

RESOLUTION

WHEREAS, the Prince George’s County Planning Board is charged with the approval of Detailed Site Plans pursuant to Part 3, Division 9 of the Zoning Ordinance of the Prince George’s County Code; and

WHEREAS, a new Zoning Ordinance, Subtitle 27, Prince George’s County Code went into effect on April 1, 2022; and

WHEREAS, the subject property is within the Residential, Multifamily-20 (RMF-20) Zone; and

WHEREAS, pursuant to Section 27-1903(c) of the Zoning Ordinance, certain development applications may be reviewed and decided in accordance with the prior Zoning Ordinance; and

WHEREAS, therefore, the Prince George’s County Planning Board of The Maryland-National Capital Park and Planning Commission reviewed this application under the Zoning Ordinance in existence prior to April 1, 2022; and

WHEREAS, in consideration of evidence presented at a public hearing on September 15, 2022, regarding Detailed Site Plan DSP-21045 for The Cassidy, the Planning Board finds:

1. **Request:** This detailed site plan (DSP) requests the development of 175 multifamily dwelling units within 3 buildings.
2. **Development Data Summary:**

	EXISTING	APPROVED
Zone(s)	RMF-20(Prior R-18)	RMF-20 (Prior R-18)
Use(s)	Vacant	Residential
Total Gross Acreage	13.14	13.14
Total Gross Floor Area (GFA)		217,033 sq. ft.
Building 1	-	91,940 sq. ft.
Building 2	-	75,307 sq. ft.
Building 3	-	49,786 sq. ft.

Parking Spaces

Use	NUMBER OF SPACES REQUIRED	NUMBER OF SPACES APPROVED
Multifamily residential 2.0 spaces per unit plus 0.5 per bedroom in excess of one per unit (175 units: 55 one bedroom, 79 two bedroom, 41 three bedroom)	431	263
Handicap-accessible spaces	9	8 (2 van accessible)
Total	431	263 (DPLS requested)

Loading Spaces

	Required	Approved
1.0 per 100–300 dwelling units	1	1
Total	1	1

3. **Location:** The subject site is located approximately 70 feet east of the intersection of Ronald Road and Karen Boulevard in Planning Area 75A and Council District 6. The site is zoned Residential, Multifamily-20 (RMF-20) and previously zoned Multifamily Medium Density Residential (R-18).
4. **Surrounding Uses:** The proposed development is located northeast of the intersection of Ronald Road and Karen Boulevard. The property is zoned RMF-20 (formerly R-18) and is currently vacant and vegetated. The subject property abuts Karen Boulevard on the west. Across Karen Boulevard is a cluster of 24 townhouses in the Residential, Single-Family-Attached (RSF-A) Zone (formerly the Townhouse (R-T) Zone). Located to the south is a multifamily development known as the Capitol Courts Apartments in the RMF-20 (formerly R-18) Zone. To the east of the site is John Bayne Elementary School, which is zoned Residential, Single-Family-65 (formerly One-Family Detached Residential). To the north, the site abuts the Addison Woods townhouse development in the RSF-A (formerly R-T) Zone. Thus, the surrounding properties are predominantly a mix of multifamily and single-family, detached, residential buildings.
5. **Previous Approvals:** The subject property is located on Tax Map 73 in Grids D-3 and E-3 and consists of one parcel known as Parcel A, recorded among the Prince George’s County Land Records in Plat Book PM 220 at page 93, titled “Parcel A, Village at Lincolnshire” dated July 27, 2007. The property consists of 13.144 acres and is located within the RMF-20 Zone and Military Installation Overlay (MIO) Zone for height. The property is subject to Preliminary Plan of Subdivision (PPS) 4-03084, which was approved by the Prince George’s County Planning Board on January 8, 2004 (PGCPB Resolution No. 04-03). PPS 4-03084 approved 24 lots and

3 parcels for development of 24 townhouses and 262 multifamily units. The 24 townhouses have been developed with DSP-04012, which was approved by the Prince George's County District Council on February 28, 2005. DSP-05001 was approved by the Planning Board on December 14, 2006, for development of 156 multifamily dwelling units under PGCPB Resolution No. 06-263 for Lincolnshire, Phase II. The prior development did not proceed and DSP-05001 expired on December 31, 2021. The development has an approved Stormwater Management (SWM) Concept Plan, 40921-2021-00.

