

NOTICE OF APPEAL

Action Being Appealed: *Castle Ridge Group Home, FDP220013*

Date of Action: *12/15/22* Decision Maker: *Planning and Zoning*

FOR CITY CLERK'S
USE ONLY:

DATE FILED: *12-28-2022*

INITIALS: *JTE*

Appellant/Appellant Representative (if more than one appellant):

Name: *KURT JOHNSON*

Phone #: *505-400-6810*

Address: *612 Castle Ridge Ct.
Fort Collins, CO 80525*

Email: *kejelbj@yahoo.com*

INSTRUCTIONS

For each allegation marked below, attach a separate summary of the facts contained in the record which support the allegation of no more than two pages, Times New Roman 12-point font. Please restate allegation at top of first page of each summary.

GROUNDINGS FOR APPEAL

The Decision Maker committed one (1) or more of the following errors (check all that apply):

- Failure to properly interpret and apply relevant provisions of the City Code, the Land Use Code, and Charter. List relevant Code and/or Charter provision(s) here, by specific Section and subsection/subparagraph:

Section 3.5.1 (J) of the Land Use Code

Failure to conduct a fair hearing in that:

- (a) The Board, Commission, or other Decision Maker exceeded its authority or jurisdiction as contained in the Code or Charter. [*New evidence not allowed*]
- (b) The Board, Commission or other Decision Maker substantially ignored its previously established rules of procedure. [*New evidence not allowed*]
- (c) The Board, Commission or other Decision Maker considered evidence relevant to its findings which was substantially false or grossly misleading. [*New evidence allowed*]
- (d) The Board, Commission or other Decision Maker improperly failed to receive all relevant evidence offered by the appellant. [*New evidence allowed*]
- (e) The Board, Commission or other Decision Maker was biased against the appellant by reason of a conflict of interest or other close business, personal or social relationship that interfered with the Decision Maker's independence of judgment. [*New evidence allowed*]

NEW EVIDENCE

All new evidence the appellant wishes Council to consider at the hearing on the appeal must be submitted to the City Clerk within seven (7) calendar days after the deadline for filing a Notice of Appeal and must be clearly marked as new evidence. No new evidence will be received at the hearing in support of these allegations unless it is submitted to the City Clerk by the deadline (7 days after the deadline to file appeal) or offered in response to questions posed by Councilmembers at the hearing.

GROUNDNS FOR APPEAL: The Planning and Zoning Commission failed to properly interpret and apply relevant provisions of the Land Use Code.

The appeal relates to FDP220013, a proposal for a 10-resident group home, which the Planning & Zoning Commission approved by a 3-2 vote on 12/15/22. The proposal was a continuation from PDP210012, which was essentially the same group home application at the same address, but for 16 residents. That application was denied unanimously (5-0 vote) by P&Z on 3/23/22. The denial was based on provision 3.5.1 (J) of the Land Use Code, specifically relating to inadequate parking and public safety concerns.

The current proposal was based on an approved reasonable accommodation request for 10 residents. That approval, however, was conditioned upon the additional approval of the overall project by the P&Z Commission through Type 2 Review. Despite P&Z's narrow approval on 12/15/2022, we contend that the proposal still does not meet 3.5.1 (J).

Castle Ridge Court is a private street, which the City has declared as substandard. When our neighborhood's plan was approved, it was done so with a variance to minimum street width based on low density, all residential use, and every house being required to have a minimum of a 3-car garage. This was the only way to ensure that the narrow streets could provide for appropriate and safe ingress and egress for residents, visitors, and emergency services.

At the 3/23/22 hearing, the P&Z Commission established that due to the reduced width, if cars were parked on both sides of the street, the Castle Ridge Court would effectively be reduced to a one-lane street. Not only would this substantially change the character of the neighborhood and present a compatibility issue, but it would create serious public safety concerns related to accessibility by emergency services, and fire egress, among other public safety factors. Consider also that this neighborhood has a single egress, thus the houses "downstream" from the property are most affected when a "chokepoint" occurs in front of the subject property.

The applicant's new proposal was to keep one 2-car garage and convert the other garage into additional living area for group home residents. The applicant claimed that this would allow 5 on-site parking spaces. This is a dubious claim, and even if it were true, the resultant use would still be a house with ten residents, multiple staff, frequent deliveries, medical and family visitations, and at times a transport van – and only a two-car garage – on a street designed for single-family occupancy with 3- and 4-car garages.

