

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: February 15, 2018

TO: Zoning Hearing Officer

FROM: Planning Staff

SUBJECT: Consideration of a Use Permit pursuant to Section 6500 of the County Zoning Regulations, to allow an accessory building to be located within the rear quarter of a parcel where, in the case of a parcel abutting upon two or more streets, accessory buildings may not encroach upon the outer quarter of the parcel nearest either street. The project is located at 3520 Bay Road in the unincorporated North Fair Oaks area of San Mateo County.

County File Number: PLN 2017-00007

PROPOSAL

The applicant proposes to construct a 464 sq. ft. detached one-car garage with an attached one-car carport that will be located 12.5 feet from the rear property line of the subject parcel. Pursuant to Section 6411(c) of the County Zoning Regulations pertaining to interior parcels abutting upon two or more streets (as is the case of the subject parcel which abuts upon Bay Road and Spring Street), no accessory buildings may be erected or altered so as to encroach upon the outer quarter of the parcel nearest either street. The applicant requests a Use Permit to allow the accessory building to be located within the quarter of the parcel abutting upon Spring Street. The project also includes the demolition of a shed in the rear yard, a 6-foot high fence to be located 2 feet behind the back of the sidewalk along Spring Street (encroachment of 6 feet 7 inches into public right-of-way), 24-inch planters between the back of the sidewalk and proposed fence, and legalization of the conversion of the attached 533 sq. ft. two-car garage within the main residence into conditioned space (a family room). The proposed fence will have a see-through design for the upper 2 feet of the fence and a solid design for the lower 4 feet of the fence. A 16-foot wide gate for vehicular access and a 3-foot wide gate for rear yard access are also proposed. With the proposed accessory building, the existing single-family residence will comply with Section 6119 (*Parking Spaces Required*) of the County Zoning Regulations, which requires two covered parking spaces for a dwelling unit with two or more bedrooms. No vegetation removal will occur and only minor grading is proposed.

RECOMMENDATION

That the Zoning Hearing Officer approve the Use Permit, County File Number PLN 2017-00007, by making the required findings and adopting the conditions of approval listed in Attachment A.

BACKGROUND

Report Prepared By: Carmelisa Morales, Project Planner, Telephone 650/363-1873

Applicant/Owner: Romain Laboisie

Location: 3520 Bay Road, Redwood City

APN: 055-185-040

Size: 7,432 sq. ft.

Existing Zoning: R-1/S-73 (Single-Family Residential District/S-73 Combining District with 5,000 sq. ft. minimum parcel size)

General Plan Designation: Single-Family Residential (15 to 24 dwelling units/net acre)

Sphere-of-Influence: Redwood City

Existing Land Use: Single-Family Residence

Water Supply: Municipal water service is provided by City of Redwood City Municipal Water Department

Sewage Disposal: County Administered Sewer (Fair Oaks Sewer Maintenance District)

Flood Zone: The project site is located in Flood Zone X as defined by FEMA (Community Panel Number 06081C0302E, dated October 16, 2012), which is an area with minimal potential for flooding.

Environmental Evaluation: Categorically exempt under provisions of Class 3, Section 15303 of the California Environmental Quality Act Guidelines for the construction of an accessory structure.

Setting: The project site is on a flat developed parcel located on a triangular-shaped block in the unincorporated North Fair Oaks neighborhood. The parcel abuts upon two streets, Bay Road and Spring Street, and is located approximately 150 feet from where these streets intersect and where Bay Road changes to Florence Street. The two-story single-family residence on the parcel consists of four bedrooms, two bathrooms, a covered porch, and decks on both levels. The second level of the residence is

accessible via an interior stairwell or exterior stairs from the rear of the residence. A shed is located in the rear yard. A 6-foot high fence is located in the public right-of-way along the back of the sidewalk along Spring Street. There are six (6) significant-sized trees (12 inches or more in diameter at breast height) on the parcel. The parcel is adjacent to and surrounded by single-family residential development. There are also nearby commercial uses on the southern side of Florence Street, approximately 450 feet from the project site.

