

RETURN COMMENTS TO:

DEPARTMENT OF PLANNING  
Zoning and Platting Division  
P.O. Box 196650  
Anchorage, Alaska 99519-6650  
Phone 343-7943

Case No. 2006-142

Request: Site plan review for a Senior Housing Development  
104.76 acre(s)

to:

a Senior Housing Development

Zoning: PLI Public lands & institutions district

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COMMENTS AND MEETING SCHEDULE:

Planning and Zoning Commission Public hearing

Hearing Date: ~~Monday, November 06, 2006~~ April 9, 2007

Agency Comments Due: ~~Monday, October 09, 2006~~

Council Comments Due: ~~Friday, October 27, 2006~~

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DISTRIBUTION: STANDARD DISTRIBUTION  
COMMUNITY COUNCIL(S):

Rabbit Creek

PLANNING AND ZONING COMMISSION  
Assembly Hall, Z. J. Loussac Library  
3600 Denali Street, Anchorage, Alaska  
Monday, November 06, 2006 6:30 p.m.

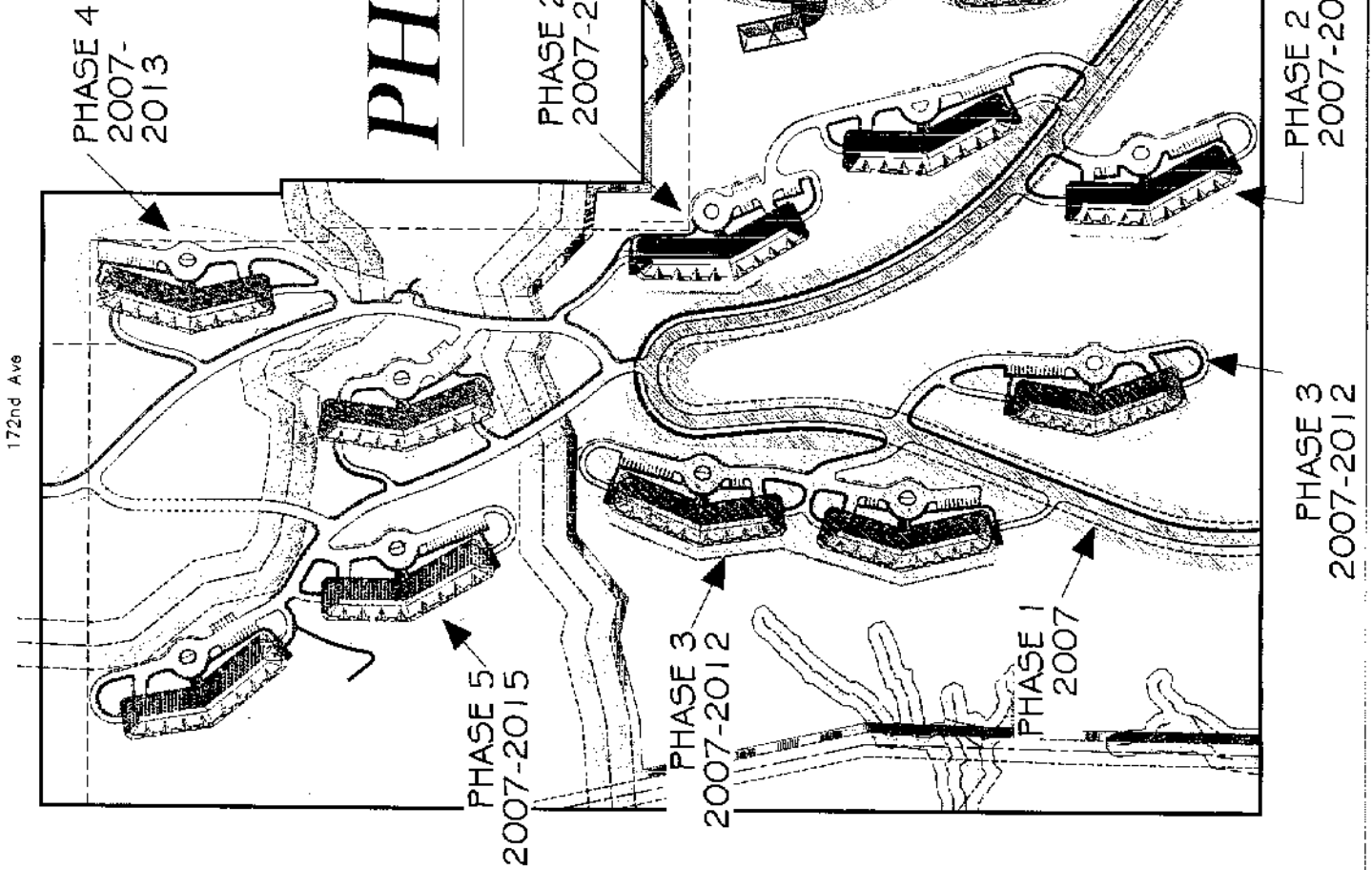




AN EXCLUSIVE SENIOR COMMUNITY

# A Senior Community Master Plan

# PHASING PLAN



Sept 13-06

Drawn by: TH

Scale: NTS

# Application for Site Plan Review

Municipality of Anchorage  
 Planning Department  
 P.O. Box 194750  
 Anchorage, AK 99519-0750



