

Agenda Item 5 (Quasi-Judicial Hearing)

Rezoning - Planned Development – General

DEV2017-048

Eagle Marsh/Gray Hawk

Second Amendment Renar PD Agreement

STAFF REPORT

DATE: July 19, 2017

TO: Planning Board Members

FROM: Rose Askew, Planner

REQUEST

A request by Jim Butler, with Eagle Marsh Homes on behalf of Renar Golf Communities at LPGA International Homeowners’ Association, Inc., to approve a second amendment to the Renar Golf Communities at LPGA International Planned Development Agreement, to add maximum lot coverage of 47 percent for lots located in Eagle Marsh and Gray Hawk, Unit 2 Subdivisions.

PROJECT LOCATION

The properties subject to the PD Amendment request are generally located south and east of LPGA Boulevard and are located within the Renar Golf Communities Planned Development at LPGA International. Zoning on the property is Planned Development-General (PD-G) and the future land use designation is Level 1 Residential with a Conservation overlay. Adjacent land uses and zoning classifications are illustrated in the following table and are also shown in the accompanying maps.

Table 1: Land Use and Zoning – Eagle Marsh

	Existing Uses*	Future Land Use Designation	Existing Zoning Classification
Site	Single and Multifamily Residential	Level 1 Residential & Conservation	Planned Development-General (PD-G)
North	Single and Multifamily Residential	Level 1 Residential & Conservation	Planned Development-General (PD-G)
South	Golf Course	Level 1 Residential, Conservation, & Golf	Single-Family Residential (SFR-5)
East	Preservation Area	Level 1 Residential, Conservation, & Golf	Single-Family Residential (SFR-5)
West	Vacant Undeveloped & Stormwater Retention	Level 1 Residential & Conservation	Single-Family Residential (SFR-5)

Table 2: Land Use and Zoning – Gray Hawk, Unit 2

	Existing Uses*	Future Land Use Designation	Existing Zoning Classification
Site	Vacant Undeveloped	Level 1 Residential	Planned Development-General (PD-G) & Single-Family Residential (SFR-5)
North	Vacant Undeveloped	Mixed Use	Planned Development-General (PD-G)
South	Single-family & Multifamily Residential Development	Level 1 & Level 2 Residential, & Mixed Use	Single-Family Residential (SFR-5)
East	Vacant Undeveloped & Single-family Residential Development	Level 1 Residential, & Golf	Single-Family Residential (SFR-5)
West	Vacant Undeveloped & Multifamily Residential Development	Level 2 Residential & Mixed Use	Single-Family Residential (SFR-5)

PROPERTY HISTORY

Ordinance No. 00-112, adopted at the March 15, 2000 City Commission Meeting approved the Renar Golf Communities at LPGA International Planned Master Development (PMD) Agreement and the PMD rezoning for a 93± acre tract of land located at LPGA International (*Attachment A*). The project included the construction of four single-family subdivisions and approval of the preliminary plat for the property.

Ordinance No. 02-82 adopted at the February 2, 2002 City Commission approved the First Amendment to the Renar Golf Communities at LPGA International PMD Agreement (*Attachment B*). The Amendment included the addition of 131± acres of land to the existing PMD, to establish development standards for the property and clarified existing language within the agreement relating to signage. Exhibit “D-1” (Table for Setbacks and Heights) to the First Amendment addresses lot and building standards for Eagle Marsh, South and Gray Hawk, Unit 2 (*Attachment C*).

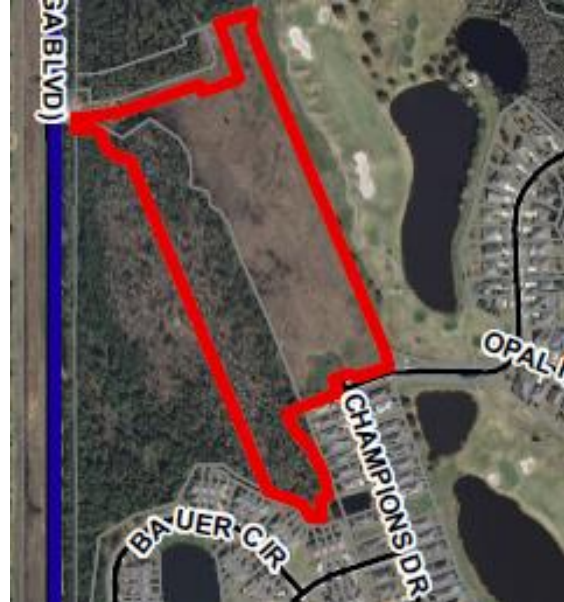
In September 2016 the Board of Adjustment approved a variance for three properties in the Eagle Marsh Subdivision, to increase maximum lot coverage from the 35 percent allowed in the LDC to 44 percent. The Board asked and the applicant agreed to have additional increases to lot coverage be processed through an amendment to the PD Agreement. The Board also requested the applicant to provide documentation to reflect the increase in lot coverage would not have a negative impact on stormwater for the planned development.