Chronology:

<u>Date</u>	<u>Action</u>
January 11, 2017	- Subject Use Permit application, PLN 2017-00007, submitted.
July 24, 2017	- Application deemed complete.
September 28, 2017	- North Fair Oaks Community Council meeting.
February 15, 2018	- Zoning Hearing Officer public hearing.

DISCUSSION

A. KEY ISSUES

1. Compliance with the General Plan/North Fair Oaks Community Plan

The proposed project complies with all applicable General Plan Policies, specifically:

Policies 8.12a (*General Plan Land Use Designations for Urban Areas*), 8.35 (*Zoning Regulations*), and 8.36 (*Uses*) seek to adopt the land use designations of the North Fair Oaks Community Plan (NFOCP), allow uses in zoning districts that are consistent with the overall land use designation, and require the use of zoning districts to regulate development. In addition, Policy 8.40 (*Parking Requirements*) aims to regulate minimum on-site parking requirements and parking development standards in order to accommodate the parking needs of the development, provide convenient and safe access, and prevent congestion of public streets.

The project parcel is zoned R-1/S-73 (*Single-Family Residential District/ S-73 Combining District*). Pursuant to Section 6161(e) of the County Zoning Regulations, the proposed accessory building for the existing single-family residence is an allowed use in this zoning district. The accessory building complies with the S-73 Zoning District development standards and the detached accessory building regulations, Chapter 20 and Sections 6410 and 6410 of the County Zoning Regulations, respectively, in regards to

maximum height, floor area and lot coverage, and minimum setbacks. Compliance with these regulations are further discussed in Section A.2 of this report.

The NFOCP land use designation for the parcel is Single-Family Residential. This land use designation regulates maximum heights and minimum setbacks which are the same requirements for the S-73 Zoning District. Since the existing use on the parcel is a single-family residence and the project complies with all applicable S-73 zoning standards as discussed above, the project therefore complies with the NFOCP.

Lastly, as mentioned in the Proposal Section of this report, the project also includes the legalization of the converted attached two-car garage in the main residence into conditioned space. Pursuant to Section 6119 (*Parking Spaces Required*) of the County Zoning Regulations, a dwelling unit with two or more bedrooms is required to have two covered parking spaces. The NFOCP Single-Family Residential land use designation also requires two parking spaces for dwelling units with three or more bedrooms. The existing single-family residence has four bedrooms. The proposed accessory building, a detached one-car garage with an attached one-car carport, will provide the two covered parking spaces required by the County Zoning Regulations and NFOCP.

2. Compliance with Zoning Regulations

a. S-73 Zoning District Development Standards

As mentioned in the section above, the project parcel is zoned R-1/S-73 (Single-Family Residential District/S-73 Combining District). The development on the parcel complies with all applicable zoning regulations of the R-1/S-73 Zoning District as outlined in the table below. Compliance with the development standards for detached accessory buildings will be further discussed in Section A.2.b.

S-73 Development Standards			
	Required	Existing	Proposed
Minimum Lot Width	Average 50 ft.	60 ft.	-
Minimum Lot Area	5,000 sq. ft.	7,432 sq. ft.	-
Minimum Front Yard Setback of Residence	20 ft.	25 ft. 7 in.	-
Minimum Left Side Yard Setback of Residence	5 ft.	5 ft.	-
Minimum Right Side Yard Setback of Residence	5 ft.	5 ft.	-
Minimum Rear Yard Setback of Residence	20 ft.	36.5 ft.	-
Maximum Building Height of Residence	28 ft.	23 ft. 1 in.	-
Maximum Lot Coverage ¹	3,716 sq. ft. (50%)	2,116 sq. ft. (28%)	2,451 sq. ft. (32%)
Maximum Floor Area ²	3,232 sq. ft. (43%)	1,881 sq. ft. (25%)	2,216 sq. ft. (29%)
¹ Lot coverage includes all structures 18 inches or more above ground. The first-level and second level decks were included because they are over 18 inches above ground.			
² In the S-73 Zoning District, floor area includes the area of all garages and carports that exceed 400 sq. ft. The garage and carport areas exceeding 400 sq. ft. were included.			

