

Subdivision Regulations Response to Comments





Comment: The holding & release of funds shall be administered entirely by the Board of County Commissioners.

Response: The administration of the required holding and release of funds is governed by terms of an agreement in favor of the Board of Commissioners. A subdivision rule requiring the Board to administer release of funds in a certain way may add cost or inefficiency, where the Board is accustomed to being able to rely on information and assistance from the County Engineer and Water Resources Department.



Comment: A signature of approval from the Township shall be required at various stages of completion in the development project.

Response: Portage County subdivision regulation proposed Amendments contained in Section 516.1(B), give townships the opportunity to accompany the County Engineer on a scheduled inspection prior to any conditional acceptance of a roadway. Because the inspection during construction is the duty of the County Engineer, and townships now or in the future may have different preferences for involvement, it is preferred this remain invitational and not required.



Comment: Any changes or alterations to any aspect of the project shall be forwarded to the Township for its review and approval.

Response: 503 and 506 of the current rules appears in proposed revised form in 514.8(A) and 514.9 and governs approval by the County Engineer of needed changes to improvement plans deemed necessary as work progresses. As the approving authority for the improvement plans during the subdivision planning stages, and responsible party for inspection during construction, the County Engineer has working knowledge of the plans and is in the best position to authorize any such changes.

All matters involving zoning at any aspect of plan or plat review or revision require township review and approval.



Comment: Change maintenance period starting when the project is 100% complete, and 10% of the total project cost retained by the Board of Commissioners as a maintenance bond for 1 year after the project is complete.

Response: 100% complete cannot be achieved. Article 5 provides steps to achieve conditional approval and have specifically included all stakeholders in the process. This helps meet our intent to have as many of the improvements installed as possible at the time of conditional approval, but there will be important items that cannot be completed until closer to the end of the maintenance period.

The current maintenance amount of 3% from the 1984 regulations hasn't been changed. The Engineers office wouldn't object to increasing the maintenance bond from 3% to 10% in sections 516.1(F) and 517.

Rootstown Township Trustees



Section 516

Conditional acceptance of Improvements

516.1 Conditional acceptance procedure

- F. Upon conditional acceptance by the Portage County Board of Commissioners, the developer shall furnish a maintenance guarantee in the amount of ~~3%~~ 10% of the construction cost.

Section 517

Maintenance Guarantees

Before the Portage County Engineer will authorize the release of the Performance Guarantee by the Portage County Board of Commissioners, an inspection will be completed to ensure that each phase of the project is satisfactory and complete. Only upon satisfactory completion of the Subdivision shall the Performance Guarantee be released or reduced. The Developer shall provide a separate Maintenance Bond Guarantee (in the form of a surety bond) in the amount of ~~three percent (3%)~~ 10% of the estimated cost of all improvements administered by the Portage County Engineer.

Rootstown Township Trustees



Comment: Each Township in Portage County shall sign off on the new Subdivision Regulations before they are presented to the Board of County Commissioners.

Response: The subdivision rules and regulations are implemented through the RPC Board and is made up of members including representatives from the Townships. The adoption of the subdivision regulations and their amendments by the RPC Board is an integral part of their coming into effect. All Townships have been notified of the proposed amendments, and their opportunity to provide feedback and comments is welcomed by the Regional Planning Commission and the Board of Commissioners.



Comment: The townships and county shall have equal representation by the Portage County Prosecutor's Office in the enforcement of the Subdivision Regulations.

Response: Where court action is necessary to enforce the subdivision regulations of a regional planning commission, the county prosecutor institutes the action for any violation occurring in the county. See R.C. 711.102. The prosecuting attorney and the attorneys of his office have a professional duty to use their sound professional judgment in bringing or defending a proceeding or asserting or controverting an issue. The current subdivision regulations support such enforcement, and no change is suggested.

Brimfield Township Trustees



Comment: Trustees do not support the proposal to eliminate developers' ability to post security for a project through the traditional means of a bond. The Brimfield Township Trustees, unanimously implore the Commissioners to reconsider the proposed modification to the bond requirement.

Response: The existing subdivision regulations do not currently accept surety bonds for performance guarantees. If the Commissioners would like to retain language from the existing subdivision regulations or change the subdivision regulations to allow the use of surety bonds for performance guarantees staff would not be opposed.



