City of Seattle
Gregory J. Nickels, Mayor

Department of Planning and Development
D. M. Sugimura, Director

CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT

Application Number: 3007607

Applicant Name: Roger H. Newell, AIA, Architect

Address of Proposal: 4738 22nd Avenue NE

SUMMARY OF PROPOSED ACTION

Land Use Application to allow construction of one 4-story townhouse structure containing two dwelling units with attached garages in an environmentally critical area (steep slope and landslide prone hazard area).

The following approvals are required:

Environmentally Critical Areas Exception: - to allow land disturbing activity in excess of 30% (1419 sq. ft.) in a steep slope critical area SMC 25.09.300.

Variance: - To allow less than required quantity of open space (210 sq. ft per unit) on roof decks only, in L-3 zone (Seattle Municipal Code23.45.016.A.3.1.a).

SEPA:-Environmental Determination – Chapter 25.05, SMC.

SEPA DETERMINATION: [ ] Exempt [ ] DNS [ ] MDNS [ ] EIS
[X] DNS with conditions
[ ] DNS involving non-exempt grading, or demolition, or involving another agency with jurisdiction.

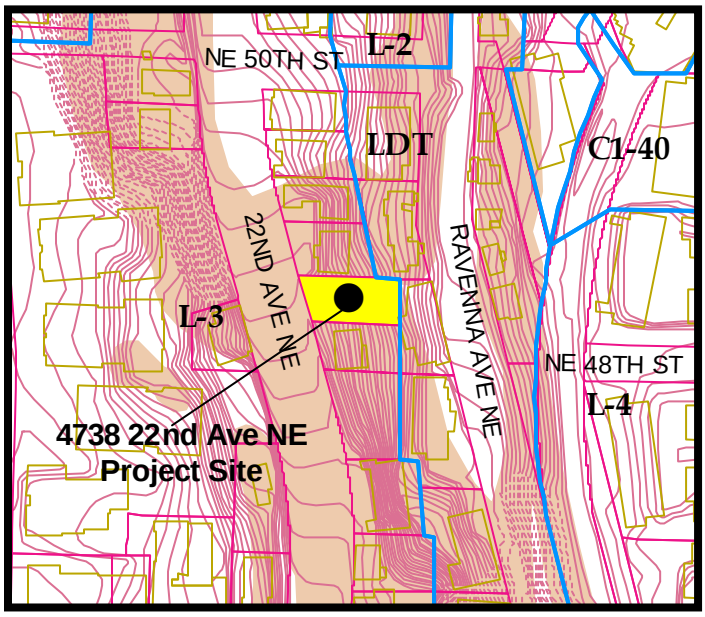
*Early Notice DNS published June 10, 2004.

BACKGROUND DATA

Site and Vicinity

The 5,514 sq. ft site is located on the east side of 22nd Avenue NE, mid-block between the partially improved Northeast 47th Street right-of-way to the south and the unimproved Northeast 50th Street right-of-way to the north, in the University District. The lot is approximately 103 feet

on its southern boundary, 50 feet on its eastern boundary, 118 feet on its northern boundary and 53 feet on its western boundary fronting on 22nd Avenue Northeast. The subject site is currently undeveloped and covered with mostly shrubs and blackberry bushes. The site generally slopes from west at an elevation of 129 feet at the west property line to the east at an elevation of 80 feet on the east property line.



The site is zoned multifamily lowrise 3 (L-3). The vacant site is bordered to the north, south and east by two to three story apartment buildings and to the west by 22nd Avenue NE. There is no alley. Vehicular access to the site is directly from 22nd Avenue NE. The L-3 zone abuts L-2 zone to the north and C1-40 zone to the east. Development in the vicinity is predominantly a mixture of apartment and single family structures converted to multifamily use. The University of Washington campus is located approximately two blocks south of the project site.

Proposal Description

The applicant proposes to construct a new 4-story 2-unit townhouse structure with attached garages in a steep slope environmentally critical area.

The 5,514 square feet site is situated on a steep east facing slope and has a 3,880 square foot steep slope area that occupies approximately 70% of the site. The proposed structure will occupy 1,345 square feet of the site. As a result, the proposed development will disturb approximately 36% (1419 sq. ft.) of the steep slope area on the site. Pursuant to SMC 25.09.180, the proposal is required to comply with ECA requirements for steep slope and steep slope buffer areas.

