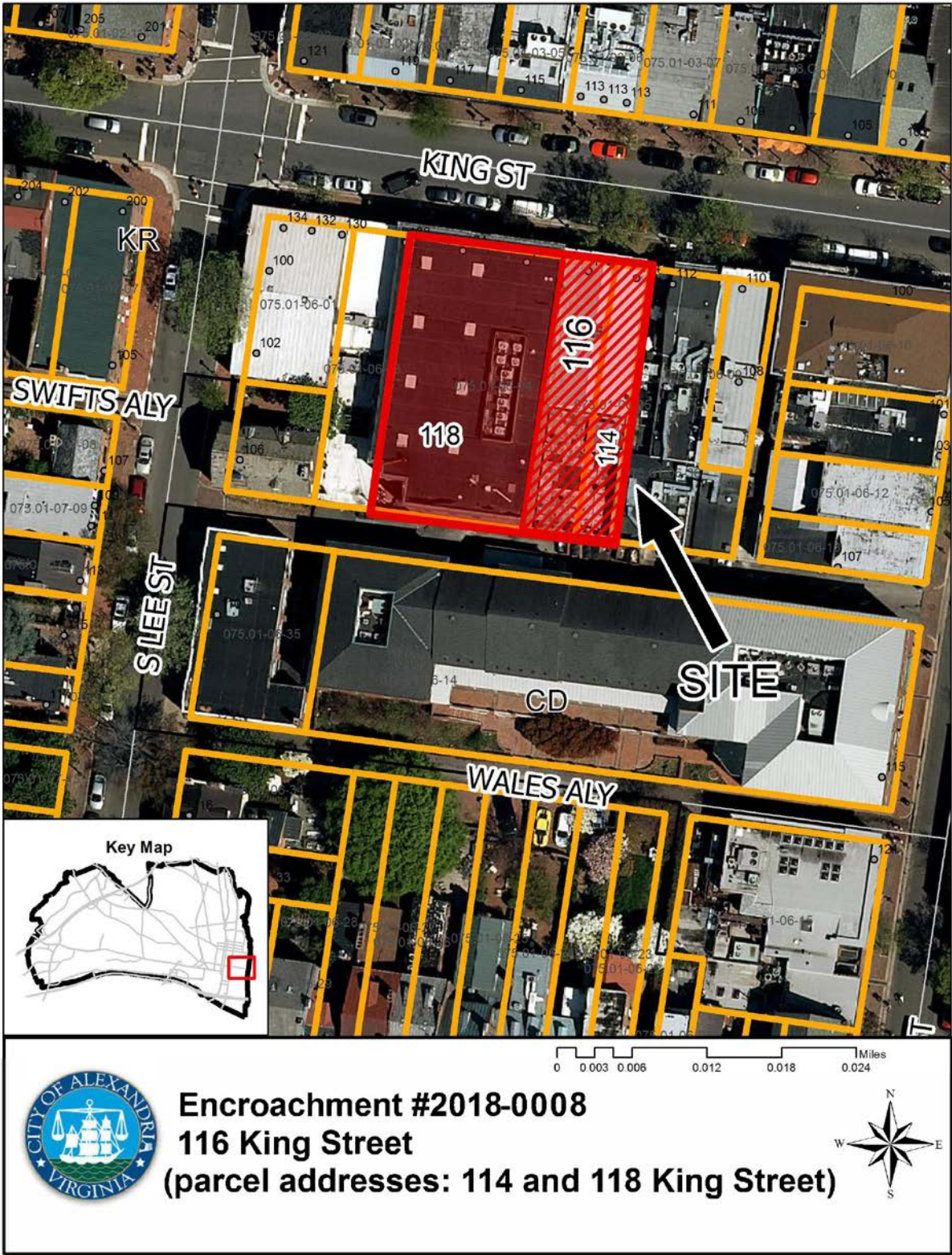
**DOCKET ITEM #19****Encroachment #2018-0008****116 King Street (parcel address: 114 & 118 King Street) –
Urbano 116**

Application		General Data	
Request: Public hearing and consideration of a request for an encroachment adjacent to 116 King Street into the public right-of-way for a customer service line and access to an outdoor carry-out window.		Planning Commission Hearing:	September 4, 2018
		City Council Hearing:	September 15, 2018
Address: 116 King Street (parcel address: 118 King Street)		Zone:	KR/King Street Retail
Applicant: Urbano 116, LLC		Small Area Plan:	Old Town

Staff Recommendation: *APPROVAL* subject to compliance with all applicable codes and ordinances and the recommended permit conditions found in Section III of this report.