6. **Design Features:** The proposed application is for development of 175 multifamily units within 3 buildings. Each building will be 4 stories and approximately 51 feet tall at its highest elevation. The site will be accessed from a single entrance along Karen Boulevard. Building 1 will contain a total of 77 dwelling units, Building 2 will contain a total of 63 dwelling units, and Building 3 will contain a total of 35 dwelling units. The clubhouse will be 3,596 square feet and located within Building 3. A total of 263 surface parking spaces are provided and the site will have 1 loading space. A companion Departure from Parking and Loading Standards (DPLS-22002) has been filed in conjunction with this DSP to allow for the reduction in 168 parking spaces. SWM facilities will be provided on-site near the entrance and adjacent to Karen Boulevard.

Signage

The site proposes one freestanding sign located at the entrance of the site along Karen Boulevard. The proposed sign will be 6 feet tall and 8 feet wide. The sign will contain a gray brick base and pier with gray asphalt framing and black dimensional metal lettering that will read "The Cassidy."

Lighting

Pole-mounted lighting is proposed throughout the parking lot, and building-mounted lights are provided at all doors. A photometric plan was submitted with this application and reflects adequate lighting throughout the site with minimal spillover onto adjacent neighboring properties.

Architecture

The proposed buildings will consist of a combination of white and light gray facing brick with white cast stone. The building will have vertical siding and trim boards. Each building will be approximately 51 feet high from the tallest elevation and will contain a shingled roof.

COMPLIANCE WITH EVALUATION CRITERIA

7. **Prior Prince George's County Zoning Ordinance:** The DSP application has been reviewed for compliance with the requirements of the R-18 Zone of the prior Prince George's County Zoning Ordinance:
 - a. The subject application is in conformance with the requirements of Section 27-441 of the Zoning Ordinance, as multifamily residential uses are permitted in the R-18 Zone.

- b. The DSP conforms with Section 27-442, Regulations for Residential Zones, of the Zoning Ordinance.
 - c. The DSP is in conformance with the applicable site design guidelines contained in Section 27-445 of the Zoning Ordinance.
 - d. **Military Installation Overlay Zone:** The project is also located within the M-I-O Zone. Under this zoning, the applicant must meet the requirement for height. The site is required to meet the applicable requirements for properties located in Transitional Surface (7:1). The proposed height of Buildings 1, 2, and 3 varies from front to rear elevations, but is 51 feet tall at its highest point and meets the height requirement.
8. **Departure from Parking and Loading Standards DPLS-22002:** The applicant is proposing a departure from Section 27-568(a) of the Zoning Ordinance, for a reduction of 168 parking spaces to allow 263 spaces as required by the new Zoning Ordinance. The applicant is requesting to utilize the 1.5 ratio parking space requirement that is outlined in the current Zoning Ordinance, which would require only 263 parking spaces. A parking analysis was conducted that supports that the proposed 263 spaces would provide adequate parking. The required findings for the Planning Board to grant the departure in Section 27-588(b)(7) of the Zoning Ordinance, are as follows:

(A) In order for the Planning Board to grant the departure, it shall make the following findings:

(i) The purposes of this Part (Section 27-550) will be served by the applicant's request;

The applicant cites guidance from the Institute of Traffic Engineers (ITE) Parking Generation Manual, 5th Edition in determining parking demand for the site. In evaluating parking requirements for multifamily projects, the ITE uses both the number of dwelling units and the number of bedrooms to determine parking adequacy. In evaluating the number of total units, the peak period demand for parking from Monday to Friday would result in 226 parking spaces and 214 on Saturdays. The applicant also evaluated the number of bedrooms, which resulted in 256 parking spaces from Monday to Friday and 259 on Saturdays. In providing sufficient off-street parking, there will be no need for any residents or visitors to use the public street to meet the parking demands. In addition to providing adequate parking, the property is within 1.1 miles of the Addison Road Metro Station and there are two bus stops within easy walking distance. The property is well served by public transit, which further reduces the need for parking. Thus, the purposes are satisfied by substantial evidence demonstrating that the number of spaces provided is sufficient to serve the parking needs of all buildings and uses proposed, therefore relieving congestion on the public streets abutting the property. The Planning Board finds that the applicant's request will serve the purposes of Section 27-550(e).