The current project includes the application for an ECA exception approval to allow development in excess of 30% disturbance of the steep slope. The updated previous Geotechnical Engineering Study, dated June 2, 2007, indicated that the scope of the project has been scaled back from a 5 unit development to now consist of a single building containing two townhouse units. As shown on the site plan and the elevation views, the footprint of the new building is substantially smaller than what was originally proposed. The lower floors of the units will step from the elevation of approximately 116 feet on the eastern half of the building to approximately 120 feet to the western half of the building. The north and south building walls will be approximately 5 feet from the property lines, but there will be window wells at the northwest and southwest corners that will extend to the property boundaries. The western wall of the basement will be located close to the west property line. As depicted on the site plan, the topography indicates that much of the northern foundation wall will be close to existing grade. On the northern corner, temporary excavations of approximately 10 feet are anticipated. On the southern side of the building temporary cuts of 10 to 12 feet below existing grade are expected for the majority of the building.

The proposed development will almost certainly include a future unit lot subdivision resulting in one unit per unit lot. This SEPA review will consider the environmental impacts of this future application. Thus it will not be necessary to require another SEPA review at the time of a unit lot subdivision application.

Public Comments

One written comment was received during the public comment period that ended in July 26, 2000. The comments expressed concern about the effect of the proposed development on slope stability and the potential for slides, shrinkage of "greenbelt" areas, effects of erosion, and impacts to the neighborhood from additional traffic and parking.

Environmentally Critical Areas Regulations

Seattle Municipal Code (SMC) Sections 25.09.040 and 25.09.060 establish standards that apply to all development within designated Environmentally Critical Areas, which includes submittal requirements for verifying the location of all such areas. SMC Section 25.09.180 provides specific standards for all development on steep slopes and steep slope buffers on existing lots, including the general requirement that development is prohibited in steep slope areas and steep slope buffers.

Conditions imposed as a means of compliance with the ECA ordinance are non-appealable. General requirements and standards described in Section 25.09.060 include the recording of conditions of approval and of the identified ECA areas in a permanent covenant with the property, as well as specific construction methods and procedures.

Seattle Municipal Code (SMC) Section 25.09.300 authorizes exceptions to ECA development standards. A standard may be reduced, waived or modified only if strict application of the standard is unreasonable, and a standard may be modified only to the extent necessary to allow reasonable use of the property in light of the facts and circumstances of a particular case. Application of the relevant criteria will be discussed below.

ANALYSIS – ENVIRONMENTALLY CRITICAL AREAS (ECA) EXCEPTION

Pursuant to SMC 25.09.300.C, the Director may modify or waive an ECA development standard and/or front and rear setbacks when an applicant demonstrates by clear and convincing evidence that: (1) strict application of the development standards would not permit any reasonable use of the property and that development undertaken pursuant to the modified or waived standards would not cause significant injury to occupiers of the land, to other properties, and to public resources or to the environment; and (2) the relief granted by reduction, waiver, or modification of an environmental critical areas development standard and of the front rear setback standards shall be the minimum to allow reasonable use of the property. Preference shall be given to modifying or waiving the front and rear setback standards. In modifying a regulation, the Director may impose reasonable conditions that prevent or mitigate the same harm that the modified or waived regulation was intended to prevent or mitigate. Seattle Municipal Code Section 25.09.300 only allows an applicant to apply for an ECA exception for modification of ECA development standards if the Director concludes that no other applicable ECA administrative remedies will provide sufficient relief.

The proposed development of a 2-unit townhouse on the subject site is limited by the existing steep slope and steep slope buffer covering 70% of the site. The standards of SMC Section 25.09.180.B and C.2 prohibits development in a steep slope and steep slope buffer. The ECA provisions of SMC Section 25.09.180.B and C are applicable to the subject site. There is a process for applying for a variance from the steep slope and steep slope buffer standards of Section 25.09.180.B and C.2. The standards of the variance process in SMC Section 25.09.180.E would allow an intrusion into not more than 30% of the steep slope area. The applicant proposes to disturb up to 36% of the steep slope. The variance process only allows the Director to grant buffer reduction or development in the critical area that is the minimum necessary to afford relief from the hardship. In this case, a grant of the variance will not provide the minimum relief from the hardship, since, as demonstrated on the applicant's site plan, even if a variance is granted only 633 square feet of building area is available. The 633-square foot area is not sufficient area to build a minimal multi-family structure given the constraints of both the requirements for a building footprint and compliance with other development standards such as parking requirements. There is a sufficient hardship to determine that reasonable use of the property will not be possible with the variance process. Thus, the construction of a two unit townhouse structure requires approval of the proposed exception to allow disturbance of more than 30% of the slope areas to occur on the lot.