Staff Reviewers: Heba ElGawish, heba.elgawish@alexandriava.gov



I. DISCUSSION

The applicant, Urbano 116, LLC, requests approval for an encroachment into the public right-of-way at 116 King Street to allow for customers to access a carry-out window and to form a queue line at a soon-to-be opened restaurant.

SITE DESCRIPTION

The subject property is one lot of record with 30 feet of frontage on King Street, a depth of 116 feet, and a lot area of 10,216 square feet. The rear of the lot fronts an alley connecting S. Lee St. and S. Union Street. A two-story commercial building with two tenant spaces exists on the site.

A mix of commercial uses surrounds the building as the 100-block of King Street features a variety of restaurants, boutiques, specialty retail and personal services. Residential and office uses generally occupy the upper floors of the nearby rowhouse structures while the ground floors are occupied by commercial establishments. Ground floor retail includes a boutique and a women's clothing store, two gift shops, a stationary store, along with a yoga studio and a variety of restaurants.



Figure 1: 116 King Street

BACKGROUND

In February 2018, City Council approved SUP#2017-0124 to operate a 163-seat restaurant, featuring Mexican-cuisine and a full-service bar, in a 3,904 square feet tenant space. Interior renovations for Urbano 116 are underway and the restaurant has not opened for business.

A separate BAR Certificate of Appropriateness for exterior alterations to replace the existing bay window with a flush, retractable window was approved by BAR in July 2018.

PROPOSAL

The applicant requests approval of an encroachment into the public right-of-way to provide access to an outdoor carry-out window and for a patron queue line at a restaurant that will open later this year. The encroachment would be 3.5 feet from the building into the public right-of-way with a total length of 18 feet. The total area of requested encroachment is approximately 63 square feet (Figure 2)

The applicant has also submitted a Special Use Permit amendment request (SUP #2018-0052) to add a carry-out window feature at Urbano 116 for City Council review at its September 2018 hearing.

