

# The County Planning Agency Review Letter: *What is This Thing?*

APA-PA State Conference 2023

Scranton, PA

Tuesday, October 17, 2023

# The Session Leaders

**Andrea Campisi**

East Bradford Township



**Jillian Dierks**

Lower Merion Township





**Matthew Edmond,  
AICP**

Montgomery County  
Planning Commission



**Paul Fritz, RLA, AICP**

Chester County Planning  
Commission



**Pattie Guttenplan,  
RLA, AICP**

Montgomery County  
Planning Commission



# A Primer on the County Review Letter





**WE CALL THEM  
“247 LETTERS”.**

**WHAT ARE THEY?**

They are technical review  
letters issued by county  
planning agencies.

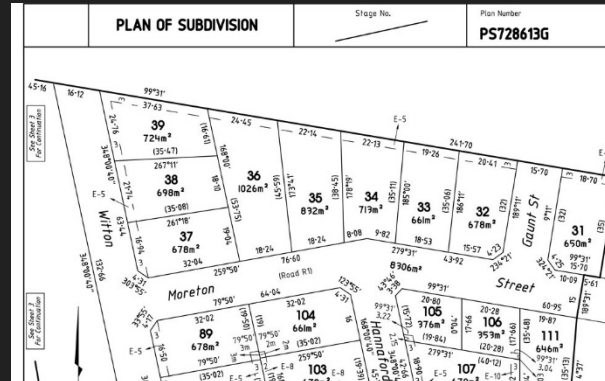
{ The Municipalities Planning Code was created by **Act 247 of 1968.** }

# What Do They Review?

## Land Developments



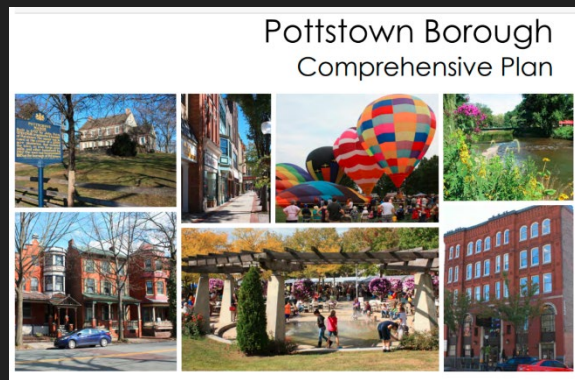
## Subdivisions



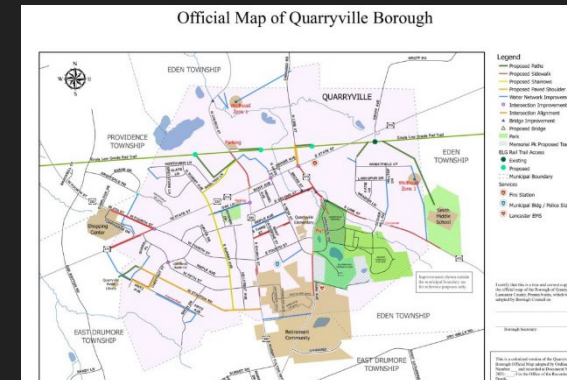
## Zoning Changes



# Comprehensive Plans



## Official Maps



# An MPC Requirement

## COMPREHENSIVE PLANS

- 301.c
- 301.3
- 304

“...shall also be sent to the **county planning commissions...for review and comment**

## SUBDIVISION & LAND DEVELOPMENT

- 502.b (applications)
- 504 (ordinance enactment)
- 505 (ordinance amend'ts)

“Applications for subdivision and land development... shall be forwarded upon receipt by the municipality **to the county planning agency for review and report...**” (502.b)

## ZONING

- 607.e (ordinance enactment)
- 609.e (ordinance amend'ts)

“...then at least 45 days prior to the public hearing by the local governing body... the municipality shall submit the proposed ordinance **to said county planning agency for recommendations.**” (607.e)

## OFFICIAL MAP

- 408.b

## MUNICIPAL CAPITAL IMPROVMENT

- 504-A.c.3

## PLANNED RESIDENTIAL DEVELOPMENT

- 704.b

# What Do They Look Like?

They all vary, but typically consist of 3 things...

DESCRIPTION

COMMENTS

RECOMMENDATION

MONTGOMERY COUNTY  
BOARD OF COMMISSIONERS  
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KENNETH E. LAWRENCE, JR., VICE CHAIR  
JOSEPH C. GALE, COMMISSIONER



MONTGOMERY COUNTY  
PLANNING COMMISSION  
MONTGOMERY COUNTY COURTHOUSE • PO BOX 311  
NORRISTOWN, PA 19404-0311  
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[WWW.MONTGOCOPA.ORG](http://WWW.MONTGOCOPA.ORG)

SCOTT FRANGE, AICP  
EXECUTIVE DIRECTOR

July 29, 2022

Mr. Geoffrey Grace  
Director of Planning and Zoning  
Upper Providence Township  
P.O. Box 406  
Oaks, PA 19456

RE: MCPC # 22-0179-001  
Plan Name: 111 E. Linfield Trappe Road  
(Parcel #61-00-03148-00-4, 2.11 acres)  
Situate: 111 E. Linfield Trappe Road, near the intersection of W. Main Street

Dear Mr. Grace:

We have reviewed the above-referenced subdivision/land development plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on May 25, 2022. We forward this letter as a report of our review.

## BACKGROUND

The applicant, Mr. Brian Kuhn of Chesco Real Estate, LLC, proposes to subdivide a 2.11 acre, R2 Residential District, property located at 11 E. Linfield Trappe Road into three lots. The existing dwelling will remain on Lot 1, is serviced by public water and sewer, and will be 0.566 acres; Lot 2 will front on E. Linfield Trappe Road and will be 0.518 acres; Lot 3 will be a flag lot with the building envelope behind Lots 1 and Lot 2, with a 50' access strip to E. Linfield Trappe Road to the west of Lot 2, this lot will be 0.633 acres. All lots will access E. Linfield Trappe Road. Lots 2 and 3 when developed will also have public water and sewer.

While the applicant did not request any waivers in their SALDO application, the applicant notes on the Preliminary/Final Subdivision Plan that the following waivers are requested for the sections indicated:

Section 154-10.D – "A land development plan shall be required whenever the application for approval shall be construed to be a land development in accordance with the definition of the same as provided in this chapter." The applicant states this waiver is requested because no construction or improvements are being proposed.





# Why Are These Letters Important?

## Guidance to Municipal Officials



Letters are advisory but help municipal officials make decisions.

## Guidance to Developers/Applicants



They give developers technical ideas about good planning practices.

# How Are They Used?



- To help enforce comprehensive (and other) plans



- To spur communication with neighboring communities and stakeholder groups



- To communicate good site design and planning principles



- To support municipal staff

# Best Practices for Writing a Letter



# Letter Language

- Formal, professional tone
- Avoid jargon
- Follow-up recommendations with “why”
- Conciseness and consistency matters
- Provide links to helpful tools and references

# Letter Structure

## Basic Components

- Opening
- Project summary/background
- Recommendation
- Relationship to county comprehensive plan
- Primary issues/comments (commend good aspects of the proposal)
- Administrative concerns



# References

## Montgomery County Planning Commission

- Model Ordinances/Plans
  - Transit-Oriented Development
  - Walk Montco/Bike Montco
- Guidebooks
  - Sustainable Green Parking Lots
  - Building Better Townhouse Communities
  - Rethinking Institutional Properties
  - Suburban Homestead

## Chester County Planning Commission

- eTools
- Guidebooks
  - Design Guide Series
  - A+ Homes Series
  - Environmental Planning Guides
  - Commercial Landscapes Series
  - Multi-modal Circulation Handbook

**MONTGOMERY COUNTY  
BOARD OF COMMISSIONERS**

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JOSEPH C. GALE, COMMISSIONER



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PLANNING COMMISSION**

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WWW.MONTCOPA.ORG

SCOTT FRANCE, AICP  
EXECUTIVE DIRECTOR

October 9, 2023

Mr. Marcus V. Dolny, Borough Manager  
Borough of Trappe  
525 West Main Street  
Trappe, Pennsylvania 19526

Re: MCPC # 23-0180-001  
Proposal Name: 56-52 W Seventh Ave  
Situate: West Seventh Avenue (east), West Main Street (south)  
Borough of Trappe

Dear Mr. Dolny:

We have reviewed the above-referenced subdivision and land development plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on September 14, 2023. We forward this letter as a report of our review.

**BACKGROUND**

Our office has received for review an application that pertains to the subdivision of an R-2 Medium Density Residential District, a 6.21-acre tract of land (County Parcel ID 23 00 00985 00 9, 23 00 00988 00 6) located on West Seventh Avenue, south of Main Street in Trappe Borough. The Pennington Property Group, LLC, the applicant, has commissioned the preparation of a set of plans delineating the creation of ten lots ("L 1" through "L 10") on the subject tract. According to the submittal information, the applicant proposes to build a single-family detached dwelling on each new parcel.

