

Y PLANNING COMMISSION

927 10TH STREET, SUITE 300 - SACRAMENTO, CALIFORNIA 95814

APPLICANT	Spink Corporation - P.O. Box 2511, Sacramento, CA 95811		
OWNER	Riverside Estates, Inc. c/o Carl Durling - 910 Florin Rd, Ste 211, Sacto. 95831		
PLANS BY	Spink Corporation - P.O. Box 2511, Sacramento, CA 95811		
FILING DATE	1-30-85	50 DAY CPC ACTION DATE	REPORT BY: DH:sq
NEGATIVE DEC	4-3-85	EIR	ASSESSOR'S PCL NO. 030-680-09, 18, 19, 40; 030-690-58, 59; 030-710-33, 46, 55, 64, 71, 78;

79

- APPLICATION:
- A. Negative Declaration
 - B. Rezone 3.5 acres in 14 lots from Single Family (R-1) zone to Townhouse (R-1A) zone
 - C. Tentative Map to divide 3.5 acres in 14 lots into 14 condominium lots with 28 airspace condominium units in the Townhouse (R-1A) zone
 - D. Special Permit to convert 28 apartment units in 14 duplex structures into condominiums
 - E. Variance to waive the two-hour firewall requirement (Section 28-C-3-(d))
 - F. Variance to waive separate water and sewer hookup or shutoff (Section 28-C-3(b)(i)(ii))

LOCATION: Various corner lots, Park River Estates, Riverside Boulevard

PROPOSAL: The applicant is requesting the necessary entitlements to convert 14 existing duplex structures into 28 airspace condominium units on corner lots in the Park River Estates Subdivision. Also proposed is the use of a homeowners' association for the joint management of all 14 parcels for common areas of exteriors of structures, front yards and utilities.

PROJECT INFORMATION:

1974 General Plan Designation: Residential
1978 South Pocket Community
Plan Designation: Low Density Residential
Existing Zoning of Site: R-1
Existing Land Use of Site: Existing duplexes

Surrounding Land Use and Zoning:

North: Residential; R-1 & R-1A
South: Residential; R-1 & R-1A
East: Residential; R-1 & R-1A
West: Residential; R-1 & R-1A

Parking Required: 28 spaces
Parking Provided: 56 spaces
Property Dimensions: Varies
Property Area: 3.5+ acres
Density of Development: 8.2 d.u. per acre
Square Footage of Building: 1,430, 2,037 and 2,205 sq. ft.
Height of Building: Single story
Topography: Flat
Street Improvements: Existing

APPLC. NO. P85-071

MEETING DATE May 16, 1985

CPC ITEM NO. 2

Utilities:	Existing
Exterior Building Materials:	Earth tones
Exterior Building Materials:	Varies; stucco, wood siding; wood shake roofs
Roof Materials:	Wood shake

SUBDIVISION REVIEW COMMITTEE RECOMMENDATION: On March 20, 1984, April 10 and April 24, 1985 the Subdivision Review Committee, by a vote of four ayes, four absent and one abstention, voted to recommend approval of this map, subject to the conditions attached in Exhibit H.

PROJECT BACKGROUND:

- A. On October 11, 1979, the Planning Commission denied a request to develop 94 halfplex units on 47 corner lots in the Park River Estates area (P-8736), based upon the small size of the units and architectural design as incompatible with surrounding single family dwellings.
- B. On October 9, 1980, the Planning Commission granted approval for the request to develop 54 halfplex units on 27 corner lots in the Park River Estates. The City Council approved the rezoning on November 12, 1980 (P-9159). These units were larger in square footage than those denied in 1979 and architecturally compatible with the surrounding single family residences.
- C. On August 25, 1983, the City Planning Commission conditionally approved a tentative map to establish 16 corner lots for 32 halfplex units with rezoning from R-1 to R-1A and approval of a special permit in Park River Estates. The applicant requested a subdivision modification to waive separate water and sewer service and was denied (P83-105). Final action by the City Council never occurred, with the request being withdrawn on July 13, 1984 by the applicant. Of the 16 corner lots proposed for halfplex development, 14 of the same lots are being considered for condominium conversion with waiver of separate water and sewer and the requirement of a two-hour firewall.
- D. Several requests for individual corner lots to be established as halfplex developments have been approved by the Planning Commission. In all approved instances, separate water and sewer services were required with compliance with the minimum firewall requirement between units.

PROJECT EVALUATION: Staff has the following comments regarding this request:

Land Use

- A. Duplex units and halfplex units on corner lots are compatible in the R-1 zone throughout the City if they are architecturally similar to single family dwellings found adjacent to the corner lots. Establishment of duplexes or halfplexes on corner lots is consistent with City General Plan and 1978 South Pocket Community Plan by "Achieving safe and adequate housing for all citizens and provide each with an opportunity for choice between alternative living arrangements."
- B. The proposed conversion application is not consistent with the Housing Element of the General Plan or the Zoning Ordinance in that approval of this project will reduce the current 0.38% vacancy rate further below the minimum allowed for conversion.