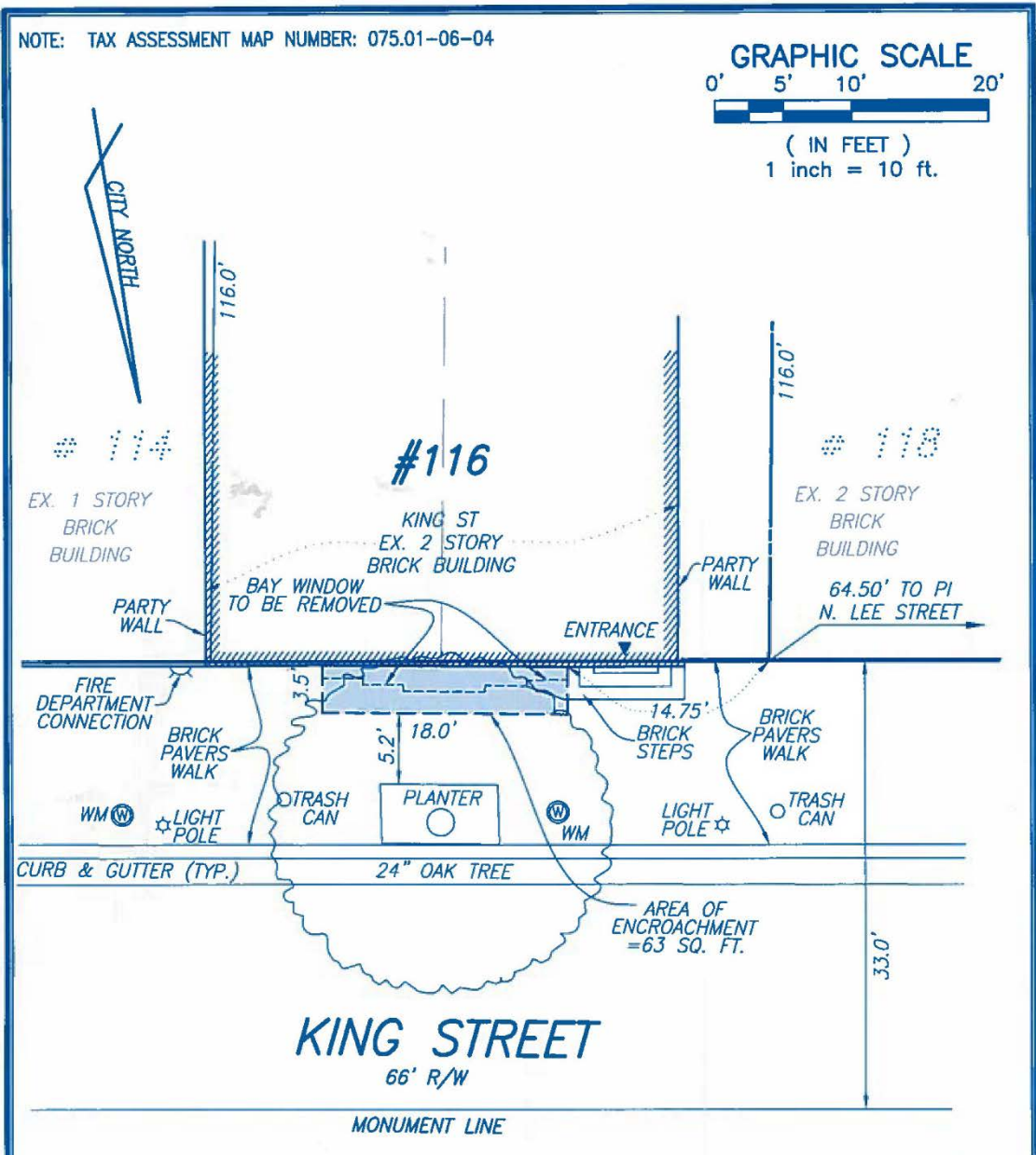


Figure 2: Plat showing area of Encroachment

ZONING/MASTER PLAN DESIGNATION

The subject property is located in the KR/King Street Retail Zone. The restaurant use is consistent with the Old Town Small Area Plan which designates the property for commercial use.

The subject site is located within the boundaries of the Old and Historic District. A separate Certificate of Appropriateness for exterior alterations to replace the existing bay window with a flush, retractable window has been submitted and approved by BAR in July 2018.

VALUE OF ENCROACHMENT

Section 3-2-85 of the City Code defines the annual charge for commercial encroachments to be the equivalent of what would be the real estate tax upon the land being encroached if it were owned by the owner of the encroaching property. The Department of Real Estate Assessments has valued the land and air-rights area in question at a rate of \$1.13 per \$100 of assessed value for an annual encroachment fee of \$185 (rounded). (See attached Memorandum, dated August 9, 2018.)

II. STAFF ANALYSIS

Staff supports the applicant's request for an encroachment into the public right-of-way to operate an outdoor carry-out service window in conjunction with an existing restaurant approval. The proposed encroachment area would allow for at least a five-foot pedestrian right-of-way which is consistent with the minimum right-of-way required for outdoor dining through the King Street Outdoor Dining Program. A requirement for a barrier to separate the pedestrian walkway and the patron queue line is mandated in Condition 1.

III. RECOMMENDED CONDITIONS

Staff recommends **approval** subject to compliance with all applicable codes and ordinances and the following conditions:

1. An unobstructed and clear 5' sidewalk shall be maintained at all times by installing a barrier, separating the patron queue line from the five-foot pedestrian right-of-way consistent with the area of encroachment. The barrier design must be consistent with the King Street Outdoor Dining Design Guidelines and subject to approval of the Director of Planning and Zoning. (P&Z) (T&ES)
2. The applicant (and his/her successors, if any) must obtain and maintain a policy of general liability insurance in the amount of \$1,000,000, which will indemnify the applicant (and his/her successors, if any) and the City of Alexandria, as an additional named insured, against all claims, demands, suits, etc., and all costs related thereto, including attorney fees, relating to any bodily injury or property damage which may occur as a result of the granting of this encroachment. (T&ES)
3. Neither the City nor any Private utility company will be held responsible for damage to the private improvements in the public right-of-way during repair, maintenance or replacement of any utilities that may be located within the area of the proposed encroachment. (T&ES)
4. In the event the City shall, in the future, have need for the area of the proposed encroachment, the applicant shall remove any structure that encroached into the public right-of-way, within 60 days, upon notification by the City. (T&ES)
5. The "applicant" shall bear all the cost associated with the removal of the encroachments. (T&ES)

STAFF: Anthony LaColla, Division Chief, Land Use Regulatory Services,
Department of Planning and Zoning;
Heba ElGawish, Urban Planner, Planning and Zoning.