In reality, the driveway is a narrow one-way in/one-way out configuration. The one garage which the applicant proposes to retain is directly in line with the driveway. This means that if 5 cars were to park on-site, it would require "musical cars" to manage. In any "real world" application, this simply cannot and will not be realized. This configuration is more challenging than any of the other group homes in Fort Collins. Thus, the result of the 10-resident, one-garage plan would be the same, un-workable and unsafe one-lane street situation which P&Z denied at the March hearing.

The applicants also proposed a parking app that would be required. The P&Z Commission dismissed this concept as unlikely to last long-term, as evidenced in their deliberations.

The result of an operation of this size would be to normally have cars parked on both sides of the street – especially considering that the other nearby residents also have needs. As there are not any distinct advantages to this location – only disadvantages – an operation of this size does not meet 3.5.1 (J), just as the 3/23/22 proposal did not.

Some P&Z members struggled during deliberations on how to apply the Land Use Code. Properly interpreting the Land Use Code involves specifically analyzing how the unique disadvantages of this location are overcome. Those voting for approval failed to cite any specific mitigation which merited approval of the new proposal. Those voting for denial, on the other hand, cited specific reasons the situation is not mitigated. As such, the Code was not properly applied.

SUPPLEMENTAL MATERIAL

As this was effectively a continuation of the 3/23/22 P&Z Commission hearing, specific submittals were referenced from that hearing as a statement of fact during the 12/15/22 hearing. For completeness, attached are certain materials which were submitted for the 3/22/22 hearing and subsequently referenced at the 12/15/22 hearing:

- the original variance on street width
- staff parking analysis for existing group homes in Fort Collins
- the 2016 road analysis declaring substandard construction

APPELLANTS

Parties-in-interest have the right to file an appeal.

A party-in-interest is a person who, or organization which, has standing to appeal the final decision of a board, commission or other decision maker. Such standing to appeal is limited to the following:

- The applicant.
- Anyone who owns or occupies the property which was the subject of the decision made by the board, commission or other decision maker.
- Anyone who received the mailed notice of, or spoke at, the hearing of the board, commission or other decision maker.
- Anyone who provided written comments to the appropriate City staff for delivery to the board, commission or other decision maker prior to or at the hearing on the matter that is being appealed.
- A City Councilmember.

Signature: <i>Katherine Chacho</i>	Date: <i>12/21/22</i>
Name: <i>Katherine Chacho</i>	Email: <i>kchacho@adl.com</i>
Address: <i>631 Castle Ridge Court</i>	Phone #: <i>970-377-1373</i>
Describe how you qualify as a party-in-interest: <i>Across the street from applicants / Received Notice</i>	

Signature: <i>Charles Bradley Sisson</i>	Date: <i>12/26/22</i>
Name: <i>Charles Bradley Sisson</i>	Email: <i>cbssiso@epm21.com</i>
Address: <i>600 Castle Ridge Court</i>	Phone #: <i>970 412 5928</i>
Describe how you qualify as a party-in-interest: <i>live on Castle Ridge Ct & Received Notice</i>	

Signature: <i>Barbara Thompson Schwerin</i>	Date: <i>12/26/2022</i>
Name: <i>Barbara Thompson Schwerin</i>	Email: <i>btschwerin@gmail.com</i>
Address: <i>600 Castle Ridge Ct.</i>	Phone #: <i>970. 420.0111</i>
Describe how you qualify as a party-in-interest: <i>Live on Castle Ridge Ct and Received Notice</i>	

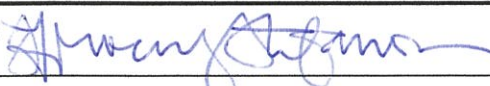
ATTACH ADDITIONAL SIGNATURE SHEETS AS NECESSARY

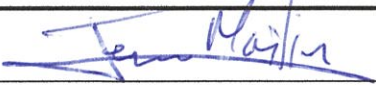
APPELLANTS


Parties-in-interest have the right to file an appeal.

A party-in-interest is a person who, or organization which, has standing to appeal the final decision of a board, commission or other decision maker. Such standing to appeal is limited to the following:

- The applicant.
- Anyone who owns or occupies the property which was the subject of the decision made by the board, commission or other decision maker.
- Anyone who received the mailed notice of, or spoke at, the hearing of the board, commission or other decision maker.
- Anyone who provided written comments to the appropriate City staff for delivery to the board, commission or other decision maker prior to or at the hearing on the matter that is being appealed.
- A City Councilmember.