PROJECT DESCRIPTION

The applicant is requesting a second amendment to the Renar PD Agreement to add “D-2” to Section 6, Table for Setbacks and Heights and to add the following language to Exhibit D-1: Maximum lot coverage of 47 percent for Eagle Marsh and Gray Hawk, Unit 2 Subdivisions.



Eagle Marsh Subdivision



Gray Hawk, Unit 2 Subdivision

PROJECT ANALYSIS

Article 3 (Review Procedures), Section 3.4.F.4 (Planned Development Review Standards) of the LDC reads:

Review of and the decision on a Planned Development application shall be based on compliance of the proposed zoning reclassification and PD Plan/Agreement with the review standards in Section 3.4.D.3, Site-Specific Zoning District Map Amendment Review Standards, and the standards for the proposed type of PD district in Section 4.8, Planned Development Zoning Districts.

Site-Specific Zoning District Map Amendment Review Standards

In determining whether to adopt or deny a proposed Site-Specific Zoning District Map Amendment, the City shall consider:

a. Whether the applicant has provided, as part of the record of the public hearing on the application, competent substantial evidence that the proposed amendment:

i. Is consistent with and furthers the goals, objectives, and policies of the comprehensive plan and all other applicable City-adopted plans;

The proposed amendment does not conflict with the goals, objectives, and policies of the Comprehensive Plan.

The City's TRT has reviewed the PD Amendment request and found it to be consistent with the City's Comprehensive Plan.

ii. Is not in conflict with any portion of this Code;

The applicant is requesting to amend the PD Agreement to allow maximum lot coverage of 47 percent in lieu of the maximum 35 percent allowed in the LDC. The amendment request to add lot coverage criteria only applies to Eagle Marsh and Gray Hawk, Unit 2 Subdivisions. No additional changes are being proposed with this amendment request.

The City's TRT has reviewed the PD Amendment request and found it to be acceptable.

iii. Addresses a demonstrated community need;

The applicant proposes that larger homes are being proposed to address a community need..

iv. Is compatible with existing and proposed uses surrounding the subject land, and is the appropriate zoning district for the land;

The City's TRT has reviewed the PD Amendment request and found it to be acceptable.

The applicant has conducted a neighborhood meeting as required by The City's Land Development Code. A summary of the neighborhood meeting has been prepared by the applicant for review by the Board (*Attachment D*).

v. Would result in a logical and orderly development pattern;

The City's TRT has reviewed the PD Amendment request and found it to be acceptable.

vi. Would not adversely affect the property values in the area;

Staff does not have any indication that the proposed amendment will have an adverse impact on the property values in the area.

- vii. Would result in development that is adequately served by public facilities (roads, potable water, wastewater, solid waste, storm water, schools, parks, police, and fire and emergency medical facilities); and**

The applicant has provided an Engineer's Certification that reflects the increase in lot coverage to 47 percent will not have a negative effect on the stormwater system for the PD (*Attachment E*).

- viii. Would not result in significantly adverse impacts on the natural environment—including, but not limited to, water, air, noise, storm water management, wildlife, vegetation, wetlands, and the natural functioning of the environment; and**

Staff does not anticipate any adverse environmental impacts with the approval of this amendment request.

- b) If the applicant demonstrates that the proposed amendment meets the criteria in subparagraph [a] above, whether the current zoning district designation accomplishes a legitimate public purpose.**

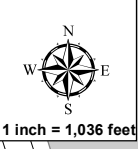
The City's TRT has reviewed the PD Amendment request and found it to be acceptable.

RECOMMENDATION

Staff recommends approval of the second amendment to the Renar Golf Communities at LPGA International Planned Development Agreement, to add maximum lot coverage of 47 percent for properties located in Eagle Marsh and Gray Hawk, Unit 2 Subdivisions.

A majority vote of the Planning Board members present and voting is required to approve the application.