Please fill in the information asked for below.

PETITIONER*	PETITIONER REPRESENTATIVE (if any)
Name (last name first) Forest Heights, LLC	Name (last name first) Lantech, Inc.
Mailing Address 4370 Business Park Blvd. Suite H-14 Anchorage, Alaska 99503	Mailing Address 440 West Benson Blvd., Suite 103 Anchorage, Alaska 99503
Contact Phone: Day: 907-242-1111 Night:	Contact Phone: Day: 562-5291 Night:
Fax:	Fax: 561-6626
E-mail:	E-mail: mail@lantechi.com

\*Report additional petitioners or disclose other co-owners on supplemental form. Failure to divulge other beneficial interest owners may delay processing of this application

PROPERTY INFORMATION		
Benefiting Property Tax # (000-000-00-000):	<del>020-181-19-000</del>	020-181-6
Site Street Address: Goldenview Drive at 172nd Avenue		
Current Legal Description: (use additional sheet if necessary) Tract A, Legacy Pointe Subdivision		
Zoning: PLI	Acreage: 104.76	Grid #: 3437

SITE PLAN APPROVAL REQUESTED
<input type="checkbox"/> Church <input type="checkbox"/> Bed and Breakfast <input type="checkbox"/> Public Facility <input type="checkbox"/> Public Facility Project Landscaping <input checked="" type="checkbox"/> Other <u>Site plan review for Elderly Housing under 21.12.030</u>

I hereby certify that (I am) (I have been authorized to act for) the owner of the property described above and that I petition for a site plan review in conformance with Title 21 of the Anchorage Municipal Code of Ordinances. I understand that payment of the application fee is nonrefundable and is to cover the costs associated with processing this application, and that it does not assure approval of the site plan. I also understand that assigned hearing dates are tentative and may have to be postponed by Planning Department Staff, the Planning and Zoning Commission or the Urban Design Commission for administrative reasons.

9/15/06 9-18-06		TONY HOFFMAN
Date	Signature (Agents must provide written proof of authorization)	

Accepted by: 	Poster & Affidavit: 4 PHNS - OK	Fee: 4800 <sup>00</sup>	Case Number: 2006-142
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<b>COMPREHENSIVE PLAN INFORMATION</b>			
Anchorage 2020 Urban/Rural Services: <input checked="" type="checkbox"/> Urban <input type="checkbox"/> Rural			
Anchorage 2020 West Anchorage Planning Area: <input type="checkbox"/> Inside <input checked="" type="checkbox"/> Outside			
Anchorage 2020 Major Urban Elements: Site is within or abuts:			
<input type="checkbox"/> Major Employment Center	<input type="checkbox"/> Redevelopment/Mixed Use Area	<input type="checkbox"/> Town Center	
<input type="checkbox"/> Neighborhood Commercial Center	<input type="checkbox"/> Industrial Center		
<input type="checkbox"/> Transit - Supportive Development Corridor			
Eagle River-Chugiak-Peters Creek Land Use Classification:			
<input type="checkbox"/> Commercial	<input type="checkbox"/> Industrial	<input type="checkbox"/> Parks/Open Space	<input type="checkbox"/> Public Land Institutions
<input type="checkbox"/> Marginal land	<input type="checkbox"/> Alpine/Slope Affected	<input type="checkbox"/> Special Study	
<input type="checkbox"/> Residential at _____ dwelling units per acre.			
Girdwood-Turnagain Arm:			
<input type="checkbox"/> Commercial	<input type="checkbox"/> Industrial	<input type="checkbox"/> Parks/Open Space	<input type="checkbox"/> Public Land Institutions
<input type="checkbox"/> Marginal land	<input type="checkbox"/> Alpine/Slope Affected	<input type="checkbox"/> Special Study	
<input type="checkbox"/> Residential at _____ dwelling units per acre.			