Signature: 	Date: 12/21/2022
Name: Tracey Stefanon	Email: traceyken@comcast.net
Address: 642 Castle Ridge Ct.	Phone #: (970) 988-7440
Describe how you qualify as a party-in-interest: Next door house to applicants / received notice	

Signature: 	Date: 12/21/2022
Name: JESUS MARTIN ROMAN	Email: JESSEMARTIN-2000@YAHOO.COM
Address: 637 CASTLE RIDGE CT	Phone #: 970 994 2332
Describe how you qualify as a party-in-interest: ACROSS THE STREET TO APPLICANTS / RECEIVED NOTICE	

Signature: 	Date: 12/26/2022
Name: GREGG LESARTRE	Email: wiselyinvest@aol.com
Address: 619 CASTLE RIDGE CT	Phone #: 970 218 1621
Describe how you qualify as a party-in-interest: RECEIVED NOTICE / EXIT FROM NEIGHBORHOOD BLOCKED BY CONGESTION	


ATTACH ADDITIONAL SIGNATURE SHEETS AS NECESSARY


APPELLANTS


Parties-in-interest have the right to file an appeal.

A party-in-interest is a person who, or organization which, has standing to appeal the final decision of a board, commission or other decision maker. Such standing to appeal is limited to the following:

- The applicant.
- Anyone who owns or occupies the property which was the subject of the decision made by the board, commission or other decision maker.
- Anyone who received the mailed notice of, or spoke at, the hearing of the board, commission or other decision maker.
- Anyone who provided written comments to the appropriate City staff for delivery to the board, commission or other decision maker prior to or at the hearing on the matter that is being appealed.
- A City Councilmember.

Signature: 	Date: 12/26/22
Name: Anthony Doing	Email: anthonydoing@comcast.net
Address: 5206 Castle Ridge Place	Phone #: 970 214 1577
Describe how you qualify as a party-in-interest: neighbor - received notice - concerned in regard to emergency service access	

Signature: 	Date: 12/26/22
Name: Steven R. Williams	Email: aitarama@comcast.net
Address: 5301 Highcastle Court	Phone #: 970-567-5541
Describe how you qualify as a party-in-interest: Neighbor, written notice received, attended meetings	

Signature: 	Date: 26-DEC-2022
Name: DOUGLAS W. SALTER	Email: KDAPW2495@GMAIL.COM
Address: 613 CASTLERIDGE COURT	Phone #: 970-481-4382
Describe how you qualify as a party-in-interest: NEIGHBOR - ATTENDED MEETING VIRTUALLY	


ATTACH ADDITIONAL SIGNATURE SHEETS AS NECESSARY


APPELLANTS

Parties-in-interest have the right to file an appeal.

A party-in-interest is a person who, or organization which, has standing to appeal the final decision of a board, commission or other decision maker. Such standing to appeal is limited to the following:

- The applicant.
- Anyone who owns or occupies the property which was the subject of the decision made by the board, commission or other decision maker.
- Anyone who received the mailed notice of, or spoke at, the hearing of the board, commission or other decision maker.
- Anyone who provided written comments to the appropriate City staff for delivery to the board, commission or other decision maker prior to or at the hearing on the matter that is being appealed.
- A City Councilmember.

Signature: 	Date: 12/18/22
Name: Kurt Johnson	Email: kejlbj@yahoo.com
Address: 612 Castle Ridge Ct	Phone #: 505-400-6810
Describe how you qualify as a party-in-interest: Received notice	

Signature: 	Date: 12/18/22
Name: Daniel Clanson	Email: danclanson92@gmail.com
Address: 5219 Castle Ridge Pl FC	Phone #: 9702220478
Describe how you qualify as a party-in-interest: Received notice	

Signature:	Date:
Name:	Email:
Address:	Phone #:
Describe how you qualify as a party-in-interest:	


ATTACH ADDITIONAL SIGNATURE SHEETS AS NECESSARY

APPELLANTS

Parties-in-interest have the right to file an appeal.