b. Detached Accessory Building Regulations

In the case of interior parcels abutting upon two or more streets, Section 6411(c) of the County Zoning Regulations does not allow detached accessory buildings to encroach upon the outer quarter of the parcel nearest either street. The project parcel abuts upon two streets; Bay Road and Spring Street. The applicant is proposing a 464 sq. ft. detached one-car garage with an attached one-car carport. The accessory building will be located 12.5 feet from the rear property line which is within the quarter of the parcel abutting Spring Street. This proposed location requires a Use Permit. The finding for approval of a Use Permit is discussed in Section A.3 of this report.

With the exception of location, the proposed project complies with all applicable standards for detached accessory buildings as shown in the table below:

Detached Accessory Building Development Standards³		
	Required	Proposed
Maximum Accessory Building Coverage of Rear Yard ⁴	1,114 sq. ft. (30% of Rear Yard)	464 sq. ft. (12% of Rear Yard)
Maximum Accessory Building Floor Area	1,000 sq. ft.	464 sq. ft.
Maximum Plate Height	10 ft.	9 ft.
Minimum Front Yard Setback ⁵	34 ft.	89 ft.

Detached Accessory Building Development Standards³		
	Required	Proposed
Minimum Left Side Yard Setback	3 ft.	31.5 ft.
Minimum Right Side Yard Setback	3 ft.	6 ft.
Minimum Rear Yard Setback ⁵	34 ft.	12.5 ft.
Maximum Accessory Building Height	19 ft.	10 ft. 9 in.
³ Regulated under Sections 6410 and 6411 of the San Mateo County Zoning Regulations.		
⁴ Rear yard of parcel is 3,716 square feet.		
⁵ Regulated by Section 6411(c), as discussed above, which requires detached accessory buildings on interior parcels abutting two or more streets, to only be located within the middle two quarters of the parcel (the subject of this Use Permit application).		

c. Fence Height Regulations

The proposed fence is in compliance with the regulations in Section 6412 of the San Mateo County Zoning Regulations as shown in the chart below:

Fence Height Regulations		
	Required	Proposed
Maximum Height in Front Yard Area	4 feet	-
Maximum Height in Rear Yard Area	6 feet	6 feet ¹
Maximum Height in Side Yard Area	6 feet	-
¹ Proposed 6-foot high fence will be located in a public right-of-way (2 feet from the back of the sidewalk along Spring Street and 6 feet 7 inches from rear property line). The Department of Public Works has reviewed and conditionally approved this project requiring an encroachment permit for all work within the public right-of-way.		

d. Parking Requirements

As discussed in the sections above, the applicant is also proposing to legalize the conversion of the attached two-car garage of the main residence into conditioned space. Pursuant to Section 6119 (*Parking Spaces Required*) of the County Zoning Regulations, a dwelling unit with two or more bedrooms is required to have two covered parking spaces. Since the existing single-family residence has four bedrooms, two covered parking spaces are required. The proposed accessory building, a detached one-car garage with an attached one-car carport, will provide the two covered parking spaces required.

3. Compliance with Use Permit Findings

Pursuant to Section 6503 (Procedure) of the County Zoning Regulations, the granting of a Use Permit is subject to the following finding:

That the establishment, maintenance, and/or conducting of the use will not, under the circumstances of the particular case, result in a significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood.

The applicant is proposing to construct a 464 sq. ft. detached one-car garage with an attached one-car carport to be located 12.5 feet from the rear property line of the subject parcel. Pursuant to Section 6411(c) of the County Zoning Regulations, in the case of interior parcels abutting upon two or more streets, as is the case of the subject parcel (abutting upon Bay Road and Spring Street), no accessory buildings may be erected or altered so as to encroach upon the outer quarter of the parcel nearest either street. The applicant requests a Use Permit to allow the accessory building to be located within the quarter of the parcel abutting upon Spring Street.