(ii) The departure is the minimum necessary, given the specific circumstances of the request;

The applicant is seeking a reduction of 168 parking spaces to provide a total of 263 spaces. The applicant has conducted a parking analysis that demonstrated that the peak parking demand is 226 parking spaces Monday to Friday and 214 spaces on Saturdays. The parking analysis determined that the peak parking demand will be supported with the applicant's proposal of 263 parking spaces. The analysis provided that the parking needs of the proposed project range from a minimum of 226 spaces to a maximum of 259 parking spaces. The development proposes 263 spaces, which exceed the maximum demand according to the analysis. The Planning Board has reviewed and is in support of the departure. The parking provided is the amount necessary to serve the needs of the proposed uses and the departure requested is the minimum necessary given the specific circumstances of the request.

(iii) The departure is necessary in order to alleviate circumstances which are special to the subject use, given its nature at this location, or alleviate circumstances which are prevalent in older areas of the County which were predominantly developed prior to November 29, 1949;

The property contains environmental features that include extreme topography, which limits the ability to provide a larger number of parking spaces. In addition, stormwater retention occupies a substantial area of the site. As such, the specific circumstances of the subject site prevent additional parking from being provided, and a departure from the required parking is needed. It is the intention of the applicant to provide adequate parking for the site. This request is not premised on the need to alleviate circumstances which are prevalent in older areas of the County. The proposed project is new development and adequate parking will be provided based on the parking analysis.

(iv) All methods for calculating the number of spaces required (Division 2, Subdivision 3, and Division 3, Subdivision 3, of this Part) have either been used or found to be impractical; and

Based on the parking analysis, a reduction in spaces to serve the development is supported, and the ITE Parking Generation Manual has been used to factor in the number of dwelling units and the number of bedrooms to determine the parking demand. The parking and access to that parking is very proximate. The proposed reduction in spaces to serve the development is supported, and all methods of calculating the number of spaces have been used on the subject site.

(v) Parking and loading needs of adjacent residential areas will not be infringed upon if the departure is granted.

The site is surrounded by a mix of multifamily and single-family detached residential buildings. Each of the surrounding multifamily and townhouse developments provides off-street parking to serve the use. The parking analysis indicates that the site will meet the demand with on-site parking and will not infringe on adjacent properties. There will be no adjacent residential areas or other developments nearby that will be impacted by the proposed reduction in parking associated with this application, since the proposed amount of parking has been determined to be adequate parking for the use.

9. **Preliminary Plan of Subdivision 4-03084:** On January 8, 2004, the Planning Board approved PPS 4-03084, with 15 conditions (PGCPB Resolution No. 04-03). The relevant conditions are discussed, as follows:

2. **Prior to the issuance of building permits, the applicant, his heirs, successors and/or assignees shall demonstrate that a homeowners association has been established and that the common areas have been conveyed to the homeowners association.**

Final Plat PM 220-93, Note 4 states that a homeowners association (HOA), “Lincolnshire Homeowners Association, Inc.” has been established for this property. Also, Note 5 indicates that Parcel A shall be conveyed to the HOA, prior to building permits. However, the submitted statement of justification states that Parcel A will be maintained by the owner of the multifamily project and therefore an HOA is not required to be established for Parcel A. The plat of correction should remove Note 5 following the approval of this DSP and prior to issuance of the building permit.

4. **The final plat shall reflect a conservation easement by bearings and distances. The conservation easement shall contain the expanded stream buffer, excluding those areas where variation requests have been approved, and be reviewed by the Environmental Planning Section prior to certification. The following note shall be placed on the plat:**

“Conservation easements described on this plat are areas where the installation of structures and roads and the removal of vegetation are prohibited without prior written consent from the M-NCPPC Planning Director or designee. The removal of hazardous trees, limbs, branches, or trunks is allowed.”

PM 220-93 does not show the conservation easement and the above-referenced note is not reflected on the plat. The Type II tree conservation plan (TCPII) does not depict an area of conservation located on Parcel A. The Planning Board has reviewed this and approves with conditions.

