests for revisions to the TIA were sent to the applicant in February and March.
  - A flood hazard area exists on this site. A Flood Boundary Delineation Survey needs to be submitted for review and approval.
  - There are several road design items that do not meet standards, including several of the cul-de-sac streets. The site plans should be revised appropriately or application for road deviations submitted.
  - The site plans show proposed storm drainage systems which will not meet standards for a public storm drainage system. While the storm drainage system is not being reviewed at this time, the applicant should take this under consideration as revisions may result in the need for additional public storm drainage tracts.
- Resource Management Section of PPW:
  - A March 18, 2019 letter regarding wetland buffer averaging has been provided to the applicant for revisions to the plat layout.
  - A Habitat Assessment Study is also required to be submitted and approved.
- Sewer Division of PPW:
  - No comments at this time. Sanitary sewers will be provided from the west through Sunrise.
- Tacoma-Pierce County Health Department:
  - The Health Department had no comments or concerns.

## Background

Site Inspection: The site is generally flat with steep slopes in the southern and eastern portions of the project area near Lorenz Creek. There are several small wetlands in the northwest portion of the site and south of Lorenz Creek. Lorenz Creek runs through the southern portion of the site and drains to the Puyallup River. The northwestern corner of the site is designated as a landslide hazard area. The site contains native forest areas, as well as invasive plant species in previously logged areas.

### Surrounding Land Use / Zoning Designation:

LAND USE		ZONING (Title 18A)
North	North – urban density single-family homes NE – approved for urban density single-family homes but still vacant and wooded	North – Moderate Density Single-Family (MSF) and Single-Family (SF) Northeast – Residential Resource (RR)
South	South - Undeveloped areas of Sunrise SE - Vacant and wooded	South - Moderate High Density Residential (MHR) and RR SE – Rural Sensitive Resource (RSR)
East	Vacant and wooded	Rural 10 (R10) and Agricultural Resource Land (ARL)
West	Undeveloped areas of Sunrise	MHR and RR

Utilities/Public Facilities: Utility service and public facilities are proposed as follows:

Water - Tacoma Water  
Sewer- Pierce County  
Power - Puget Sound Energy  
School- Orting School District

### **Governing Regulations**

The proposal has been reviewed for conformance with the following goals, policies and requirements as specified in the November 16, 2017, Rezone/PDD approval of Z1-13 by the Pierce County Hearing Examiner (Appl. Nos. 767782/767786):

- Title 19A Comprehensive Plan - January 1, 1995, as amended
- Title 17A Construction and Infrastructure Regulations – Site Development and Stormwater Drainage
- Title 17B Construction and Infrastructure Regulations – Road and Bridge Design and Construction Standards
- Title 18 Development Regulations - General Provisions
- Title 18A Development Regulations – Zoning
- Title 18D Development Regulations - Environmental
- Title 18E Development Regulations - Critical Areas
- Title 18F Development Regulations - Land Division and Boundary Changes
- Title 18H Development Regulations - Forest Practices
- Title 18J Design Standards and Guidelines

### **Initial Planning and Public Works (PPW) Staff Review for Consistency with Land Use Policies and Regulations**

#### State Environmental Policy Act (SEPA)

- The traffic impact analysis for the Phase 1 preliminary plat will need to have been approved prior to issuance of a SEPA determination and preparation of a staff report for the Hearing Examiner.

#### Title 18E, Development Regulations – Critical Areas

- Impervious cover of the entire 320-acre Uplands project is limited to a maximum of 35%, i.e., 112 acres, per aquifer recharge Table 18E.50.040-A, unless the applicant can provide an engineering justification for higher impervious cover. The first preliminary plat proposes 47.3 acres of impervious cover.

#### Title 18A, Development Regulations - Zoning

- Rezone/Planned Development District (Z1-13/PDD) – The proposed plat is subject to the requirements of November 16, 2017, Rezone/PDD approval of Z1-13 by the Pierce County Hearing Examiner (Appl. Nos. 767782/767786).
- The Z1-13 Rezone/PDD approval only controls the northern 240 acres of the 13-parcel larger site. The southern 39.77 acres, the area south of the northern boundary of the critical area buffer of Lorenz Creek, will remain zoned Residential Resource (RR). The separate 40.15-acre parcel to the west also remains zoned RR.