A party-in-interest is a person who, or organization which, has standing to appeal the final decision of a board, commission or other decision maker. Such standing to appeal is limited to the following:

- The applicant.
- Anyone who owns or occupies the property which was the subject of the decision made by the board, commission or other decision maker.
- Anyone who received the mailed notice of, or spoke at, the hearing of the board, commission or other decision maker.
- Anyone who provided written comments to the appropriate City staff for delivery to the board, commission or other decision maker prior to or at the hearing on the matter that is being appealed.
- A City Councilmember.

Signature: 	Date: 12/27/22
Name: MICHAEL V. LUZZO	Email: MIKELUZZO@YAHOO.COM
Address: 5225 CASTLE RIDGE PL, FORT COLLINS, CO 80525	Phone #: (408) 230-6131
Describe how you qualify as a party-in-interest: ATTENDED AND SPOKE AT CITY PLANNING MEETING	

Signature:	Date:
Name:	Email:
Address:	Phone #:
Describe how you qualify as a party-in-interest:	

Signature:	Date:
Name:	Email:
Address:	Phone #:
Describe how you qualify as a party-in-interest:	

ATTACH ADDITIONAL SIGNATURE SHEETS AS NECESSARY

July 6, 1993

(File: 9346LT01)

Mr. Mike Herzig
Fort Collins Development Engineer
P.O. Box 580
Fort Collins, CO 80522-0580

Dear Mike:

Castle Ridge at Miramont is proposing to build 28 foot wide public streets within this portion of the development. The streets proposed to be 28 feet wide are "private drives" west of Highcastle Drive. According to the Fort Collins Design Criteria and Standards for Streets, this street width will require a variance by the City of Fort Collins.

The reasons for requesting/granting this variance are listed below:

- The streets will have less than 750 ADT on them. The development itself will have 18 dwelling units, which will generate 180 vehicle trips on an average weekday. There is not likely to be any external traffic passing through this development. Therefore, the highest traffic volume at a given worst case location will be 180 ADT.
- The streets that are proposed to be 28 feet are all cul-de-sacs.
- The cul-de-sacs do not access an arterial street.
- This is a large lot development. The density is considered to be low (2 or less dwelling units per acre). Based upon criteria in "Recommended Guidelines for Subdivision Streets, A Recommended Practice," Institute of Transportation Engineers, 1984, the pavement width should be 22-27 feet. The proposed 28 feet exceeds this recommended practice.
- Typical development with lot size of ≥ 0.5 acres provide more than four off-street parking spaces per dwelling unit. A comparable development is the First Filing of Clarendon Hills. Based upon observation at various times on a number of days, the average number of vehicles parked on Hinsdale Drive in Clarendon Hills was 3 in a length of 1300 feet. This observation was conducted where there were dwelling units on both sides of the street. The number of parked, on-street vehicles would enable Hinsdale Drive to have been a 28 foot wide street with no traffic or parking problems.

I recommend that the streets in Castle Ridge at Miramont be 28 feet wide (curb to curb). I would further recommend that parking be allowed on both sides of the streets, if at least four off-street parking spaces are provided per dwelling unit.

If you have any questions or desire additional information, do not hesitate to call me.

Sincerely,

Matthew J. Delich, P.E.

File

HPDesk Local Print for Mike HERZIG

Start of Item 2.

Message.

Subject: 28' Street Width Variance for Castle Ridge at Miramont
Sender: Warren JONES / CFC52/01
TO: Mike HERZIG / CFC52/01

Dated: 07/19/93 at 0903.

Contents: 2.

Part 1.

FROM: Warren JONES / CFC52/01

TO: Mike HERZIG / CFC52/01

Part 2.

RE: 28' Street Width Variance for Castle Ridge at
Miramont

Our research indicates that the on-street parking demands in large lot, high end single family housing projects is very low. The strongest correlating factor we have observed is the use of three car garages. If this project fits this scenario, including the three car garages, I have no opposition to a 28' street width.

End of Item 2.