- B. Duplex units generally contain more square feet of living area than apartments. The subject project's range from a 950 square foot two bedroom, two bath unit to a 1,595 square foot two bedroom, two bath unit. Apartments usually range from 650 square feet to 1,000 square feet of living area.
- C. Duplex units have a private rear yard as an amenity and located on a minor single family residential street in a single family environment. Apartment units are usually located on major streets, lack a secure private outdoor space and generally are not as desirable for a family or someone seeking a more spacious family environment in a single family residential neighborhood.
- D. The present demand for halfplex lots are being met by new construction. Since January 2, 1985 the City Council has approved five requests for rezonings from R-1 to R-1A with tentative map and special permits to establish 10 halfplex parcels on five corner lots in the Pocket area. During the same time period, the City Council approved three subdivisions which included recognition of rezoning to R-1A and establishment of 65 lots for future halfplex division into 130 parcels (P84-404, P84-433, P85-033). The Council also approved a private subdivision in which 25 corner lots could be constructed with duplex units (P84-120) in the R-1A zone.

Development Standards

- A. In review of the tentative map by the Subdivision Review Committee and, after consultation with the City Attorney's Office and Director of Public Works, three issues await future determination:
 - 1. The specific type of firewall standard to be used to separate the duplex units. Presently a non-rated firewall separates the units. The applicant has stated he is willing to upgrade the firewall to 1/2 hour or one hour as required by the Building Inspector, but not the two hour wall as required under the Zoning Ordinance.
 - 2. The applicant is proposing waiver of separate water and sewer hookups and placing the area between the street and buildings in a common area with maintenance and access through the Covenants, Conditions and Restrictions (C.C. & R's) and the establishing of a homeowners' association. If the homeowners' association were to disband, the City would require, prior to dissolution, installation of separate water and sewer lines to each unit. The City Attorney's Office has advised staff that if the homeowners' association disbands, individual property owners would have no interest in installing separate water and sewer lines and, in fact, may oppose it. The City would be left in a difficult position to require compliance. It would take separate legal actions against each of the 28 duplex owners to require compliance. (Refer to attached letter from Theodore H. Kobey, Assistant City Attorney, dated April 29, 1985.)
 - 3. The atrium provided on 12 of the units will require emergency access. The City Building Inspector and Fire Marshal have commented on the proposed use of a fire escape from the atrium to the roof and installation of a ladder from the roof to the outside yard area. The applicant has agreed to install the appropriate measures if the

At the time of this report, the applicant had not proposed any measures which will successfully mitigate the adverse effect on the rental housing stock and it is expected that tenant displacement and relocation problems will result with this conversion. The applicant proposes a lifetime lease for all present qualified tenants. This by itself does not alleviate the impact the proposed conversion would have on the available rental housing stock in the Pocket area. The applicant has provided a statement May 1, 1985 that the owners propose construction of 200 units in the Pocket area to lessen the impact of the conversion if approved (see attached letter).

In October, 1984, the vacancy rate for the Pocket Community Plan area was 0.38 percent. The vacancy rate was determined from a survey of 4,173 rental units located in the Pocket Community Plan area. The minimum vacancy rate allowed for conversion is 5+ percent or greater. By allowing the proposed conversion, the vacancy rate would decrease, which is inconsistent with the policy and goals of the City Housing Element.

- C. Staff conducted a field investigation of single-family and corner lot development as shown on Exhibit G for the Park River Estates area. The survey focused on corner lots identifying halfplex or duplex units. The following summary is provided to establish the land use pattern.
1. A total of 65 duplex corner lots were inventoried with the 14 proposed for condo conversion comprising 22 percent of the total.
 2. Since 1980, a total of 28 halfplex lots were approved on corner lots establishing 56 individual dwellings. These dwellings were constructed with a two hour firewall and individual water and sewer hookups.
 3. Of the 14 duplex units proposed for condo conversion, none have a fire rated wall separating the units nor do they have separate water and sewer services.
 4. If approved, conversion of 14 duplex units, 28 units, would deplete the supply of rental units in the study area until new replacement units have been constructed.
 5. Of the total 130 units in 65 duplex structures, 14 duplexes proposed for conversion, constitute 22% of the units available in duplex structures in the study area.
- D. Lack of a common geographic identity for the proposed project creates a problem for future maintenance of common facilities. Difficulties may arise in enforcing conditions of the C.C.& R's over 14 detached separate parcels rather than one apartment building on one parcel. The physical separation of units fosters a sense of independence from other units, thereby encouraging individual actions which may be in conflict with the C.C.& R's or homeowners' association bylaws.

Housing

- A. Duplexes provide an opportunity for house holds who want to live in a single family neighborhood environment but do not, or cannot, afford to purchase a single family dwelling.

conversion is approved. At the time of this report, the specific type of fire emergency access had not been designed or accepted by the City.

- B. Staff wishes to emphasize that the subject application is not consistent with the past history of halfplex development on corner lots. Halfplex units have each complied with the requirement for individual water and sewer connections and the firewall separation to Building Code standards.

STAFF EVALUATION SUMMARY:

Housing

- A. Request is inconsistent with 5% vacancy threshold requirement of the Zoning Ordinance without similar replacement housing being provided.
- B. If the conversion were approved, it would deplete the total number of duplex units on corner lots by 22% in the Park River Estates area. Duplex units are a housing resource in the Pocket area.
- C. Duplex units provide a rental housing opportunity for households who desire amenities of a single family neighborhood who cannot afford to purchase a single family dwelling.
- D. Duplex units generally contain more square footage of living area than apartments.
- E. Duplex units possess the amenities of a private rear yard and location on a minor street frontage in a single family neighborhood.
- F. Present demand for halfplex lots are being met by new construction.