- Density of the northern MSF zoned property is limited to maximum MSF density of 6 dwelling units per net developable acre. The PDD approval caps density within the MSF portion to no more than 1123 dwelling units.
- Density in RR is 1-2 dwelling units per net acre and up to 3 du/net acre with a new PDD approval.
- The Phase 1 Preliminary Plat proposes 374 dwelling units. The proposed dwelling units are in the MSF portion of the site.
- Master Plan: The 2017 Rezone/PDD approval required the applicant comply with all proposals and commitments set forth in the design concept discussed in Exhibit No. 12 to that approval. The decision required implementation of the applicant's descriptions and proposals in Exhibit No. 12 and its proposed compliance with recreational area requirements. This was to be reflected in the Final Master Plan submitted for review with the first preliminary plat. The Final Master Plan has been submitted for review.
- PDD Deviations: The Z1-13 Rezone/PDD approval, allowed the applicant to request to deviate from bulk standards through the PDD process. The applicant is requesting the following deviations:
  - Allow the 36 zero-lot line lots to have a minimum lot size of 3,500 square feet, rather than 4,000 square feet. The remainder of the plat lots will be no smaller than 4,000 square feet, with an average lot size of the 374 lots of 5,600 square feet;
  - allow the 36 zero-lot-line lots to have a 35-foot lot width. All other lots will be 40 feet of greater in width. The Rezone/PDD allowed lots as narrow as 40 feet.;
  - allow for certain parks and recreation spaces to be located adjacent to an arterial roadway; and
  - use standard setbacks for lots on shared access facilities instead of uniform flag-lot setbacks on seven lots with the Phase 1 plat.

## Title 18J, Development Regulations – Design Standards and Guidelines

### County-wide Design Standards:

- Site Design (18J.15.015): Retaining walls of up to 13 feet in height are proposed along the rear of Lots 321-330. Section 18J.15.015.D.5 does not permit walls exceeding 8 feet in height. The applicant needs to explain why the road and lot layout west of Wetlands H and J cannot be designed to slope toward the wetland and avoid use of walls or at least be restricted to walls less than 4 feet in height, per 18J.15.015.D.2. and D.4. All walls exceeding 4 feet will need to be screened with an L1 landscape buffer, per 18J.15.015.D.7. The proposed walls will require application for Site Plan Review approval if exceeding 8 feet in height.
- Site Clearing (18J.15.020): The applicant believes that the requirement for 39%/126 acres of open space as part of the Z1-13/PDD approval was a clerical mistake and the preliminary PDD approval was for 35.63%/113.97 acres. This issue will need to be clarified by the Hearing Examiner during the first preliminary plat approval.
- Tree Conservation (18J.15.030): The applicant submitted a tree conservation plan for the Final Master Plan in November 2018. A partial revision to the plan was submitted in April 2019 in response to staff questions. The revised plan indicates that 912 of 3,632 significant trees (25.1%) are proposed to be retained over the 320-acre master plan. The plan states that there are approximately 21,237 healthy trees between 6- and 54-inches diameter at breast height. The Phase 1 plat proposes to retain 485 total trees, 24 of them significant, within the wetlands and wetland buffers of the plat.

- Future platting of the Uplands PDD will require the retention of an additional 178 significant trees, or the applicant will need to apply for and receive Site Plan Review approval to retain a lesser number of trees. The applicant’s current argument for why additional trees cannot be retained is the anticipated grading for the layout shown on the Final Master Plan. The applicant has not yet shown that they cannot modify the road network or product type to lessen the future grading and retain the required trees. This will be evaluated within the future plats.
- Street Trees (18J.15.050): Street trees will be provided internally along the new roadways, at 1 per 30 lineal feet of frontage in common tracts and a minimum of 1 street tree per single-family lot will be required prior to home occupancy.
- Stormwater Facilities (18J.15.170): The proposed stormwater runoff treatment includes water quality swales, rain gardens, and where necessary stormwater filters. The infiltration systems are proposed to be gravel trenches under public roads. There are four stormwater basins on the site. The stormwater design will meet the requirements established in the 2015 Pierce County Stormwater Management & Site Development Manual. Based on the proposed design, the Phase 1 plat will not trigger the storm water facility design standards of Section 18J.15.170.D.2.a.
- Recreational Areas (18J.15.180): The MSF-zoned portion of Uplands requires a minimum of 13.4 acres of total recreation and a minimum of 3.25 acres (25%) of active recreation. The Final Master Plan proposes 13.91 acres of total recreation, including 5.13 acres of active recreation, 5.86 acres of passive recreation, and 2.92 acres of “linear park”. As stated earlier in this report, the Final Master Plan will need to locate additional active or passive recreation areas since the staff supported linear park concept will not equal the 2.92 acres of linear park proposed by the applicant.
- The Phase 1 plat proposes 2.42 acres of active recreation, 4.61 acres of passive recreation, and 2.31 acres of “linear park” – refer to comment above on linear park issue.