512.1 Performance Guarantee

- A. Prior to any consideration of Plat approval, the Developer shall furnish a Performance Guarantee to the Portage County Board of Commissioners in the amount equal to one hundred ten (110) percent of the approved total cost of the improvements not yet completed based on the estimates prepared in accordance with Section 511.2. ~~Such Performance Guarantee shall be secured by a cash escrow account established with a solvent financial institution.~~ Such guarantee shall be in the form of a construction loan, cash escrow, savings account or other financial arrangement which binds the developer to completion of the improvements and from which the County Engineer has the authority to release funds as the work progresses, or in the form of a surety bond issued by a surety company authorized to do business in Ohio and approved by the Board of Commissioners. Performance Guarantees and Escrow agreements shall be provided utilizing forms in Appendix 5A or appropriate forms provided by the Portage County Engineer and the Portage County Soil and Water Conservation District.



512.2 Reduction of Performance Guarantee

The Portage County Engineer may authorize the release of funds backing the Performance Guarantee for Improvement Plan items completed after receiving a written, itemized request from the Developer. The request shall include copies of all invoices to be paid by the funds released. The amount of any surety bond may be reduced at times and in amounts deemed appropriate by the county engineer.

After an inspection of the completed work, an amount equal to 90% of the requested funds will be authorized for release. Ten percent (10%) of each release request will be retained until all improvements have been completed. The reduced Performance Guarantee shall remain in effect to cover the remaining construction of improvements.

Brimfield Township Trustees



514.6 Inspection Fees

- A. The inspection fees shall cover the actual wage/salary plus overhead of the County Engineer inspector, or the contract cost of the inspection service as determined by the Portage County Engineer.
- B. Any costs incurred by the Portage County Engineer to perform pavement corings, sub-grade borings and/or non-destructive testing to field verify the Developer's work shall be borne by the Developer.
- C. The Developer is held responsible for all inspection fees which will be payable upon receipt of invoice. The Performance Guarantees posted by the Developer guarantees the payment of all inspection fees. Without regard to any other provisions of these regulations, the guarantee for payment of all inspection fees shall be in the form of a cash escrow account established with a solvent financial institution.
- D. The Portage County Board of Commissioners shall not authorize the release of any Guarantees until the Portage County Engineer certifies that all inspection fees have been paid in full.



606.1 Performance Guarantee in lieu of the Installation of Sanitary Sewer and/or Water Improvements *(Section 633, p. 51, 1984 PCSR)*

- A. As consideration for plat approval by the Portage County Regional Planning Commission, and in lieu of the actual installation, completion and acceptance of any required improvement(s) prior to said plat approval, the Developer may execute a cash Performance Guarantee obligating the Developer to the completion of the required improvements and the payment of all costs incurred in such construction.
- B. Such Performance Guarantee shall be secured by a construction loan account established with a solvent building and loan institution or a cash escrow account established with a solvent financial institution, or be in the form of a surety bond issued by a surety company authorized to do business in Ohio and approved by the Board of Commissioners.

Brimfield Township Trustees



606.4 Release of the Performance Guarantee for Sanitary Sewer and/or Water Improvements (Section 636, p. 52, 1984 PCSR)

The Performance Guarantee may periodically be partially released or reduced at times and in amounts deemed appropriate by PCWR. PCWR will authorize such release or reduction of construction estimates from the Performance Guarantee to pay the Developer or the contractor for materials and/or labor furnished for the satisfactory completion of the sewer and/or water improvements. All payments shall be made according to the following general procedures:

- A. The Developer's engineer shall prepare the estimates on forms prescribed by PCWR and shall certify to PCWR that the work has been done according to the plans and specifications of PCWR.
 1. The sum to be paid or reduced must represent an increase in the value of the project at least equivalent to amount to be paid or reduced; and,
 2. Upon payment or reduction of the estimates, sufficient ~~funds~~ amount will remain to complete the project.
- B. Upon the approval of the Developer and PCWR, the estimates will be forwarded to the financial institution for payment or reduction.
- C. At all times, the retainage amount of ten percent (10%) of each construction estimate will be withheld as stipulated in Section 606.1.
- D. PCWR will release the ten percent (10%) retainage of the Performance Guarantee upon final acceptance of the completed improvements by the Portage County Board of Commissioners.