IV. CITY DEPARTMENT COMMENTS

Legend: C - code requirement R - recommendation S - suggestion F - finding

Transportation & Environmental Services:

- R-1 The applicant (and his/her successors, if any) must obtain and maintain a policy of general liability insurance in the amount of \$1,000,000, which will indemnify the applicant (and his/her successors, if any) and the City of Alexandria, as an additional named insured, against all claims, demands, suits, etc., and all costs related thereto, including attorney fees, relating to any bodily injury or property damage which may occur as a result of the granting of this encroachment. (T&ES)
- R-2 Neither the City nor any Private utility company will be held responsible for damage to the private improvements in the public right-of-way during repair, maintenance or replacement of any utilities that may be located within the area of the proposed encroachment. (T&ES)
- R-3 In the event the City shall, in the future, have need for the area of the proposed encroachment, the applicant shall remove any structure that encroached into the public right-of-way, within 60 days, upon notification by the City. (T&ES)
- R-4 The “applicant” shall bear all the cost associated with the removal of the encroachments. (T&ES)

Code Enforcement:

- C - 1 Sites, buildings and structures shall be accessible to persons with physical disabilities, per the current edition of USBC.
- C - 2 Recommend a code consultation with the building code department prior to approval.

Fire Department:

No comments received.

Health Department

No comments received.

Police Department:

No comments received.

Parks and Recreation:

No comments received.

Real Estate Assessments:

See attached Memorandum, dated August 9, 2018.

REVISED



APPLICATION

ENCROACHMENT

ENC# _____

PROPERTY LOCATION: 116 KING STREET
TAX MAP REFERENCE: 675.01-06-04 ZONE: KR/CBD

APPLICANT

Name: URBANO 116, LLC
Address: 116 KING STREET, ALEXANDRIA VA 22314

PROPERTY OWNER

Name: GLD TOWN 2, LLC
Address: 1616 CAMDEN ROAD, SUITE 210 / CHARLOTTE, NC 28203

PROPOSED USE: ENCROACHMENT FOR CARRY OUT WINDOW. CURRENT
BAY WINDOW ENCROACHES 2' INTO ROW AND WILL BE
REMOVED DURING RENOVATION. NEW FLUSH WINDOW INSTALLED
THUS RETURNING 2' ENCROACHMENT BACK TO SIDE WALK TO BE
USED AS LINE FOR WINDOW.

INSURANCE CARRIER (copy attached) ERIE POLICY # Q430250609 USED AS

A certificate of general liability insurance in the amount of \$1,000,000 which will indemnify the owner and names the city as an additional insured must be attached to this application. LINE FOR WINDOW.

☒ **THE UNDERSIGNED** hereby applies for an Encroachment Ordinance in accordance with the provisions of Section 8-1-16 and Sections 3-2-82 and 85 of the Code of the City of Alexandria, Virginia.

☐ **THE UNDERSIGNED** hereby applies for an Administrative Use Permit in accordance with the provisions of Article VI, Section 6-600 of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

☒ **THE UNDERSIGNED**, having obtained permission from the property owner, hereby grants permission to the City of Alexandria to post placard notice on the property for which this application is requested, pursuant to Article XI, Section 11-301 (B) of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

☒ **THE UNDERSIGNED** I so attests that all of the information herein provided and specifically including all surveys, drawings, etc., required of the applicant are true, correct and accurate to the best of their knowledge and belief.

JUSTIN SPARROW
Print Name of Applicant or Agent
1191 N. FAIRFAX ST., SUITE 210
Mailing/Street Address
ALEXANDRIA VA 22314
City and State Zip Code

[Signature]
Signature
(703-813-5554 / 703-622-3282 (M))
Telephone # Fax #
jsparrow@advancedconstructgroup.com
Email address
6/7/12
Date

Application Received: _____ Date and Fee Paid: \$ _____
ACTION - PLANNING COMMISSION: _____ ACTION - CITY COUNCIL: _____

OWNERSHIP AND DISCLOSURE STATEMENT

Use additional sheets if necessary

1. Applicant. State the name, address and percent of ownership of any person or entity owning an interest in the applicant, unless the entity is a corporation or partnership, in which case identify each owner of more than three percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

URBANO 116, LLC

Name	Address	Percent of Ownership
1. JUSTIN SPARROW	1194 N. FAIRFAX ST., SUITE 210 ALEXANDRIA, VA 22314	33.33%
2. CHAD SPARROW	SAME	33.33%
3. LARRY WALSTON, JR.	SAME	33.33%

2. Property. State the name, address and percent of ownership of any person or entity owning an interest in the property located at _____ (address), unless the entity is a corporation or partnership, in which case identify each owner of more than three percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

Name	Address	Percent of Ownership
1. OLD TOWN 2, LLC	1616 CANNON ROAD, SUITE 210 CHARLOTTE, NC 28203	100%
2. SEE ATTACHED		
3.		