<b>ENVIRONMENTAL INFORMATION</b>					
Wetlands Classification:	<input checked="" type="checkbox"/> None	<input type="checkbox"/> "C"	<input type="checkbox"/> "B"	<input type="checkbox"/> "A"	
Avalanche Zone:	<input checked="" type="checkbox"/> None	<input type="checkbox"/> Blue Zone	<input type="checkbox"/> Red Zone		
Floodplain:	<input checked="" type="checkbox"/> None	<input type="checkbox"/> 100 Year	<input type="checkbox"/> 500 Year		
Seismic Zone (Harding/Lawson):	<input type="checkbox"/> "1"	<input checked="" type="checkbox"/> "2"	<input type="checkbox"/> "3"	<input type="checkbox"/> "4"	<input type="checkbox"/> "5"

<b>RECENT REGULATORY INFORMATION</b> (Events that have occurred in the last 5 years for all or portion of site)	
<input checked="" type="checkbox"/> Rezoning	Case Number: 2005-139
<input type="checkbox"/> Preliminary Plat	<input checked="" type="checkbox"/> Final Plat Case Number(s): 2006-10
<input type="checkbox"/> Conditional Use	Case Number(s):
<input type="checkbox"/> Zoning Variance	Case Number(s):
<input type="checkbox"/> Land Use Enforcement Action for:	
<input type="checkbox"/> Building of Land Use Permit for:	
<input type="checkbox"/> Wetland permit: <input type="checkbox"/> Army Corp of Engineers <input type="checkbox"/> Municipality of Anchorage	

<b>DOCUMENTATION</b>			
Required:	<input checked="" type="checkbox"/> 25 copies of site plan to scale depicting: building footprints; parking areas; vehicle and pedestrian circulation; lighting; grading; landscaping; signage; drainage and project location.		
	<input checked="" type="checkbox"/> 25 copies of building plans to scale depicting: floor plans; building elevations; exterior colors and textures.		
	<input checked="" type="checkbox"/> Narrative: explaining the project; planning objectives; construction and operation schedule; final ownership.		
	<input type="checkbox"/> One copy of Assembly Ordinance enacting zoning special limitations, if applicable.		
Required if indicated:	<input type="checkbox"/> Air quality impact	<input checked="" type="checkbox"/> Traffic impact analysis	<input type="checkbox"/> Economic impact analysis
	<input type="checkbox"/> Soils analysis	<input type="checkbox"/> Noise impact Analysis	<input type="checkbox"/> Holding capacity of the land analysis
	<input type="checkbox"/> Shadow impact analysis		

**CHURCH AND BED & BREAKFAST STANDARDS**

The Planning Director may only approve a church site plan or a bed and breakfast site plan if the director finds that all of the following standards are satisfied. Each standard must have a response in as much detail as it takes to explain how your project satisfies the standard. The burden of proof rests with you. Use additional paper if needed.

Explain how the proposed site plan demonstrates that the church will not have a permanent or negative impact on those items listed in this subsection substantially greater than that anticipated from permitted residential development.

a. Pedestrian and vehicular traffic circulation and safety.

b. Demand for, and availability of, public services and facilities.

c. Noise pollution, air pollution and other forms of environmental pollution.

The Urban Design Commission shall consider the following criteria in reviewing public facility project landscaping under this section. Each standard must have a response in as much detail as it takes to explain how your project satisfies the standard. The burden of proof rests with you. Use additional paper if needed.

Cost.

Feasibility.

Explain how planning and design criteria are met by the proposed landscape plan.

The external impacts generated by the public facility project on adjacent areas. The landscape elements of the public facility project should compliment, maintain or improve the landscape of adjacent neighborhoods and areas.

The degree to which the landscape elements contribute to on-site use of the public facility project. The landscape elements of the public facility project should enhance safe, efficient and comfortable public use.

The visual attractiveness of the landscaping and its enhancement of the architecture of the public facility project, including the integration of internal and exterior architectural themes.

**PUBLIC FACILITY STANDARDS**

The Planning and Zoning Commission shall review a proposed site plan for consistency with the goals, policies and land use designations of the comprehensive plan and other municipal plans adopted by the assembly, conformity to the requirements of this title, and the effects of the proposal on the area surrounding the site.

The proposed usage of the property, Housing for the Elderly, is in harmony with many aspects of the Anchorage 2020 Comprehensive Plan. "Rapid Growth of Anchorage's senior population means rising demand for housing, facilities and services...conveniently located for seniors" (page 14).

The proposed design meets the goals of 2020 policy 37 "Design, construct and maintain roadways and rights-of-ways to accommodate pedestrians....." and policy 38 "Design, construct and maintain roadways....to promote and enhance physical connectivity within and between neighborhoods" The design of the 20 foot wide multi use trail access allows for pedestrian travel all the way across the property. Additionally, detached sidewalks accommodate pedestrian traffic between buildings, and along roadways.