Facility Name	Parking Count	Bed Count	Ratio Parking/Beds
Seneca House Assisted Living	4	10	0.40
Terry Lake Assisted Living Turnbettery Place Assisted Living	4	8	0.50
Turnberry Place Assisted Living	4	8	0.50
Monarch Greens Assisted Living	6	8	0.75
Presitge Living LLC	6	8	0.75
Live to Assist	7	8	0.88



October 19, 2016

Castle Ridge at Miramont HOA
c/o Faith Property Management
300 East Boardwalk Drive; Building 6, Suite B
Fort Collins, Colorado 80525

Attn: Ms. Lauren Winn (lauren@faithproperty.com)

Re: Existing Pavements Evaluation
Castle Ridge Court and Castle Ridge Place
Fort Collins, Colorado
EEC Project No. 1162090

Ms. Winn;

Earth Engineering Consultants, LLC (EEC) personnel have completed the subsurface exploration and engineering evaluation requested for the existing roadways within the Castle Ridge at Miramont development located west of Highcastle Drive and south of the Mail Creek Ditch in Fort Collins, Colorado. The roadways in this evaluation include Castle Ridge Court and Castle Ridge Place. Results of the field and laboratory testing for this project as well as our evaluation of those test results are provided with this report.

Earth Engineering Consultants, Inc. completed a geotechnical exploration for this development in 1993. We believe the reference roadways were constructed shortly thereafter. The 1993 pavement section recommendations suggested at least 3-inches of hot bituminous pavement (HBP) over at least 6-inches of aggregate base, which was consistent with the minimum standards at that time. The in-place roadways appear to be in reasonably good shape based on visual observations. Several areas of concrete curb-and-gutter appear to have been replaced and the roadways appear to have been seal coated relatively recently. Photographs of the pavement areas taken at the time of our field exploration are included with this report.

To help determine the existing pavement sections and evaluate existing subgrade conditions, soil borings were completed at four (4) locations within the referenced roadway alignments. A diagram indicating the approximate boring locations is included with this report. Those borings were extended to depths of approximately 10 feet below existing surface grades with samples of the subsurface materials encountered obtained using split-barrel and California barrel sampling techniques in general accordance with ASTM Specifications D1586 and D3550, respectively.

In the split-barrel and California barrel sampling procedures, standard sampling spoons are driven into the ground by means of a 140-pound hammer falling a distance of 30 inches. The number of blows required to advance the split-barrel and California barrel samplers is recorded and is used to estimate the in-situ relative density of cohesionless soils and, to a lesser degree of accuracy, the consistency of cohesive soils and hardness of weathered bedrock. In the California barrel sampling procedure, relatively intact samples are obtained in removable brass liners. Samples obtained in the field were sealed and returned to our laboratory for further examination, classification and testing.

Laboratory moisture content tests were completed on each of the recovered samples. Select samples were tested for dry density, unconfined strength, swell/consolidation, fines content and plasticity. Results of the outlined tests are indicated on the attached boring logs and summary sheets. One (1) Hveem stabilometer R-value was completed on a composite sample of the subgrade soils. As a part of the testing program, all samples were examined in the laboratory and classified in general accordance with the attached General Notes and the Unified Soil Classification System, based on the soil's texture and plasticity. The estimated group symbol for the Unified Soil Classification System is indicated on the borings and a brief description of that classification system is included with this report.

Based on results of the field borings and laboratory testing, subsurface conditions can be generalized as follows. The existing pavement surface observed in the field borings consisted of approximately 2½ to 4 inches of hot bituminous pavement in the cul-de-sacs (i.e. general vicinity of borings B-1, B-3 and B-4) and approximately 3½ inches in the local roadway (i.e. general vicinity of boring B-2). The HBP was underlain by approximately 6½ to 10 inches of aggregate base course. At all boring locations, the pavement sections were underlain by moderate plasticity lean clays with varying amounts of sand. The cohesive subgrade soils were generally moist and stiff to very stiff. The moist soils showed generally low potential for swelling at current moisture and density conditions. The lean clay soils were underlain at depths of approximately 3½ to 9 feet by claystone/siltstone/sandstone bedrock. The test borings were terminated at depths on the order of 10 feet below existing pavement surface in moderately to highly plastic bedrock.

Observations were made while drilling and after completion of the borings to detect the presence and depth to free groundwater. No free water was observed in the test borings at the time of drilling. The borings were backfilled after drilling and the pavements patched so that longer-term observations of groundwater levels were not possible.

Fluctuations in groundwater levels can occur over time depending on variations in hydrologic conditions and other conditions not apparent at the time of this report. Perched groundwater may be encountered in the subgrade soils particularly immediately above the low permeability bedrock. Soil stratification boundaries indicated on the boring logs were based on visual and tactual observation of the field samples. In-situ, the change of materials may be gradual and indistinct.