Development Standards

- A. Variance from separate water and sewer hookup establishes a precedent for future requests for duplex units and halfplex requests. The City would be placed in an untenable position enforcing separate services at a later date.
- B. Lack of a common geographic identity may impede future maintenance of common facilities.
- C. Variance from two-hour firewall requirement leaves unresolved the type of unit standard to apply to the duplex units from the U.B.C.
- D. Past halfplex developments have complied with the separate water and sewer connections requirement. Project seeks to waive what otherwise would be required if newly constructed as a halfplex.

ENVIRONMENTAL DETERMINATION: The Environmental Coordinator has reviewed the project and determined that the proposed project will not have a significant adverse effect on the environment and has filed a negative declaration.

STAFF RECOMMENDATION: Staff recommends that the Planning Commission take the following actions:

- A. Ratify the Negative Declaration;

- B. Deny the Rezoning from Single Family (R-1) to Townhouse R-1A) zone;
- C. Deny the Tentative Map;
- D. Deny the Special Permit based upon findings of fact which follow;
- E. Deny the Variance to waive the two-hour firewall requirement based upon findings of fact;
- F. Deny the Variance to waive separate water and sewer hookup or shutoff based upon findings of fact.

Special Permit - Findings of Fact

- 1. The proposal is inconsistent with the City Housing Element and Zoning Ordinance.
- 2. The proposal would deplete the total number of duplex units on corner lots by 22 percent in Park River Estates area.
- 3. The proposal would establish a precedent to allow the condo conversion ordinance process to circumvent the purpose and intent of past City policy to require separate water and sewer connections for each unit and minimum firewall requirements for what would otherwise be recognized as a halfplex.
- 4. Adequate comparable replacement housing will not be available as proposed in the project.
- 5. The duplex units represent a unique and needed rental housing resource in the Pocket area.

Findings of Fact - Variance

- 1. As proposed, the variance from the requirement for individual water and sewer connections will be injurious to the public welfare or other property owners in that sewage backup and repair of common lines will create long term problems for the owners.
- 2. As proposed, waiver of the two hour firewall will be injurious to the public welfare since no fire rated wall exists at this time and no specific wall standard is proposed.
- 3. As requested, approval of the variances would be granting special privilege to the individual property owner inconsistent with similar limitations on surrounding properties.

INFORMATION AND FACT SHEET
RIVERSIDE ESTATES DUPLEX CONDOMINIUMS

THREE BUILDING UNIT TYPES:

Unit A - Smallest: 2 bedroom/2 bath

950 square feet
+480 square feet - 2 car garage
1,430 square feet; total building area

Unit B - Medium: 3 bedroom/2 bath

1,437 square feet
+600 square feet - 2 car garage
2,037 square feet; total building area

Unit C - Largest: 2 bedroom/2 bath

1,595 square feet
+610 square feet - 2 car garage
2,205 square feet; total building area

UNIT COMBINATIONS (PLAN TYPES):

Plan 2 (9 proposed @ 18 duplex condo lots and units)

A Unit + B Unit = 3,467 square feet building area

Plan 3 (2 proposed @ 4 duplex condo lots and units)

A Unit + C Unit = 3,635 square feet building area

Plan 4 (3 proposed @ 6 duplex condo lots and units)