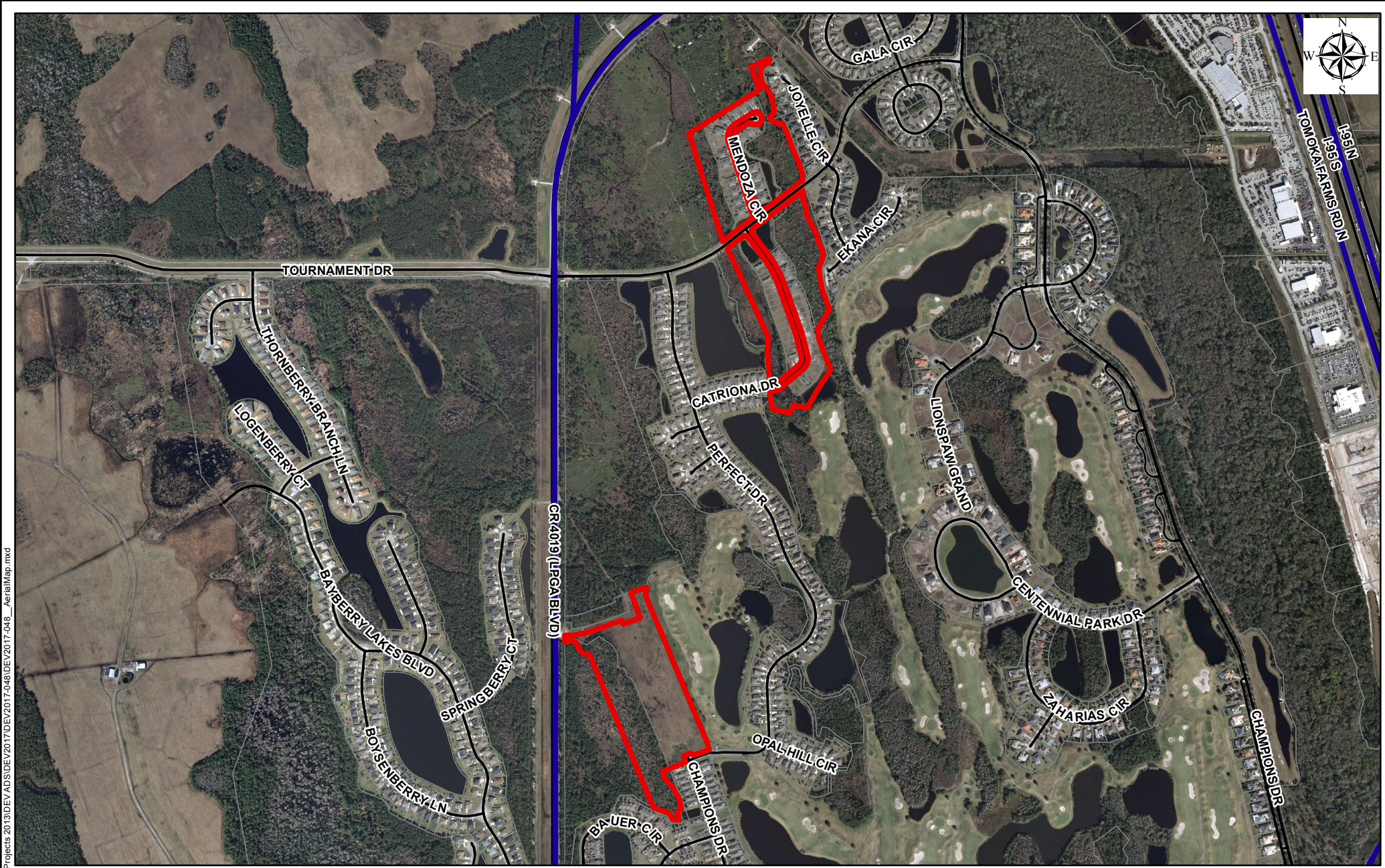
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**DEV2017-048
 PLANNED DEVELOPMENT GENERAL AMENDMENT
 LOCATION MAP**



City of Daytona Beach Map disclaimer:
 These maps were developed and produced by the City of Daytona Beach GIS. They are provided for reference only and are not intended to show map scale accuracy or all inclusive map features. As indicated, the accuracy of the map has not been verified and it should be used for informational purposes only. Any possible discrepancies should be brought to the attention of City Engineering and or Development Services.