The analysis of the exception criteria follows:

1. The Director may modify an environmentally critical areas development standard and/or the yard and setback standards for front or rear setbacks when an applicant demonstrates by clear and convincing evidence that strict application of the development standards would not permit any reasonable use of the property and that development undertaken pursuant to the modified or waived standards would not cause significant injury to occupiers of the land, to other properties, and to public resources, or to the environment.

The proposal site is located on an ECA steep slope area which occupies approximately 70% of the site or 3,880 square feet of the lot. The approximately 1,634 square feet of the site that is outside the steep slope is confined to a 633 square feet area within the front setback abutting the street and a 1001 square feet area within the required rear setback down the slope to the east. The approximately 1001 square feet area within the rear setback is not accessible without intruding into the steep slope. The 633 square feet area within the front setback is the only area outside the steep slope that can be developed without intruding into the steep slope. As noted above, the 633 square feet area is too small to be a practical building site for a minimal multi-family structure. Accordingly, development potential outside of the steep slope and buffer critical area is very limited.

The applicant's proposal is for a 4-story two unit townhouse structure. The proposed building footprint would be limited to 1,345 square feet. This proposal will disturb 36% of the steep slope, which is more than the 30% disturbance maximum allowed by the variance. As explained in more detail above, neither the setback modification nor the variance to allow up to 30% disturbance of the steep slope is a remedy for the applicant, and accordingly this exception is the only possible administrative remedy to allow reasonable use of two units for this multifamily zoned site.

There is no evidence that development of the subject site as recommended by the applicant's geotechnical engineer, and subject to appropriate conditioning by DPD, would cause significant injury to occupiers of land, other properties, public resources, or to the environment. Based on the geotechnical engineer's report, dated June 2, 2007, the proposed development will not increase the risk of slope stability. The geotechnical engineer recommends that the building will be supported on drilled concrete piers, as a majority of the excavation will not reach dense soils. The eastern foundation wall of the building will be supported on closely-spaced drilled piers, in the event that slope movement occurs in the future. The proposed structure will have negligible landslide impact on public resources.

2. The relief granted by the reduction, waiver, or other modification of the environmentally critical area development standard and of the yard and setback standards for front or rear yards shall be the minimum to allow reasonable use of the property. Preference shall be given to modifying or waiving the yard or setback standards for front or rear yard or setbacks. In modifying a reduction, the Director may impose reasonable conditions that prevent or mitigate the same harm that the modified regulation was intended to prevent or mitigate.

The proposed 2-unit townhouse development on the site in an L-3 zone is the minimum multifamily development for this multifamily zoned lot. In the L-3 zone, other development alternatives include single family dwelling units, apartments, congregate residences and adult family homes. With density standards of one dwelling per 800 square feet, a property the size of this proposal could be developed with up to approximately seven new dwelling units. In addition, pursuant to SMC 23.45.016A, for ground related housing in L-3 zones, an average of 300 square feet per unit of private, usable open space, at ground level and directly accessible to each unit is required. The hardship presented by the steep slope on the lot is the inability to provide open space for the two unit townhouse at ground level. The applicant request for the modification of the open space requirement to a minimum of 210 square feet usable open space for each unit to be located on roof decks is the minimum needed for the reasonable use of the site. The decks would provide some useable private open space use for each of the units, as required by the Land Use Code, but result in disturbance to the steep slope in addition to the habitable and parking areas of each townhouse unit. It is reasonable to allow the proposed additional disturbance to provide reasonable use of the property.

Other lots in the vicinity of similar size are developed with at least four dwelling units and there is at least one structure on almost every lot. The relief granted to allow disturbance of 36% (1419 sq ft) of the steep slope is the minimum necessary to allow reasonable use (two units) of the site that is largely constrained by the amount and location of the steep slopes. It is worth noting as well, that the likelihood of future unit lot subdivision will result in development of only one dwelling unit per unit lot, which is the minimum possible density. Therefore, the proposal is the minimum necessary to allow reasonable use of the subject property. As conditioned below, the proposed development should be approved.