Public water and sanitary sewer facilities serve the subject tract following requirements outlined in §340-19 of the Zoning Ordinance.

The applicant will seek relief from regulations established in the Subdivision and Land Development Ordinance (Chapter 295). These waivers relate to standards governing sidewalks and curbs (§295-9.B) to permit the installation of Belgian block curbs along the proposed cul-de-sac street, benchmark requirements (§295-23.B) to allow the applicant's engineer to base the site on NAVD88 datum, and tree replacement standards (§295-25.E.(1) (a) through (c)), for a reduction in the number of required replacement trees.

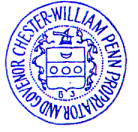
**COMPREHENSIVE PLAN COMPLIANCE**

This application is generally consistent with the goals and objectives established in the County Comprehensive Plan, Montco 2040: A Shared Vision.

In addition, the plan is generally consistent with Montco 2040's objectives to support growth and development in appropriate areas where infrastructure already exists.



# THE COUNTY OF CHESTER



COMMISSIONERS  
Marian D. Moskowitz  
Josh Maxwell  
Michelle Kichline

Brian N. O'Leary, AICP  
Executive Director

PLANNING COMMISSION  
Government Services Center, Suite 270  
601 Westtown Road  
P. O. Box 2747  
West Chester, PA 19380-0990  
(610) 344-6285 Fax (610) 344-6515

June 27, 2023

Joseph Real, Manager  
Parkesburg Borough  
315 West First Avenue, Building 1  
Parkesburg, PA 19365

Re: Sketch Plan for 70 East Second Avenue  
# Parkesburg Borough - LD-06-23-17730

Dear Mr. Real:

An unofficial sketch plan entitled "Proposed Residential Development" (located at 70 East Second Avenue in Parkesburg Borough), prepared by DL Howell and dated March 7, 2023, was received by this office on May 24, 2023. A separate "concept" plan for the same site, dated March 7, 2023, was also received on May 24, 2023. Although our review is not required by Act 247, the Pennsylvania Municipalities Planning Code as amended, our comments are offered as a planning service at the request of Parkesburg Borough. This review focuses primarily upon design and procedural-related issues and concerns to assist the applicant and Parkesburg Borough in its review of this proposal prior to the official submission. This review does not replace the need for an official referral by Parkesburg Borough of a preliminary or final plan, as required by the Pennsylvania Municipalities Planning Code.

**PROJECT SUMMARY:**

Location:	West of Church Street (State Route 10), south of East Second Avenue
Site Acreage:	Approximately 25 acres (ChescoViews indicates 24.4 acres)
Lots:	1 lot
Proposed Land Use:	Residential
UPI#:	8-6-61

**PROPOSAL:**

The site, which will be served by public water and public sewer facilities, is in the Parkesburg Borough R-2 Residential zoning district.

Two separate concept site plans were submitted to the County: a "By-Right" plan showing 44 single-family detached dwellings, and a "Proposed Concept Plan" showing 96 townhouse dwellings and four apartment buildings with 36 units in each. Building elevation drawings were not included in the submittal.

**RECOMMENDATION:** The County Planning Commission recommends that the issues raised in this letter be addressed and all Parkesburg Borough issues should be resolved before action is taken on this plan.

# Zoning & SALDO Reviews

## Basic Reviews

- New Zoning Ordinance & Map
- New Subdivision & Land Development Ordinance
- Amendments
  - Zoning Ordinance and/or Map
  - Subdivision & Land Development Ordinance



# Zoning Reviews

## Key Issues

- Zoning Map and Text Amendments
  - Relationship to community goals, path of future growth, future land use plan
  - Implications site specific versus district wide
  - Impacts on traffic and other surrounding properties
  - Unintended Consequences
- SALDO amendments
  - Will it lead to better design?
  - Will it still meet community goals?

# Subdivision & Land Development Reviews

## Valuable comments

- Natural Resource Protection
- Open Space Protection
- Parking Design
- Pedestrian Amenities
- Access and Circulation
- Historic Preservation
- Mixed Use Elements
- Housing Variety
- Sustainability
- Stormwater Management





# Natural Resource Protection

- Riparian buffer protection and enhancement
- Minimize disturbance to steep slopes and woodlands
- Avoid floodplains





# Open Space Integration

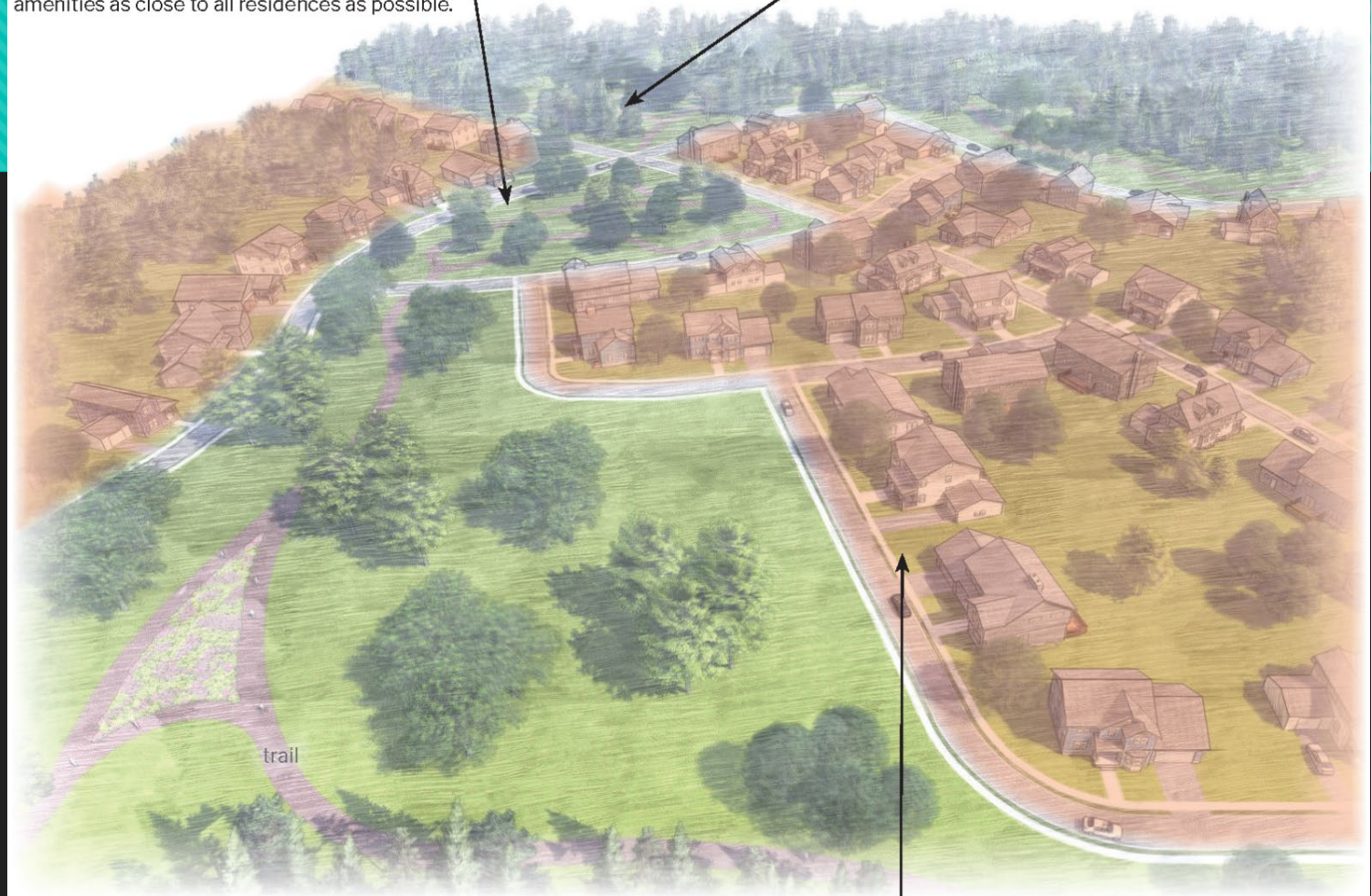
- Weave open space through development
- Connect to natural areas
- Link development with open space on site and with adjacent parcels
- Permanently protect open space

## Weave open space through development

Preserve existing natural features and provide space for passive and active recreation amenities as close to all residences as possible.

## Connect to natural areas

Connect natural areas with neighborhood parks and trail networks.



## Link development with open space

Design and layout streets to avoid large existing natural features. Design single-loaded frontage roads around open space to prevent the resource from becoming "privatized" in backyards.