Title 17B, Construction and Infrastructure Regulations – Road and Bridge Design and Construction Standards

- Curbs, gutters, sidewalks and street lights will be required within the plat.

**Required Findings for Planned Development District (PDD) Approvals**

**Title 18A, Development Regulations - Zoning**

Section 18A.75.050 Planned Development Districts.

- J. **PDD Approval – Findings Required.** The action by the Examiner to approve a preliminary development plan for a proposed PDD with or without modifications shall be based upon the following findings:
1. *That the proposed development is in substantial conformance with the Comprehensive Plan and adopted Community Plans.*

2. *That exceptions from the standards of the underlying district are warranted by the design and amenities incorporated in the development plan and program such as: setting aside additional open space; creating more functional park/open space areas; providing greater protection of critical areas; providing variations in housing style and type; preserving native trees; and, providing transportation features such as narrower streets and alleyways. In order to achieve the base density within a zone classification, the Examiner may determine that additional design amenities are not necessary when a site has a significant percentage of land area encumbered by constraint areas such as wetlands or steep slopes.*
3. *That exceptions or deviations from road standards are warranted by the design and amenities incorporated in the development plan and also subject to review and approval of the County Engineer.*
4. *That the proposal is in harmony with the surrounding area or its potential future use.*
5. *That the system of ownership and means of developing, preserving, and maintaining open space is suitable.*
6. *That the approval will result in a beneficial effect upon the area which could not be achieved under the current zoning and development regulations that apply to the property.*
7. *That the proposed development or units thereof will be pursued and completed in a conscientious and diligent manner.*
8. *That adequate provisions have been made for sidewalks, curb, gutters and street lighting for developments in urban areas.*

## **Required Findings for Preliminary Plat Approvals**

### **Title 18F, Development Regulations - Land Division and Boundary Changes**

#### **Section 18F.40.030 Proposed Preliminary Plat Requirements.**

- C. **Required Written Findings and Determinations.** The Examiner's written decision on the preliminary plat shall include findings and conclusions, based on the record, to support the decision. The Examiner shall inquire into the public use and interest proposed to be served by the establishment of the subdivision and dedication. A proposed subdivision and dedication shall not be approved unless the Examiner makes written findings that:
1. *Appropriate provisions are made for, but not limited to, the public health, safety and general welfare, for open spaces, drainage ways, critical areas, streets or roads, alleys, other public ways, transit stops, potable water supplies, sanitary wastes, parks and recreation, playgrounds, schools and school grounds, and all other relevant facts including sidewalks and other planning features that assure safe walking conditions for students who walk to and from school; and*
  2. *The public use and interest will be served by the subdivision and dedication.*

## **Questions for SHAC Discussion and Consideration**

### **Planned Development District – Overall Master Plan:**

- Is the proposed Final Master Plan consistent with Exhibit 12 of the Z1-13/PDD approval? If not, what changes are recommended to the plan?

Planned Development District – Phase 1 Plat:

- Should the deviations to lot size, lot width, shared access lot setbacks, and park proximity to arterial roadways be permitted? Are they justified by compliance with the PDD findings and overall Final Master Plan?

Preliminary Plat:

- Is the plat proposal adequately addressing public health, safety and general welfare issues as discussed above? If no, what changes are recommended.
- Will the public use and interest be served by the proposal? If not, what changes are recommended?

**Other Questions or Concerns?**

Uplands PDD PP Phase 1 IPR SHAC-RJ.docx