Anchorage 2020 Policy 48, 49 and 50 are met through the characteristics of low area footprint design that are inherent in the design of this project.

Anchorage 2020 Policies 66 and 67, which address wildlife habitat and conservation, are addressed through the retention of 100 foot wide corridors along the existing watersheds, throughout the property. Additionally, approximately 29 acres of the existing habitat area on the western area of the property will remain undisturbed.

This project will be similar in density to the proposed multi family development south of this project. This project will facilitate the connection of a much needed Collector status road between Goldenview Drive and Potter Valley Road.

**SPECIAL LIMITATION STANDARDS**

The Planning and Zoning Commission shall review the proposed site plan governed by special limitation for consistency with the special limitations, goals, policies and land use designations of the comprehensive development plan and other municipal plans adopted by the assembly, conformity to the requirements of this title, and the effects of the proposal on the area surrounding the site. Each special limitation standard must have a response in as much detail as it takes to explain how your project satisfies the standard. The burden of proof rests with you. Use additional paper if necessary.

# Legacy Pointe PLI Site Plan

## Narrative

### PROJECT OVERVIEW:

This is a request for review and approval of the site plan for construction of elderly housing on Tract "A", Legacy Pointe Subdivision, Plat 2006-10. The property is zoned PLI, which accommodates housing for the elderly, under AMC 21.40.020.B.15. Under that section of Title 21, all permitted uses must follow the procedures outlined in 21.15.015 (Public Facility Site Review) which entails a site plan application review per 21.15.030. **This narrative, the required documents, and the site plans are submitted as documentation with this Site Plan Review Application, per 21.15.030.**

The proposed layout of the 12 building plan for the Legacy Pointe Development (formerly referred to as "Forest Heights") is portrayed on the site plan attached to this package. Tract "B", as shown on the plat of Legacy Pointe Subdivision, has been purchased by the Municipality of Anchorage's Heritage Land Bank.

We have developed a Senior Housing project, (housing for the elderly) a land use that is fully supported by the current property zoning per AMC 21.40.020 B.15. In multiple meetings with different neighborhood and community councils, it has been stated that the community would prefer the land be developed in a manner consistent with the current zoning of the subject property. This development does that, as well as meeting a growing need for Senior Housing in the City of Anchorage.

"Housing for the elderly" is defined as "multiple-family housing especially designed for occupancy by persons 62 years of age and older and requires 30 percent of the units within the facility to be handicapped accessible with accommodation for wheelchairs (AMC 21.35.020). The Legacy Pointe buildings comply with that standard.

All the building sites are situated within the most suitable areas on the property. No development will occur in the western 29 acres of the property, which contains mapped wetland and stream areas (*It should be noted that these streams have been field located and verified by MOA watershed management personal*). In some instances, we have included additional open space tracts adjacent to the 3,700 lineal feet of 100 foot wide stream protection easements, thus creating large areas of natural, undisturbed open space.

The property is covered by heavy alder thickets, paper birch and white spruce. Ground cover consists of heavy bluegrass and meadow foliage.

The design has 960,000 s.f. of impervious coverage as defined by AMC 21.35.020 (roads, sidewalks and buildings), which is 21% of the total land mass.<sup>1</sup> By comparison, a potential residential R-6 development of 84 lots on this property would encompass approximately 802,000 s.f., or 18%, of impervious coverage (not including any additional expansion of side yards, driveways, etc.). Additionally, this property has been studied and

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<sup>1</sup> The maximum allowable PLI building coverage, by zone, is 45% (21.40.020G).

# Legacy Pointe PLI Site Plan

## Narrative

tested for on-site septic suitability, and testing indicated that the soils cannot support septic systems.

Approximately 54 acres (52%) of the entire property will be undisturbed by any sort of site grading or construction activity and will be left in its present state.

### **ANCHORAGE 2020 PLAN - GOALS AND OBJECTIVES:**

A number of the goals and objectives on the Anchorage 2020 Goals and objectives are addressed by the design of this development. Some of them are:

*The proposed usage of the property, Housing for the Elderly, is in harmony with many aspects of the Anchorage 2020 Comprehensive Plan. "Rapid Growth of Anchorage's senior population means rising demand for housing, facilities and services...conveniently located for seniors" (page 14).*

*The proposed design meets the goals of 2020 policy 37 "Design, construct and maintain roadways and rights-of-ways to accommodate pedestrians....." and policy 38 "Design, construct and maintain roadways....to promote and enhance physical connectivity within and between neighborhoods" The design of the 20 foot wide multi use trail access allows for pedestrian travel all the way across the property. Additionally, detached sidewalks accommodate pedestrian traffic between buildings, and along roadways.*