The proposed use, an accessory building that is appurtenant to the residential use currently on the parcel, is an allowed use in R-1/S-73 Zoning District and the Single-Family Residential land use designation of the NFOCP. As discussed in the previous sections above, the proposed project includes the legalization of the converted attached two-car garage of the main residence into conditioned space. The accessory building will allow the single-family residential use to comply with the County Zoning Regulations by providing two covered parking spaces.

Based on the preceding discussions in this report, the project is not expected to be detrimental to the public welfare or injurious to property or improvements in the neighborhood. Furthermore, the project will not impact coastal resources as it is not located in the coastal zone.

B. ENVIRONMENTAL REVIEW

This project is categorically exempt pursuant to Section 15303, Class 3, of the California Environmental Quality Act (CEQA) related to the construction of an accessory structure.

C. REVIEW BY THE NORTH FAIR OAKS COMMUNITY COUNCIL

On September 28, 2017, the proposed project was presented to the North Fair Oaks Community Council (NFOCC). Six council members were present and a motion to recommend approval to the Zoning Hearing Officer was passed by a majority vote. All council members voted for approval of the proposed project.

Public notices were required to be sent out ten days prior to the date of the NFOCC meeting. During the public commenting period from September 18, 2017 to September 28, 2017, one comment was received in opposition of the project. The comment included concerns regarding the unmaintained fence in the public

right-of-way along Spring Street, the dilapidated shed in the rear yard, and the conversion of the attached garage into conditioned space.

At the NFOCC meeting, two members of the public stated they were in support of the project. One of the two commenters inquired about the driveway entrance to the proposed detached accessory building and recommended replacement of the existing fence. The other commenter stated the project was minor in scope and will be an aesthetic improvement to the neighborhood.

The proposed project includes the demolition of the shed in the rear yard. The attached garage was converted illegally into conditioned space by the previous owner. The applicant is proposing to remodel the illegally converted area to comply with the California Building Code. Shortly after the NFOCC meeting, the applicant revised the project scope to include the replacement and relocation of the 6-foot high fence in the public right-of-way along Spring Street. The fence will be replaced with a 6-foot high unstained redwood fence that will be located 2 feet from the back of the sidewalk along Spring Street. There will be a 16-foot wide gate and a 3-foot wide gate for rear yard access. The fence will have a see-through design for the upper 2 feet and a solid design for the lower 4 feet. The existing driveway will be widened to 16 feet, and 24-inch planters will be installed between the proposed fence and sidewalk. Lastly, the Building Section and Department of Public Works have reviewed and conditionally approved the proposed project.

D. REVIEWING AGENCIES

Building Section
Department of Public Works
Redwood City Fire Department

ATTACHMENTS

- A. Conditions of Approval
- B. Parcel Map
- C. Project Plans

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County of San Mateo
Planning and Building Department

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2017-00007 Hearing Date: February 15, 2018

Prepared By: Carmelisa Morales For Adoption By: Zoning Hearing Officer
Project Planner

RECOMMENDED FINDINGS

Regarding the Environmental Review, Find:

1. That this project is categorically exempt from environmental review, per Class 1, Section 15301, of the California Environmental Quality Act (CEQA) Guidelines for the construction of an accessory structure.

Regarding the Use Permit, Find:

2. That the establishment, maintenance, and/or conducting of the use will not, under the circumstances of this particular case, result in a significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood, as the project parcel is not located within the Coastal Zone and the proposed accessory building, appurtenant to the residential use currently on the parcel, is an allowed use in the R-1/S-73 Zoning District and the Single-Family Residential land use designation of the North Fair Oaks Community Plan. The project also includes the legalization of the converted attached two-car garage of the main residence into conditioned space. The accessory building will allow the single-family residential use to comply with the County Zoning Regulations by providing two covered parking spaces. The project which includes a new fence with an improved appearance along Spring Street will not be detrimental to the public welfare or injurious to property or improvements in the neighborhood.

