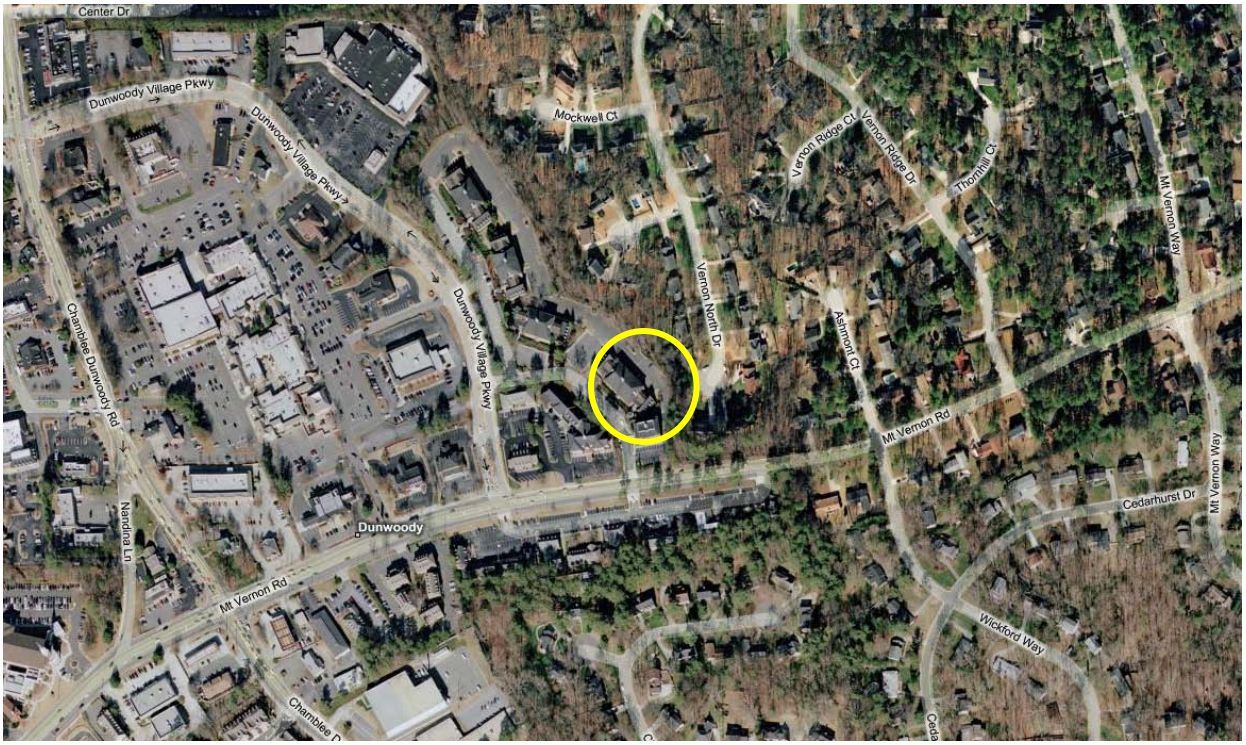
Property Location	**1536 Dunwoody Village Parkway (LL 366)**
Petitioner	**Warren S, Jolly, Owner** **1532 Dunwoody Village Parkway, Suite 100;** **Rich & Peggy Kernan, Applicants** **210 Scotney Glen Circle** **John's Creek, Georgia 30022**
Variance Requests	**Permission to encroach into both an undisturbed and impervious surface stream buffer**

Vicinity Map



The site is located at 1536 Dunwoody Village Parkway, which is approximately on the northeast corner of Dunwoody Village Parkway and Mount Vernon Road. The property is currently zoned O-I/DVOD (Office-Institution/Dunwoody Village Overlay District). The applicant's request is to encroach into an undisturbed state waters stream buffer to remove/remodel a portion of an impervious parking lot and in its place construct a child's playground to facilitate the establishment of a child day care facility.