5. **Review of the DSP shall include the review of the proposed stormwater management facilities for views and landscaping. The pond at the entrance of the subdivision shall be designed as an amenity to the community.**

The applicant submitted a copy of an approved SWM Plan 40921-2021-00 with the subject DSP, which shows three SWM ponds located along the front of the property. The SWM concept plan, landscape plan, and the DSP show a 10-foot-wide maintenance path around the three proposed SWM ponds, along with benches, as amenities to serve the community. The PPS designated a proposed Parcel B, contemplating that a SWM facility would be constructed on it and that it may be conveyed to an HOA, subject to an easement to the benefit of the County. Since that time, new SWM requirements were adopted. The proposed DSP includes SWM facilities which are now designed and will be constructed, in accordance with the Environmental Planning Section requirements set forth in Subtitle 32. These facilities are located at the entrance point and will be maintained in a manner to serve as an amenity and provide green space to benefit residents.

6. **The applicant, his heirs, successors and or assignees shall provide standard sidewalks along both sides of internal streets unless modified by the Department of Public Works and Transportation.**

The DSP shows standard sidewalks along both sides of internal streets. The Planning Board has reviewed this and the stated condition of approval related to transportation has been addressed.

7. **In accordance with Section 24-135(b) of the Subdivision Regulations, the applicant shall be providing private on-site recreational facilities. Facilities shall be provided in accordance with the Parks and Recreational Facilities Guidelines on Parcel A for the townhouses and on Parcel C for the multifamily dwelling units.**
8. **The applicant, his heirs, successors and/or assignees shall submit three original Recreational Facilities Agreements (RFA) to DRD for approval prior to the submission of final plats, for construction of recreational facilities on homeowners land. Upon approval by DRD, the RFA shall be recorded among the county land records.**
9. **The applicant, his heirs, successors and/or assignees shall submit a performance bond, letter of credit, or other suitable financial guarantee prior to building permits for the construction of recreational facilities on homeowners land.**

A recreational facilities agreement (RFA) pursuant to Conditions 7 and 8 was recorded in Liber 28011 at folio 201, subsequent to prior DSP-05001, approved for Parcel A. The recorded RFA will need to be amended and the proposed recreational facilities bonded, in accordance with Condition 9, prior to building permit approval, to reflect the new proposal for on-site recreational facilities with this DSP. The list of proposed recreational facilities includes lounges in each of the multifamily buildings, a community building, outdoor patios with site amenities, an open play area, and a hiker/biker trail. The proposed recreational facilities have been reviewed and a condition has been added to establish triggers for construction of those facilities.

11. Development of this site shall be in accordance with the approved Stormwater Management Concept Plan # 20523-2003-00.

The applicant submitted an approved SWM Concept Plan 40921-2021-00 and letter with this subject DSP. The DSP shows the layout of the proposed buildings in conformance with the approved SWM concept plan.

14. A Type II tree conservation shall be approved at the time of DSP.

The applicant submitted a TCPII with the subject application. The Planning Board has reviewed this and approves, with conditions.

15. Development of this subdivision shall be in compliance with the approved Type I Tree Conservation Plan (TCPI/58/03). The following note shall be placed on the Final Plat of Subdivision:

“Development is subject to restriction shown on the approved Type I Tree Conservation Plan (TCPI/58/03), or as modified by the Type II Tree Conservation Plan, and precludes any disturbance or installation of any structure within specific areas. Failure to comply will mean a violation of an approved Tree Conservation Plan and will make the owner subject to mitigation under the Woodland Conservation/Tree Preservation Policy and Subtitle 25.”

The DSP reflects development in general compliance with the approved Type I tree conservation plan. PM 220-93 reflects the above-referenced note.

10. **2010 Prince George’s County Landscape Manual:** The application is subject to the requirements of Section 4.1 Residential Requirements; Section 4.2, Landscape Strips Along Streets; Section 4.3, Parking Lot Requirements; and Section 4.9, Sustainable Landscaping Requirements, of the 2010 *Prince George’s County Landscape Manual*. The landscape plan provided with the subject DSP contains the required schedules demonstrating conformance to these requirements.

11. **Prince George’s County Woodland and Wildlife Habitat Conservation Ordinance:** The project is subject to the current regulations of Subtitle 25 (Woodland and Wildlife Habitat Conservation Ordinance) and Subtitle 27 (Zoning Ordinance). A Type I Tree Conservation Plan (TCPI-058-03) was approved with the PPS application for Phase I, which included the Lincolnshire and Cassidy sites. TCPII-077-04-01 was submitted with the prior DSP-05001 approval for Phase I. TCPII-077-04-02 was a stand-alone TCPII to modify the dwelling units to the two-over-two style. TCPII-077-04-03 was submitted with this DSP-21045 for Phase II, now identified as The Cassidy.