DECISION – ENVIRONMENTALLY CRITICAL AREAS EXCEPTION

ECA Exception to allow land disturbing activity in excess of 30% (1419 sq. ft.) of the area measured over 40% steep slope on the site is **CONDITIONALLY GRANTED.**

ANALYSIS – VARIANCE

As provided in SMC 23.40.020, variances from the provisions or requirements of Title 23 shall be authorized only when all of the facts and conditions stated in the numbered paragraphs below are found to exist. Analysis for the variance requested follows each statement of required facts and conditions.

1. *Because of unusual conditions applicable to the subject property including size, shape, topography, location or surroundings, which were not created by the owner or applicant, the strict application of this Land Use Code would deprive the property of rights and privileges enjoyed by other properties in the same zone or vicinity; and*

The unusual conditions applicable to the subject property, which are not created by the owner or applicant is the existing steep slope environmentally critical area on the lot. The proposal to develop a townhouse structure with access directly from 22nd Avenue is limited by the ECA steep slope and steep slope buffer areas. Pursuant to SMC 23.45.016.A.3, 300 square feet per unit of private, usable open space, at ground level and directly accessible to each unit is required. The existing steep slope areas on the lot do not provide level ground for the location of open space at ground level for ground related housing on the site. If open space were to be located on the ground level, this would have resulted in a larger intrusion of the building in the steep slope to provide for more level ground for open space in the front. The applicant's request to reduce open space (210 sq. ft. per unit) so that there will be less intrusion into the steep slope makes sense.

According to the King County Assessor's Records, development in the immediate vicinity is characterized by structures built in the 1950s or earlier when current open space development standards were not required by code. Given the above mentioned site constraints, the request for a variance to allow less than the required quantity of open space to be located only on roof decks rather than at ground level is sensible. Because of the unusual conditions applicable to the subject property, including location of the existing topography which is not created by the applicant, the strict application of the Land Use Code would deprive the property of the rights and privileges enjoyed by other property owners in the same zone or vicinity.

2 *The requested variance does not go beyond the minimum necessary to afford relief and does not constitute a grant of special privilege inconsistent with the limitation upon other properties in the vicinity and zone in which the subject property is located; and*

Pursuant SMC 23.45.016A.3 ground related housing in L-3 zone is required to have an average of 300 square feet per unit of private usable open space, at ground level and directly accessible to each unit. No unit shall have less than 200 square feet of private usable open space. In this case, the construction of the proposed townhouse units will have less than the required quantity of open space at ground level due to the existing topography of the site.

Allowing less than required quantity of open space which is not on ground level will result in a development that will allow a modest structure to be built on the lot. Constrained by the existing topography and ECA development standards, the proposed variance is reasonable. Thus the applicant has demonstrated that the variance does not go beyond the minimum to afford relief and does not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is located.

3. The granting of the variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the zone or vicinity in which the subject property is located; and

No detriment to the public welfare or injury to the property or improvements in the zone or vicinity is likely to occur by granting the requested variance. The applicant request to reduce the amount of open space required from 300 sq, ft to 210 sq. ft. is a benefit instead of detriment because it will result in less disturbance of the steep slope. Thus granting the variance to reduce the amount of open space and locate them on roof decks will not be detrimental to the public welfare or injurious to the property or improvements in the zone or vicinity in which the property is located.

4. *The literal interpretation and strict application of the applicable provisions or requirements of this Land Use Code would cause undue hardship or practical difficulties;*

The literal interpretation and strict application of the applicable provisions and requirements of the Land Use Code would cause undue hardship and practical difficulties because if the more intrusion into the steep slope should occur, the applicant may not get an exception to allow reasonable use of the property.

5. The requested variance would be consistent with the spirit and purpose of the Land Use Code regulations for the area.

Granting the request for a structure to provide less than the required open space would allow development of a two unit townhouse structure that would provide additional multi-family housing opportunities in the City, which is certainly consistent with the spirit and purposes of the Land Use Code.