3. Business or Financial Relationships. Each person or entity indicated above in sections 1 and 2, with an ownership interest in the applicant or in the subject property are required to disclose any business or financial relationship, as defined by [Section 11-350 of the Zoning Ordinance](#), existing at the time of this application, or within the 12-month period prior to the submission of this application with any member of the Alexandria City Council, Planning Commission, Board of Zoning Appeals or either Boards of Architectural Review. All fields must be filled out completely. Do not leave blank. (If there are no relationships please indicate each person or entity and "None" in the corresponding fields).

For a list of current council, commission and board members, as well as the definition of business and financial relationship, [click here](#).

Name of person or entity	Relationship as defined by Section 11-350 of the Zoning Ordinance	Member of the Approving Body (i.e. City Council, Planning Commission, etc.)
1. OLD TOWN 2, LLC	NONE	N/A
2. URBANO 116, LLC	NONE	N/A
3. JUSTIN SPARROW/CHAD SPARROW/LARRY WALSTON, JR.	NONE	N/A

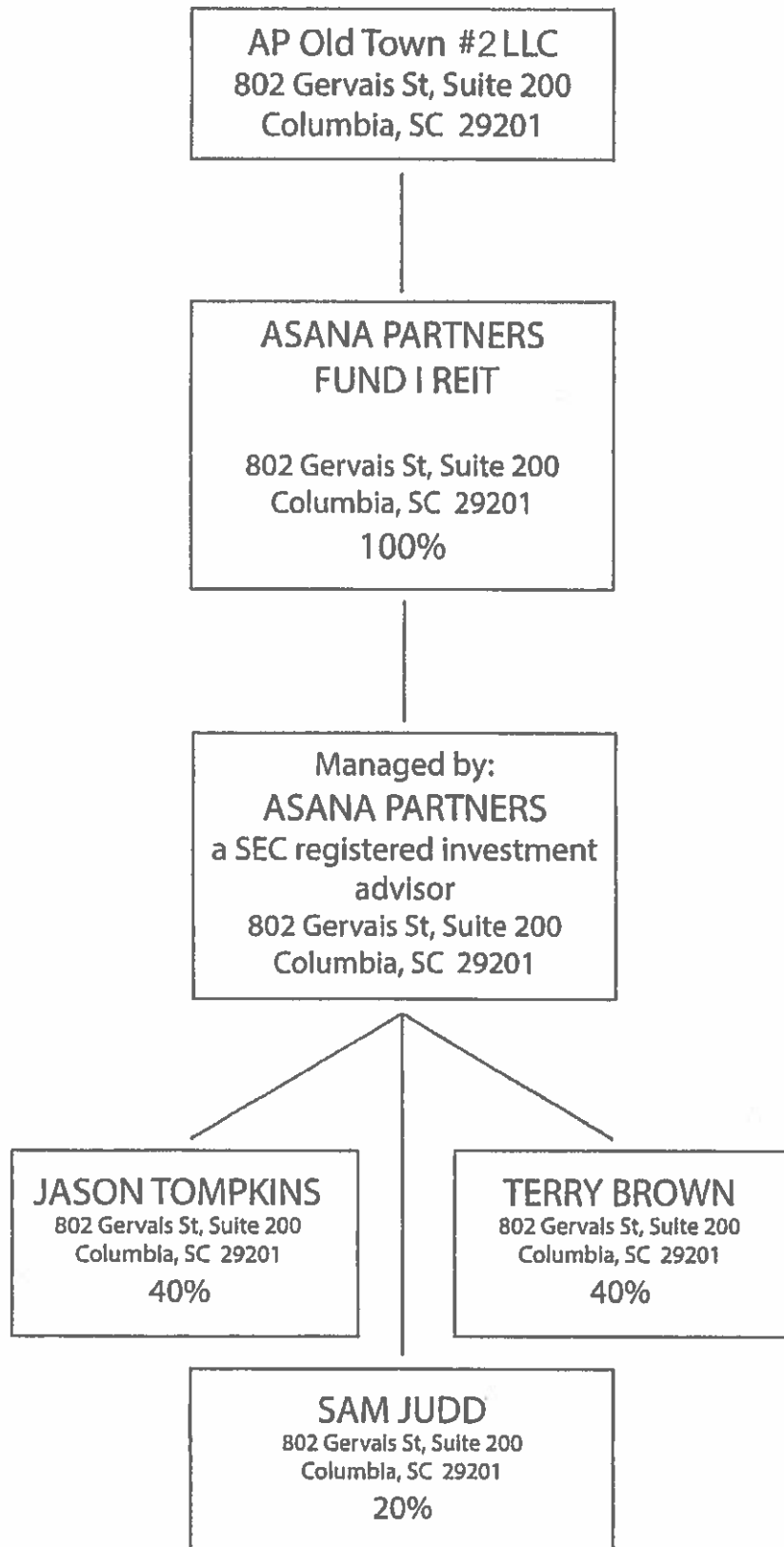
NOTE: Business or financial relationships of the type described in Sec. 11-350 that arise after the filing of this application and before each public hearing must be disclosed prior to the public hearings.

