

LAND USE
BOARD OF APPEALS

JUN 7 6 21 PM '88

BEFORE THE LAND USE BOARD OF APPEALS
OF THE STATE OF OREGON

1
2
3 STANDARD INSURANCE COMPANY,)
an Oregon corporation,)
4) Petitioner,)
5))
6) vs.)
7 WASHINGTON COUNTY,))
8) Respondent,)
9))
10) and)
11 LLOYD POWELL and ASSOCIATES,))
Intervenor-)
Respondent.)

LUBA No. 88-005
FINAL OPINION
AND ORDER

12 Appeal from Washington County.

13 Jack L. Orchard, Portland, filed the petition for review
14 and argued on behalf of petitioner. With him on the brief was
Ball, Janik & Novack.

15 Lawrence R. Derr, Portland, jointly filed a brief on behalf
16 of intervenor-respondent with Jeffrey J. Bennett, Portland, of
Bauer, Hermann, Fountain & Rhoades, P.C., and DeMar L.
17 Batchelor, Portland, of Schwenn, Bradley, Batchelor, Brisbee &
Stockton. Lawrence R. Derr argued on behalf of
18 intervenor-respondent.

19 No appearance by respondent county.

20 BAGG, Chief Referee; HOLSTUN, Referee; SHERTON, Referee;
participated in the decision.

21 REMANDED 06/07/88

22 You are entitled to judicial review of this Order.
23 Judicial review is governed by the provisions of ORS 197.850.

1 Opinion by Bagg.

2 NATURE OF THE DECISION

3 Petitioner appeals approval of a comprehensive plan map
4 change from Industrial to Neighborhood Commercial (NC) for
5 property located at 185th Avenue and N.W. Walker Road in
6 Washington County. This is the second time LUBA has reviewed a
7 comprehensive plan map change for this property. Our first
8 review resulted in a remand in Standard Insurance Company v.
9 Washington County, ___ Or LUBA ___ (LUBA No. 87-020, September
10 1, 1987) (Standard).

11 Petitioner again argues that the county's comprehensive
12 plan map change is defective and requests that we reverse the
13 decision or, in the alternative, remand it to Washington County
14 for further proceedings.

15 FACTS

16 The facts are as we found them in our earlier review:

17 "The tract is located at the intersection of N.W.
18 Walker Road and N.W. 185th Avenue in the urban area of
19 Washington County. The applicant for the change
20 proposes to construct a 100,000 square foot shopping
21 center anchored by a 40,000 square foot supermarket.
22 Plan designations on surrounding properties are
23 Industrial to the north, west and south, and Office
24 Commercial, Neighborhood Commercial and Institutional
25 to the east. The planning commission recommended
26 denial of the application. The county commission
approved the amendment as proposed. Standard, slip
opinion at 2.

24 After our remand, the county reopened the proceeding to
25 address two issues: transportation related matters and proof
26 of a lack of suitable alternative sites. New evidence was

1 submitted in this second proceeding, including a federal
2 environmental impact statement (EIS) which documents the nature
3 and scope of improvements to be made to 185th Avenue.

4 MOTION TO INTERVENE

5 Lloyd Powell and Associates move to intervene in this
6 proceeding. There is no opposition, and we allow the motion.

7 MOTION TO AMEND THE RECORD

8 Petitioner filed an affidavit from a member of the county
9 planning staff. Petitioner asks that we consider the affidavit
10 as a supplement to the record in our review of this case. The
11 affidavit explains the county staff's role in the
12 transportation analysis undertaken for this plan amendment.

13 We decline to review the submittal. The affidavit was
14 filed on the date our opinion was due to be issued. Petitioner
15 offers little explanation of how the testimony in the affidavit
16 might affect the outcome of our review. Further, it is clear
17 from the affidavit that it was not before the county board when
18 it rendered its decision. Therefore, the submittal is not
19 appropriate as a supplement to the record. OAR 661-10-025.

20 If we consider the submittal a motion for evidentiary
21 hearing, we still decline to review the material. Petitioner
22 does not explain how the testimony warrants reversal or remand
23 of the decision. OAR 661-10-045(1).

24 FIRST ASSIGNMENT OF ERROR

25 "The applicant and the County failed to perform the
26 appropriate and required transportation system
analysis of the traffic impacts created by the

1 proposed plan change."