# Parking Layout

- Reserve parking
- Shared parking
- Bicycle parking
- Side yard and rear yard parking

## Minimize parking extents

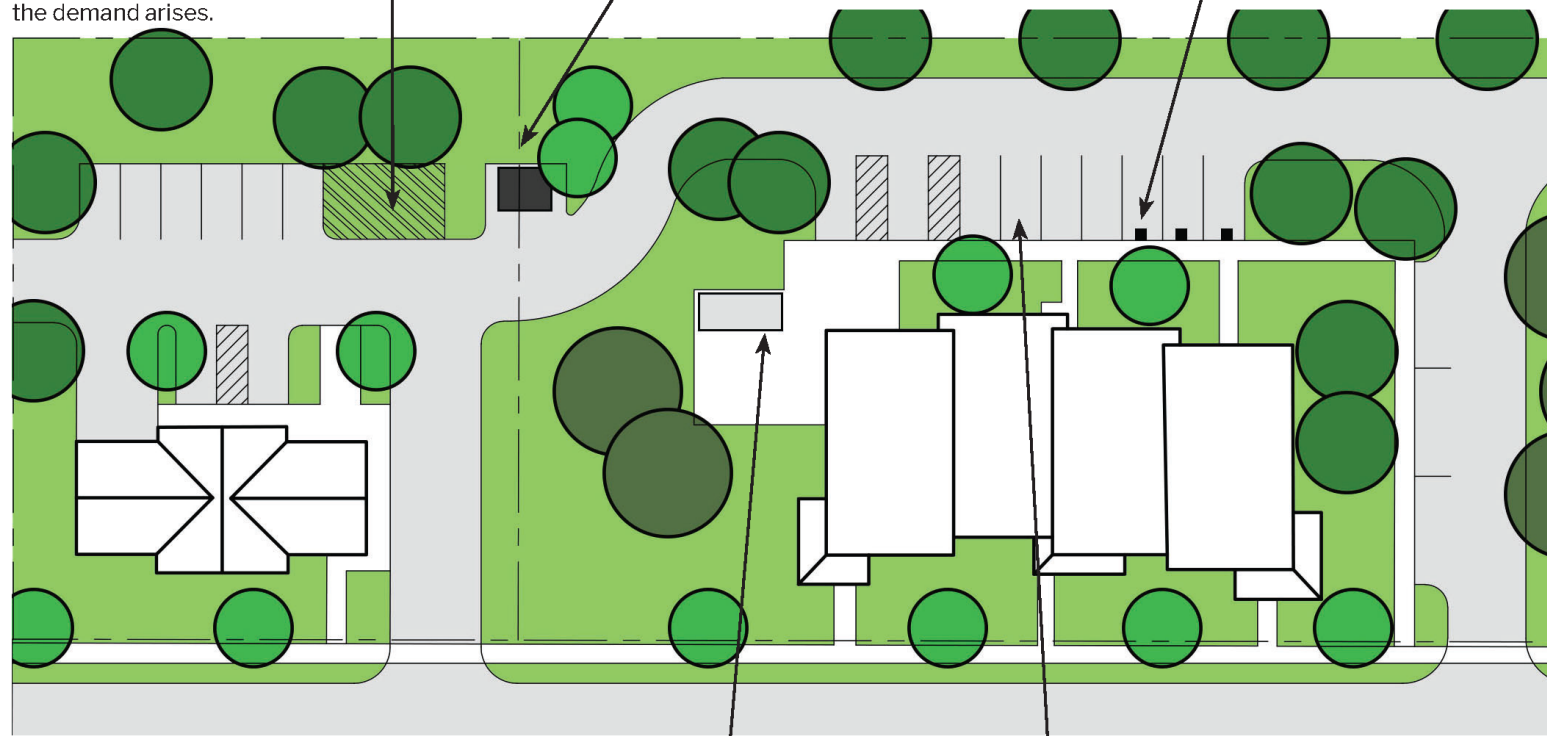
Commercial development should not exceed parking requirements. Consider landscape reserves that can be converted into parking if the demand arises.

## Coordinate service areas between adjacent sites

Provide coordinated areas and access for service and refuse collection.

## Plan for and/or install EV charging stations

Consider providing electric vehicle charging stations in parking areas.



## Provide bicycle parking

Provide bicycle parking at locations that are clearly visible and convenient to building entrances.

## Share parking

Share parking where adjacent buildings have interior uses which offset each other in their use of the parking lot.



# Green Parking

- Maximize Shade & Greening
- Promote natural Drainage
- Encourage Pavement that infiltrates
- Design for Pedestrian & Vehicular Safety
- Use Sustainable Light & Energy Practices
- Consider Community Character

Consider Community Character

Maximize Shading & Greening

Promote Naturalized Drainage

Use Sustainable Lighting & Energy Practices

Encourage Pavements that Infiltrate

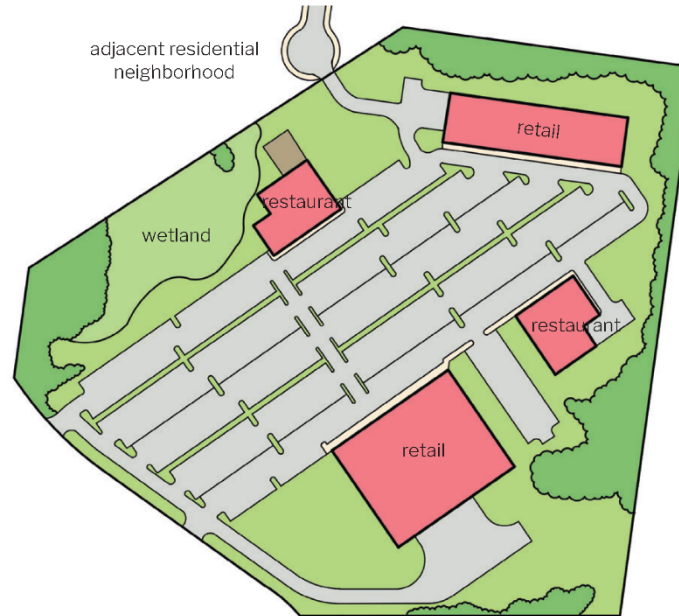
Design for Pedestrian & Vehicular Safety



# Compact layout

- Efficient use of land

NOT RECOMMENDED



RECOMMENDED



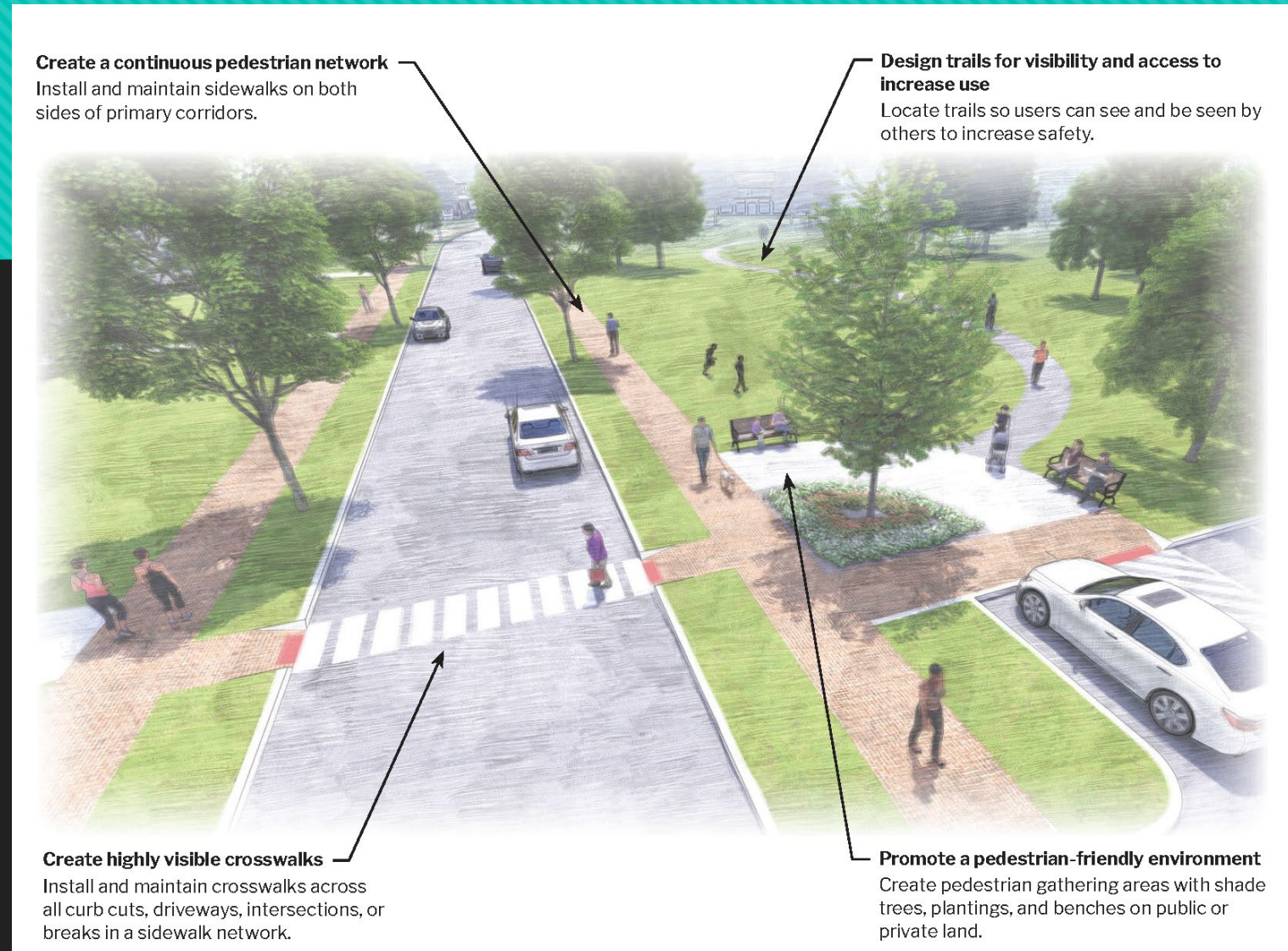
## Create compact pedestrian-oriented development

This illustration compares a conventional (left) versus cluster (right) layout for a four building non-residential development. The cluster layout is compact and pedestrian-oriented with building entrances oriented to street sidewalks and pathways and landscaping in parking areas to provide direct, safe, and comfortable universal access to buildings.