Site Plan Analysis

The site, 1536 Dunwoody Village Parkway, is zoned O-I and located in the Dunwoody Village Overlay District. 1536 is a minor parcel, what was recently a part of the larger parent parcel which comprised eight-acres and is developed with multi-tenant planned office park of multiple two-story

buildings. The building at issue in this request is the southern-most building, now existing on a separate parcel. The site has only one manner of direct automobile ingress/egress: from Dunwoody Village Parkway. As it is currently configured, the site is capable of allowing indirect access from Mount Vernon Road through the State Farm Insurance building parking lot to the south; however, following construction, the southern-most parking lot drive aisle would be closed off with curb & gutter to preclude vehicle access around the rear of the structure.

The property also abuts a single family home development, zoned R-100, along its northeast property line, and commercial office and bank properties on the remaining sides zoned both O-I/DVOD and C-1/DVOD (Local Commercial district), some of which are located across Dunwoody Village Parkway.

Analysis

The property line between the subject property and the adjoining single family residences is a stream. Georgia state law requires there be no less than a 25-foot undisturbed buffer yard adjacent and contiguous with stream banks, and the City of Dunwoody recognizes an additional 25-foot of buffer yard -above and beyond the state requirement- for disturbing the soil in any manner, and 25 additional feet after that which precludes the installation of impervious surfaces. The total stream buffer in the City of Dunwoody is 75 feet overall, as measured from that point where vegetation has been wrested by normal stream flow or wave action (typically referred to as 'top of the stream bank') with differing allowable uses in the buffer.

As asphalt surfaces replace the natural land cover, pollutants from human activities begin to accumulate on these impervious surfaces. During storm events, these pollutants are then washed off into the streams.

Stream buffers are vegetated areas situated between water bodies and developed land, which are known to promote water quality by acting as filters to slow runoff flows and remove sediment, excessive nutrients, and other pollutants. The width of stream buffers substantially affects the amount of pollutants entering a stream. Studies have shown that stream buffers can reduce pollutant loadings in storm water runoff by as much as 46%.

In this specific situation, previous development saw construction of an asphalt parking lot within the area normally reserved for the stream buffer. Replacement of the asphalt with a pervious surface within this area will promote better water quality by reducing runoff, removing the impervious surface that previously collected pollutants, and filtering storm water flows.

The child care use, as proposed, requires the construction of a playground. The site plan submitted by the applicant would encroach into the currently-required stream buffer, primarily to remove the existing asphalt parking spaces and the drive aisle behind the 1536 building, and in its place construct an outdoor playground for the proposed child care use.

History

The applicant first appeared at the regular June 2009 meeting of the Zoning Board of Appeals seeking three variances, this stream buffer variance, a parking variance and a playground square footage reduction. The request was ZBA09-053. A shared parking agreement with the neighboring property to the north has satisfied the parking requirement for the proposed use, negating a requirement for a variance, and the playground area variance was further investigated by staff and found to be unnecessary per the Dunwoody Zoning Ordinance. This revised request has been re-advertised for Public Hearing and came forward with a new case number, ZBA09-061, to the regular July meeting of the Zoning Board of Appeals.

At that July meeting, many additional questions were asked, both of staff and of the Board membership. The most prominent of these items is listed below, in bullet point format with an associated explanation, to clarify staff's position as you deliberate the merits of the environmental request before you.

- Chapter 14, Article II, Section 8(c)(1) of the City Code regarding stream buffer variances and their relation to the state Environmental Protection Division. Specifically, the city Community Development Director "shall take no action on any such request for variance until the Director of the Environmental Protection Division grants the variance or otherwise approves the request..."
  This requirement would only be relevant were a state waters buffer variance required of the applicant. Staff was made aware early in the process and continues to operate with the understanding that the there is no requirement for a state waters buffer variance. The City Engineer has attached an addendum to this report that explains the city's position with respect to the need for the state EPD variance. In addition, staff has received a letter from Peggy Chambers, also attached to this memo, which further justifies the state bufferyard variance exemption.