The TCPII for this site was phased with the majority of the required woodland conservation left for Phase II and this DSP. This 13.14-acre property contains no floodplain and has a total of 11.20 acres of woodlands. Phase I provided 1.28 acres of woodland conservation that will count

towards the 7.73-acre requirement for Phase II. The subject site proposes to clear 9.88 acres of existing woodland. The woodland conservation worksheet shows the project meeting the 7.73-acre woodland conservation requirement with 1.32 acres on-site preservation, 2.24 acres of afforestation, and 2.89 acres of woodland preservation off-site. An update to the Phase II Reforestation Planting Schedules to reflect 1,000 seedlings per acre will be required. If larger plant material is proposed, then one seedling is equivalent to every 0.5-inch caliper. Each planting area shall be proposed with a minimum of five species.

12. **Prince George's County Tree Canopy Coverage Ordinance:** The DSP is subject to the requirements of the Prince George's County Tree Canopy Coverage Ordinance. Section 25-128 of the Prince George's County Code requires a minimum percentage of tree canopy coverage on projects that propose more than 5,000 square feet of disturbance. The subject DSP provides the required schedule demonstrating conformance to these requirements through new plantings on the subject property.
13. **Referral Comments:** The subject application was referred to the concerned agencies and divisions. The referral comments are summarized, as follows, and are incorporated herein by reference:
 - a. **Subdivision**—The Planning Board has reviewed and adopts the memorandum dated August 15, 2022 (Vatandoost to Butler), in which the Subdivision Section noted that the DSP has been found to be in substantial conformance with the approved PPS. Technical conditions have been conditioned herein.
 - b. **Transportation**—The Planning Board has reviewed and adopts the memorandum dated August 12, 2022 (Ryan to Butler), in which the Transportation Planning Section determined that this plan is acceptable, with conditions that are included herein.
 - c. **Environmental Planning**—The Planning Board has reviewed and adopts the memorandum dated August 18, 2022 (Kirchhof to Butler), in which the Environmental Planning Section provided a discussion of various environmental issues and recommended approval of TCPII-077-04-03, with conditions included herein.
 - d. **Historic**—The Planning Board has reviewed and adopts the memorandum dated June 24, 2022 (Smith to Butler), in which it was noted that the subject property does not contain and is not adjacent to any designated Prince George's County historic sites or resources.
 - e. **Permits**—The Planning Board has reviewed and adopts the memorandum dated August 15, 2022 (Jacobs to Butler), in which it was noted that the plan was acceptable.
 - f. **Community Planning**—The Planning Board has reviewed and adopts the memorandum dated August 15, 2022 (White to Butler), in which it was noted that, pursuant to Part 3, Division 9, Subdivision 3 of the prior Zoning Ordinance, master plan conformance is not required for this application.

- g. **Prince George’s County Department of Parks and Recreation**—The Planning Board has reviewed and adopts the memorandum dated July 30, 2022 (Thompson to Butler), in which it was noted that the mandatory dedication requirements, per Sections 24-134 and 24-135(b) of the Prince George’s County Subdivision Regulations, are met by the provision of on-site private recreational facilities.
 - h. **Prince George’s County Department of Permitting, Inspections and Enforcement (DPIE)**—The Planning Board has reviewed and adopts the email dated July 25, 2022 (Giles to Butler), in which DPIE provided standard comments on the subject DSP, which will be addressed through their own separate permitting process.
14. As required by Section 27-285(b)(1) of the prior Zoning Ordinance, the DSP, if revised as conditioned, represents a reasonable alternative for satisfying the site design guidelines of Subtitle 27, Part 3, Division 9, of the County Code, without requiring unreasonable cost and without detracting substantially from the utility of the proposed development for its intended use.
15. Per Section 27-285(b)(4) of the prior Zoning Ordinance, which became effective on September 1, 2010, a required finding for approval of a DSP is as follows:

The Planning Board may approve a Detailed Site Plan if it finds that the regulated environmental features have been preserved and/or restored in a natural state to the fullest extent possible.

Based on the level of design information submitted with this application, the regulated environmental features on the subject property have been preserved and/or restored to the fullest extent possible. No impacts to regulated environmental features are proposed with this DSP.