As the applicant or the applicant's authorized agent, I hereby attest to the best of my ability that the information provided above is true and correct.

5/16/18
Date

JUSTIN A. SPARROW
Printed Name


Signature



May 17, 2018

City of Alexandria
Department of Planning & Zoning
301 King Street
Alexandria, VA 22314

To whom it may concern:

Old Town 2, LLC is the owner of 116 King Street and has entered into a lease with Urbano 116, LLC to operate a new Mexican Restaurant within the space. We have reviewed the proposed changes and approve. Urbano 116, LLC has our permission to move forward with the application and subsequent changes to the building.

Thank you,

Old Town 2, LLC c/o Asana Partners

A handwritten signature in blue ink, appearing to read 'Reed Kracke', is written over the printed name.

Reed Kracke



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

06/26/2018

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER		CONTACT NAME	
Downs & Associates, Inc.		PHONE (A/C No. Ext.) (703)834-3120	
Suite 300		FAX (A/C No.) (703)834-3159	
131 Elden Street		E-MAIL ADDRESS	
Herndon VA 20170		INSURER(S) AFFORDING COVERAGE	
		INSURER A Erie Insurance Exchange	
		INSURER B Erie Flagship	
		INSURER C	
		INSURER D	
		INSURER E	
		INSURER F	
INSURED		NAIC #	
Advanced Construction Group & GCA Floors LLC		26271	
1199 N Fairfax St, Suite 210		35585	
Alexandria, VA 22314			

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL SUBR INSD WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	☒ COMMERCIAL GENERAL LIABILITY ☐ CLAIMS-MADE ☒ OCCUR GEN'L AGGREGATE LIMIT APPLIES PER ☐ POLICY ☒ PROJECT ☐ LOC ☐ OTHER	Y	N	Q430250609	7/2/2017	7/2/2019	
						EACH OCCURRENCE \$ 1,000,000	
						DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000	
						MED EXP (Any one person) \$ 5,000	
						PERSONAL & ADV INJURY \$ 1,000,000	
						GENERAL AGGREGATE \$ 2,000,000	
						PRODUCTS - COMPROP AGG \$ 2,000,000	
						\$	
A	☒ AUTOMOBILE LIABILITY ☒ ANY AUTO ☐ ALL OWNED AUTOS ☒ HIRED AUTOS ☐ SCHEDULED AUTOS ☒ NON-OWNED AUTOS	Y	N	Q070230576	7/2/2017	7/2/2019	
						COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000	
						BODILY INJURY (Per person) \$	
						BODILY INJURY (Per accident) \$	
						PROPERTY DAMAGE (Per accident) \$	
						\$	
A	☒ UMBRELLA LIAB ☒ OCCUR ☐ EXCESS LIAB ☐ CLAIMS-MADE ☐ DED ☒ RETENTION \$ 0	Y	N	Q310270161	7/2/2017	7/2/2019	
						EACH OCCURRENCE \$ 10,000,000	
						AGGREGATE \$ 10,000,000	
						\$	
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) if yes, describe under DESCRIPTION OF OPERATIONS below	Y/N Y	N/A	N	Q915200154 (DC, MD, VA)	7/2/2017	7/2/2019
						☒ PER STATUTE ☐ OTHER	
						E L EACH ACCIDENT \$ 1,000,000	
						E L DISEASE - EA EMPLOYEE \$ 1,000,000	
						E L DISEASE - POLICY LIMIT \$ 1,000,000	

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

City of Alexandria is listed as an additional insured.