Comments: 150-Planned Unit Developments; There should be exemptions afforded to Planned Developments to allow for innovative planning and design.

Response: As the intent of this section is to allow for flexibility as determined by the Township and the County Engineer's Office and Water Resources as appropriate, this feedback is considered and the proposed amendments to section 150 are suggested to be withdrawn. Subdividers may pursue a non-traditional development, but those are determined through the preliminary plan process and thorough evaluation, including in the area of public safety, which is crucial when dealing with road design.



Section 150

Planned Unit Developments Encouraged

The planned unit development approach to development is greatly encouraged. These Regulations may be modified by the degree necessary to accomplish the objectives and standards required for the ~~FLEXIBILITY IN SUBDIVISION DESIGN FOR~~ planned unit development of residential, commercial, or industrial subdivisions, or a mixture thereof, in accordance with provisions of township zoning resolutions, ~~IS SUGGESTED TO INTEGRATE LAND USES, OPEN SPACE AND COMMUNITY AMENITIES.~~ Nothing within this section, however, shall exempt the developer from the requirements of these Regulations.



Comments: 201 - Definitions: The term "Road Opening" should be defined. The definition of Preliminary Plan should be expanded to also include a registered engineer as well. Variance should be defined as a modification of the strict terms of the relevant regulations, where such a modification will not be contrary to public interest and are due to conditions specific to the property and not the result of the actions of the applicant.

Response: Road opening as mentioned in Section 308.1 is in relation to Ohio Revised Code section 711.131, and here is intended to have the same meaning. In keeping with Section 302.2, definition of Preliminary Plan should include a registered engineer.

The definition of Variance is in accord with Section 705 on Variances, and no change is suggested.



Section 201

Definitions

Plan

5. Preliminary Plan: A map of a proposed subdivision prepared by a registered surveyor or registered engineer in accordance with these regulations that includes explanatory exhibits and text, and is submitted to the Regional Planning Commission for its review and comments. The Preliminary Plan, if approved or conditionally approved by the Regional Planning Commission, shall provide the basis for proceeding with the preparation of the final plat of a proposed subdivision.



Comments: 301 - Pre-Application Meeting: This is an added step in the subdivision process. It is not required, but "strongly recommended". The Pre-Application Meeting will result in additional time and expense to the developer in the approval process.

Response: The pre-application meeting is, as noted, strongly recommended, and the intent is to help the developer to work through some pre-application issues informally and have constructive dialogue before launching into extensive engineering costs, which may result in a savings for some developers.



Comments: 302.1 - Preliminary Plans Required for Major Subdivisions: Under the current regulations, a preliminary plan is optional. This will be an unnecessary added expense to a landowner simply trying to subdivide property along and existing public roadway.

Response: Preliminary plans are required for major subdivisions involving new, expanded, or extended roads, water and/or sewer lines, as well as other major subdivisions with circumstances involving stormwater, wetlands, floodplain etc. issues that may exist on site. We understand there will be less information devoted to roads and or water and sewer if they already exist, but we believe the required preliminary plan will resolve any possible issues earlier in the platting process and may result in savings to subdividers as well as consistency in applying the subdivision rules and regulations. No change to Section 302.1 is suggested.



Comments: 402 - Road and Street Design: It appears that the new regulations will require a variance to not extend public roadway to adjacent properties. The variance would require the developer to prove a hardship created by the requirement to extend the roadway. The developer will also be burdened with determining the development potential of the adjacent parcels. The required Extension of streets to the boundary for future extension will result in added design and infrastructure costs to the developer. It may also result in a layout that is not favorable to the developer.

Response: Proposed amendments to this item are a clarification of an existing requirement found in Section 410.4 of the subdivision regulations and will be determined at the planning level.

Home Builders Association



Comments: 408 - Open Space: The proposed regulations require increased open space for developments with lot sizes less than 0.92 acre. The proposed regulations change from 5% to 7% for medium density lots and 10% for high density. We want to keep 5%. We want "permanent water bodies should comprise no more than 30% of the required open space" and "no more than 40% of the open space are may be sensitive or natural environmental areas" stricken from the regulations.

Response: The intent of the change is two-fold, first as lots get smaller under an acre and under a half-acre -- kids and adults need space to recreate. We created a sliding scale to address smaller lots. We recognize that environmental constraints, topography lot layout, may tip the scale on profitably developing the subdivision and added a fee-in-lieu of option. The fee is based on the land value prior to development and a fund is created for the Township to provide new equipment for all residents. We are trying to provide options and create a win/win opportunity for future and or current residents.