DECISION – VARIANCE

For all of the reasons annunciated above, the request for a variance to allow less than the required quantity of open space as shown on the approved plans (210 sq. ft. on roof decks) in L-3 zone (Seattle Municipal Code23.45.016.A.3.1.a) is **GRANTED.**

ANALYSIS - SEPA

The proposed construction of a two-unit town house structure on the subject site would be categorically exempt from SEPA review but for the presence of an identified Environmentally Critical Area (ECA) steep slope on the lot (SMC 25.05.908). Environmental review of a unit lot subdivision in the future has also been considered. The scope of environmental review of the proposed construction within the identified environmental critical area is limited to:

1) Documenting whether the proposal is consistent with the City of Seattle Environmentally Critical Areas (ECA) regulations in SMC 25.09; and

2) Evaluating potentially significant impacts on the critical area resources not adequately addressed in the City of Seattle Environmentally Critical Area requirements of SMC Chapter 25.09, Regulations for Environmentally Critical Areas, including additional mitigation measures needed to protect the environmentally critical areas in order to achieve consistency with SEPA and other applicable environmental review laws. (*SMC 25.05.908.B*)

The initial disclosure of the potential environmental impacts on this project was made in the environmental checklist prepared by the applicant, Roger Newell, dated June 19, 2006. The information in the checklist, the supplemental information submitted by the applicant, field inspection, and the experience of the lead agency with similar projects form the basis for this analysis and decision.

The proposal has been reviewed for consistency with the ECA regulations. It requires approval of an ECA exception (SMC 25.09.300) to modify the standard of SMC 25.09.180 which prohibits development in steep slopes and steep slope buffer, modified by SMC 25.09.180E which allows such development up to 30% of the steep slope. As approved, the proposal is consistent with the City's ECA regulations.

The Department of Planning and Development has analyzed and annotated the environmental checklist submitted by the applicant and reviewed the project plans and any additional information in the file. This proposal may result in adverse impacts on the environmentally critical area. However, due to their temporary nature and limited effects, the impacts are not expected to be significant.

The SEPA Overview Policy (SMC 25.05.665 D) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

The Overview Policy states, in part, that "Where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation" subject to some limitations. Under such limitations/circumstances (SMC 25.05.665 D1-7) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate. Short-term and long-term adverse impacts are anticipated from the proposal.

<u>Short-term Impacts</u>

The following temporary or construction-related impacts on the critical area are expected: increased potential for erosion.
Adopted codes and/or ordinances provide mitigation for the identified impact. The Stormwater, Grading and Drainage Control Code requires preparation of a soils report to evaluate the site conditions and provides recommendations for safe construction on sites where grading will involve cuts or fills of greater than three feet in height or grading greater than 100 cubic yards of material. The current proposal involves grading to accommodate excavation for the foundation of the structures with cuts up to 300 cubic yards and a back fill of 300 cubic yards to level grade on uphill side of the structure with no imported material required. The Stormwater, Grading and Drainage Control Code regulates site excavation for foundation purposes and requires that soil erosion control techniques be initiated for the duration of construction. These Code provisions also provide extensive conditioning authority and prescriptive construction methodology to assure safe construction techniques are used. The ECA Ordinance and Directors Rules (DR) 3-2007, 4-2007 and 33-2006 regulate development and construction techniques in designated ECA's. The Building Code provides for construction measures in general. Compliance with these applicable codes and ordinances will reduce or eliminate most short-term impacts to the environmentally critical area.

Earth

The ECA Ordinance and Directors Rule (DR) 33-2006 requires submission of a soils report to evaluate the site conditions and provide recommendations for safe construction in areas with steep slopes, liquefaction zones, and/or a history of unstable soil conditions. Pursuant to this requirement the applicant submitted a geotechnical engineering study prepared by the Geotech Consultant Inc, dated February 10, 2004. The report evaluates the soil and site conditions and provides recommendations for erosion and drainage controls, slope stability, grading and earthwork and foundation construction.

The construction plans, including shoring of excavations as needed and erosion control techniques will be reviewed by DPD. Additional information required showing conformance with the Environmentally Critical Areas Ordinance will be required prior to issuance of building permit. The Stormwater, Grading and Drainage Control Code requires preparation of a soils report to evaluate the site conditions and provide recommendations for safe construction on sites where grading will involve cuts or fills of greater than three feet in height or grading greater than 100 cubic yards of material. Any fill needed for back fill will be composed of the excavated materials. The Stormwater, Grading and Drainage Control Code provide extensive conditioning authority and prescriptive construction methodology to assure safe construction techniques are used. Therefore, due to the developed nature of the sites and surrounding neighborhood and the limited areas within the steep slope and steep slope buffer, no additional earth/soils-related conditioning is warranted pursuant to SEPA policies.