# Pedestrian Amenities

- Continuous pedestrian network
- Trail visibility
- Crosswalks





# Pedestrian Amenities/Access and Circulation

- Continue pedestrian connections
- Follow existing street patterns

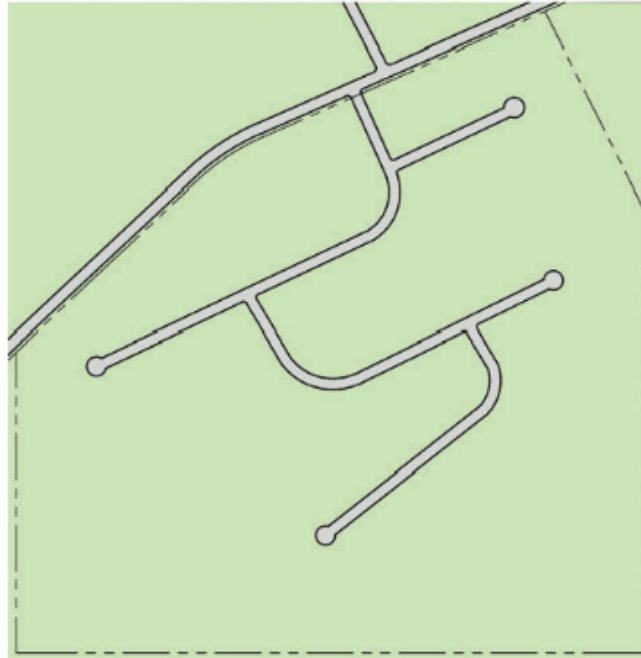


# Access and Circulation

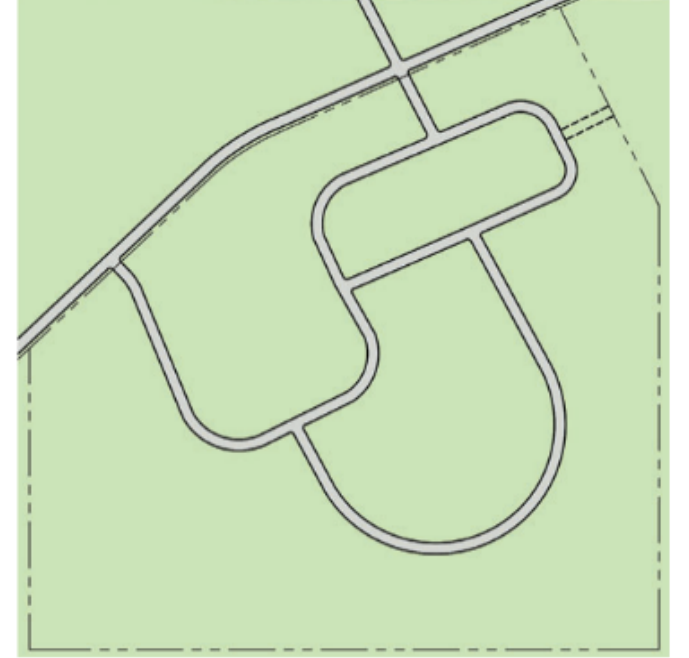
- Limit the use of cul-de-sacs
- Street layouts with cross connections



NOT RECOMMENDED



RECOMMENDED



**Provide varied routes and cross connections**

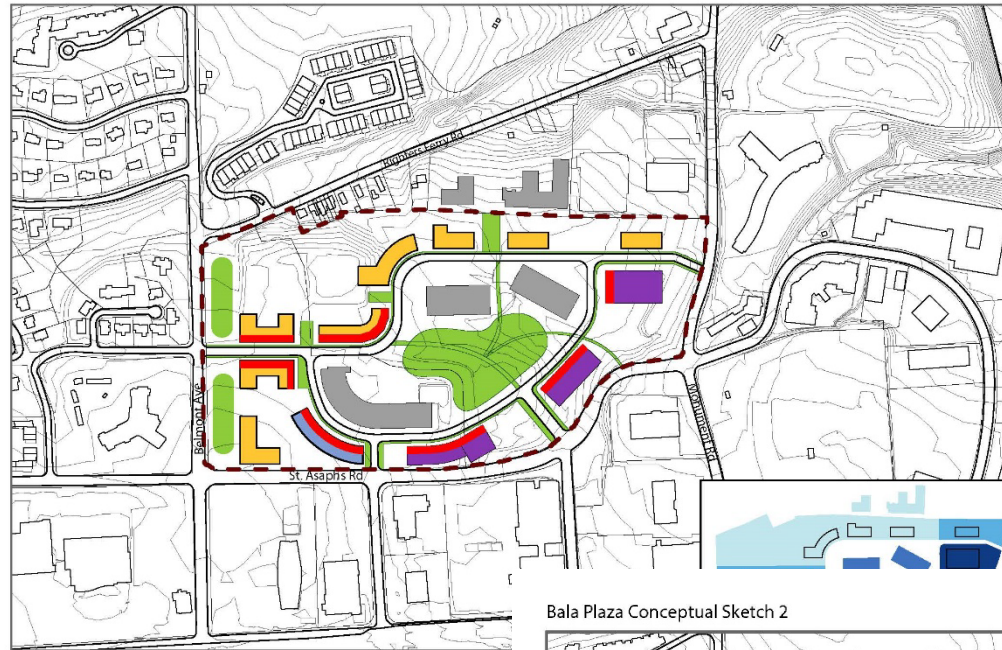
Street systems should have multiple connections and routes of travel.