CERTIFICATE HOLDER

CANCELLATION

City of Alexandria
301 King Street

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Virginia Delcid

Alexandria

VA 22314

Fax:

Email:

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ACORD 25 (2014/01)

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METES AND BOUNDS DESCRIPTION

**ENCROACHMENT AREA
#116 KING STREET**

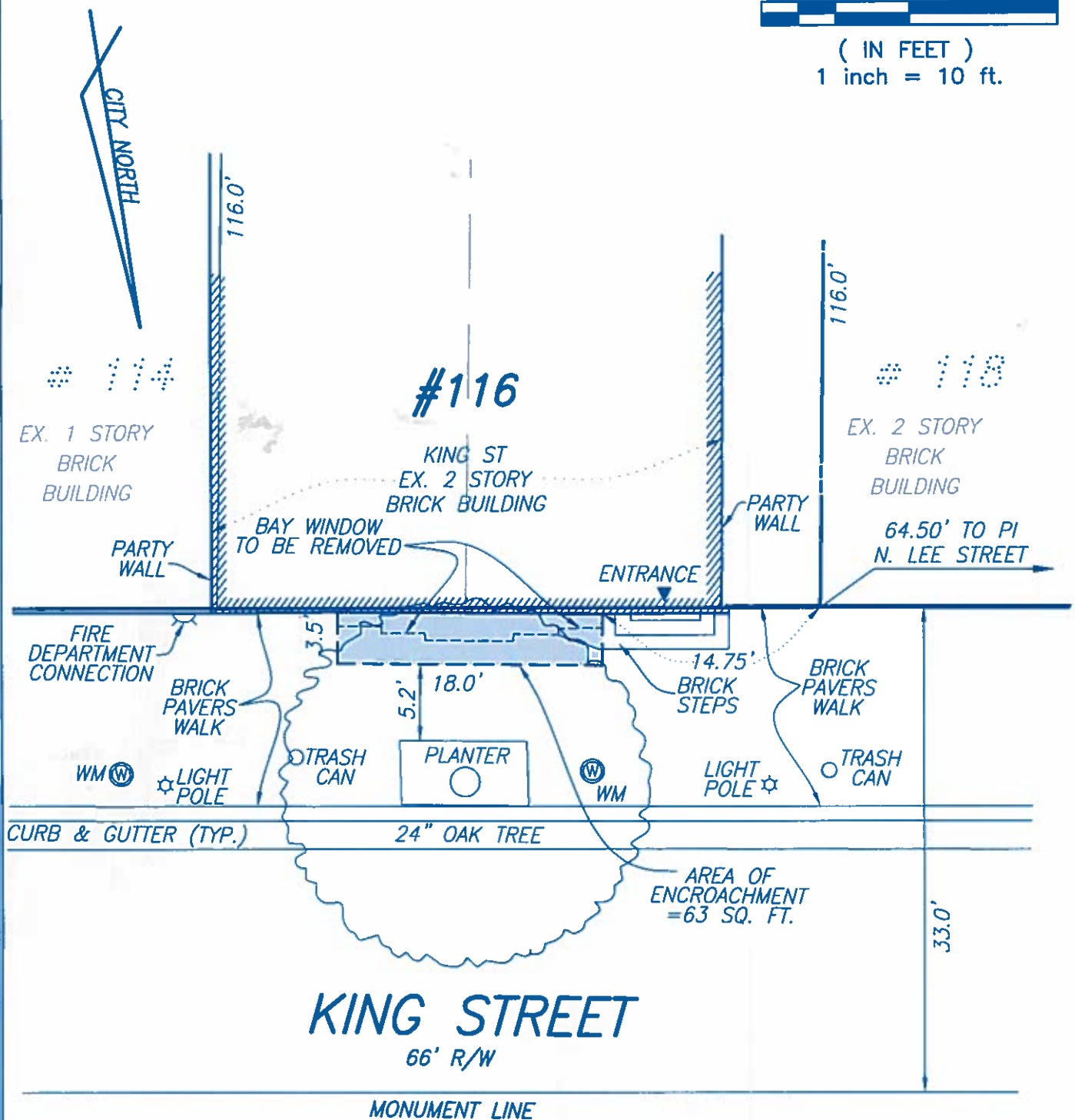
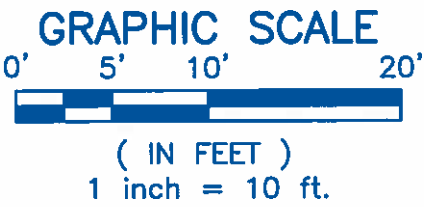
CITY OF ALEXANDRIA, VIRGINIA

BEING A STRIP OF LAND HEREINAFTER DESCRIBED RUNNING IN, THROUGH, OVER AND ACROSS PART OF THE RIGHT-OF-WAY OF KING STREET, LYING AND BEING SITUATED IN THE CITY OF ALEXANDRIA, VIRGINIA AND BEING MORE PARTICULARLY BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT LOCATED 79.25 FEET EAST OF THE INTERSECTION OF THE SOUTHERLY RIGHT-OF-WAY LIMITS OF KING STREET WITH THE EASTERLY RIGHT-OF-WAY LIMITS OF N. LEE STREET, THENCE DEPARTING SAID SOUTHERLY LIMITS AND RUNNING PARALLEL WITH THE SAID EASTERLY LIMITS OF N. LEE STREET;