2 Under the county's Comprehensive Framework Plan (CFP)
3 Policy 1, Implementing Strategy (g), a plan change may not be
4 approved unless the applicant demonstrates that

5 " * * * the potential service aspects of the
6 designation will not impact the built or planned
service delivery system in the community."

7 * * * * *

8 The parties agree this policy is applicable and that
9 transportation is a "service delivery system." Petitioner
10 argues that the applicant submitted an impermissibly limited
11 traffic analysis. The applicant's traffic expert concluded the
12 traffic impact area was limited to portions of N.W. Walker and
13 185th and the intersection of those roads. Record 210. The
14 applicant's traffic expert explained the limits of his study as
15 follows:

16 "My report indicated there were - the limits of that
17 report were 1,000 feet on 185th, 600 feet on Walker
18 Road. Anything outside of that impact area with the
19 10 percent rule is required by staff to analyze the
impact and needed improvements, not me, or not the
developer. It's clearly stated in your new impact
statement report." Tr. at 57.

20 Petitioner argues that in order to satisfy the CFP Policy,
21 there must be a demonstration that the change will not impact
22 built or planned service facilities. According to petitioner,
23 because the applicant did not analyze all facilities that will
24 be affected by the proposed shopping center, but rather only
25 analyzed the street frontage in the immediate vicinity of the
26 shopping center, the analysis is incomplete.

1 The county found, in part, as follows:

2 "The applicant conducted a traffic impact study in
3 connection with its application for development review
4 and an access spacing variance. * * * Based upon that
5 traffic report and the Transportation Report prepared
6 by the County traffic analysts dated May 5, 1987, the
7 Board finds that the proposed use is a 99,271 square
8 foot grocery-based neighborhood shopping center.
9 Based on an interpolated daily rate of 77.01 trips per
10 thousand square feet for the shopping center and 553
11 trips per thousand square feet of restaurant space a
12 total daily generation of 9,857 trips is expected.

13 "The percentage increase to existing roadways is: 5%
14 on Walker west of 185th, 7% on Walker east of 185th;
15 8% on 185th South of Walker, and 18% on 185th north of
16 Walker. These increases lie within an acceptable
17 tolerance given the nature of the five-lane
18 improvement scheduled for 185th Avenue so long as
19 construction of an additional two lanes at the 185th
20 Avenue/Walker Road intersection is required in
21 connection with any development of the subject
22 property.

23 "The County's projections for traffic flows on 185th
24 at the intersection of 185th and Walker Road yield a
25 Year 2005 need for a seven-lane intersection
26 improvement. These projections do not, however,
27 indicate the need for more than a five-lane facility
28 between any intersections along 185th Avenue other
29 than the seven-lane facility contemplated from Cornell
30 Road north to Sunset Highway.

31 "Because the County's improvements are based upon
32 anticipated flows the Board concludes that the plan
33 service delivery system for 185th Avenue generally is
34 a five-lane facility, and that only at the
35 intersection of 185th and Walker Road is a seven-lane
36 improvement warranted. Based upon Year 2005 traffic
37 projections, this intersection improvement would be
38 warranted even if the proposed plan amendment were not
39 approved.

40 "Addition of the traffic generated by the proposed use
41 will not require more than the County's planned
42 facility. Accordingly, approval of the plan amendment
43 will not detrimentally affect the planned street
44 system, and presents a condition whereby the planned
45 transportation services will accommodate
46 implementation of the proposed Neighborhood Commercial

1 plan designation.

2 "Standard Insurance has suggested that approval of
3 this plan amendment will detrimentally impact the
4 planned five-lane service facility for 185th Avenue.
5 As specifically stated above, the Plan specifically
6 authorizes laneage in excess of five lanes (in the
7 case of a major arterial) at street intersections
8 where the widening is 'essential to accomodate
9 intersection turn movements.' That is the case here.
10 The need for a seven lane intersection improvement is
11 based upon intersection turn movements, not the more
12 general need to provide a seven-lane facility.

13
14 "Based upon the above, the Board concludes that the
15 planned facility for 185th is generally a five-lane
16 facility. The impacts generated by this plan
17 amendment lie within tolerance levels permitted on a
18 five-lane facility so long as additional intersection
19 laneage is required to assure safe turning movements
20 at the 185th Avenue/Walker Road intersection.
21 Approval of this plan amendment will not require
22 readjustment of the scope of that planned facility.
23 Record 97-99.