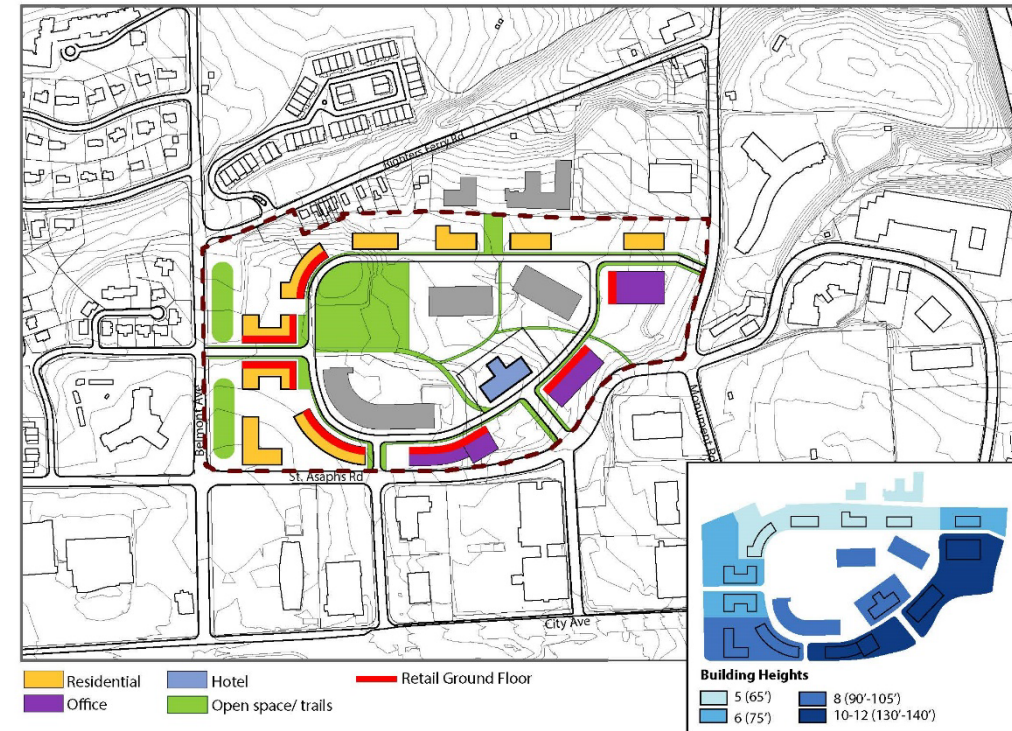
# Access and Circulation

- Alignment to existing streets
- Optimal circulation within the site

Bala Plaza Conceptual Sketch 1



Bala Plaza Conceptual Sketch 2





# Historic Preservation

- Repurpose buildings





# Historic Preservation

- Innovative Additions





# Historic Preservation

- Sensitivity to historic landscapes

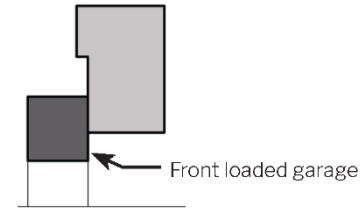




# Building Character

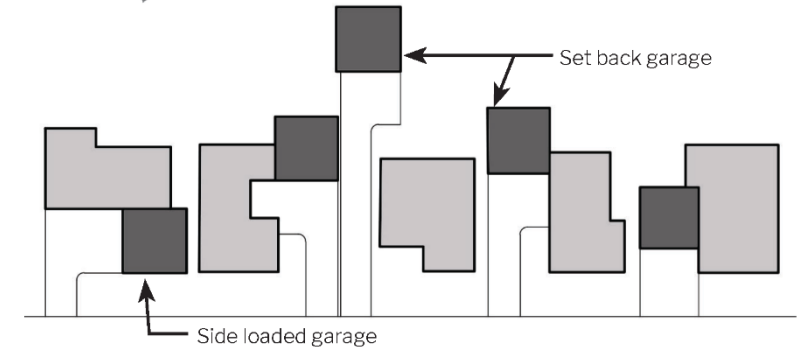
- Garage location and orientation

⊘ NOT RECOMMENDED



Front loaded garages dominate building facades and create an unwelcoming pedestrian environment.

✓ RECOMMENDED



## Create an attractive street appearance

Garages set back from the front facade and garages with side entries are recommended. Garages recessed behind the front wall plane of the ground floor living area or covered porch allow the entry of a dwelling to become the prominent feature.



## Recess garage doors

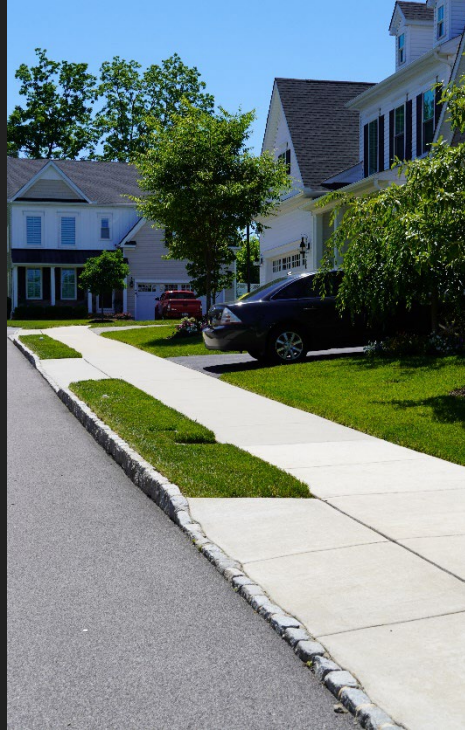
Alternatively, design the second floor to overhang beyond the garage door.



# Building Design Standards

- Townhouse design
- Zero-Lot line Alternatives

## BUILDING BETTER TOWNHOUSE COMMUNITIES





# Landscaping

- Extensive landscaping in parking lots



**A. Landscape islands at ends of rows**

Terminate parking rows with a parking lot island or landscaped area.

**B. Landscape islands within long rows**

Provide a parking island between at least every 10 parking spaces.

**C. Landscape islands with generous width**

Provide parking lot islands that are the same dimension or greater than the parking stalls to support sufficient growing space.

**D. Strategically located shade trees**

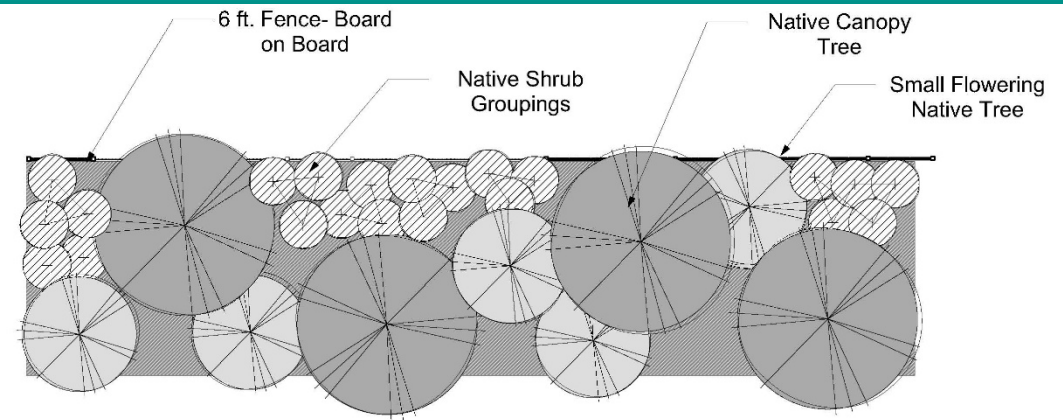
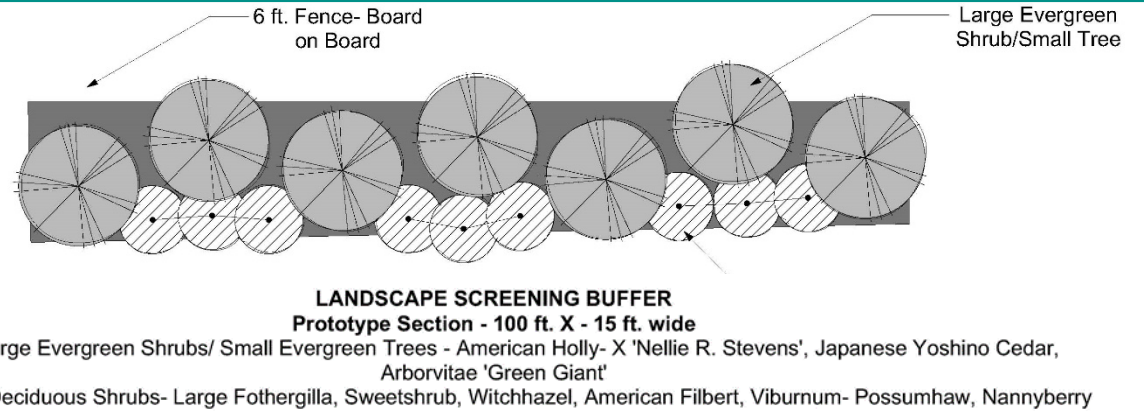
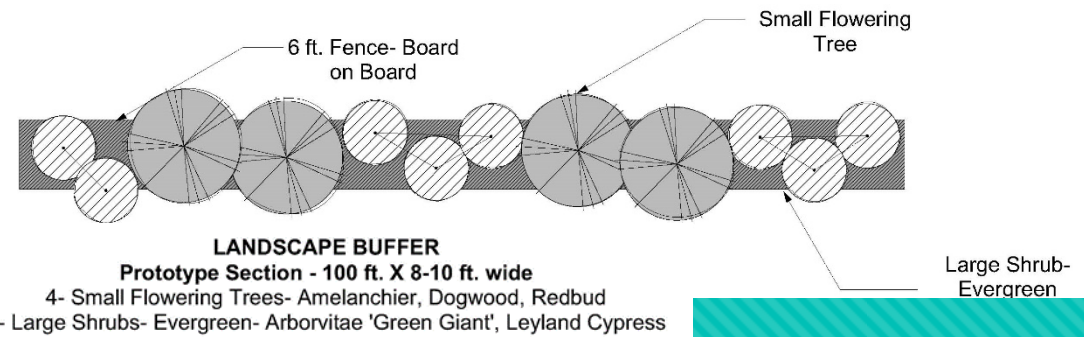
Provide a minimum of one shade tree for every parking lot island or landscaped area. Plant large canopy trees to provide maximum shade. In addition, plant shrubs, ground cover, perennials, or ornamental grasses on a minimum of 60% of every parking lot island.

**E. Use native landscape material**

To reduce watering and maintenance needs, use native plants for all new ornamental landscape trees, shrubs and perennial plants.