Long-term Impacts

Potential long-term impacts on the environmentally critical area that may occur as a result of this project include: increased surface water runoff from greater site coverage by impervious surfaces. This long-term impact is not considered significant because the impact is minor in scope.

The long-term impact will be mitigated by the City's adopted codes and/or ordinances. Specifically these are: Stormwater, Grading and Drainage Control Code (storm water runoff from additional site coverage by impervious surface) and the Regulations for Environmentally Critical Areas.

DECISION - SEPA

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirements of the State Environmental Policy Act (RCW 43.21C), including the requirement to inform the public agency decisions pursuant to SEPA.

[**X**] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030 2C.

[ ] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030 2C.

CONDITIONS – VARIANCE

None required

CONDITIONS – SEPA

None required.

CONDITIONS – ECA EXCEPTION

Prior to Issuance of a Master Use Permit

1 Limit disturbance of steep slope to 1419 sq. ft. as proposed in the plans sheet A100 dated February 16, 2007.

2. Limit proposal to the two unit townhouse as shown in plans dated February 16, 2007.

(Non-appealable ECA conditions apply to all the lot. These conditions include, but are not limited to, the following items):

3. Show on the site plan the location of permanent ECA markers.

4. Show on building plans the location of a temporary, durable, highly visible construction fence at the boundary between the construction activity area and areas of steep slope and steep slope buffer which are to be left undisturbed. (25.09.060)

Prior to Issuance of Any Building Permits

The owner and/or responsible party shall:

5. Show permanent visible markers shall be placed along the edge of the no disturbance area as proposed on the site plan. The markers shall be either reinforcing steel or metal pipe driven securely into the ground with a brass cap affixed to the top similar to survey monuments. The brass cap shall be visible at the ground surface and indicate the purpose of the marker. Markers shall be placed at all points along the edge of the no disturbance line where the line changes direction. Markers must be in place before issuance of this Master Use permit. Markers should be detailed in accordance with description contained in Director's Rule 4-2007.

6. Show on building plans the location and boundaries of ECA's on the site. Use the contours on the topographic survey to delineate the steep slope critical area on the building plans. The steep slope areas are at least 10 feet in height and average at least 40 percent. Provide area calculations for the steep slope delineation.

7. Provide a note on the building plans indicating that landslides occurred on the subject site. (25.09.060A.2.a)

8. Provide on building plans calculations for developmental coverage and impervious surface, and show the construction activity area for the proposal on building plans. (25.09.060)

9. Show on building plans the location of a temporary, durable, highly visible construction fence at the boundary between the construction activity area and areas of steep slope and steep slope buffer which are to be left undisturbed. (25.09.060)

10. Show on building plans the existing and proposed final grade contours.

11. Show on building plans the location of the stormwater control system and the connection to the public system.

12. Provide on building plans a Best Management Practices plan to include temporary and permanent drainage and erosion control.

13. Provide note on building plans indicating that grading must be stabilized by October 31st, and no excavation to be performed between October 31st and April 1st. (25.09.060C.9)

14. Show on building plans the location of permanent visible markers to delineate existing (pre-construction) steep slopes and associated buffers. The buffer from the edge of the steep slope should be at least 15 feet. The markers must be arranged to delineate the buffers and existing steep slope area on the property. Markers should be detailed in accordance with description contained in Director's Rule 4-2007.

15. ECA Covenant. Provide names of owner(s) of property and their relationship (single man or woman, marital community, partnership, corporation, etc.) so we can incorporate this information into the ECA Covenant document. We will also include the number of permanent markers (see previous item). The ECA Covenant form will be provided during review of corrected building plans. Note that the ECA Covenant is not the same as the Geologic Hazard Covenant.

16. Provide a construction activity schedule for the earthwork and foundation work. The schedule should include type of equipment, installation of BMP measures and temporary/permanent storm water controls, and other pertinent information. (25.09.060C11)

17. Provide a note on building plans that a pre-construction meeting is required between owner's representatives and DPD. (25.09.060C11)

18. Bonds and insurance are required by the ECA Regulations because the excavation below a 45-degree projection from the property line is deeper than 4 feet.

Signature: (signature on file) Date: October 22, 2007
Christopher A. Ndifon, Land Use Planner

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