*Anchorage 2020 Policy 48, 49 and 50 are met through the characteristics of low area footprint design that are inherent in the design of this project.*

*Anchorage 2020 Policies 66 and 67, which address wildlife habitat and conservation, are addressed through the retention of 100 foot wide corridors along the exiting watersheds, throughout the property. Additionally, approximately 29 acres of the existing habitat area on the western area of the property will remain undisturbed.*

### **TRAILS:**

Currently, approximately 2,200 feet of the "Moen Trail" traverses through the property. This trail is widely used recreational trail, used by hikers year round. Skiers and sledgers enjoy the use of the trail in the winter. The trail is extremely steep (in excess of 15% in places) which make winter time use dangerous for pedestrians. The collector status of the road make trail crossing considerations difficult, as well. The new trail has been aligned to follow the existing alignment of one of the creek drainages through the property, and will be centered on a 20' wide trail easement. The new trail will not cross the collector road, making it a safer alignment. In addition to the trail, pedestrian paths and sidewalks connect all the buildings, and create interconnectivity between surrounding residential areas.

The Municipality of Anchorage Department of Community Planning and Development Trail Plan (adopted November, 1997) clearly indicates a planned multi use trail connection across the property. Additionally, the Potter Valley Land Use Analysis Plan (December 1999) states that "the Municipality also requires that this trail be retained or

# Legacy Pointe PLI Site Plan

## Narrative

*similarly replaced* within the future development of the Mental Health Trust Land". The current design creates a superior trail, with easier access and better connectivity. Additionally, the proposed multi-use pathway will be constructed as a gravel trail, by the developers, as part of this development.

### OWNERSHIP:

The project will become the property of the Condominium Homeowners Association. All property maintenance, snow removal and landscaping will be the responsibility of the Homeowners.

### DENSITY:

The proposed design incorporates 12 buildings, each one containing 55 Senior Housing units, ranging in size from 1,360 to 3,000 s.f.. The buildings are 5 stories high, with 1 ½ of the bottom levels allocated for the bulk of residence parking. The buildings will be terraced into the ground, with only 3 ½ stories visible from the uphill (easterly) side. The layout of the buildings maximize views of Cook Inlet to the west, and Chugach Mountains to the east. Additionally, there will be a "Club House" type facility, approximately 7,600 s.f., for the use and benefit of the owners in the development.

In all, we are proposing a density of 6.3 dwelling units per acre, comparable to the property that abuts to the south, which is zoned R-3SL, and has a potential D.U.A. of 6.0. Plans for a multi and single family home development are being finalized for that property. This type of design ultimately minimizes overall ground disturbance, as well as preserving existing watershed areas and wildlife corridors.

It should be noted that a 100 foot natural landscape buffer is designed along the northerly boundaries, adjacent to the R-6 zoned subdivisions.

### UTILITIES:

The entire project will be served by public water and sewer. Approximately 4,300 linear feet of water line is being extended south on Goldenview Drive from 164<sup>th</sup> Avenue to supply water to the project. The proposed sewer system will connect to an existing sewer main on Potter Valley Road, approximately 1,900 feet west from the southwest corner of the project. On site, approximately 10,000 linear feet of water line and 8,800 linear feet of sewer line will be installed to service the project. More than 60 manholes will be constructed. The increase in water availability decreases fire department response time, making for a safer hillside area.

### DRAINAGE:

To address the community concerns regarding drainage impacts, both to properties that border on the north of the development, as well as to Potters Marsh to the west, we are in the process of developing a more in-depth drainage impact analysis. Additionally, design of infiltration trenches and detention basins throughout the development and in the westerly areas of the property will be incorporated into the final engineering and grading

# Legacy Pointe PLI Site Plan

## Narrative

plans. Onsite drainage from the buildings and roads will be directed into curb and gutter, eventually channeled to a combination of storm drain lines, infiltration trenches, retention ponds and other infiltration systems to *allow off site drainages to maintain their natural courses*.

It should be noted that the Municipality of Anchorage's Project Management Department will not allow construction to take place until they have thoroughly reviewed all project construction plans, as well as the site specific Storm Water and Pollution Prevention Plan. The effects of construction for this project to Potter Marsh will be minimized to the maximum extent possible, and all possible safeguards will be in place.

### WETLANDS:

In the summer of 2005, CH2M Hill mapped the wetlands on the project site and published the attached wetlands delineation report (dated October 4, 2005). After the Corps of Engineers conducted a site visit, the developers contracted to have more extensive wetland studies completed during the summer of 2006. Subsequently, additional wetlands have been delineated on the site, and an amendment to the original CH2M Hill report has been submitted to the Corps of Engineers (also attached to this application). Eventually, a permit process to fill small areas of the wetlands will be initiated.