24 The county found that the planned service delivery system
25 is 185th Avenue and Walker Road. The county also found the
26 traffic projections do not indicate a need for more than the
27 planned for five lane 185th street facility between
28 intersections on 185th or for more than the planned seven lane
29 intersection at 185th and Walker Road.¹ However, these
30 findings do not satisfy the questions raised by petitioner.
31 Petitioner claims an analysis limited to 185th and Walker Road
32 is not sufficient, because there are facilities other than
33 those two roads and their intersection which must be
34 considered. Petitioner also argues the county failed to find
35 there will be no impact on Walker Road itself or on
36 intersections along 185th, other than the Walker Road

1 intersection.

2 The county's order does not explain what the county
3 believes constitutes an "impact [on] the built or planned
4 [transportation] system." There is no discussion in the
5 county's order about how much additional traffic may be
6 generated before the plan policy is triggered.²

7 Along with the failure to clarify what level of activity
8 constitutes an "impact" under the plan policy, the county
9 findings do not discuss the traffic effects of the proposed
10 change on facilities other than 185th and Walker Road. The
11 county did not, in its findings, explain why it chose to
12 examine 185th and Walker Road and to exclude other
13 intersections or roadways in the vicinity.³ Also, the
14 county's findings do not state that the facilities planned for
15 Walker Road itself and for the intersections on 185th, other
16 than that with Walker Road, will not be impacted.

17 While it may be true that additional traffic generated by
18 the proposed use will require no improvements other than those
19 already planned for 185th and its intersection with Walker
20 Road, as the county found, the plan policy requirement that the
21 change will not impact built or planned service facilities
22 requires a more complete examination of traffic effects. If
23 the county wishes to make this examination of traffic effects
24 more manageable by limiting the area to be studied, the area
25 chosen and the basis for its selection must be explained. In
26 addition, the county must affirmatively state in its findings

1 that beyond the limits of such a study area, there are no
2 "impacts" as that term is used in the CFP Policy. Finally, for
3 the roads and intersections within such a study area, the
4 county must find that the built or planned for facilities will
5 not be impacted by the approved plan change.

6 The first assignment of error is sustained.

7 SECOND ASSIGNMENT OF ERROR

8 "The County failed to consider the impact of the
9 proposed development upon the Final Environmental
10 Impact Statement approved for the 185th project and
11 failed to relate the traffic impacts created by the
12 proposed shopping center to the EIS process."

11 A. EIS Process

12 Under this assignment of error, petitioner argues that the
13 EIS is the "'plan' for the improvement of the expansion of
14 185th * * *." Brief of Petitioner at 13. Because the plan
15 designation for the subject property was industrial when the
16 EIS was prepared, petitioner argues that the factual
17 underpinnings of the EIS are now changed as a result of the
18 plan amendment. Petitioner argues the county has therefore
19 ignored the EIS in approval of this plan change.

20 The county findings do not address the EIS, and petitioner
21 believes that

22 "[A]t a minimum, the County must address a basic
23 threshold question: Does the plan change impact the
24 adopted EIS for 185th - which, itself, is the
25 transportation plan for 185th? Without making this
26 initial inquiry, the county cannot determine whether
the plan amendment meets Plan Policies 32 and 33 or
achieve consistency with the EIS." Petition for
Review at 20-21.⁴

1 Petitioner goes on to argue that a supplemental EIS must be
2 undertaken.

3 The EIS is necessary in order to obtain federal funding for
4 the planned highway improvement project for 185th Avenue. See
5 42 USC Sec. 4332(2)(c); 40 CFR Sec 1508.23. However, we find
6 nothing in the county plan or implementing ordinances or in any
7 other document to which we are cited which makes the EIS a
8 "plan" provision or other approval criterion for this plan
9 amendment. Respondent explains that the EIS may be a plan for
10 a particular road project, but its only purpose is to "infuse
11 environmental considerations into the Federal Highway Agency's
12 decision to fund and construct a specific 185th Avenue
13 project." Brief of Respondent at 10. While the EIS is
14 necessary for funding, it is not an approval criterion under
15 the county's land use scheme, according to respondent.