Comments: Article 5 - Portage County Engineers Standards for Road, Storm water and Drainage Improvements: The items being proposed are not uncommon in other locations. However, it is a significant upgrade to the previous regulation and will result in additional survey, design, and construction costs for development projects in the county.

Response: The Board appreciates that different standards for road, storm water and drainage improvements could be accompanied by a different cost, and a resultant potentially different cost in home prices or other developments, which may be affected by many factors. The revisions, as mentioned, are not uncommon, and would have the additional result of reduced wear and tear on vehicles, lower maintenance costs to the community, as well as a higher quality standard of living and service within the communities of the county, which is believed to outweigh the risk of additional costs.



Comments: 502.5 Road Plan and Profile Sheets: The scales designated for roadway plan and profile sheets by the highway engineer do not match the scales designated for sanitary/water plan and profile sheets by Water Resources in Section 601.2. Differing scales would require added plan sheets, resulting in additional design costs. The regulations need to be consistent with other regulations.

Response: The County Engineer agree with matching the scale requirements and will adjust the appropriate sections to make them the same for consistency.



502.5 Road Plan and Profile Sheets

All roads within the subdivision shall be shown on a standard plan and profile sheet. Plan view on top of sheet and profile view on bottom.

A. Scale

1. 1" = 50 feet for the horizontal scale and 1" = 5 feet for vertical scale on rural density Subdivisions.
2. 1" = ~~30~~ 20 feet for the horizontal scale and 1" = 5 feet for vertical scale on suburban or urban density Subdivisions.



Comments: 519.2 - As Built Drawings: as built drawings will be required for all permanent Post-Construction Storm Water Management facilities (including as-built design calculations), all storm water structures, waterline and gas line structures such as valves and hydrants, service valves, sanitary, storm, and water connection in lots. The requirement for as built will be an added expense to the developer.

Response: As-built locations for the ends of the utilities is also a safety issue. We want to ensure the home excavator knows where the ends of the laterals are to ensure they are not searching for laterals so close to high power underground electric lines and fiber optics that are located behind the right of way within the easement. This is viewed as a safety and cost saving measure for each individual lot.



Comments: 519.3 - Final Inspections: The proposed regulations will require all storm sewer to be cleaned and televised prior to acceptance by the county. This will be an added expense to the developer.

Response: This is not a new requirement and is currently part of the ODOT specifications and is only highlighted to ensure it is not missed by the contractors in their estimates.



Comments: 520.2 - General Liability Insurance: The proposed regulations will increase the insurance limits required by the developer. This will result in increased insurance premiums for the developer. We need to keep this regulation in line with other municipalities.

Response: Matching to the county's insurance limits for liability per the current coverage rate standards. The old rates were from 1984.



Comments: 521 - Minimum Roadway Specifications: The proposed regulations will change the roadway specifications for publicly dedicated roads. This is an upgrade and will result in a more superior roadway construction. However, it will also be a significant cost increase for the developer to install streets.

Response: The revisions, as mentioned, will result in superior roadway construction, and would have the additional result of reduced wear and tear on vehicles, lower maintenance costs to the community, as well as higher quality standard of living and service within the communities of the county, which is believed to outweigh the risk of additional costs.



Comments: Article 6 - Water Resources Standards: In general, it appears that PC Water Resources is incorporating their current standards into the subdivision regulations. Most items listed in the proposed regulations were already required for the installation and dedication of public water and sanitary sewer mains.

Response: The intent of the update to the subdivision regulations was to match the Departments rules and regulations for sewer and water systems.



Comments: 601.2 - Drawings shall be submitted in the following format: The scales designated for sanitary/water plan and profile sheets by the highway engineer do not match the scales designated for roadway plan and profile sheet by the Highway Engineer in Section 502.5. Differing scales would require added plan sheets, resulting in additional design costs.

Response: The County Engineer agree with matching the scale requirements and will adjust the appropriate sections to make them the same for consistency.



502.5 Road Plan and Profile Sheets

All roads within the subdivision shall be shown on a standard plan and profile sheet. Plan view on top of sheet and profile view on bottom.