- Should the criteria used to evaluate the variance request be taken from Chapter 27, the Zoning Ordinance, or from Chapter 14, the Land Development and Environmental Protection Ordinance?
  Staff chose to utilize the criteria from <u>both</u> Chapter 14 and Chapter 27 when considering this request for this stream buffer variance. The environmental criteria for approval was first considered, and those criteria are found in Chapter 14, Article 2, §8(c)3 of the Land Development and Environmental Protection ordinance. These criteria were examined by staff and by reference elaborated upon in the narrative of this staff report, above. The criteria enumerated in Chapter 27, the City of Dunwoody Zoning Ordinance are printed in §5D-15(a), were considered for the land rights criteria of variance deliberation. Please do not assume that because the criteria in Chapter 14 were not specifically written out in their entirety in the staff report that they were ignored or disregarded during the evaluation of this proposed application.

- Is the applicant required to satisfy <u>all five</u> of the criteria provided for in the §5D of Chapter 27 in order for the variance to be approved?
  The specific text in Chapter 27 reads that the criteria in 5D-15(a) only apply to the regulations contained in Chapter 27 itself. The text in the Zoning Ordinance reads: "Variances from the provisions or requirements of <u>this Chapter</u> *shall be authorized only upon making all of the following findings…" [emphasis added]. "This Chapter" refers to Chapter 27; stream buffer criteria are contained in Chapter 14 and only Chapter 14. Therefore, stream buffer variance requests are designed to be evaluated, by code, under the criteria in Chapter 14 and Chapter 14 alone. Chapter 14 has no requirement that all the criteria be met; it reads that all criteria need to be considered prior to the Zoning Board of Appeals making a decision. Staff believes it is more effective*

policy to evaluate the request for not only its environmental component (Chapter 14), but to examine the land rights impact as well(Chapter 27). Therefore both sets of criteria were considered.

- Why was a traffic study not a requirement for this application? What about noise?
  A traffic study would be a useful informational reference were the request being made by the applicant a question of land use. This request is not a question of land use. The land use proposed for the site is a use already permitted by right in the O-I zoning district, just the same as the previous tenant who occupied the site by right. The request is an environmental consideration. It has been considered and reviewed by staff in the narrow scope of whether or not the finished product is a more beneficial condition --in its proximity to the stream bank and the associated downstream effects-- than what currently exists on the property. Traffic onto and off of the site is not relevant to the environmental discussion. Traffic will be consistent with other, similar O-I uses on neighboring properties in the immediate vicinity. Similarly, the question of an increase in noise over previous uses is not a criterion on which to base your decision, as any associated noises from use of the property are not germane to the environmental impacts of the request currently before you.

Conditions of the Zoning Ordinance

Article 5, Section 5D-15 of the City of Dunwoody Zoning Ordinance identifies the following criteria for evaluation that should be examined when determining the appropriateness of a variance:

1. By reason of exceptional narrowness, shallowness, or shape of a specific lot, or by reason of exceptional topographic conditions, which were not created by the owner or applicant, the strict application of the requirements of this Chapter would deprive the property owner of rights and privileges enjoyed by other property owners in the same zoning district; *The site's proximity to a stream, specifically, the location of the building adjacent to- and in some instances inside the modern day stream buffer is not a condition created by the applicant. The steam buffer variance requested actually seeks to reduce the square footage of impervious surface in that buffer, thereby lessening the non-conforming condition on the site. This is requested so that the applicants can utilize the site for a use permitted by right in the O-I zoning district, consistent with other similarly zoned properties in the corporate limits of Dunwoody.*

2. The requested variance does not go beyond the minimum necessary to afford relief, and does not constitute a grant of special privilege inconsistent with the limitations upon other properties in the zoning district in which the subject property is located; *The applicant actually seeks the maximum amount of variance feasable on the site they propose to redevelop. This request is made not because it is the minimum necessary to afford relief to the city development standards, but to maximize the playground space for the benefit of the children who will recreate at the child care facility proposed. For this reason staff can support this specific request for the maximum variance allowed for two reasons: it removes the most amount of impervious surface possible, and provides the greatest amount of square footage for use as a playground.*

3. The grant of the variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the zoning district in which the subject property is located; *Negative effects to the adjoining property owners, those property owners located downstream, (especially those directly along the stream itself) and the general public welfare would not be realized by the granting of the variance; to grant the request would in fact facilitate an improvement to the current environmental situation on the site as it sits developed today.*

4. The literal interpretation and strict application of the applicable provisions or requirements of this Chapter would cause undue and unnecessary hardship; and… *The literal interpretation*

of the land development code in concert with the zoning ordinance makes the further development of this building nearly impossible, but that does not preclude the use of the structure as it sits today, for uses other than a child daycare facility, without site/structure renovation or rezoning to change the use.