16 There are several difficulties with petitioner's
17 assertion. First, petitioner does not explain how LUBA can
18 determine whether a supplemental EIS is required. That is,
19 there is no citation to any requirement in the county's land
20 use planning scheme (or in the EIS) clearly showing that a
21 supplemental EIS is necessary before the county plan may be
22 amended.

23 Second, even if we assume a supplemental EIS is required,
24 the Council on Environmental Quality expressly recognizes that
25 following preparation of an EIS, local comprehensive plans are
26 "subject to future change."⁵ 46 Fed. Reg. 18026. Thus,

1 while a plan amendment or a series of amendments might present
2 such a change in circumstances that a supplementary EIS would
3 be required, see Comm. for Nuclear Responsibility v. Seaborg,
4 463 F. 2d 783, (D.C. Cir. 1971), there is no requirement that a
5 new EIS precede such plan amendments.

6 B. CFP Policy 33

7 Petitioner also argues that CFP Policy 33 is violated
8 because the county did not coordinate its transportation
9 planning function with the federal government.

10 While it is true Policy 33 does state that it is the
11 "policy" of the county to coordinate transportation planning
12 with local, regional and state agencies, we do not understand
13 the policy to require approval of other agencies prior to
14 county action under its own planning scheme. There is nothing
15 in this policy, nor are we cited to any other provision in the
16 county's plan or regulations, limiting the county's ability to
17 seek a change in the EIS to reflect the change in planning for
18 this area. We do not find error as alleged.

19 C. Funding of Planned Improvements

20 Finally, petitioner argues that federal money available for
21 the 185th Avenue project is now in question. Petitioner argues
22 the county's findings do not address the question of funding.
23 Petitioner claims this issue must be addressed because without
24 a source of funds for the planned improvements to 185th Avenue,
25 street improvements upon which approval of the plan amendment
26 relies will not be realized.

1 Respondent replies that the county's comprehensive plan
2 does not require public service facilities to be in place prior
3 to approval of a plan amendment. The facilities simply need to
4 be planned for.

5 We do not believe that the county is required to assure
6 that funding for public service facilities needed to support
7 planned development is available before it may adopt or amend
8 its plan to permit such development.⁶ In approving this plan
9 amendment, it is sufficient that the county found that
10 transportation facilities necessary to assure compliance with
11 plan policies either exist or are planned for.

12 The second assignment of error is denied.

13 THIRD ASSIGNMENT OF ERROR

14 "The County has failed to address the lack of
15 appropriately designated suitable alternative sites
16 requirement which is necessary for a plan amendment in
this instance under the Comprehensive Framework Plan
Policy 1, implementing strategy (g)."

17 A. 158th and Walker Avenue

18 In this subassignment of error petitioner attacks the
19 county's conclusion that the 158th and Walker Avenue site is
20 not suitable. Petitioner recognizes that this Board reviewed
21 the county's conclusion that this location was not suitable and
22 sustained it in our first review of this plan change. However,
23 petitioner argues that there is new and factually based
24 information regarding the divisibility of the site into smaller
25 parcels. The divisibility of the parcel, as we understand
26 petitioner's argument, was not something before the county

1 board prior to its first land use decision; and, therefore, we
2 should review the matter.

3 We decline to review the 158th and Walker Road site a
4 second time. The Board reviewed the site in its first opinion,
5 and sustained the county's rejection of the site. The county's
6 rejection of the site was not based on its divisibility or lack
7 of divisibility. Thus, the new evidence⁷ does nothing to
8 refute the county's reasons for concluding that this property
9 is not available as an alternative site.

10 B. 185th and Cornell Road

11 Petitioner next attacks the county's rejection of the 185th
12 and Cornell Road site. In our previous review of this plan
13 change, we did not accept the county's conclusion that the site
14 was not suitable and rejected the county's interpretation of
15 certain provisions in its plan. The county concluded, as it
16 does here, that Community Business District (CBD) zoning is not
17 appropriate for the proposed use. The county reached this
18 conclusion notwithstanding the fact that grocery stores are a
19 permitted use under this classification. The county found

20 "In other words, the function of the Neighborhood
21 Commercial District is to provide for the immediate
22 day-to-day shopping and service needs of persons who
23 live within the immediate neighborhood. In contrast,
24 the central [sic] business district is intended to
25 service a much larger trade area or 'community,' and
26 to provide a much broader range of consumer
services." Standard, slip opinion at 15, quoting
Record at 57.