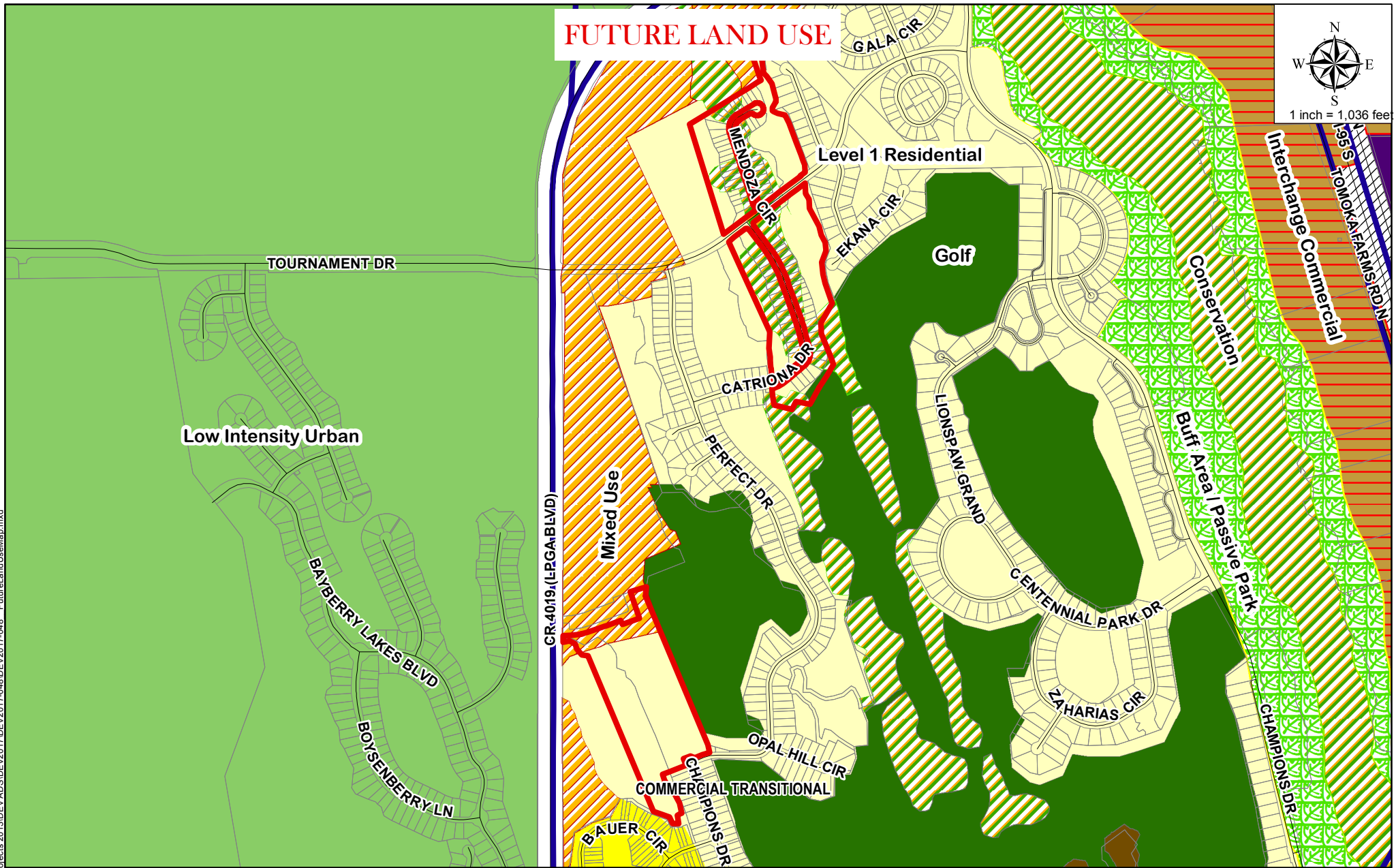
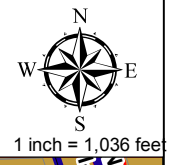
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**DEV2017-048
 PLANNED DEVELOPMENT GENERAL AMENDMENT
 AERIAL MAP**

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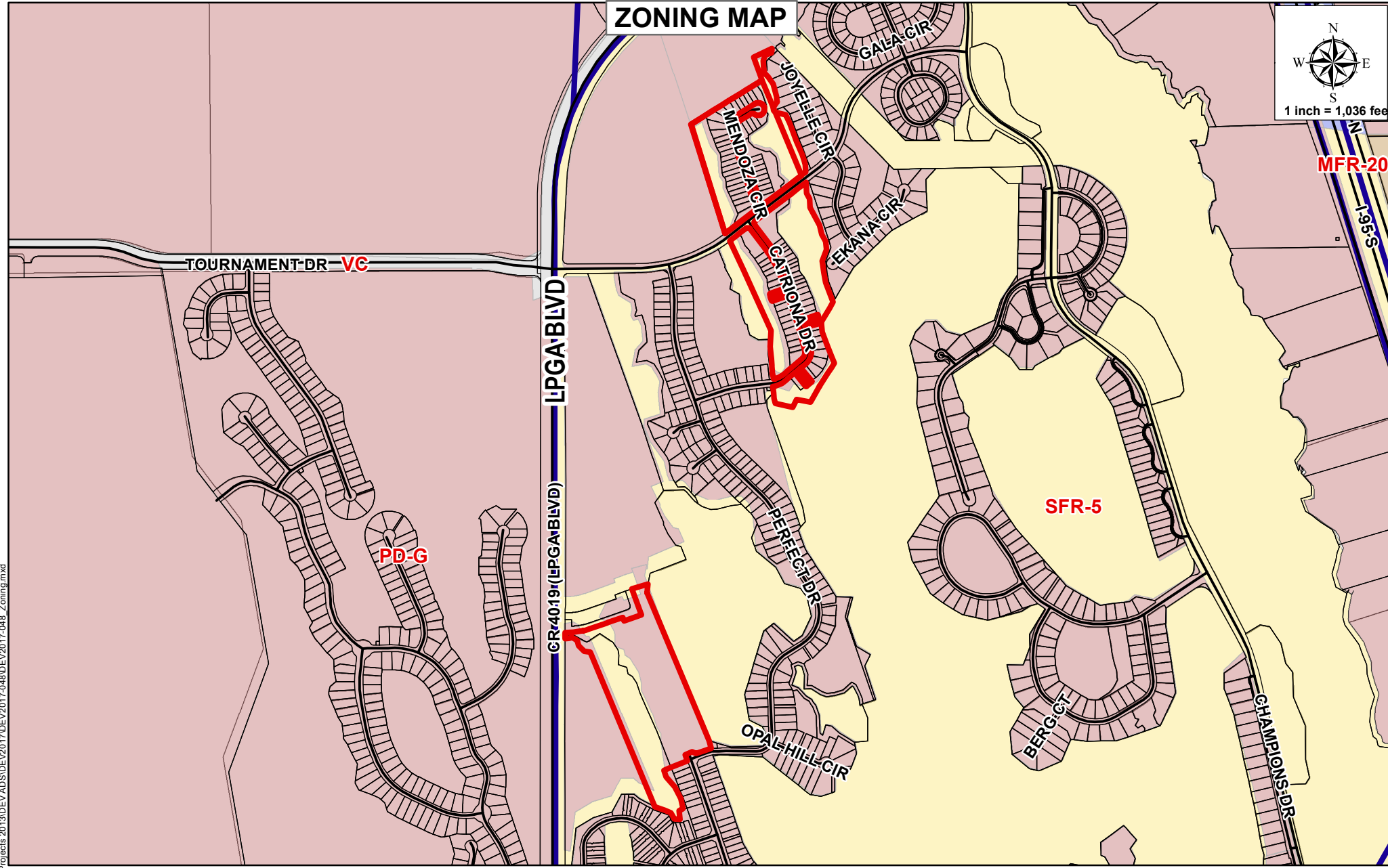
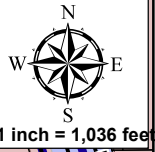
FUTURE LAND USE