5. The requested variance would be consistent with the spirit and purpose of this Chapter and the City of Dunwoody Comprehensive Plan text. *The requested variance was applied for to allow the proper establishment of a use permitted by right in the zoning district in question. Granting the variance will not compromise the spirit and purpose of the zoning ordinance, or compromise the spirit and purpose of the city's comprehensive plan. The granting of this request does not convey to the applicant any special land use or special privilege that couldn't be achieved by any other operator of a child care facility in the O-I district anywhere else in the City's O-I district by right.*

Recommendation

Staff recommends the application, as has been detailed and submitted to city staff, be approved subject to the following conditions:

1. Approval of the variance request is not permission to begin construction. Construction documents must be submitted, reviewed and if possible approved by city – and where applicable – county staff. All applicable permits, both state and local, must be secured. A copy of the shared parking agreement with the neighboring property must be submitted to staff and made a part of the approval to initiate the child care facility at the proposed location.

Attachments

- City Engineer's addenda

ZBA Members:

In connection with ZBA09-061 (Goddard School), you have asked us to evaluate whether the Kernan's request for a state waters buffer variance was necessary or if indeed they do not need a variance from EPD, and you would like documentation from EPD which indicates their stance on the issue.

SUMMARY

<u>No state waters buffer variance is required.</u>

We conclude that the nature of both the project and the state waters is such that it is exempt from state waters buffer requirements, and therefore no state waters buffer variance is required. The Georgia Department of Natural Resources Environmental Protection Division (Georgia EPD) concurs with this opinion, and has provided documentation to that affect (attached).

BACKGROUND

The City of Dunwoody's administration of its erosion and sedimentation control ordinance is regulated by the Georgia EPD. Pursuant to OCGA 12-7-8 and GA DNR Rule 391-3-7-.09 (Local Issuing Authorities), they have certified Dunwoody a "Local Issuing Authority" (LIA). Per Rule 391-3-7-.09, responsibilities of certified LIA's include assuring compliance with stream buffer variance requirements.

In administering compliance with the stream buffer variance requirements, an LIA must determine when an applicant for a land disturbance permit must apply for and obtain a state waters buffer variance from the Georgia EPD.

To conserve staff resources, we normally employ a rebuttable presumption in making this determination. If an applicant indicates the presence of state waters and associated buffer on a site, and indicates that they plan to encroach in that buffer, we assume a state waters buffer variance will be required for that activity unless they rebut that presumption and claim an exemption or indicate that the state waters in question does not require a buffer. If this is the case, staff investigates the matter further to determine whether, in fact, the applicant's assertions have merit. In short, the burden is on the applicant to show that they do not need a state waters buffer variance.

GODDARD SCHOOL SITUATION

In the case of ZBA09-061, the applicant submitted a site plan by Landworks Associates, a Buford, Georgia civil engineering firm. The site plan created by them showed the state waters, a state waters buffer, and proposed encroachment into the buffer. Prior experience with this firm on other projects told me that they understood this very issue, as they have explored state waters buffer applicability in the past. We applied the rebuttable presumption and told the Kernans that they must obtain a state waters buffer variance from the Georgia EPD.

Since questions have arisen regarding whether a variance is required, from the Kernans, Georgia EPD staff, and the Zoning Board of Appeals, we investigated further.

The State's model Erosion and Sediment Control Ordinance (and hence Dunwoody's version of the ordinance) exempts minor land disturbing activities from regulation. Historically, there has been much inconsistency among jurisdictions in interpreting the meaning of "minor land disturbing activity". Accordingly, Georgia EPD has drafted a guidance document (attached) which helps LIA's interpret "minor land disturbing activity".