RECOMMENDED CONDITIONS OF APPROVAL

Current Planning Section

1. This approval applies only to the proposal, documents, and plans described in this report and submitted to and approved by the Zoning Hearing Officer on February 15, 2018. Minor modifications to the project may be approved by the

Community Development Director if they are consistent with the intent of, and in substantial conformance with, this approval.

2. This use permit shall be valid for one (1) year from the date of approval by which time a valid building permit shall have been issued. Any extension of this permit shall require submittal of an application for permit extension and payment of applicable permit extension fees sixty (60) days prior to expiration.
3. This use permit shall be for the proposed project only. Any change or change in intensity of use shall require an amendment to the use permit. Amendment to this use permit requires an application for amendment, payment of applicable fees, and consideration at a public hearing.
4. This permit does not allow for the removal of any trees. Removal of any trees with a diameter equal to or greater than 12 inches as measured 4.5 feet above the ground shall require a separate tree removal permit.
5. At the building permit stage, a boundary survey will be required.
6. The applicant shall apply for a building permit and shall adhere to all requirements from the Building Inspection Section, the Department of Public Works, and the Redwood City Fire Department.
7. Within one (1) year from the date of final approval, a valid building permit shall be issued and a completed inspection (to the satisfaction of the Building Inspection Section) shall have occurred within 180 days of its issuance, or the approval becomes null and void. Any extension of time shall require the submittal of a written request for permit extension and payment of applicable extension fees sixty (60) days prior to this one (1) year expiration date.
8. The applicant shall include an erosion and sediment control plan to comply with the County's Erosion Control Guidelines on the plans submitted for the building permit. This plan shall identify the type and location of erosion control measures to be installed upon the commencement of construction in order to maintain the stability of the site and prevent erosion and sedimentation off-site. A separate tree protection plan may also be required as part of the building permit. Species and size of trees shall be indicated on the plan (size shall be measured by diameter at breast height (dbh) method).
9. An Erosion Control and/or Tree Protection Inspection may be required prior to the issuance of a building permit for grading, construction, and demolition purposes, as the project requires tree protection of significant tree(s). Once all review agencies have approved the Building Permit, the applicant will be notified that an approved job copy of the Erosion Control and/or Tree Protection Plan is ready for pick-up at the Planning counter of the Planning and Building Department. Once the Erosion Control and/or Tree Protection measures have been installed per the

approved plans, the applicant shall contact Jeremiah Pons, Building/Erosion Control Inspector, at 650/599-1592 or jpons@smcgov.org, to schedule a pre-site inspection. A \$144 inspection fee will be assessed to the Building Permit for the inspection. If the initial pre-site inspection is not approved, an additional inspection fee will be assessed for each required re-inspection until the job site passes the Pre-Site Inspection, or as determined by the Building Inspection Section.

10. Prior to any construction or grading activities, the applicant shall implement erosion and sediment control methods including sensitive habitat exclusion fencing, stabilized construction entranceways, and fiber rolls or silt fencing. Photos of the installed measures shall be submitted to the Planning Department for review and approval. Measures shall be installed prior to the issuance of the grading permit "hard card" and shall be maintained for the duration of the construction activities. Erosion control measure deficiencies, as they occur, shall be immediately corrected.
11. Upon the start of excavation activities and through to the completion of the project, the applicant shall be responsible for ensuring dust control measures are implemented as needed. The intent of the plan shall be to mitigate excessive dust generation resulting from any and all excavation and earth-moving operations.
12. The applicant is responsible for ensuring that all contractors minimize the transport and discharge of pollutants from the project site into water bodies by adhering to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," Items 14.a through 14.I, below.