27 Petitioner again challenges the county's rejection of the
28 site. According to petitioner, the county's findings show the

1 county believed that CBD designated sites are not to be
2 considered as alternative sites when there are no NC designated
3 sites within the planning area.⁸ That is, the county
4 believed the fact there is no NC designated site within the
5 planning area makes the CBD site an inappropriate alternative.
6 Petitioner argues this interpretation of the ordinance is
7 erroneous; and, therefore, the county's rejection of the 185th
8 and Cornell Road site is error.

9 CFP Policy 1, implementing strategy (g) provides as follows:

10 "g. A quasi-judicial plan amendment to the Community
11 Plan Maps, including the implementing tax maps,
12 shall be granted only if the Review Authority
13 determines that the proponent has demonstrated
14 that the proposed designation conforms to the
15 location criteria of the Comprehensive Framework
16 Plan, the Community Plan Overview and sub-area
17 description and design elements, complies with
18 the regional plan, and demonstrates that the
19 potential service impacts of the designation will
20 not impact the built or planned service delivery
21 system in the community. This is a generalized
22 analysis that in no way precludes full
23 application of the Growth Management Policies to
24 development permits as provided in the Code. In
25 addition, the proponent shall demonstrate one of
26 the following:

"i. A mistake in the current designation such
that it probably would not have been placed
on the property had the error been brought
to the attention of the Board during the
adoption process;

"ii. A lack of appropriately designated suitable
alternative sites within the vicinity for a
proposed use. Factors in determining the
suitability of the alternative sites are
limited to one of the following:

"a. Size: suitability of the size of the
alternative sites to accommodate the
proposed use; or

1 "b. Location: suitability of the location
2 of the alternative sites to permit the
3 proposed use."

4 The respondent argues that "appropriately designated
5 suitable alternative sites" under (g)(ii) gives the county
6 sufficient flexibility to find that CBD designated sites "will
7 not be considered as alternative sites when there are no
8 Neighborhood Commercial (NC) designated sites within the
9 relevant planning area * * *." Brief of Respondent at 16.

10 The county explains further in its findings.

11 "It was not and is not the Board's interpretation that
12 grocery-based convenience shopping facilities are
13 generically inappropriate in the CBD District. Our
14 interpretation of the Plan is a narrow one: CBD
15 district sites will not be considered as alternative
16 sites under CFP Policy 1, implementing strategy (g)
17 when there are NO Neighborhood Commercial (NC)
18 designated sites within the relevant planning area."
19 Record 82-83.

20 The county goes on to say that this interpretation of its plan
21 is necessary to

22 "ensure that each Community Planning Area contains
23 Neighborhood Commercial sites that are adequate in
24 size, number and location." Record 83.

25 The county further finds:

26 "In order to insure that those neighborhood
27 convenience needs are met, the Board concludes that
28 where demographics warrant, each planning area must
29 include an adequate number of NC designated sites to
30 insure that the needs the NC designation is intended
31 to satisfy are met. Although these needs could be
32 satisfied by CBD designated sites, prudent planning
33 policy does not permit the Board to rely on CBD sites
34 alone to appropriately satisfy convenience needs. CBD
35 sites are located based upon criteria that vary from
36 those used to locate NC sites. Due to the number of
37 commercial uses allowed within the CBD District, there
38 are no assurances that CBD sites will in fact be

1 developed to satisfy identified neighborhood needs.
2 In short, each planning area must include a sufficient
3 number of NC sites, with appropriate locations and
4 sizes. That is not the case in the Sunset West
5 Community Planning Area." Record 85.

6 Because there are no NC sites within the planning area, the
7 county concludes that its planning policies will not be met by
8 reliance on the CBD site alone. Therefore, the county
9 concludes the Cornell Road and 185th Avenue site is not
10 "appropriately designated" as that term is used in the county
11 plan.

12 The county findings also note that the county's alternative
13 sites criterion obligates the applicant to show

14 "a lack of appropriately designated suitable
15 alternative sites within the vicinity of the proposed
16 use. (emphasis added). Brief of Respondent at 18;
17 Record 86-87.