DEV2017-052 PLANNED DEVELOPMENT GENERAL AMENDMENT FUTURE LAND USE MAP

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ZONING MAP



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DEV2017-048 PLANNED DEVELOPMENT GENERAL AMENDMENT ZONING MAP

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ATTACHMENT A

ORDINANCE NO 00 112

AN ORDINANCE AMENDING THE ZONING MAP OF THE LAND DEVELOPMENT CODE TO REZONE 93± ACRES OF PROPERTY AT LPGA INTERNATIONAL FROM R 1a (SINGLE FAMILY RESIDENTIAL) TO PMD (PLANNED MASTER DEVELOPMENT) ZONING DISTRICT AUTHORIZING THE MAYOR AND CITY CLERK TO EXECUTE A PLANNED DEVELOPMENT AGREEMENT AUTHORIZING CONSTRUCTION OF FOUR SINGLE FAMILY SUBDIVISIONS IN THE DISTRICT APPROVING THE PRELIMINARY PLAT OF THE PROPERTY REPEALING ALL ORDINANCES OR PARTS OF ORDINANCES IN CONFLICT HERewith AND PROVIDING WHEN THIS ORDINANCE SHALL TAKE EFFECT

WHEREAS certain property located at LPGA International is currently zoned R 1a (single family residential) and

WHEREAS Renar Golf Communities II LLC is the owner of the property and has requested that the City rezone it to PMD (Planned Master Development) and has submitted a Planned Development Agreement authorizing construction of four single family subdivisions in the district and

WHEREAS the Planning Board has reviewed the request and found the rezoning to be consistent with the City's Comprehensive Plan and recommended approval of the request

NOW THEREFORE BE IT ENACTED BY THE PEOPLE OF THE CITY OF DAYTONA BEACH FLORIDA

SECTION 1 The Zoning Map of the City's Land Development Code is hereby amended to rezone 93 ± acres of property located at LPGA International from R 1a (single family residential) to PMD (Planned Master Development) The property is more particularly described in Exhibit A to the agreement attached hereto and incorporated by reference herein

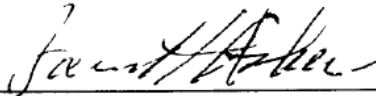
SECTION 2 The Mayor and City Clerk are hereby authorized to execute the Planned Master Development (PMD) Agreement with Renar Golf Communities II LLC a copy of which is attached hereto and incorporated by reference herein

SECTION 3 A Public Hearing at 7 00 p m Wednesday March 15 2000 in Commission Chambers City Hall 301 South Ridgewood Avenue Daytona Beach Florida, after notice published is deemed to comply with Chapter 166 Florida Statutes and the City s Land Development Code

SECTION 4 The City Commission has received the report of the Planning Board determining consistency with the Citys Comprehensive Plan and recommending approval of the amendment

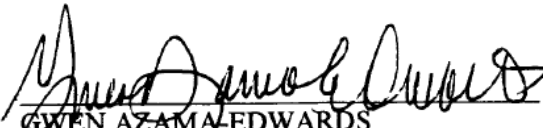
SECTION 5 All ordinances or parts of ordinances in conflict herewith are hereby repealed