A. Scale

1. 1" = 50 feet for the horizontal scale and 1" = 5 feet for vertical scale on rural density Subdivisions.
2. 1" = ~~30~~ 20 feet for the horizontal scale and 1" = 5 feet for vertical scale on suburban or urban density Subdivisions.



Comments: Section 404(B)3 - basically not allowing Cul-du-sacs to be longer than 1,200 feet if they do not intersect with an ingress/egress path from the development.

Response: Suggested revision: 404 1a) Lengths over 1,200 shall require a variance to the block length requirements.

1b) The variance will be required to demonstrate the ability to adequately address emergency vehicles for public safety.

1c) Variances should consider lot configuration, topography, environmental constraints (wetlands, floodplains, and soil conditions), and the ability to appropriately sub-street connect to adjoining parcels.

The intent is primarily for public safety with emergency vehicles and to encourage interconnection to other existing or future subdivisions.



404.1 Block and Cul-De-Sac Length

A. Blocks

1. Residential and mixed-use blocks may average 1,200 feet in length, but in no case exceed 1,500 feet.

a. Lengths over 1,200 shall require a variance to the block length requirements.

b. The variance will be required to demonstrate the ability for adequately address emergency vehicles for public safety.

c. Variances should consider lot configuration, topography, environmental constraints (wetlands, floodplains, and soil conditions), and the ability to appropriately sub-street connect to adjoining parcels.



Comments: Section 301.1(B) - clarify what we want for a pre-application sketch.

Response: We want applicants to use FIRM Maps and NWI maps for the surrounding parcel info.



301.1 Pre-application Sketch Content

The Developer is encouraged to submit to the Regional Planning Commission a sketch plan, legibly drawn at a suitable scale and containing the following information:

- A. The proposed Subdivision in relation to existing community facilities, thoroughfares and other transportation modes, shopping centers, manufacturing establishments, and residential developments.
- B. Natural and man-made features such as soil types, vegetation, contours, surface water, and possible wetlands on the site of the development and immediately adjacent to it and use the FIRM and National Wetland Inventory Maps.



Comments: Section 303.2(H&I) - Clarify what we want as part of the preliminary plan (information just outside the project site).

Response: We want applicants to use FIRM Maps and NWI maps for the surrounding parcel info.



303.2

- I. Location of wooded areas and other significant topographic and natural features, including surface water, wetlands and flood hazard areas per FEMA Flood Insurance Rate Maps (FIRM), within and adjacent to the plan for a minimum distance of fifty (50) feet and use the FIRM and National Wetland Inventory Maps.



Comments: Enactment of regulation amendments

Response: Added section 180: Enactment

General Inquiries



Section 180

Enactment

These Regulations shall become effective from and after the date of their approval, adoption and/or amendment by the regional planning commission and the board of county commissioners after public hearing(s) and certification to the county recorder as required by Chapter 711 of the Ohio Revised Code. Henceforth, any other subdivision regulations previously adopted pursuant to Chapter 711 of the Ohio Revised Code by the Portage County Regional Planning Commission and Portage County Board of Commissioners shall be deemed to be repealed. These Regulations shall not affect any subdivision having received preliminary plan approval prior to the effective date of these regulations or amendment thereto, provided, however, that no changes to the preliminary plan, as approved, are introduced by the subdivider.

General Inquiries



Comments: Appendices 5A & 6A

Response: The template / example documents provided in Appendices 5A and 6A are not themselves rules or regulations and are being stricken during the pendency of the amendment process so that they may be updated and provided for convenience of developers at the time any amendments to the subdivision rules and regulations are approved and adopted.

Staff Changes



305.4 Required Statements on Plats

L. The following statement shall be affixed to all Subdivision Plats involving the construction of new roads, which have been constructed in accordance with the specifications set forth on the approved plat, and have been found to be in good repair following the required period of maintenance;

Roads APPROVED in Accordance with Section 711.091, Ohio Revised Code.

Date _____, 2____.