On July 7, I spoke with Frank Carruba of the Georgia Environmental Protection Division. Frank stated that he had spoken with the applicant regarding this state waters buffer variance, told them about EPD's guidance document for minor land disturbing activity, and said that if the LIA found that the guidance document applied to the facts of their situation, the LIA could find, and EPD would support the finding that the proposed state waters buffer encroachment was a "minor land disturbing activity", and would therefore be exempt from regulation.

The pertinent part of the guidance document indicates that if an applicant wants to remove an existing structure from the state waters buffer, and is not proposing to disturb the buffer by more than 100 square feet, this activity could be considered "minor land disturbing activity". A review of the proposed site plan indicates that the disturbed portion of the state waters buffer is approximately 400 square feet. <u>Therefore, we do not believe that the proposed activity is a minor land disturbing activity.</u>

The same day, I spoke with Peggy Chambers of the Georgia EPD, who was involved in the evaluation of the Goddard School State Waters Buffer Variance. She said she visited the site and believed that the stream was classified as intermittent. If we agreed with this assessment, then the project could be exempt from the State Waters Buffer under the following exemption:

(8) Any project involving less than one acre of disturbed area [is exempt]; provided, however, that this exemption shall not apply to any land-disturbing activity within a larger common plan of development or sale with a planned disturbance of equal to or greater than one acre or within 200 feet of the bank of any state waters, and for purposes of this paragraph, "state waters" excludes channels and drainageways which have water in them only during and immediately after rainfall events and intermittent streams which do not have water in them year round; provided, however, that any person responsible for a project which involves less than one acre, which involves land-disturbing activity, and which is within 200 feet of any such excluded channel or drainageway must prevent sediment from moving beyond the boundaries of the property on which such project is located and provided, further, that nothing contained in this chapter shall prevent a city or county which is a local issuing authority from regulating any such project which is not specifically exempted by paragraph (1), (2), (3), (4), (5), (6), (7), (9), or (10) of this Code section;

She indicated that EPD would support the finding that the stream was an intermittent stream if the City made that determination.

We retained Ana Sellers, President of Ecological Consulting, an Alpharetta based environmental consultant, to determine whether the stream is intermittent or perennial within 200 feet of the site work. Ana has BS and MS degrees in biology and fisheries

ecology and has nine years of experience as an environmental scientist. Her primary areas of expertise are delineating Waters of the U.S., preparing Nationwide and Individual Permits under Section 404/401 of the Clean Water Act, and addressing stream buffer requirements under state erosion and sedimentation control laws. The field work was performed on July 8, 2009, and Ms. Sellers report is attached. Her conclusions are that the stream segment in question is partly intermittent and partly ephemeral. Per a separate EPD guidance document, an ephemeral stream has no state waters buffer on it.

Based on this information, and the site plan submitted by the Kernans showing the proposed land disturbance area, we conclude that the Goddard School project is exempt from state waters buffer requirements, and Ms. Chambers of the EPD has indicated that she will send us a letter indicating that they support that determination. A State Waters Buffer Variance is not required.

Please email me if you have any questions.

Rich Edinger, PE
City Engineer

Ken Wright – Mayor
Denis Shortal – City Council Post 1
Adrian Bonser – City Council Post 2
Tom Taylor – City Council Post 3
Robert Wittenstein – City Council Post 4
Danny Ross – City Council Post 5
John Heneghan – City Council Post 6

Warren Hutmacher – City Manager
Brian Anderson – City Attorney

July 9, 2009

Ms. Peggy Chambers
Georgia Department of Natural Resources – Environmental Protection Division
4220 International Parkway
Atlanta, GA 30354

VIA EMAIL @ peggy_chambers@mail.dnr.state.ga.us

RE: Goddard School State Waters Buffer Variance

Dear Ms. Chambers:

We understand that the Goddard School has petitioned the Georgia EPD for a stream buffer variance which would remove an existing parking lot from what their site plan purports is a state waters buffer. The applicants have asserted that they are actually exempt from the buffer as a result of conversations with EPD. Before the Dunwoody Zoning Board of Appeals moves forward with a local stream buffer variance request, they are seeking clarification regarding the applicability of the state waters buffer to this project.