B Unit + C Unit = 4,242 square feet building area

EXHIBIT A

RIVERSIDE ESTATES

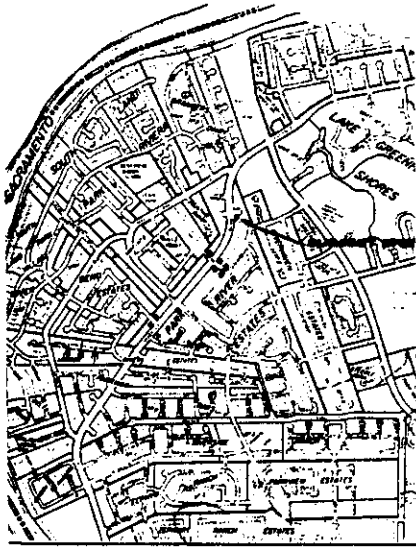
DUPLEXES

PHASE I

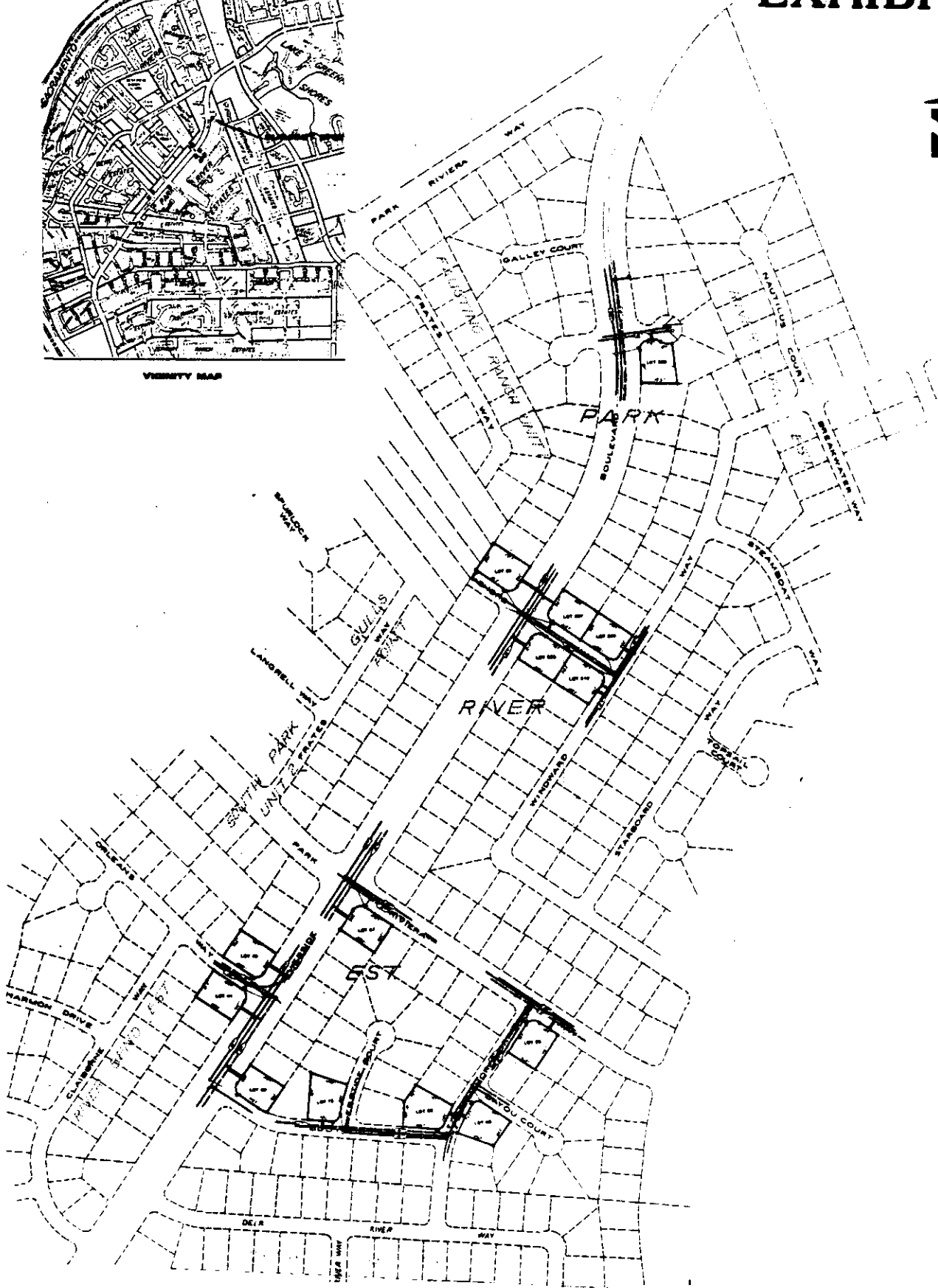
<u>LOT #</u>	<u>PLAN</u>	<u>ADDRESS</u>		<u>A.P.N.</u>
26	4	<u>6690</u> Riverside Blvd.-C	<u>421</u> Ashore Way-B	30-680-40
40	2	<u>6880</u> Riverside Blvd.-A	<u>6696</u> Orleans Way-B	30-710-79
41	2R	<u>6900</u> Riverside Blvd.-AR	<u>6697</u> Orleans Way-BR	30-710-78
50	2R	<u>6915</u> Riverside Blvd.-AR	<u>355</u> Buoy Way-BR	30-710-71
57	4	<u>6815</u> Riverside Blvd.-C	<u>6820</u> Park Riviera Way-B	30-710-64
66	3	<u>6930</u> Northshore Way-C	<u>405</u> Buoy Way-A	30-710-55
75	3R	<u>375</u> Buoy Way-CR	<u>1</u> Ebbside Court-A	30-710-46
86	2	<u>6925</u> Northshore Way-AR	<u>2</u> Bayou Court-B	30-710-33
95	2R	<u>6868</u> Park Riviera Way-A	<u>6905</u> Northshore Way-B	30-710-24
319	2	<u>455</u> Windward Way-AR	<u>441</u> Ashore Way-B	30-680-19
320	2R	<u>443</u> Windward Way-A	<u>440</u> Ashore Way-B	30-690-57
356	4	<u>6705</u> Riverside Blvd.-C	<u>430</u> Ashore Way-B	30-690-58
357	2R	<u>6695</u> Riverside Blvd.-A	<u>431</u> Ashore Way-B	30-680-18
366	2R	<u>6595</u> Riverside Blvd.-A	<u>6605</u> Riverside Blvd.-B	30-680-09