Portage County Engineer

Staff Changes



405.3 Lot Frontage

- A. If public sewer is not available, the Subdivider of land shall provide each lot with a minimum frontage on a public or private street of sixty (60) feet. The 60-foot width, or greater, shall be maintained the entire length of the lot. Frontage on a limited access road will not be counted as frontage without proof that access can be obtained.
- B. If public sewer is available and zoning permits, the lot frontage may be reduced to 50 feet. The 50-foot width, or greater, shall be maintained the entire length of the lot. Frontage on a limited access road will not be counted as frontage without proof that access can be obtained.
- C. Flag lots with minimum frontage on a public road or private road built to county standards shall provide access to only that lot. If the narrow portion of the lot offers access to more than one parcel or lot, it shall be built to road standards as specified in these regulations.
- D. Frontage may be reduced by the Regional Planning Commission for lots on a permanent cul-de-sac or on the curved portions of a loop street. Frontage requirements must meet local zoning regulations.
- E. The subdivider of land shall provide each lot with a minimum frontage on a public or private street, of sixty (60) feet in width or an access strip to a road approved by the County Engineer. Such access strip must be at least sixty (60) feet in width for entire length of said strip and must provide access to only one (1) parcel of land. A strip of land providing access to more than one (1) parcel of land shall be dedicated as a public or private street and shall be improved by the developer or subdivider in accordance with these regulations.



406.3 Schedule of Building Construction

The sanitary sewers and water lines (where applicable), storm sewers and first layer of asphalt on roads shall be installed prior to the construction of buildings within a Subdivision. No lot shall be sold or leased, nor shall any building permits be issued for any building unless required improvements are first constructed as specified by these regulations and township zoning requirements are met. It is imperative that traffic be contained on the pavement and driveway areas since stronger pipe is to be provided at these areas. This case will aid in preventing damage to the storm and sanitary sewer systems. In addition, all items constructed shall be completely protected. Damaged items shall be replaced or repaired as directed by the inspector and at the contractor's expense. The curbing and road base will follow when ordered by the inspector upon an approved sub-grade. Upon completion and approval of all other items, the pavement surface-course will be applied. (Amended 26, 1984)

Staff Changes



514.9 Change Orders

If during the prosecution of the work, it becomes necessary to modify the approved plans or specifications due to unforeseen circumstances, the subdivider's engineer shall revise the plans, specifications and estimate of cost and recommend approval of the required change to the Portage County Engineer and/or Sanitary Engineer. If the County Engineer and/or Sanitary Engineer approves such a revision, a written change order shall be prepared by the subdivider's engineer and signed by the appropriate county authority.

Staff Changes



508.1 Drainage System Requirements *(Sec. 620 1984 PCSR)*

The design criteria for the drainage system shall be based on the State of Ohio Department of Transportation design policy and/or County Engineer standards. These criteria shall apply to development along existing roads as well as those requiring new roads to be constructed.

A. Road Drainage System

The road storm drainage system shall serve as the local drainage system. It shall be designed to carry roadway, adjacent land, and house storm water drainage. To prevent excessive pipe sizes, storm sewers shall drain into natural waterways as soon as possible.

B. Off-Road Drainage System

The design of the off-road drainage system shall include the watershed affecting the Subdivision and shall be extended to a watercourse or ditch adequate to receive the storm drainage.

C. Dams or Basins Embankments

Three (3) copies of detailed drawings of proposed dams or basins and all calculations shall be submitted to the County Engineer for approval. The developer or his engineer shall apply for a permit from the State of Ohio, Department of Natural Resources, Division of Water, if applicable, and any other applicable agencies.



509.2 Storm Water Pollution Prevention Plan (SWPPP)

- D. As-built drawings will be required for all permanent, post-construction storm water management facilities and shall be submitted per Section [519.2](#) to the County Engineer. The As-Built Survey of the permanent Stormwater Management facilities shall include an As-Built set of stormwater facility calculations. These As-built volume and outflow calculations shall be certified (sealed, signed and dated) by a Registered Surveyor and/or Engineer as applicable, with a statement certifying that the Storm water facilities as installed meet the design criteria of the improvement plans approved by the County.
- E. No earthmoving activities may commence without SWPPP approval from the PCSWCD.



514.5 Inspection

- A. The Portage County Engineer shall be responsible for the inspection of all improvements listed in Section ~~516.4D~~ 514.5D below. The Developer, his/her engineer, or his/her contractor shall give notice to the Portage County Engineer at least three (3) working days in advance of any construction of physical public improvements. Failure to notify the Portage County Engineer may result in requiring the complete removal of such uninspected work at the Developer's sole cost.

THANK YOU