SECTION 6 This Ordinance shall take effect immediately upon its adoption



BARON H ASHER
Mayor

ATTEST



GWEN AZAMA-EDWARDS
City Clerk

Passed on 1st Reading February 16 2000
Adopted on 2nd Reading March 15 2000

ATTACHMENT B

ORDINANCE NO. 02-82

AN ORDINANCE AMENDING THE ZONING MAP OF THE LAND DEVELOPMENT CODE TO REZONE 131+ ACRES OF PROPERTY LOCATED AT RENAR GOLF COMMUNITIES AT LPGA FROM R1-A (SINGLE-FAMILY RESIDENTIAL) TO PMD (PLANNED MASTER DEVELOPMENT) ZONING DISTRICT; AUTHORIZING THE MAYOR AND CITY CLERK TO EXECUTE AN AMENDMENT TO THE RENAR GOLF COMMUNITIES AT LPGA PLANNED MASTER DEVELOPMENT AGREEMENT, TO ADD THE ABOVE-DESCRIBED PROPERTY TO THE EXISTING RENAR GOLF COMMUNITIES PLANNED DEVELOPMENT, TO ESTABLISH DEVELOPMENT STANDARDS FOR THE PROPERTY TO BE ADDED TO THE PLANNED DEVELOPMENT, AND TO CLARIFY EXISTING LANGUAGE WITHIN THE AGREEMENT RELATING TO SIGNAGE; REPEALING ALL ORDINANCES OR PARTS OF ORDINANCES IN CONFLICT HERewith; AND PROVIDING WHEN THIS ORDINANCE SHALL TAKE EFFECT.

WHEREAS, certain property located in the LPGA Golf Course Community is currently zoned R1-A (single-family residential); and

WHEREAS, Renar Golf Communities II. LLC, has requested that the City rezone the property to PMD (planned master development), and has submitted a proposed amendment to the Renar Golf Communities at LPGA Planned Master Development Agreement, which would incorporate the above-described property into the existing Renar Golf Communities Planned Development; and

WHEREAS, the proposed amendment would also establish development standards for the property to be added to the Planned Development, and clarify existing language within the Agreement relating to signage ; and

WHEREAS, the Planning Board has reviewed the request, found the rezoning to be consistent with the City's Comprehensive Plan, and recommended approval of the request.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF DAYTONA BEACH, FLORIDA:

SECTION 1. The Zoning Map of the City's Land Development Code is hereby amended to rezone 131 ± acres of property located within the LPGA Golf Course Community form R1-A (single-family residential) to PMD (planned master development). The property is more particularly described in Exhibit A, attached hereto and incorporated herein by reference.

SECTION 2. The Mayor and City Clerk are hereby authorized to execute the First Amendment to the Renar Golf Course Communities at LPGA Planned Master Development Agreement, adding the above-described property to the Renar Golf Course Communities Planned Development, establishing development standards for the property being added to the Planned Development, and amending existing language within the Agreement concerning signage. A copy of the agreement is attached hereto and incorporated by reference herein as Exhibit B.

SECTION 3. A Public Hearing at 7:00 p.m., Wednesday, February 20, 2002, in Commission Chambers, City Hall, 301 South Ridgewood Avenue, Daytona Beach, Florida, after notice published, is deemed to comply with the Land Development Code (LDC).

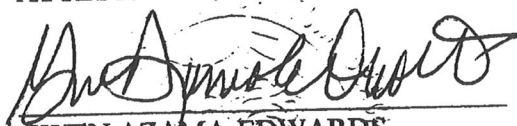
SECTION 4. The City Commission has received the report of the Planning Board determining consistency with the City's Comprehensive Plan and recommending approval of the rezoning and amendment.

SECTION 5. All ordinances or parts of ordinances in conflict herewith are hereby repealed.

SECTION 6. This Ordinance shall take effect immediately upon adoption.


BARON H. ASHER
Mayor

ATTEST:


GWEN AZAMA-EDWARDS
City Clerk

Passed on 1st Reading: January 23, 2002
Adopted on 2nd Reading: February 20, 2002

EXHIBIT "D-1"

TABLE FOR SETBACKS AND HEIGHTS (expressed in feet)

For purposes of this Table, the four neighborhood communities being added to the Renar Golf Communities at LPGA International, will be referenced as follows:

- Opal Hill, Unit 2 at LPGA International will be referred to as Tract "E".
- Gray Hawk, Unit 2 at LPGA International will be referred to as Tract "F".
- Centennial Park at LPGA International will be referred to as Tract "G".
- Eagle Marsh at LPGA International will be referred to as Tract "H".