### CONSTRUCTION PHASING SCHEDULE:

While contingent on various approvals, the project construction schedule will be as follows:

- The installation of off-site water and sewer, construction of the collector road on the subject property, and the road adjacent to Tract "A" will be completed in the spring and summer of 2007. Utilities in the collector road will be installed at that time.
- Building construction will begin with the easterly two buildings during the summer of 2007. The remaining buildings, road and utility infrastructure will be built out as the project moves west, finishing within 5-7 years.

See attached Phase Plan.

### NATURAL VEGETATION RETENTION:

The site plan shows the approximate limits of vegetation disturbance in the project area. The "open space" tracts, and stream protection easements will only be disturbed during the project for construction of utilities and for road crossings.

Areas disturbed by building construction, utility installation and the extents of road construction areas can be limited by placing a note on the site plan prior to approval, and could be worded as follows:

*Only that area needed for building, driveway and utility construction shall be disturbed as per approved master site plan. All areas disturbed by utility installation shall be*

# Legacy Pointe PLI Site Plan

## Narrative

*seeded with grass seed or other suitable ground cover that is acceptable to the Municipality of Anchorage.*

The project site plan shows the amount of planned vegetation retention, the amount of clearing, and extent of construction that is proposed for this development.

### **TRAFFIC CIRCULATION AND CONNECTIVITY**

As mentioned previously, we are incorporating a portion of the 70' wide collector ROW that will ultimately be a main connection between South Goldenview Drive and Potter Valley Road. Through meetings with the Municipality of Anchorage, we have established the alignment of the collector that has been identified in the Long Range Transportation Plan (LRTP) as amendment #91, and have integrated that alignment into the design. Also, we have been in contact with the adjacent property owner to the south of our project (Viewpoint Subdivision, Tract 1) and have established the connection points for the future development of that property. This development's design incorporates 3,200 lineal feet of subdivision "Collector" standard road, which will be encompassed in a 70 feet wide Public Use Easement, as well as 4200 lineal feet of internal subdivision standard roads.

See attached Traffic Impact Analysis.

### **CONCLUSION:**

We request that the Municipality of Anchorage Planning Department, as well as the other departments reviewing this project, will concur that this is the best use of the subject property. We have taken into account the community desires for trails, waterways, open spaces and future road connectivity, while meeting a growing demand for Senior Housing that the City of Anchorage has not kept up with. We welcome requests for additional information, and will respond to any questions the planning staff or the general public may have as the process moves along.

**PER 21.15.030 C.1&2**, we are submitting the following maps, along with this narrative and attached Application for Site Plan Review Form, as part of this application:

1. (25) Existing Conditions Site Plan (1"=100')
2. (25) Existing Conditions Site Plan W\Photo (1'=100')
3. (25) Master Site Plan
4. (25) Reduced Copies of Building Floor Plans
5. Draft Copy of Traffic Impact Analysis, Prepared by USKH, dated July 2006
6. Wetland Delineation report by Shaw Alaska, dated 8/28/06
7. Wetland Delineation report by CH2M Hill, dated 10/4/05
8. Phase I Environmental Site Assessment by Shannon and Wilson, dated October 2005
9. Soils Logs by Anderson Engineering, dated March 2004
10. Construction Phase Plan



**CERTIFICATE OF OWNERSHIP and DEDICATION**

This map, with the legal description and the accompanying plat, is intended to show the location and extent of the proposed dedication of the new Moon Trail. The dedication is shown by a dashed line on this map. The dedication is shown by a dashed line on this map. The dedication is shown by a dashed line on this map.

Prepared by:  
 Lantech, Inc.  
 10000 S. 10th Street, Suite 100  
 Aurora, CO 80015  
 Date: 11/11/2009