Based on our conversation of July 7, 2009, the City staff investigated the stream in question to determine whether it is intermittent or perennial within 200 feet of the proposed site work. Accordingly, we retained Ecological Consulting to make this determination. The field work was performed on July 8, 2009, and Ecological Consulting's report is attached. Their conclusions are that the stream segment in question is partly intermittent and partly ephemeral.

Based on this information, and the site plan submitted by the applicant showing the proposed land disturbance area, we conclude that the Goddard School project is exempt from state waters buffer requirements for two reasons:

1. Per OCGA 12-7-17(8) and the corresponding City of Dunwoody Code Chapter 14, section 11, paragraph (b)(3)(H). To paraphrase, A site disturbing less than 1 acre is exempt if it is not within 200 feet of a perennial stream.

Ken Wright – Mayor
Denis Shortal – City Council Post 1
Adrian Bonser – City Council Post 2
Tom Taylor – City Council Post 3
Robert Wittenstein – City Council Post 4
Danny Ross – City Council Post 5
John Heneghan – City Council Post 6

Warren Hutmacher – City Manager
Brian Anderson – City Attorney

2. Per EPD's *Guidelines for Determining the Presence of State Waters Requiring a Buffer*. Since the encroachment is in an area where the stream is ephemeral, the buffer has been misapplied on the applicant's site plan.

Accordingly, a State Waters Buffer Variance is not required. Please advise us if you concur with this opinion.

Sincerely,

Rich Edinger, PE, CFM
City Engineer

cc: Brian Anderson, City Attorney
Howard Koontz, City Planner
File

City of Dunwoody - P.O. Box 888074 - Dunwoody, GA 30356
41 Perimeter Center East, Suite 250, Dunwoody, Georgia 30346
P: 678-382-6700 - F: 678-382-6701 - www.dunwoodyga.gov

Ecological Consulting LLC
12595 Concord Hall Drive
Alpharetta, GA 30005

July 8, 2009

Mr. Richard J. Edinger, PE, CFM
Clark Patterson Lee
350 Town Center Avenue
Suite 201
Suwanee, GA 30024

Subject: City of Dunwoody – Goddard School Site
State Waters Assessment

Dear Mr. Edinger:

At your request, Ecological Consulting conducted a State Waters assessment on July 8, 2009 within the Project Study Area (PSA), located at the intersection of Dunwoody Village Parkway and Mt. Vernon Road in the City of Dunwoody, Georgia. The assessment was conducted in order to evaluate a drainage feature located along the northeastern property boundary, adjacent to an existing parking area. The assessment included data gathering such as soil data, vegetation composition, drainage composition, and photographic documentation along approximately 500 linear feet down gradient from an existing culvert located under Mt. Vernon Road.

State jurisdictional features such as State Waters are identified in accordance with the 2006 Georgia Department of Natural Resources (GADNR) *Guidelines for Determining the Presence of State Waters Requiring a Buffer* (Guidelines). Per the Guidelines, there are three types of stream designations: perennial, intermittent, and ephemeral streams.

Ephemeral streams are those that flow during and immediately following precipitation events such as rainfall and do not have a groundwater connection. A common method of differentiating ephemeral streams from intermittent or perennial streams is the presence/absence of hydric soils within 0 to 12 inches of the surface. Intermittent streams have seasonal flow, typically in the winter/spring in northern Georgia. During a normal year, most perennial streams have year round flow. Further, per the Guidelines, site inspections should result in a visually discernible stream flow as evidence of groundwater contribution between rain events, even in low flow conditions for all perennial streams.

Storm flows from the surrounding impervious surfaces in the vicinity of the PSA are concentrated and released at the downstream end of the culvert at Mt. Vernon Road. The

drainage feature in question exhibited characteristics of an ephemeral drainage along its upper reaches, including poorly developed stream banks, discontinuous flow path, and the absence of hydric soils. Sporadic vegetation, leaf litter and debris jams were observed along the flow path areas, evidence that storm water flows during and immediately after rain event; however, sufficient normal flow does not exist to wrest vegetation or remove leaf litter and debris from the channel. Channel definition was observed in certain areas, but no flow nor hydric soils were observed at the time of the visit. Please note that the site visit was conducted less than 24 hours following a significant rain event.