TRACT:	E	F	G	H
PRINCIPAL RESIDENCE:				
MINIMUM SIZE (SQ. FT. LIVING AREA):	1,300	1,200	1,800	1,100
MAXIMUM HEIGHT INCLUDING ROOF (IN STORIES/FEET) ⁽¹⁾ :	2/35	2/35	2/35	2/35
MINIMUM FRONT YARD (For Lots 130 feet or more deep) ⁽²⁾ :	30	30	30	25
MINIMUM FRONT YARD (For Lots less than 130 Feet Deep on both sides) ⁽²⁾ :	25	25	25	25
MINIMUM SIDE YARD ABUTTING STREET:	20	20	20	N/A
MINIMUM SIDE YARD (INTERIOR):	5	5	5	5 ⁽³⁾
MINIMUM REAR YARD:	20	20	20	15
MINIMUM LOT AREA (SQ. FT.):	6,000	5,000	10,000	3,000/4,000/ 14,000 ⁽⁴⁾
ACCESSORY STRUCTURES⁽⁵⁾:				
MAX. SIZE ALL STRUCTURES (% OF PRINCIPAL RESIDENCE LIVING AREA):	25%	25%	25%	25%
MINIMUM SIZE (SQ. FT.):	NONE	NONE	NONE	NONE
MAXIMUM HEIGHT INCLUDING ROOF (IN STORIES/FEET) ⁽¹⁾ :	2/35	2/35	2/35	2/35
MINIMUM FRONT YARD AND SIDE YARD ABUTTING STREET:	30	30	30	25
MINIMUM SIDE YARD NOT ABUTTING A STREET:	5	5	5	5 ⁽³⁾
MIN. REAR YARD ABUTTING AREAS OTHER THAN RESIDENTIAL LOTS:	5	5	5	5
MIN. REAR YARD ABUTTING OTHER RESIDENTIAL LOTS:	10	10	10	10

TABLE FOR SETBACKS AND HEIGHTS, cont'd.

TRACT:	E	F	G	H
SWIMMING POOLS & SCREEN ENCLOSURES⁽⁶⁾:				
MINIMUM FRONT YARD AND SIDE YARD ABUTTING STREET ⁽⁷⁾ :	26	26	26	26
MINIMUM SIDE YARD NOT ABUTTING A STREET:	5	5	5	5
MINIMUM REAR YARD ⁽⁸⁾ :	3/6/10	3/6/10	3/6/10	3/6/10

WALLS AND FENCES:

ENTRY FEATURE OR SUBDIVISION WALLS⁽⁹⁾:

- MAXIMUM HEIGHT
(0' TO 4' OFF R/W): 4
- MAXIMUM HEIGHT
(4 OR MORE FEET
OFF R/W)): 8

LOT WALLS AND FENCES ON PLATTED LOTS⁽¹⁰⁾⁽¹¹⁾⁽¹²⁾:

○ Fences and walls constructed within any front, side, or rear yard setback area as shown in this Exhibit "D" are subject to the following restrictions within the following "Areas", as depicted in Exhibit "E":

- **AREA A:** Within the area encompassed by the front property line, the front principal residence setback line, and the two side lot property lines, no wall or fence of any height may be constructed.

- **AREA B:** Within the area encompassed by the front principal residence setback line, the side property line, the side principal residence setback line, and the point ten feet (10') rearward of the outside front corner of the principal residence, garage, or accessory structure closest to the side principal residence setback line, walls or fences may be decorative masonry, landscape or other materials if approved by the Architectural Review Board and may be up to four feet (4') in height.

- **AREA C:** Within the area encompassed by the point ten feet (10') behind the outside front corner of the principal residence, garage, or accessory structure closest to the side property line, the side principal residence setback line, and the rear principal residence setback lines, any wall or fence may be up to six feet (6') in height.

- **AREA D:** Within the area encompassed by the rear property line, the side principal residence setback lines, and the rear principal residence setback line, and each side lot line, walls and fences up to six feet (6') in height are allowed if opacity of the same is at least seventy percent (70%).

● **GENERAL NOTES TO LOT WALLS AND FENCES ON PLATTED LOTS:**

○ Walls and fences include any structures which serve the purpose typically served by a wall or fence, including hedges and other plant materials which would function as such when grown.

○ When a side yard abuts a street, the setback for walls and fences shall be the same as the principal residence setback and otherwise shall be in conformance with all other requirements contained herein.

○ The height of walls or fences shall be measured from the normal finished first floor elevation of the principal residence.

- Any wall or fence installed between Areas B, C or D in the principal residence or accessory structure must be the same material, design, dimension and height as the fences installed in those areas.
- The TRC may approve modifications from these wall and fence requirements, based upon unique design characteristics.

GENERAL RULES TO TABLE FOR SETBACKS AND HEIGHTS:

- All items refer to horizontal setbacks, except where height is indicated, in which case vertical height is intended.
- Setbacks shall be measured from the property line.
- "NONE" means there is no minimum.