Graphic Scale:  
 1 inch = 100 feet

**LEGEND**  
 Surface Elevation 280  
 Contour Station 280  
 Existing Zoning R-U

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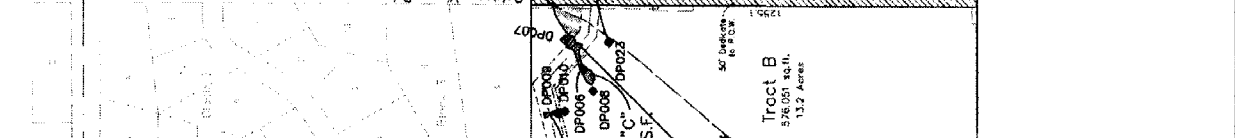
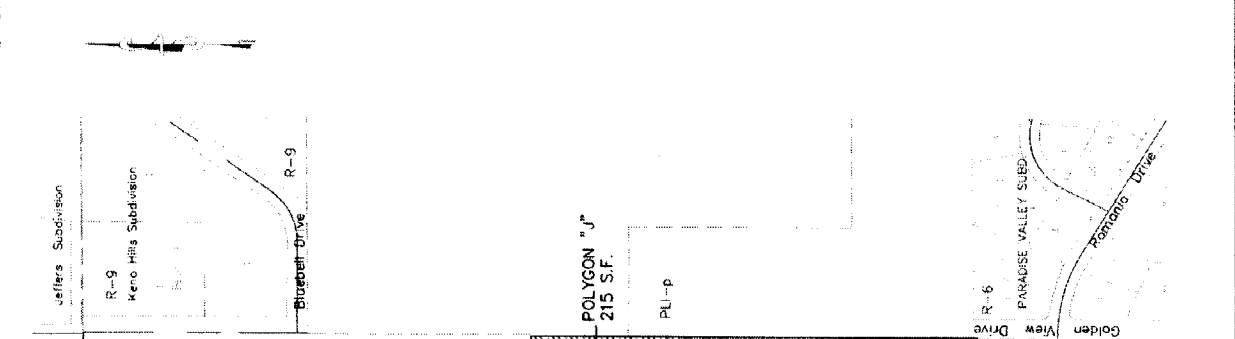
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- NOTES:**
1. DEK Right of Way Easement (Basis Easement) is for the construction, distribution line or system. Recorded January 15, 1985, book 113 page 196.
  2. The Bick Wetlands Area identifies the wetland by Type "S", "W", "U", "M", "A", "B", "C", "D", "E", "F", "G", "H", "I", "J", "K", "L", "M", "N", "O", "P", "Q", "R", "S", "T", "U", "V", "W", "X", "Y", "Z", "AA", "AB", "AC", "AD", "AE", "AF", "AG", "AH", "AI", "AJ", "AK", "AL", "AM", "AN", "AO", "AP", "AQ", "AR", "AS", "AT", "AU", "AV", "AW", "AX", "AY", "AZ", "BA", "BB", "BC", "BD", "BE", "BF", "BG", "BH", "BI", "BJ", "BK", "BL", "BM", "BN", "BO", "BP", "BQ", "BR", "BS", "BT", "BU", "BV", "BW", "BX", "BY", "BZ", "CA", "CB", "CC", "CD", "CE", "CF", "CG", "CH", "CI", "CJ", "CK", "CL", "CM", "CN", "CO", "CP", "CQ", "CR", "CS", "CT", "CU", "CV", "CW", "CX", "CY", "CZ", "DA", "DB", "DC", "DD", "DE", "DF", "DG", "DH", "DI", "DJ", "DK", "DL", "DM", "DN", "DO", "DP", "DQ", "DR", "DS", "DT", "DU", "DV", "DW", "DX", "DY", "DZ", "EA", "EB", "EC", "ED", "EE", "EF", "EG", "EH", "EI", "EJ", "EK", "EL", "EM", "EN", "EO", "EP", "EQ", "ER", "ES", "ET", "EU", "EV", "EW", "EX", "EY", "EZ", "FA", "FB", "FC", "FD", "FE", "FF", "FG", "FH", "FI", "FJ", "FK", "FL", "FM", "FN", "FO", "FP", "FQ", "FR", "FS", "FT", "FU", "FV", "FW", "FX", "FY", "FZ", "GA", "GB", "GC", "GD", "GE", "GF", "GG", "GH", "GI", "GJ", "GK", "GL", "GM", "GN", "GO", "GP", "GQ", "GR", "GS", "GT", "GU", "GV", "GW", "GX", "GY", "GZ", "HA", "HB", "HC", "HD", "HE", "HF", "HG", "HH", "HI", "HJ", "HK", "HL", "HM", "HN", "HO", "HP", "HQ", "HR", "HS", "HT", "HU", "HV", "HW", "HX", "HY", "HZ", "IA", "IB", "IC", "ID", "IE", "IF", "IG", "IH", "II", "IJ", "IK", "IL", "IM", "IN", "IO", "IP", "IQ", "IR", "IS", "IT", "IU", "IV", "IW", "IX", "IY", "IZ", "JA", "JB", "JC", "JD", "JE", "JF", "JG", "JH", "JI", "JJ", "JK", "JL", "JM", "JN", "JO", "JP", "JQ", "JR", "JS", "JT", "JU", "JV", "JW", "JX", "JY", "JZ", "KA", "KB", "KC", "KD", "KE", "KF", "KG", "KH", "KI", "KJ", "KL", "KM", "KN", "KO", "KP", "KQ", "KR", "KS", "KT", "KU", "KV", "KW", "KX", "KY", "KZ", "LA", "LB", "LC", "LD", "LE", "LF", "LG", "LH", "LI", "LJ", "LK", "LL", "LM", "LN", "LO", "LP", "LQ", "LR", "LS", "LT", "LU", "LV", "LW", "LX", "LY", "LZ", "MA", "MB", "MC", "MD", "ME", "MF", "MG", "MH", "MI", "MJ", "MK", "ML", "MM", "MN", "MO", "MP", "MQ", "MR", "MS", "MT", "MU", "MV", "MW", "MX", "MY", "MZ", "NA", "NB", "NC", "ND", "NE", "NF", "NG", "NH", "NI", "NJ", "NK", "NL", "NM", "NN", "NO", "NP", "NQ", "NR", "NS", "NT", "NU", "NV", "NW", "NX", "NY", "NZ", "OA", "OB", "OC", "OD", "OE", "OF", "OG", "OH", "OI", "OJ", "OK", "OL", "OM", "ON", "OO", "OP", "OQ", "OR", "OS", "OT", "OU", "OV", "OW", "OX", "OY", "OZ", "PA", "PB", "PC", "PD", "PE", "PF", "PG", "PH", "PI", "PJ", "PK", "PL", "PM", "PN", "PO", "PP", "PQ", "PR", "PS", "PT", "PU", "PV", "PW", "PX", "PY", "PZ", "QA", "QB", "QC", "QD", "QE", "QF", "QG", "QH", "QI", "QJ", "QK", "QL", "QM", "QN", "QO", "QP", "QQ", "QR", "QS", "QT", "QU", "QV", "QW", "QX", "QY", "QZ", "RA", "RB", "RC", "RD", "RE", "RF", "RG", "RH", "RI", "RJ", "RK", "RL", "RM", "RN", "RO", "RP", "RQ", "RR", "RS", "RT", "RU", "RV", "RW", "RX", "RY", "RZ", "SA", "SB", "SC", "SD", "SE", "SF", "SG", "SH", "SI", "SJ", "SK", "SL", "SM", "SN", "SO", "SP", "SQ", "SR", "SS", "ST", "SU", "SV", "SW", "SX", "SY", "SZ", "TA", "TB", "TC", "TD", "TE", "TF", "TG", "TH", "TI", "TJ", "TK", "TL", "TM", "TN", "TO", "TP", "TQ", "TR", "TS", "TT", "TU", "TV", "TW", "TX", "TY", "TZ", "UA", "UB", "UC", "UD", "UE", "UF", "UG", "UH", "UI", "UJ", "UK", "UL", "UM", "UN", "UO", "UP", "UQ", "UR", "US", "UT", "UU", "UV", "UW", "UX", "UY", "UZ", "VA", "VB", "VC", "VD", "VE", "VF", "VG", "VH", "VI", "VJ", "VK", "VL", "VM", "VN", "VO", "VP", "VQ", "VR", "VS", "VT", "VU", "VV", "VW", "VX", "VY", "VZ", "WA", "WB", "WC", "WD", "WE", "WF", "WG", "WH", "WI", "WJ", "WK", "WL", "WM", "WN", "WO", "WP", "WQ", "WR", "WS", "WT", "WU", "WV", "WW", "WX", "WY", "WZ", "XA", "XB", "XC", "XD", "XE", "XF", "XG", "XH", "XI", "XJ", "XK", "XL", "XM", "XN", "XO", "XP", "XQ", "XR", "XS", "XT", "XU", "XV", "XW", "XX", "XY", "XZ", "YA", "YB", "YC", "YD", "YE", "YF", "YG", "YH", "YI", "YJ", "YK", "YL", "YM", "YN", "YO", "YP", "YQ", "YR", "YS", "YT", "YU", "YV", "YW", "YX", "YZ", "ZA", "ZB", "ZC", "ZD", "ZE", "ZF", "ZG", "ZH", "ZI", "ZJ", "ZK", "ZL", "ZM", "ZN", "ZO", "ZP", "ZQ", "ZR", "ZS", "ZT", "ZU", "ZV", "ZW", "ZX", "ZY", "ZZ

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**Lantech**  
 LANTech, Inc.  
 10000 S. 10th Street, Suite 100  
 Aurora, CO 80015  
 Phone: 303.733.1111  
 Fax: 303.733.1112  
 Email: info@lantech.com  
 Website: www.lantech.com

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