# Landscaping

- Right-sizes buffers with specie diversity





# Housing Variety

- Include Missing Middle Housing types
- Meet long-term planning goals





# Sustainability

- Green roofs
- White roofs
- Solar power opportunities





# Stormwater Management

- Porous Pavement
- Rain gardens
- Organic shaped detention basins
- Maintenance



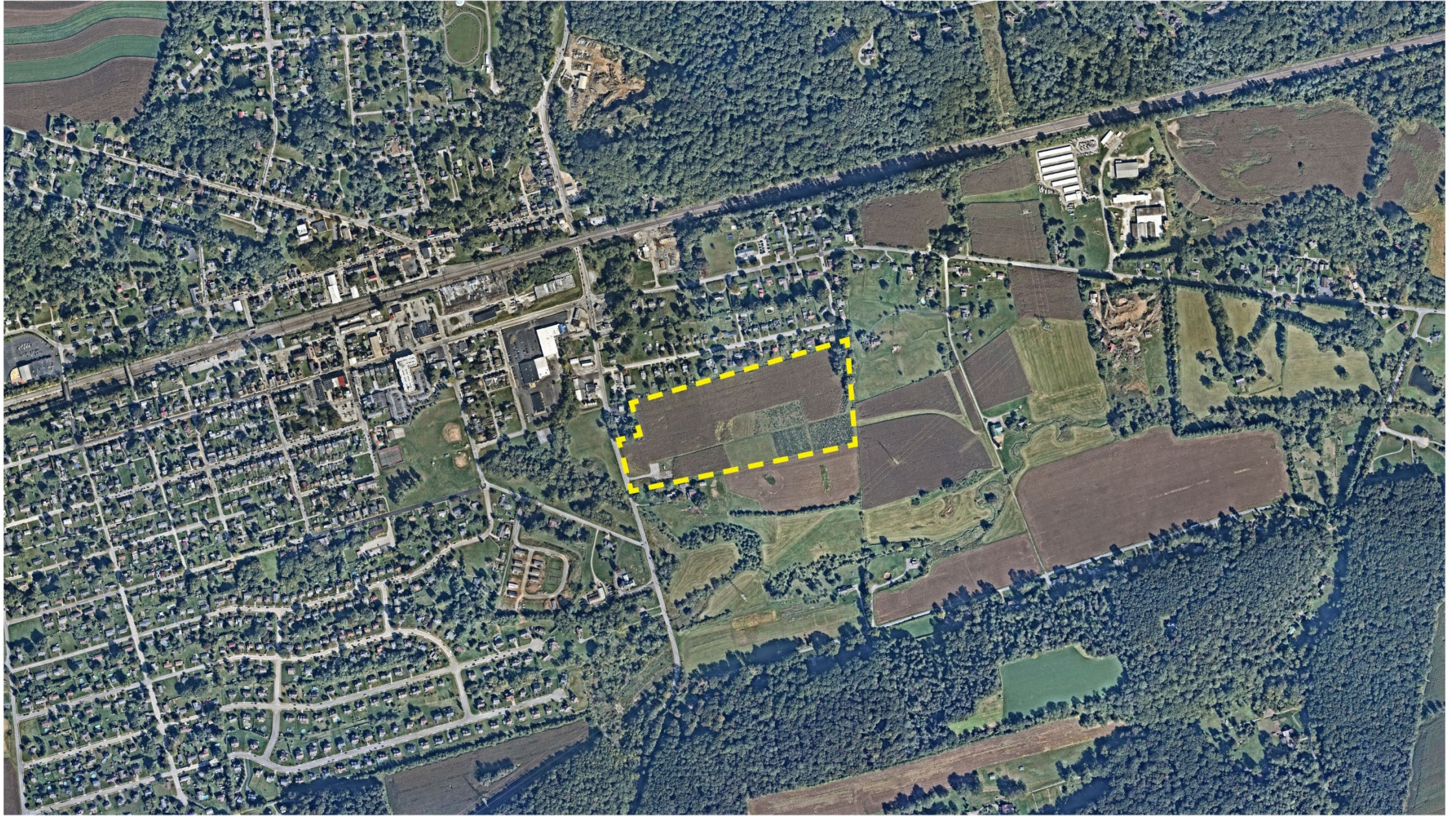


# Let's Roll Up Our Sleeves...



Audience  
Participation  
Time







# Sketch Plan Alternative

## Single-Family

A mix of front loaded and rear loaded 2 and 3 bedroom homes with front porches.



## Townhome

A 4-unit rear loaded building designed to fit the scale of the neighborhood streetscape. Some stacked townhouse options also shown.



### UNIT SUMMARY

Twins = 8 units  
Townhomes = 44 units  
Single Family Detached = 38 units  
Total = 90 units (3.5 units/acre)

### LOT SUMMARY

Residential Lot Size =  
2,600 SF to 9,000 SF  
Lot Width = 24' to 80'

### OPEN SPACE

Total = 30%

### General notes:

1. Plan prepared for discussion purposes only.
2. Total Site Area = 24.86 acres
3. Project assumes public water and sewer services available.



= Starter Homes



## Commercial/Flex Building

A building designed to accommodate various uses and fit surrounding characteristics.



## Central Green

A large central green programmed for passive and active recreation.



## Twin

Semi-detached rear loaded 3 bedroom homes with a common front porch.

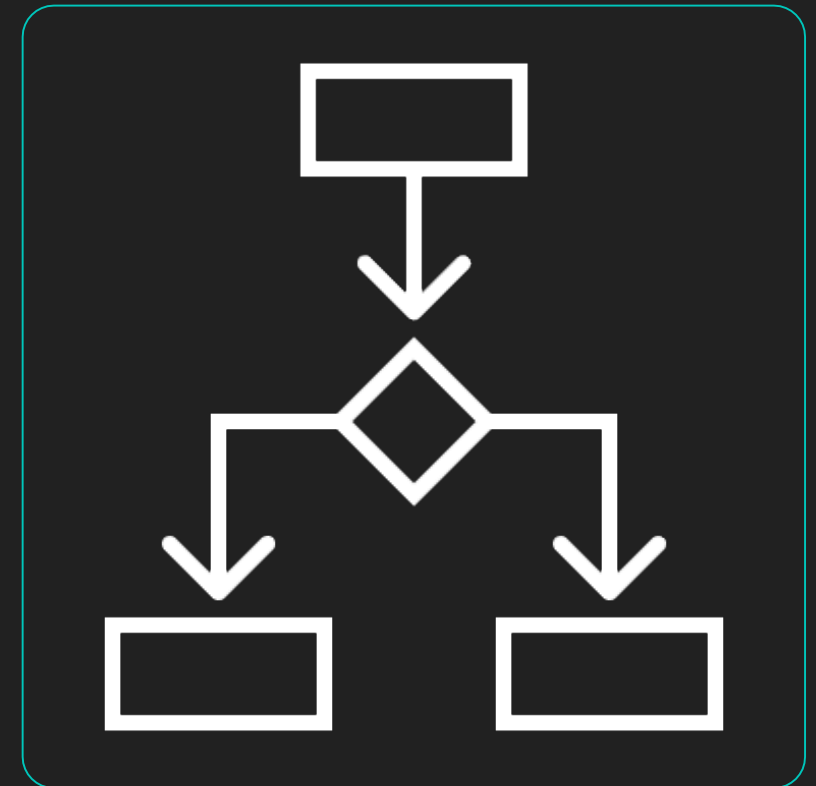


# Tips On How to Interpret and Use a 247 Letter



# Process

- Planning review processes differ based on municipal policy & SALDO requirements
- Determine how to best integrate Act 247 review comments into that process
  - Land Development Committees
  - Advisory Board Reviews (HC, EAC, Parks & Recreation, etc.)





# Process



## East Bradford Process:

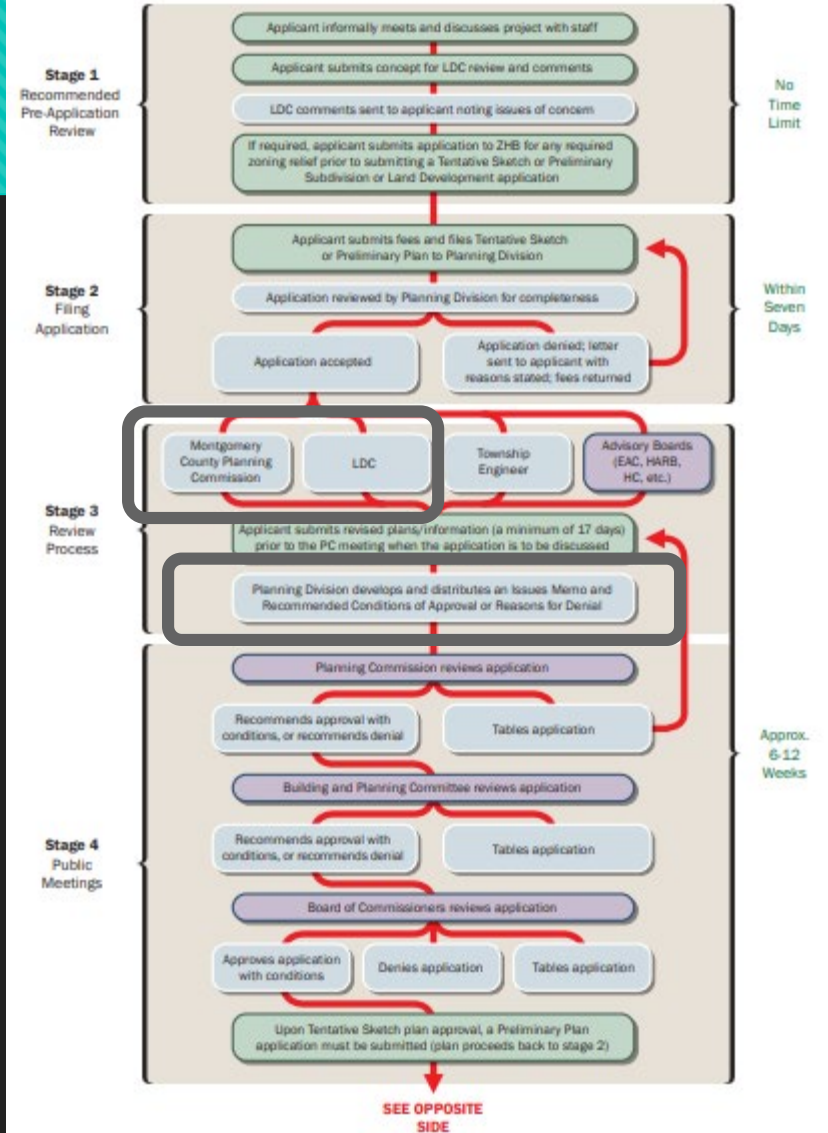
- New applications distributed to County and all Twp. advisory boards
- Advisory boards review at next meeting
- Comments compiled by staff and shared with elected officials and applicant
- Act 247 reviews posted to Township website