P 85071

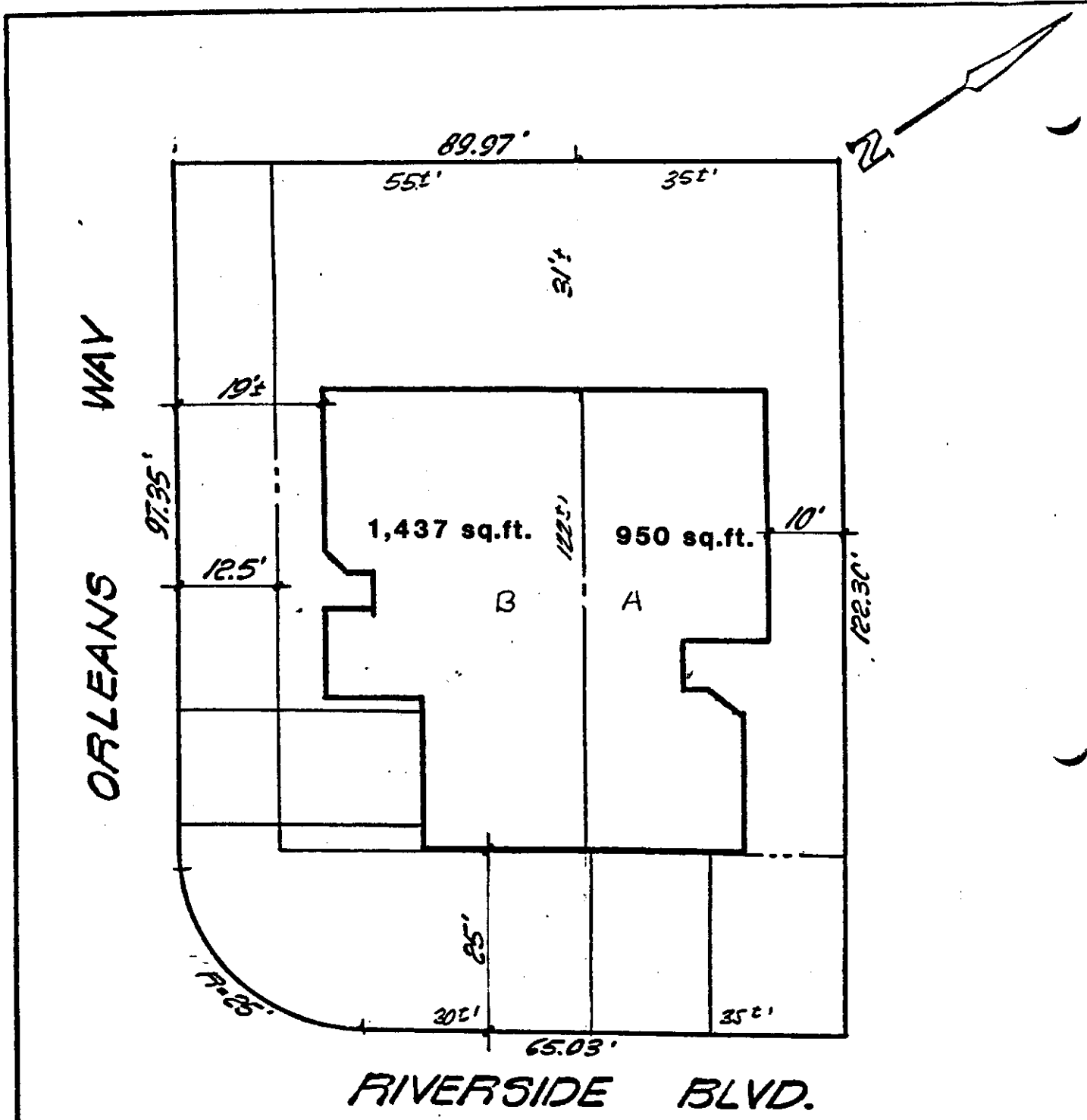
EXHIBIT B



VICINITY MAP



VICINITY MAP



TYPICAL SITE PLAN

PLAN - 2

**RIVERSIDE ESTATES
 DUPLEX CONDOMINIUMS
 CITY OF SACRAMENTO, CALIF.**

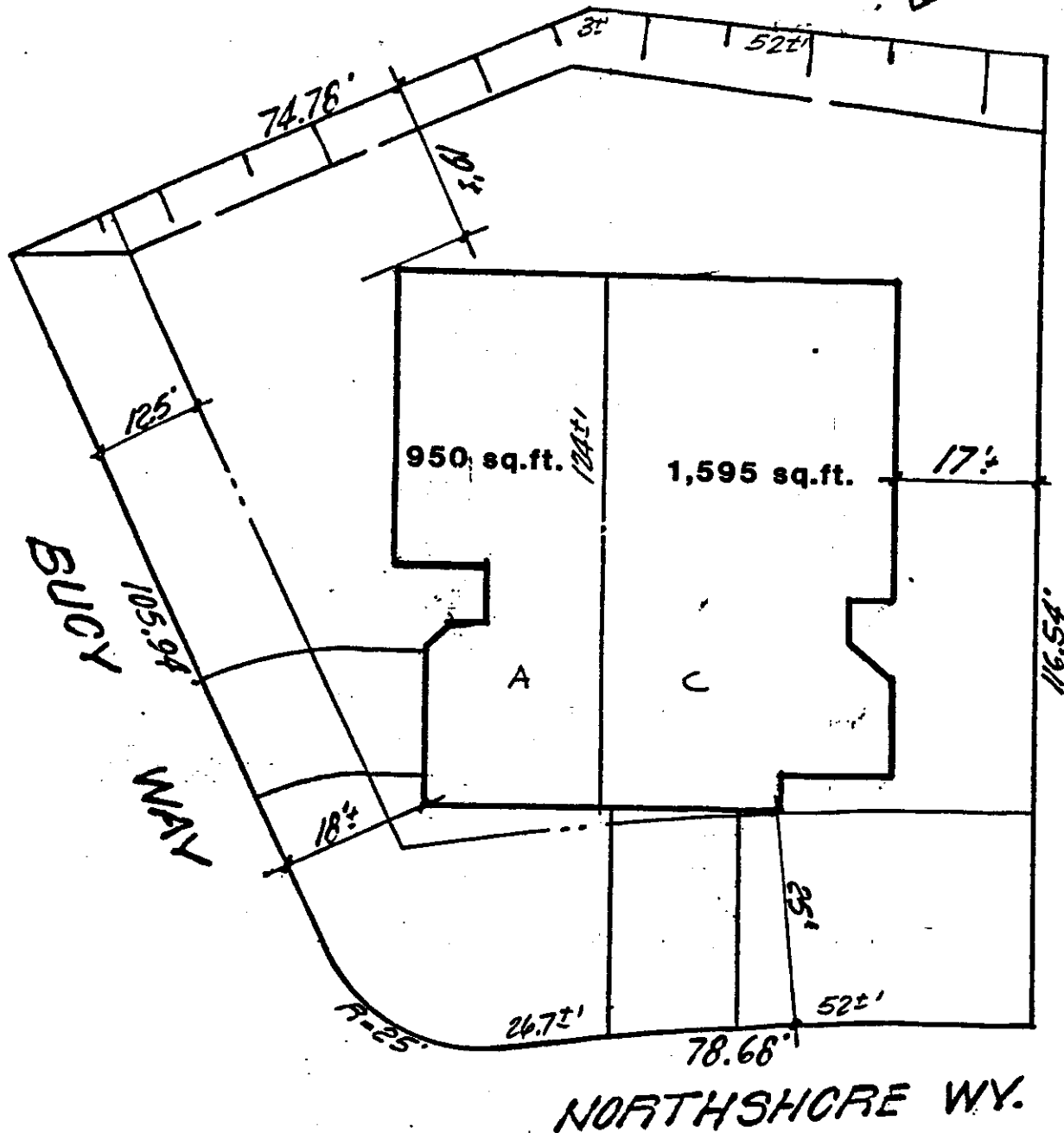
THE SPINK CORPORATION
 ENVIRONMENTAL PLANNING · ENGINEERING
 ARCHITECTURE · SURVEYING · MAPPING · SYSTEMS
 730 F STREET · SACRAMENTO, CALIFORNIA 95811 PH-496 (241) 044

LOT 40, 6880 RIVERSIDE BLVD. & 6696 ORLEANS WAY

JANUARY, 1985

SCALE 1"=20'