NOW, THEREFORE, BE IT RESOLVED, that pursuant to Subtitle 27 of the Prince George’s County Code, the Prince George’s County Planning Board of The Maryland-National Capital Park and Planning Commission adopted the findings contained herein and APPROVED Type II Tree Conservation Plan TCP11-077-04-03, and further APPROVED Detailed Site Plan DSP-21045 for the above-described land, subject to the following conditions:

- 1. Prior to signature approval, the detailed site plan (DSP) shall be revised to replace the plat reference for the subject property on all sheets of the DSP listed as Plat Book 231 plat no. 67 with Plat Book PM 220 plat no. 93.
- 2. Prior to approval of any building permit, the applicant and the applicant’s heirs, successors, and/or assignees shall submit a plat of correction to correct the property’s boundary bearings and distances and remove Note 5 of the existing Plat Book PM 220-93.
- 3. The applicant, and the applicant’s heirs, successors, and/or assignees shall submit three original executed private recreational facilities agreements (RFAs) to the Development Review Division (DRD) of the Prince George’s County Planning Department for construction of on-site recreational facilities, for approval prior to a submission of a plat of correction. Upon approval by

DRD, the RFA shall be recorded among the Prince George's County Land Records and the Liber and folio of the RFA shall be noted on the final plat prior to recordation.

4. Prior to approval of any building permits, the applicant, and the applicant's heirs, successors, and/or assignees shall submit to the Development Review Division (DRD) of the Prince George's County Planning Department a performance bond, letter of credit, or other suitable financial guarantee for construction of recreational facilities, in an amount to be determined by DRD.
5. Coordinate with staff to establish triggers for construction of the recreation facilities.
6. The woodland conservation worksheet shall be revised as follows:
 - a. Revise Line 6 to show Type II Tree Conservation Plan TCPII-077-04 for the TCPII number and indicate "3" for the revision number.
 - b. Add Type I Tree Conservation Plan TCPI-058-03 as the TCP1 number on Line 8.
 - c. Revise Line 17 to indicate Detailed Site Plan DSP-21045 for Phase II.
 - d. Revise Line 18 to show that Detailed Site Plan DSP-05001 is associated with TCPII-077-04 Revision 1, and DSP-21045 is associated with TCPII-077-04 Revision 3.
 - e. Correct Line 1 to show that, under the prior Zoning Ordinance, this site is zoned Multifamily Medium Density Residential (R-18).
7. Update the Phase II Reforestation Planting Schedules to reflect 1,000 seedlings per acre. If larger plant material is proposed, then one seedling is equivalent to every 0.5-inch caliper. Each planting area shall be proposed with a minimum of five species. The general notes shall be revised, as follows:
 - a. Revise General Note 6 to indicate that the site is developed under the prior Multifamily Medium Density Residential Zone.
 - b. Combine General Notes 18 and 19 into one note, as shown in the 2018 Environmental Technical Manual.
 - c. Revise the post development notes to follow the structural formatting, as shown in the 2018 Environmental Technical Manual.
 - d. Have the worksheet and plans signed by the qualified professional who prepared them.
 - e. Provide the general notes for the preservation of existing woodlands, as shown in the 2018 Environmental Technical Manual.

- f. Provide the detail graphic for the permanent tree protection fence. Revise the approval block to the Development Review Division standard.

BE IT FURTHER RESOLVED, that an appeal of the Planning Board's action must be filed with the District Council of Prince George's County within thirty (30) days following the final notice of the Planning Board's decision.

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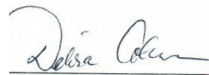
This is to certify that the foregoing is a true and correct copy of the action taken by the Prince George's County Planning Board of The Maryland-National Capital Park and Planning Commission on the motion of Commissioner Washington, seconded by Commissioner Geraldo, with Commissioners Washington, Geraldo, Doerner and Shapiro voting in favor of the motion, with Commissioner Bailey absent at its regular meeting held on Thursday, September 15, 2022, in Upper Marlboro, Maryland.

Adopted by the Prince George's County Planning Board this 6th day of October 2022.

Peter A. Shapiro
Chairman

By 
Jessica Jones
Planning Board Administrator

PAS:JJ:TB:jah


Approved for Legal Sufficiency
M-NCPPC Office of General
Counsel
Dated 9/27/22