### Subdivision & Land Development Process

#### 1. Township Review & Approval

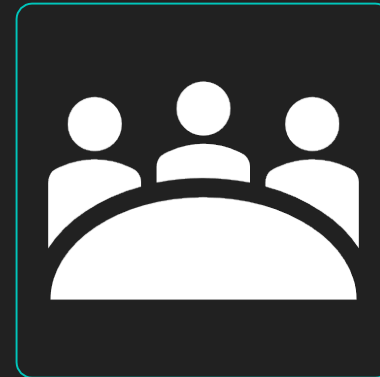
BCC Board Of Commissioners  
EAC Environmental Advisory Council  
HARB Historical Architectural Review Board  
HC Historical Commission  
LDC Land Development Committee  
PC Planning Commission  
ZHB Zoning Hearing Board

Applicant Action  
Township Action  
Public Meeting



# Process

- The process should allow opportunities for the following :
  - Gain a better understanding of comments
  - Check for potential misinterpretations
  - Avoid conflicting recommendations
  - Justify specific design choices
  - Plan revisions

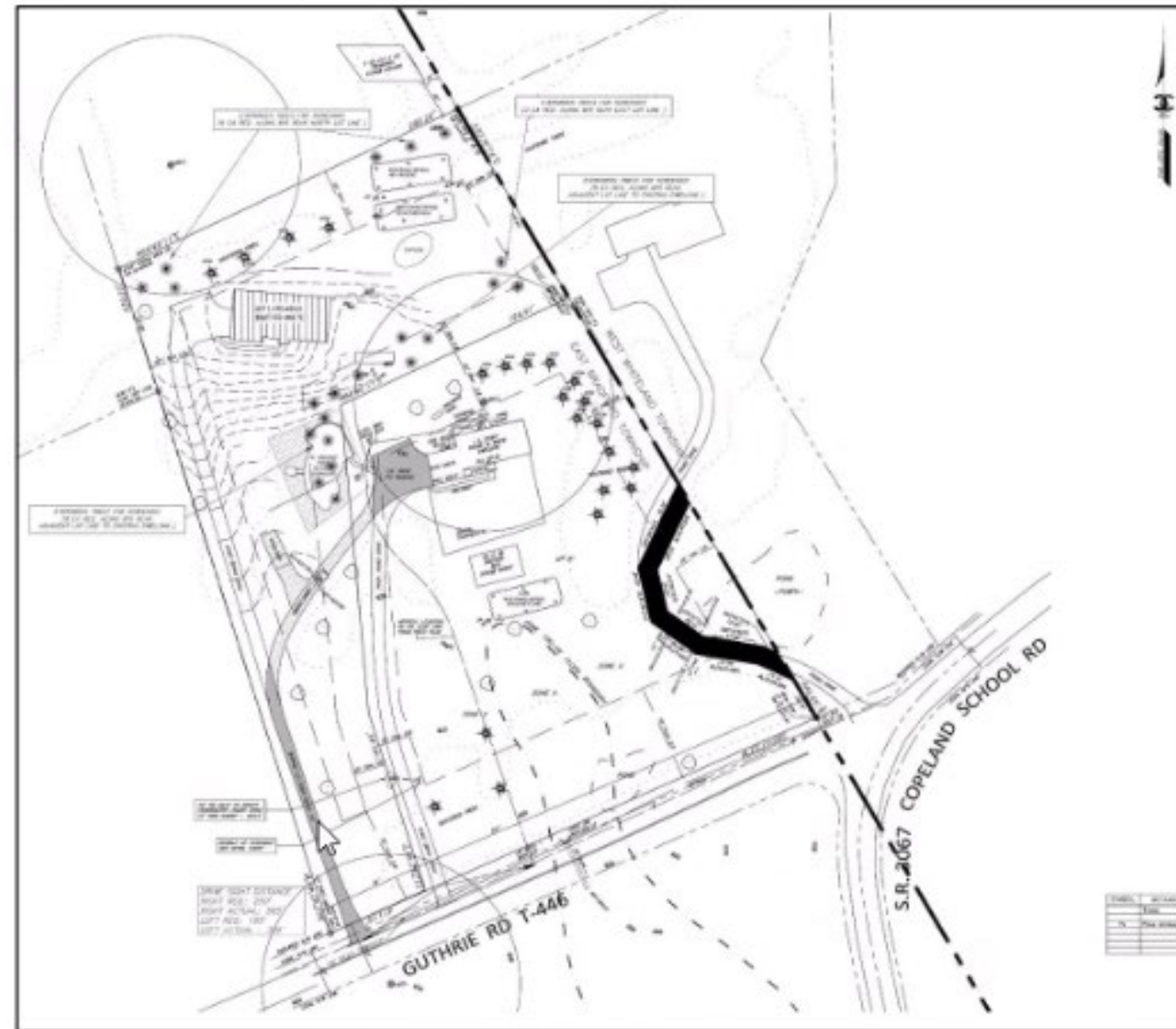




# East Bradford Township Example

## Two Lot Subdivision

- County recommended shared driveway
- Zoning Ordinance prohibits shared driveways
- Applicant would be required to obtain a variance



Site Plan Detail, Sheet 6: Final Subdivision - 815 Guthrie Road



# Lower Merion Example

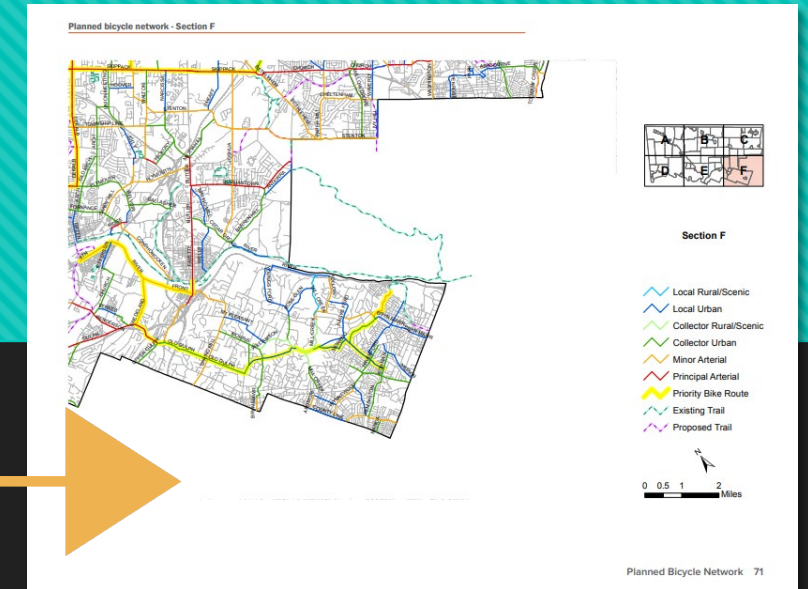
- Large Estate Redevelopment
- Overlay of Open Space Preservation & Historic Preservation Districts
- Input from various advisory boards and considerations to manage





# Content

- Relating comments to Comprehensive Plan materials and relevant studies
  - This approach provides justification for recommended changes.