18 Respondent claims this criterion shows that the county has a
19 policy that more than one site must be available to accommodate
20 any identified need.

21 We are not convinced by the respondent's arguments or the
22 county's findings. The county's position as stated in its
23 findings is simply not reflected in the county's plan. While
24 the county's findings regarding the desirability of requiring
25 there be an NC site on each planning area make sense and
26 reflect a reasonable and prudent planning policy, this policy
is not expressed in the plan or implementing ordinances. The
county, therefore is neither obliged nor permitted to use it.
If the county wishes to adopt such a policy as part of its

1 plan, it must do so.

2 Further, we attach no significance to the use of the word
3 "sites" in the county's alternative sites criterion. There is
4 nothing in the plan to suggest that the county's reference to
5 "sites" means there must be more than one place available and
6 appropriately designated for a particular use. The choice of
7 words, in this context, simply insures that any and all
8 alternative sites must be considered before a plan map
9 amendment is allowed.

10 The third assignment of error is sustained.

11 FOURTH ASSIGNMENT OF ERROR

12 "Contrary to the arguments advanced to LUBA
13 previously, the County attaches legal significance to
14 the statements of intent and function relating to the
NC and CFP [sic] land use districts."

15 Petitioner argues, as it did in our first review of this
16 plan change, that the county places undue significance on
17 statements of intent and purpose found in the CBD and NC zoning
18 districts. Petitioner says it was improper for the county to
19 use the statements of intent in evaluating alternative sites.

20 This issue was raised in our first review. We found the
21 statements of intent and purpose to be descriptions of
22 characteristics of the districts, not approval standards, and
23 we denied petitioner's similar claim that the county improperly
24 relied on these descriptions in its review of the proposed
25 comprehensive plan change. Standard, slip opinion at 5.

26 We see no reason to change our view. While petitioner is

1 correct that the county's decision does discuss the purpose of
2 the NC and CBD designations, we find nothing in the county's
3 findings suggesting that the county used the statements of
4 intent as approval criteria. Rather, the county used the
5 statements of intent as a means to bolster its argument about
6 the need for alternative NC district sites discussed under the
7 third assignment of error. The county's discussion is simply
8 argument and justification for its action.

9 The fourth assignment of error is denied.

10 The decision of Washington County is remanded for
11 proceedings not inconsistent with this opinion.
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1 FOOTNOTES

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5 Additionally, seven lanes are planned for 185th between
6 Cornell Road and Sunset Highway.

7 2
8 The findings do suggest that the county interprets the
9 policy to proscribe plan changes which would require
10 improvements to service delivery systems in excess of
11 improvements already built or planned for. In other words, the
12 service delivery system is not "impacted" as that term is used
13 in the plan policy if the plan change does not require
14 improvements beyond those already planned for. On remand, the
15 county should explain its construction of this policy provision.

16 3
17 There is discussion in the record about a "10% rule"
18 regarding traffic impacts. The rule is not stated in any
19 county document to which we are cited. It apparently is a
20 reference to a rule of thumb that increases in traffic flow of
21 less than 10% do not require analysis. See Transcript p. 57.
22 The county's findings do not mention this "10% rule."

23 4
24 CFP Policy 32 states:

25 "It is the policy of Washington County to provide a
26 balanced transportation system which combines land
27 uses with the appropriate levels and types of
28 transportation services necessary to accommodate the
29 full implementation of the comprehensive plan."

30 CFP Policy 33 states:

31 "It is the policy of Washington County to coordinate
32 its transportation planning with local, regional and
33 state agencies to ensure the efficient management and
34 distribution of transportation resources and to
35 provide consistency among functional plans and
36 strategies."

37 5
38 The Council on Environmental Quality is responsible for

1 issuing regulations that implement provisions of the
2 National Environmental Protection Act (NEPA).

3

6
4 LCDC's Public Facilities Planning rule expressly
5 recognizes that funding for long term public facilities
6 may be uncertain. OAR 661-11-025(1).

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7 The new evidence referred to by petitioner is simply a
8 letter from BENJFRAN Development, Inc. expressing
9 willingness to be "flexible with regard to the sizes of
10 the pieces of property that we offer for sale." Record
11 268.

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11 The county plan identifies discrete "planning areas."
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