EXHIBIT D



PLAN - 3

TYPICAL SITE PLAN

**RIVERSIDE ESTATES
DUPLEX CONDOMINIUMS
CITY OF SACRAMENTO, CALIF.**

LOT 66, 6930 NORTHSORE WAY & 405 BUOY WAY

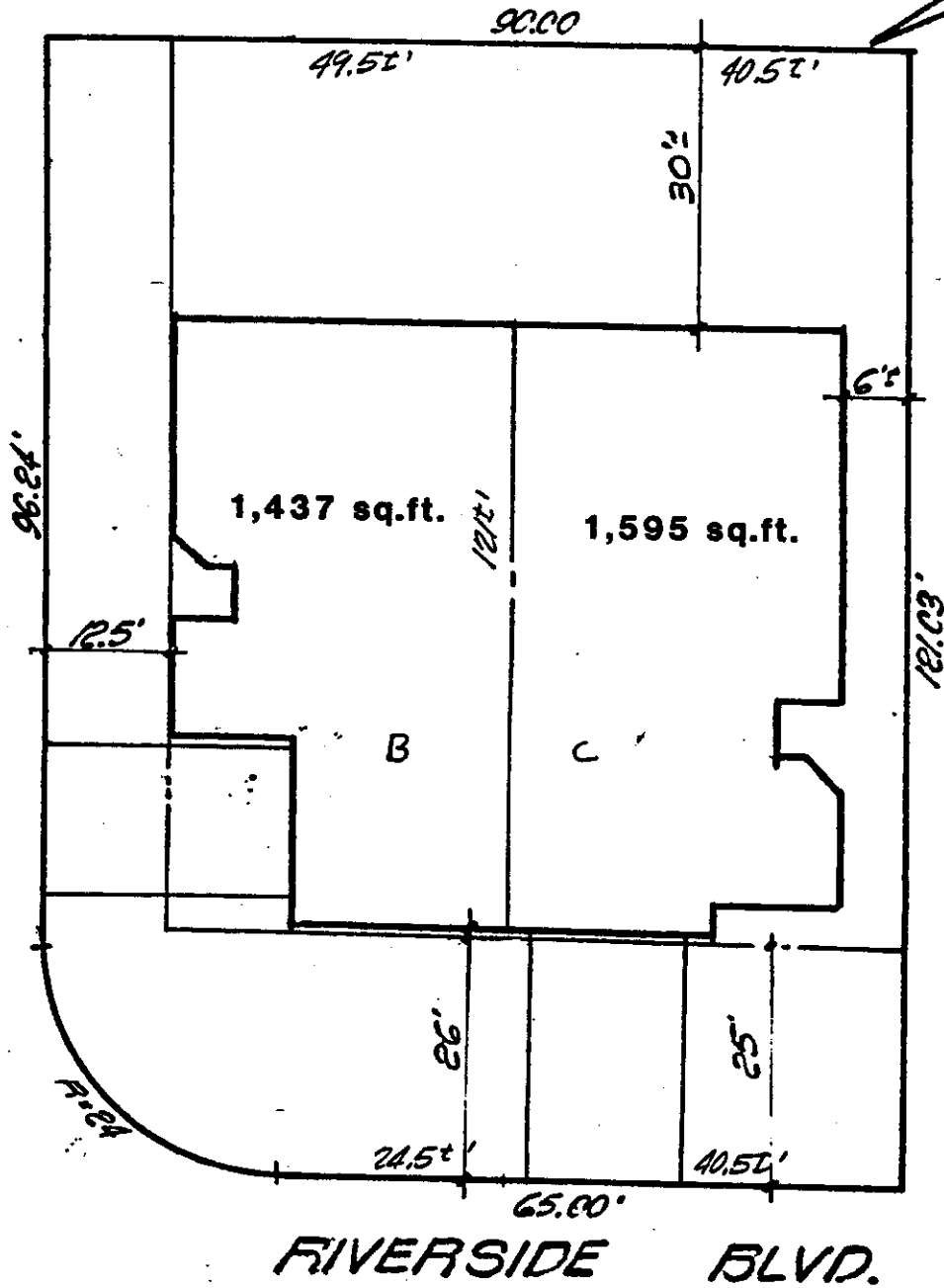
JANUARY, 1985

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THE SPINK CORPORATION
ENVIRONMENTAL PLANNING · ENGINEERING
ARCHITECTURE · SURVEYING · MAPPING · SYSTEMS
730 F STREET SACRAMENTO, CALIFORNIA 95811 PHONE (916) 444-9170

SCALE 1"=20'

ASHORE WAY



PLAN # 4

TYPICAL SITE PLAN

**RIVERSIDE ESTATES
 DUPLEX CONDOMINIUMS
 CITY OF SACRAMENTO, CALIF.**

THE SPINK CORPORATION
 ENVIRONMENTAL PLANNING · ENGINEERING
 ARCHITECTURE · SURVEYING · MAPPING · SYSTEMS
 720 F STREET SACRAMENTO, CALIFORNIA 95816 PHONE (916) 444-2100

LOT 26, 6690 RIVERSIDE BLVD. & 421 ASHORE WAY

JANUARY, 1985

SCALE 1"=20'

FIVESIDE ESTATES
DUPLEX CONDOMINIUMS
RESIDENT SURVEY

EXHIBIT F

The owner of your duplex unit has filed an application with the City of Sacramento for conversion to condominium (sales) housing. You are requested to answer completely the questions below and return the survey within five (5) days to:

City of Sacramento
Planning Department
927 10th Street, Suite 300
Sacramento, California 95814

RESIDENT SURVEY

1. How long have you been a resident? _____ years _____ months
2. Why did you move into this complex? Check most important reason(s).
- | | | |
|--|---------------------------|---|
| <u>5</u> close to work | <u>3</u> close to friends | <u>0</u> amenities |
| <u>4</u> close to services
(shopping, church,
entertainment) | <u>5</u> like rent rate | <u>2</u> good
management,
maintenance |
| <u>4</u> other | | |
3. How long do you plan on living at this complex?
- | | | |
|-----------------------|----------------------------|---|
| <u>5</u> unknown | _____ less than 1 year | <u>4</u> 1 to 3
years |
| <u>3</u> 3 to 5 years | <u>1</u> more than 5 years | <u>8</u> as long as rent is
reasonable |
- Under what conditions? _____
4. If it is offered for sale, are you interested in purchasing the unit in which you are now living, or another in this complex?
- | | |
|--------------|-------------|
| <u>4</u> yes | <u>9</u> no |
|--------------|-------------|
5. If you are unable to purchase a unit, will you be able to locate a comparable unit to rent within this vicinity?
- | | | |
|--------------|-------------|-------------------------|
| <u>1</u> yes | <u>6</u> no | <u>6</u> do not
know |
|--------------|-------------|-------------------------|
6. What improvements, if any, to your unit and/or the complex would be necessary before you would be interested in buying?

Unit A - New microwave, new flooring surfaces in kitchen & baths - carpet allowance; Unit B - New carpets, new lawn in rear, spray for pests; Unit C - New carpet, drapes, paint, wallpeper, kitchen & bathroom floors, bathtubs; increase insulation; Unit D - Insulation, weather stripping, bathtubs; Unit E - Kitchen & bathroom floors redone; Unit F - Upgrading fixtures, bedrooms too small, sound proofing needed from outside noise; Unit G - Insulate.

7. Are you retired? 1 yes 12 no

If retired, are others in your household currently wage earners?

1 yes 0 no

8. Do you approve in principle of this proposed conversion to condominium housing?

5 yes 8 no

Why or why not? Only if affordable; Builder making a large profit off the conversion; Believe owner has the right to convert; Forced to move if not willing to buy; Gives people opportunity for home ownership.

9. Do you and your household qualify as low income (defined by U.S. Department of Housing and Urban Development as below 80% of Metropolitan Sacramento's median household income)?