# Content

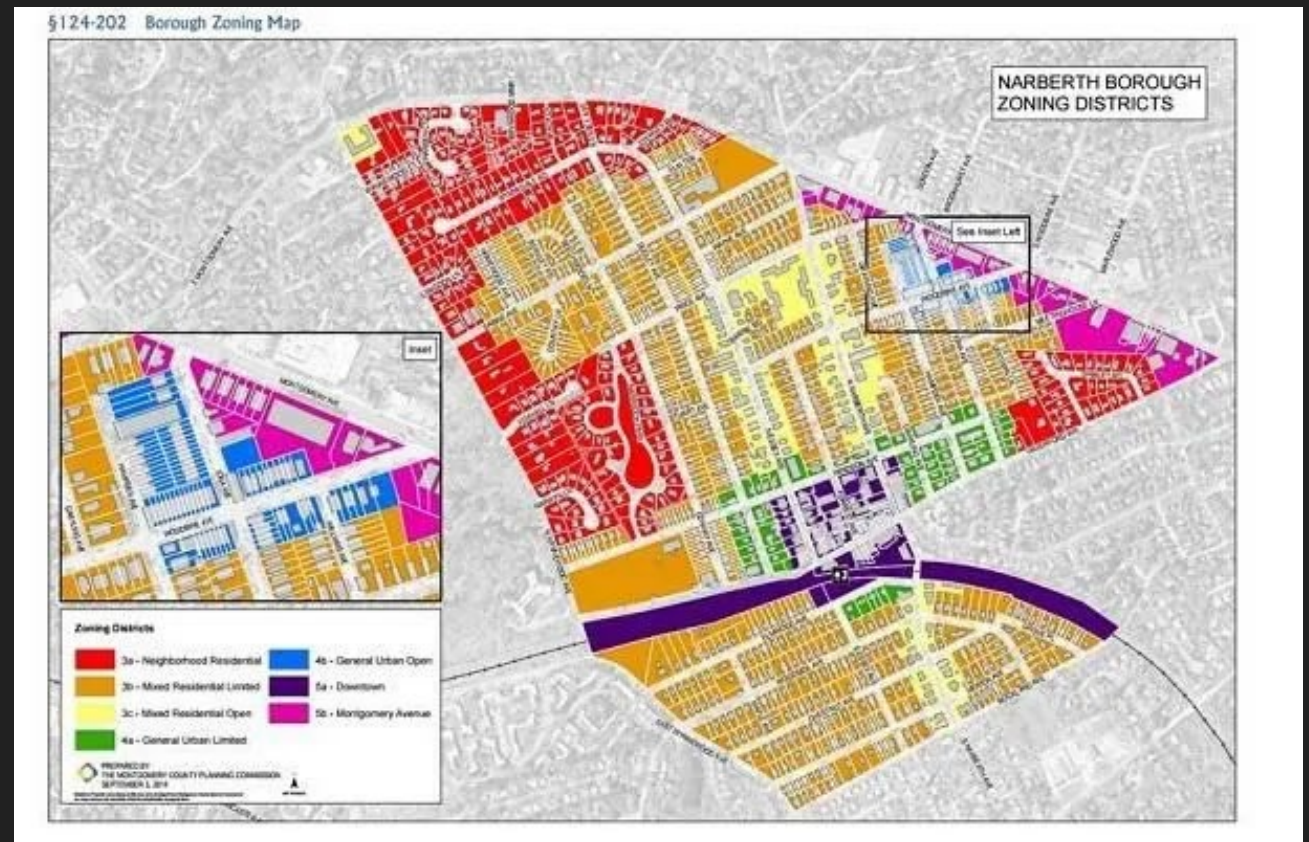
- Providing Examples from Other Communities
- Tapping into Resources Not Available Locally
  - For instance, seeking input from landscape design professionals or transportation planners to incorporate best practices.





# Content

- Multi-municipal consistency:
  - Land Development
  - Open Space
  - Commercial District
  - Transportation Projects



# Example: Lower Merion & Narberth Active Transportation Initiatives

- Consistency of Complete Streets Ordinances Requirements
- Avoiding bicycle and pedestrian network interruptions across municipal boundaries with Land Development projects







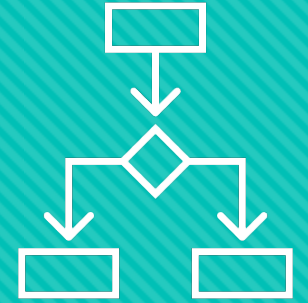
# Example: East Bradford Bradford Avenue Joint Committee

- A pedestrian friendly corridor that separates East Bradford and West Chester Borough
- Goal to coordinate and implement projects that result in safe pedestrian and bicycle connections

Committee focuses on implementing the following:

- EBT & WCB Comprehensive Plans
- Brandywine Scenic Byway Corridor Plan
- Central Chester County Pedestrian & Bicycle Plan

# Communication



- Communication Format
  - Who & How ? Establishing a line of communication.
- Distinguishing Advisory Comments from Ordinance-Based Comments
- Effectively Incorporating Act 247 Review Comments into Staff Reports or Board/Supervisor Materials to enhance the decision-making process.





# Communication

## SD 654 - 815 Guthrie Road (Schmidt Property)

A Final Plan showing the subdivision of the existing lot into two new lots and the construction of a new single-family dwelling. The applicant has granted the Township an indefinite extension within which to render a decision on this application. The Planning Commission will review the application at their October 24, 2023 meeting.

- [Application](#)
- [Site Plan](#)
- [Environmental Impact Assessment](#)
- [Planning Module Mailer](#)
- [Chester County Planning Commission review letter](#)
- [July 22 2022 Planning & Zoning Review](#)
- [July 25 2022 Township Engineer's Review](#)
- [July 28 2022 Township Engineer's Review](#)
- [September 11 2023 Site Plan](#)
- [August 19 2023 Revised Environmental Impact Assessment](#)
- [September 11 2023 Planning & Zoning Response Letter](#)
- [September 11 2023 Township Engineer Response Letters](#)



## EAST BRADFORD TOWNSHIP CHESTER COUNTY, PENNSYLVANIA

### Memo

To: Planning Commission members  
From: Andrea Campisi, Director of Planning & Zoning/Zoning Officer  
Date: July 22, 2022  
Subject: Final Plan, Application #654, 815 Guthrie Road, Parcel# 51-3-4

#### Proposal

- Subdivision of the existing 4.4-acre lot into two new lots.
- Construction of a new home and driveway to Guthrie Road on Lot 2. The proposed home will be served by a proposed well and an on-lot sewage disposal system.
- The existing home will remain on Lot 1 and will be accessed via a new driveway.
- The existing pool, existing shed and a portion of the existing driveway will be removed.

The plan set consists of six sheets and was prepared by Manley Engineering Associates and is dated June 10, 2022.

#### Property Description

The property is 4.4 acres and contains areas of slopes that are greater than 20%, floodplain and wetlands. Two manmade ponds also exist on the property. In addition to the existing single-family dwelling, a detached garage/shed and an inground pool are present. A portion of an existing driveway and a corresponding easement serving the home at 1280 Copeland Road also exist on the eastern most portion of the property. The existing home is served by a well and a septic system. Guthrie Road is designated as a Scenic Road by the Township.

#### Advisory Board Review Schedule

The following advisory boards reviewed the plan but did not have any comments:

- Trails Committee
- Parks and Recreation Committee
- Environmental Advisory Committee
- Traffic Committee
- Historical Commission

#### Township Engineer's Review

The Township Engineer's review is pending and will be provided prior to the Planning Commission meeting.

#### Chester County Planning Commission Review

The application was submitted to the Chester County Planning Commission on June 17, 2022. Their review letter was received on July 8, 2022 and has been posted to the Township website. While the County review suggests a shared driveway be considered for the new home it would require a variance from the Zoning Ordinance which requires each lot to be served by an individual driveway.

# Communication

8. The Final Plan, complying with all applicable conditions of approval shall be filed with the Department of Building and Planning within twelve (12) months from the date of approval by the Board of Commissioners
9. Any changes to the approved plans shall require the submission of an as-built plan before the issuance of the Certificate of Occupancy. Building and Planning staff can waive this requirement if the changes are determined to be insignificant.
10. A copy of the revised plan shall be submitted with any changes highlighted. A letter shall also be provided with the revised plan indicating how each requested revision has been addressed in the re-submission.
11. The owner shall make payment of fees and expenses of the Township’s professional consultants who perform services on behalf of the Township concerning these plans and the work contemplated thereunder and will establish and maintain with the Township those escrows for the payment of such fees required by Township Code. The owner agrees that any statement from the Township for such fees which remain unpaid for a period of 30 days may be recorded against the property as a municipal lien.
12. The owner shall make payment of the Township Engineer’s and/or Clerk of the Works’ inspection fees within 30 days of presentation. A penalty of 1.5% per month will be due for late payments from the date of presentation. If any shares are not paid within 60 days of presentation, the Township may elect to suspend any outstanding permits until all pending charges are settled.
13. Existing buildings shall have approved address numbers, building numbers, or approved building identification placed in a position that is legible and visible from the street or road fronting on the property. The address numbers shall be a minimum of four (4) inches (102mm) high with a minimum stroke width of 0.5 inches (12.7mm).

14. The property owner(s) shall comply with all applicable federal, state, county local, and Lower Merion Township ordinances and laws regardless of specific mention herein.

### PUBLIC COMMENT

#### ADDITIONAL INFORMATION:

#### ATTACHMENTS:

Description	Type
□ <a href="#">Issues Memo</a>	Issue Briefing
□ <a href="#">County Review</a>	Backup Material
□ <a href="#">TE Review</a>	Backup Material





# QUESTIONS?

Thank you for attending our session!