NOTES TO TABLE FOR SETBACKS AND HEIGHTS:

- ⁽¹⁾ Height is per City Land Development Code definitions.
- ⁽²⁾ In the event of a side entry garage, the setback will be reduced to 20 feet.
- ⁽³⁾ Measurement is from each end of a duplex or 4-unit building. No side yard setback required for contiguous lots.
- ⁽⁴⁾ The first number refers to an interior lot. The second number refers to an end lot. The third number refers to a 4-lot cluster.
- ⁽⁵⁾ These include pool houses, guest cottages, garage apartments, gazebos, pavilions, and the like. Paragraph 10.3 of the main text of this Agreement contains additional regulations, including a relation between the height of the principal residence and the allowed height of the accessory structure.
- ⁽⁶⁾ The TRC may authorize exceptions for lesser setbacks so long as setbacks are no less than existing City of Daytona Beach minimum adopted standards and the Developer and the Master Developer consent to such exceptions. The City shall accept a request for an exception when submitted with a sworn statement from the applicant that the applicant has prior thereto or simultaneously therewith also submitted the necessary application for approval to the architectural review entity of the appropriate property owners' association.
- ⁽⁷⁾ No pools are permitted in the front yard unless within an enclosed courtyard which appears to be part of the structure of the principal residence, or within an enclosed courtyard, in either case properly shielded from front and side view.
- ⁽⁸⁾ The first measurement applies to the edge of the pool deck. The second measurement applies to the pool water's edge. The third measurement applies to the pool enclosure.
- ⁽⁹⁾ These are development border walls located along Champions Drive typically where the tract border abuts the right-of-way. They can only be permitted by the Master Developer, the Developer or the applicable homeowners' association. These border walls may be within the 10 foot landscape easement or the street right-of-way. This wall height is measured from a point one foot (1') above the crown of the road.
- ⁽¹⁰⁾ Fences shall be located entirely within the property of the owner, and not extend over the boundary of the owner's property.
- ⁽¹¹⁾ Walls connected to house and built entirely within the principal residence set-backs of the lot may not be higher than the wall of the principal residence at the point which the wall abuts the principal residence.



LPGA Eagle Marsh, LLC

1965 28th Avenue

Vero Beach, FL 32960

May 12, 2017

INVITATION TO NEIGHBORHOOD MEETING

Dear Neighbor,

Eagle Marsh Homes would like to invite you to a neighborhood meeting to review plans that have been submitted to the City of Daytona requesting approval for amending the existing LPGA PMD Agreement Ordinance #02-82.

The purpose of the amendment is to increase the ground coverage from 35% to 47% to allow our clients to have the flexibility to build the same size homes that exist, or have been built on similar lots in Gray Hawk, Eagle Marsh South, and Eagle Marsh North in prior years.

As neighbors, and future neighbors to the development, we would like to invite you to discuss this project on **Tuesday, May 23, 2017 at 6:00 PM** held at 165 Catriona Drive, Daytona Beach, Florida 32124.

We look forward to meeting with you, and if you are interested in discussing the project, please attend the meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joseph C. McAuliffe', written over a light blue circular stamp.

Joseph C. McAuliffe

Managing Partner

LPGA Eagle Marsh, LLC

PARKER MYNCHENBERG & ASSOCIATES, INC.

1729 Ridgewood Avenue
Holly Hill, Florida 32117
(386) 677-6891
FAX (386) 677-2114
E-Mail: info@parkermynchenberg.com

November 3, 2016

Mr. Dennis Mrozek, LEED AP
Principle Planner
The City of Daytona Beach
Building Department
301 S. Ridgewood Avenue
Daytona Beach, FL 32114

**RE: GRAY HAWK GRANDE
Engineer's Certification of No Drainage Impact**

Dear Mr. Mrozek:

As the Engineer of Record for the Grey Hawk Unit 2 and Eagle Marsh Subdivision at LPGA International, I offer the following: The LPGA DRI was established in the early 1990's and has a Master Drainage System which was originally designed by Miller Sellen and Associates, Inc. The Master Drainage System included sub-basins and proposed pond locations. Grey Hawk Unit 2 and Eagle Marsh Subdivisions are within Stormwater Basins TR-21 and TR-30, respectively. The St Johns River Water Management District has two criteria to determine the required treatment volume of a development – Impervious Area and Watershed Size. The required treatment volume for both TR-21 and TR-30 was based upon the watershed size.

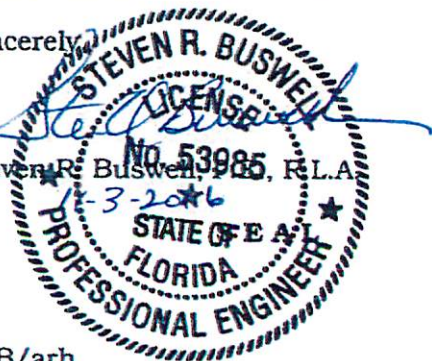
Upon reviewing the calculations, the size of home is independent of the required stormwater treatment. An increase in lot coverage for the referenced subdivision will not cause the stormwater management systems to be out of compliance and the stormwater system will still function as designed.

Therefore, by copy of this letter I hereby certify, an increase in lot coverage from 36% to 46% would not adversely impact the drainage master plan for the PD of the above referenced project.

Should you have any questions or need additional information, please do not hesitate to contact me at (386) 677-6891.

Sincerely,

Steven R. Buswell, P.E., F.L.A.



SRB/arh

cc: Mr. Joe McAuliffe (via email)