ANALYSIS AND RECOMMENDATIONS

The pavement section observed within the roadway borings consisted of 2½ to 4 inches of HBP on 6½ to 10 inches of aggregate base. The pavement sections are generally deficient on HBP surfacing based on a current minimum standard of 4 inches of hot bituminous pavement overlying 6 inches of aggregate base course for local residential streets and 5 inches of HBP over 6 inches of aggregate base for cul-de-sacs. Furthermore, the contribution of the approximate 25 year old HBP is substantially less than new HBP, further contributing to the deficiency of the pavement.

Reconstruction or a significant overlay of the existing roadways would be required to upgrade the roadways into current LCUASS standards.

For reconstruction, the existing pavement surface and adjacent concrete pans should be removed along with sufficient aggregate base/subgrade to establish top-of-subgrade or top-of-base elevations. We expect the subgrades would be unstable upon removal of the pavements thereby requiring stabilization. If the exposed materials are unstable, it might be necessary to remove base materials to a depth where the subgrades can be stabilized and appropriate base placed for the roadways. Stabilization of the subgrades, if required, could include incorporation of at least 12 percent Class C fly ash in the top 12 inches of subgrade. The stabilized zone would be adjusted in moisture content to slightly dry of standard Proctor optimum moisture and compacted to at least 95% of standard Proctor maximum dry density.

Pavement sections for the thru-streets classified as local residential, should consist of 4 inches of hot bituminous pavement overlying 6 inches of base course. The new pavement section for the cul-de-sacs should include 5 inches of hot bituminous pavement overlying 6 inches of base course. Aggregate base course should consist of Class 5 or Class 6 aggregate base in accordance with LCUASS standards. Hot bituminous pavement should consist of Grading S 75 with 58-28

binder. Aggregate base course should be compacted to at least 95% of standard Proctor maximum dry density at a workable moisture content. Hot bituminous pavement should be compacted to be with the range of 92 to 96% of maximum theoretical specific gravity (Rice Value) at the time of placement.

Concerning an overlay approach, we suggest at least 2½ inches of new asphalt would be required in the cul-de-sacs and 1½ inches required in the local roadways to bring the structural number of the streets up to meet current design. As an alternative, 2-inches of the in-place HBP could be milled and overlay of 4 inches and 3 inches, respectively, placed in the cul-de-sacs and roadways. Adding 2 to 2½ inches of pavement above the existing grades would significantly alter the roadway cross slopes; care would be needed to match existing curb-and-gutter and driveways. Areas of thinner pavements may not provide adequate support of the milling operation.

Positive drainage should be developed across and away from the new pavements to prevent wetting of the pavement subgrades. Pavement subgrades allowed to become wetted subsequent to construction can result in an unacceptable performance of the pavements. In addition, care should be taken to place and compact cohesive soil subgrades behind the new curbs lines to prevent ponding of water behind curbs.

General Comments

The analysis and recommendations presented in this report are based upon the data obtained from the borings completed at the indicated locations and from any other information discussed in this report. This report does not reflect any variations which may occur between borings or across the site. The nature and extent of such variations may not become evident until construction. If variations appear evident, it will be necessary to re-evaluate the recommendations of this report.

It is recommended that the geotechnical engineer be retained to review the plans and specifications so that comments can be made regarding the interpretation and implementation of our geotechnical recommendations in the design and specifications. It is further recommended that the geotechnical engineer be retained for testing and observations during earthwork and pavement construction phases to help determine that the design requirements are fulfilled.

EEC Project No. 1162090
October 19, 2016
Page 5

This report has been prepared for the exclusive use of Castle Ridge at Miramont HOA c/o Faith Property Management personnel for specific application to the project discussed, and has been prepared in accordance with generally accepted geotechnical engineering practices. No warranty, express or implied, is made. In the event that any changes in the nature, design or location of the project as outlined in this report are planned, the conclusions and recommendations contained in this report shall not be considered valid unless the changes are reviewed and the conclusions of this report modified or verified in writing by the geotechnical engineer.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning this report, or if we can be of further service to you in any other way, please do not hesitate to contact us.

Very truly yours,
Earth Engineering Consultants, LLC



David A. Richer, P.E.
Senior Geotechnical Engineer

Reviewed by: Lester L. Litton, P.E.
Principal Engineer

DAR/LLL/dla

cc: Shear Engineering Corporation – Brian Shear (bshear@shearengineering.com)