Approximately 300 feet downstream of the culvert, a drop in topography results in an increase in channel definition, wrested vegetation, lack of leaf litter, exposure of sand and gravel in a nearly continuous low lying channel, and hydric soil indicators along the stream banks. No flow was observed at the time of the site visit. Representative photographs of the drainage are included with this report (Photograph 1 and Photograph 2).

It is our professional opinion that the drainage feature within the PSA is an ephemeral/intermittent drainage. Photographs and accompanying field notes of the drainage feature were collected during the site visit.

Ecological Consulting appreciates the opportunity to assist you with this project. If you have any questions or require any additional information regarding this letter report, please contact me at 770-403-8605.

Sincerely,
ECOLOGICAL CONSULTING, LLC.

Ana M. Sellers
President

Photograph 1. Representative photograph of drainage channel

Photograph 2. Representative photograph of drainage channel

Georgia Department of Natural Resources
Environmental Protection Division, Watershed Protection Branch
4220 International Parkway, Suite 101, Atlanta, Georgia 30354

Reply To:
NonPoint Source Program
404/675-6240
FAX: 404/675-6245

FAX COVER SHEET

DATE: 7/15/09

PLEASE DELIVER THE FOLLOWING PAGES TO:

TO: Rich Edinger

COMPANY:

FAX NO:

FROM: Jon Sommers

ORGANIZATION: GA EPD – WATERSHED PROTECTION BRANCH
NONPOINT SOURCE PROGRAM

PHONE: (404) 675-6240 FAX NO: (404) 675-6245

This transmission is a total of ____ pages, with this cover letter being page one. If you do not receive all pages or if problems arise during transmission, please call at the phone number listed above, immediately.

Georgia Department of Natural Resources

Environmental Protection Division, Water Protection Branch
4220 International Parkway, Suite 101, Atlanta, Georgia 30354
Linda MacGregor, Branch Chief
404/675-6232

Reply To:
NonPoint Source Program
404/675-6240
FAX: 404/675-6245

July 14, 2009

Warren S. Jolly
Dunwoody Place Village, LLC
1532 Dunwoody Village Parkway
Suite 100
Dunwoody, Georgia 30038

Re: The Goddard School
City of Dunwoody

Dear Mr. Jolly:

The Georgia Environmental Protection Division's (EPD's) Water Protection Branch has received your application for encroachment into the state mandated 25-foot stream buffer to construct a playground for a proposed daycare facility. Upon review of the application, it appears that this project, as currently designed and submitted, may be exempt under the Erosion and Sedimentation Control Act of 1975, 12-7-17 (8) which states the following: Any project involving less than one acre of disturbed area; provided, however, that this exemption shall not apply to any land-disturbing activity within a larger common plan of development or sale with a planned disturbance of equal to or greater than one acre or within 200 feet of the bank of any state waters, and for purposes of this paragraph, "state waters" excludes channels and drainageways which have water in them only during and immediately after rainfall events and intermittent streams which do not have water in them year round; provided, however, that any person responsible for a project which involves less than one acre, which involves land-disturbing activity, and which is within 200 feet of any such excluded channel or drainageway must prevent sediment from moving beyond the boundaries of the property on which such project is located and provided, further, that nothing contained in this chapter shall prevent a city or county which is a local issuing authority from regulating any such project which is not specifically exempted by paragraph (1), (2), (3), (4), (5), (6), (7), (9), or (10) Of this Code section.

This determination as to whether the activity in question is considered to be exempt is made by the local Issuing Authority (LIA). After further review and a field site investigation the City of Dunwoody has determined and documented to EPD in correspondence dated July 9, 2209 that your project meets this exemption. Therefore no stream buffer variance is required for this project. EPD therefore considers this project file to be closed. If you have any further questions please do not hesitate to contact me at (404) 675-6240.

Sincerely,

Peggy Chambers
Environmental Specialist
Erosion and Sedimentation Control Unit

PC:kj
Attachment

File: BV-044-09-03

cc: Rich Edinger - City Engineer
Ana Sellers – Ecological Solutions