2 yes 8 no 4 uncertain

10. Would you be interested in attending a resident meeting to discuss conversion plans?

6 yes 6 no

11. Do you have any comments related to the owner's request?

1. Do not understand the concept of duplexes becoming condo's;

2. Yes. I do not't understand why this proposal was not explained to me before I rented three days ago.

The completed questionnaire will be used by the Planning Department in writing its report to the City Planning Commission and City Council on the proposed conversion. Your name, apartment number, et cetera will be used only to verify the number of returns, and the City will make every effort to preserve the confidentiality of the tenant. Only a summary of all tenant answers will be disclosed. Thank you for your cooperation.

NAME _____ APT. # _____

ADDRESS _____ TELE. # _____

EXHIBIT H

Tentative Map Conditions (P85-071)

The applicant shall satisfy each of the following conditions prior to filing the final map unless a different time for compliance is established through an approved subdivision improvement agreement.

1. The existing structures must meet the current code for firewall separation between units for new construction.
2. The units shall comply with the sound control provisions of the Condominium Conversion Ordinance.
3. The buildings shall comply with the requirements of the Personal Safety Building Code to the satisfaction of the City Building Inspector (Ordinance 84-056).
4. That emergency access from the atrium be provided to the satisfaction of the City Fire Department and Building Inspection Division. Proof of satisfaction shall be made prior to recordation of the final map to the Planning Director.
5. That the applicant prepare wording in the by-laws of the homeowners' association and the Covenants, Conditions and Restrictions to provide for installation of separate water and sewer lines to each unit if the homeowners' association were to dissolve. The proposed language is to be approved by the City Public Works Director, Office of the City Attorney, and Planning Director.
6. That gas lines serving a unit and passing through another unit be relocated and protected if financially practical and meeting the requirements of the City Building Inspector.
7. That all furnace and water heater gas vent connectors have adequate clearance from combustible materials by providing a six inch clearance on all type C single wall connectors or change to a type B double wall connector.
8. That all above-grade PVC water piping installed between the sprinkler vacuum breakers and the domestic water supply shall be changed to an approved material, i.e. copper, etc. to the satisfaction of the City Building Inspector.
9. All existing assessments be paid off.
10. The applicant shall provide replacement housing options in the form of lease, ownership, or comparable replacement housing opportunities to existing tenants, as specified in the special permit conditions for this project. Assurances of compliance with such conditions or City approved alternatives, meeting the intent of the City Zoning Ordinance, shall be provided prior to final map recordation.



CITY OF SACRAMENTO

DEPARTMENT OF LAW
812 TENTH STREET
SUITE 201
SACRAMENTO CA 95814
TELEPHONE (916) 449-5346

April 29, 1985

JAMES P. JACKSON
City Attorney
THEODORE H. KOBAY, JR.
Assistant City Attorney
SAMUEL L. JACKSON
WILLIAM P. CARNAZZO
LAWRENCE M. LUNARDINI
DIANE B. BALTER
RICHARD F. ANTOINE
Deputy City Attorneys

MEMORANDUM

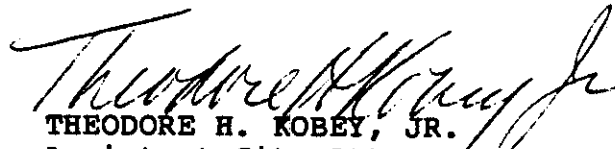
TO: Dan Hendrycks, Planning Department

FROM: Theodore H. Kobey, Jr., Assistant City Attorney

RE: CC and R's for Riverside Estates -
Requirement of Installation by Homeowners
of Separate Water and Sewer Lines

Following up on our recent discussion, this office would be opposed to the above condition, either as a map condition or in the CC and R's. There simply would be no practical way to enforce it.

It seems likely that the homeowners' association would dissolve, given the scattered location of the properties involved. It also seems obvious that if disbanded, individual homeowners would have no interest in putting in separate water and sewer lines and, in fact, would oppose this. Thus, the City would be left with a difficult compliance problem and this office would be required to file suit to gain compliance.


THEODORE H. KOBAY, JR.
Assistant City Attorney

THK/jmv

CITY PLANNING DIVISION

APR 29 1985

RECEIVED

**COMMUNITY
LAND
DEVELOPMENT**

A Research,

Planning,

Marketing

& Development Firm

May 1, 1985

Dan Hendryeks
Planning Department
927 - 10th Street, Suite 300
Sacramento, CA 95814

Subject: P85-071, Duplex Condominiums

Dear Dan:

You requested written confirmation on two points:

1. Replacement Housing, and
2. Estimated monthly payment to purchase one of the duplex condominium units.

Regarding replacement housing; it is the intent, and the commitment, to build a minimum of 200 apartments in the area of Pocket Road, West of Greenhaven Drive. This area is currently being planned as part of the South Pocket Assessment District.

We estimate that the monthly house payment for a duplex condominium will be approximately \$850.00 per month. This includes: Homeownership fees at \$51.00 per month, principle and interest, and taxes. The estimate does not include utilities. The estimate is based on an interest rate of ten percent. We can not estimate what the actual interest rate will be.

If you need additional information, please contact me.

Sincerely,

Carl L. Durling

Carl L. Durling

CITY PLANNING DIVISION

MAY 1 1985

RECEIVED