Additionally, the applicant shall apply for a National Pollutant Discharge Elimination System (NPDES) permit from the Central Coast Region State Water Resources Quality Control Board. A copy of this permit shall be submitted to the Planning Department and the Department of Public Works.

- a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 1 and April 30. Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area.
- b. Storing, handling, and disposing of construction materials and wastes properly, so as to prevent their contact with stormwater.
- c. Controlling and preventing the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.

- d. Using sediment controls or filtration to remove sediment when dewatering site and obtaining all necessary permits.
 - e. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
 - f. Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses.
 - g. Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
 - h. Performing clearing and earth-moving activities only during dry weather.
 - i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
 - j. Limiting construction access routes and stabilizing designated access points.
 - k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
 - l. The contractor shall train and provide instruction to all employees and subcontractors regarding the construction best management practices.
13. Construction equipment shall comply with the County's Energy Efficiency Climate Action Plan (EECAP) for construction vehicle idling as applicable considering the sensitive nature of the project area. Specifically, Bay Area Air Quality Management District Best Management Practices for Mitigating Criteria Air Pollutants and Precursors:
- a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
 - b. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
 - c. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day.
 - d. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
 - e. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of

California Code of Regulations). Clear signage shall be provided for construction workers at all access points.

- f. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
 - g. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
14. To reduce the impact of construction activities on neighboring properties, comply with the following:
- a. All debris shall be contained on-site; a dumpster or trash bin shall be provided on site during construction to prevent debris from blowing onto adjacent properties. The applicant shall monitor the site to ensure that trash is picked up and appropriately disposed of daily.
 - b. The applicant shall remove all construction equipment from the site upon completion of the use and/or need of each piece of equipment which shall include but not be limited to tractors, back hoes, cement mixers, etc.
 - c. The applicant shall ensure that no construction-related vehicles shall impede through traffic along the right-of-way on Bay Road and Spring Street. All construction vehicles shall be parked on-site outside the public right-of-way or in locations which do not impede safe access on Bay Road and Spring Street. There shall be no storage of construction vehicles in the public right-of-way.
15. Noise sources associated with demolition, construction, repair, remodeling, or grading of any real property shall be limited to the hours from 7:00 a.m. to 6:00 p.m., weekdays and 9:00 a.m. to 5:00 p.m., Saturdays. Said activities are prohibited on Sundays, Thanksgiving, and Christmas (San Mateo Ordinance Code Section 4.88.360).

Department of Public Works

- 16. Prior to the issuance of the building permit, the applicant will be required to provide payment of "roadway mitigation fees" based on the square footage (assessable space) of the proposed building per Ordinance #3277.
- 17. The existing fence shall be removed and the new fence must be relocated to a distance of 2 feet behind the back of the sidewalk along Spring Street. The lower 4 feet of fence may be solid. However, the upper 2 feet of fence must be

constructed of see-through material for adequate sight distance for vehicle ingress and egress from garage.

18. The applicant shall apply separately for an encroachment permit from the Department of Public Works for all proposed work, including landscaping and fence, within the County right-of-way prior to commencing any work. The application shall be accompanied by plans specific to work in the public right-of-way, and shall conform to County standards and special provisions. No work shall commence until the encroachment permit has been issued. The applicant shall contact a Department of Public Works Inspector 48 hours prior to commencing work in the right-of-way. Please note all encroachment permits are revocable permits.

19. Prior to the issuance of the Building permit or Planning permit (for Provision C3 Regulated Projects), the applicant shall have prepared, by a registered civil engineer, a drainage analysis of the proposed project and submit it to the Department of Public Works for review and approval. The drainage analysis shall consist of a written narrative and a plan. The flow of the stormwater onto, over, and off of the property shall be detailed on the plan and shall include adjacent lands as appropriate to clearly depict the pattern of flow. The analysis shall detail the measures necessary to certify adequate drainage. Post-development flows and velocities shall not exceed those that existed in the pre-developed state. Recommended measures shall be designed and included in the improvement plans and submitted to the Department of Public Works for review and approval.

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