- 1) 3.5 FEET IN A NORTHERLY DIRECTION TO A POINT, THENCE RUNNING PARALLEL WITH THE SAID SOUTHERLY LIMITS OF KING STREET;
- 2) 18.0 FEET IN AN EASTERLY DIRECTION TO A POINT, THENCE RUNNING PARALLEL WITH THE SAID EASTERLY LIMITS OF N. LEE STREET;
- 3) 3.5 FEET IN A SOUTHERLY DIRECTION TO A POINT LOCATED AT THE SOUTHERLY RIGHT-OF-WAY LIMITS OF KING STREET, THENCE RUNNING ALONG SAID RIGHT-OF-WAY LIMITS;
- 4) 18.0 FEET IN A WESTERLY DIRECTION TO THE POINT OF BEGINNING.

CONTAINING 63 SQUARE FEET OR 0.0014 ACRES OF LAND



ENCROACHMENT PLAT

SHOWING AREA OF ENCROACHMENT
FOR WINDOW (PASS THRU SERVICE)
ON THE PROPERTY LOCATED AT

#116 KING STREET

DB. 383, PG. 481

CITY OF ALEXANDRIA, VIRGINIA

SCALE: 1" = 10'
DATE: JUNE 26, 2018

OWNER: OLD TOWN 2 LLC.
CLIENT: JUSTIN SPARROW

INSTR.: #170012792
PLAT SUBJECT TO
RESTRICTIONS OF RECORD.
TITLE REPORT NOT FURNISHED,
THUS ALL EASEMENTS MAY NOT
BE SHOWN.

RC FIELDS
& ASSOCIATES, INC.
ENGINEERING • LAND SURVEYING • PLANNING
730 S. Washington Street
Alexandria, Virginia 22314
www.rcfassoc.com
(703) 549-6422



I HEREBY CERTIFY THAT THE POSITIONS OF ALL THE EXISTING IMPROVEMENTS HAVE BEEN CAREFULLY ESTABLISHED BY A TRANSIT TAPE SURVEY AND/OR WITH CALIBRATED ELECTRONIC DISTANCE MEASURING EQUIPMENT AND, UNLESS OTHERWISE SHOWN, THERE ARE NO VISIBLE ENCROACHMENTS.

City of Alexandria, Virginia

MEMORANDUM

DATE: AUGUST 9, 2018

TO: KARL MORITZ, DIRECTOR
DEPARTMENT OF PLANNING AND ZONING

FROM: WILLIAM BRYAN PAGE, SRA, REAL ESTATE ASSESSOR
OFFICE OF REAL ESTATE ASSESSMENTS

ADDRESS: 116 KING STREET, ALEXANDRIA, VIRGINIA

SUBJECT: 3.5 FEET WIDE BY 18 FEET LONG ENCROACHMENT ALONG THE 100
BLOCK OF KING STREET, ALEXANDRIA, VIRGINIA

ACCOUNT: 12642510 (PART, MULTIPLE ADDRESSES)

PROJECT: ENCROACHMENT #2018-0008 (RELATED SUP: 2017-00124)

Per your request, we have reviewed the proposed encroachment into the public right-of-way along the south side of King Street just west of its intersection with Union Street. The actual encroachment consists of a 63 square-foot strip of brick-paved sidewalk that is flush with the northern elevation of the building at 114 – 116 King Street. It will project out into the right-of-way a distance of 3.5 feet and extend a distance of 18 feet. The existing bay window will be removed and a new storefront window in compliance with existing architectural guidelines will be installed in its place; a portion of which will be used for carry out service in association with the Urbano Restaurant. The actual proposed encroachment will function as a service line for the operation.

The proposed use is within two contiguous two-story masonry buildings constructed at various times containing a net leaseable floor area of 20,070 square feet. The improvements are sited on a parcel containing 10,046 square feet indicating a floor area ratio of 2.0. It is zoned KR (King Street Urban Retail).

The value of the encroachment can be determined by the application of **Section 3-2-85** of the City Code which defines the annual charge for commercial encroachments to be the equivalent of what would be the real estate tax upon the land being encroached if it were owned by the owner or owners of the encroaching property.

Based on a land value of \$260 per square-foot, a land encroachment area of 63 square feet and the 2018 tax rate of 1.13 per \$100 of assessed value, the indicated **annual fee** of the encroachment is \$185.00 (rounded).

One Hundred and Eighty-Five Dollars

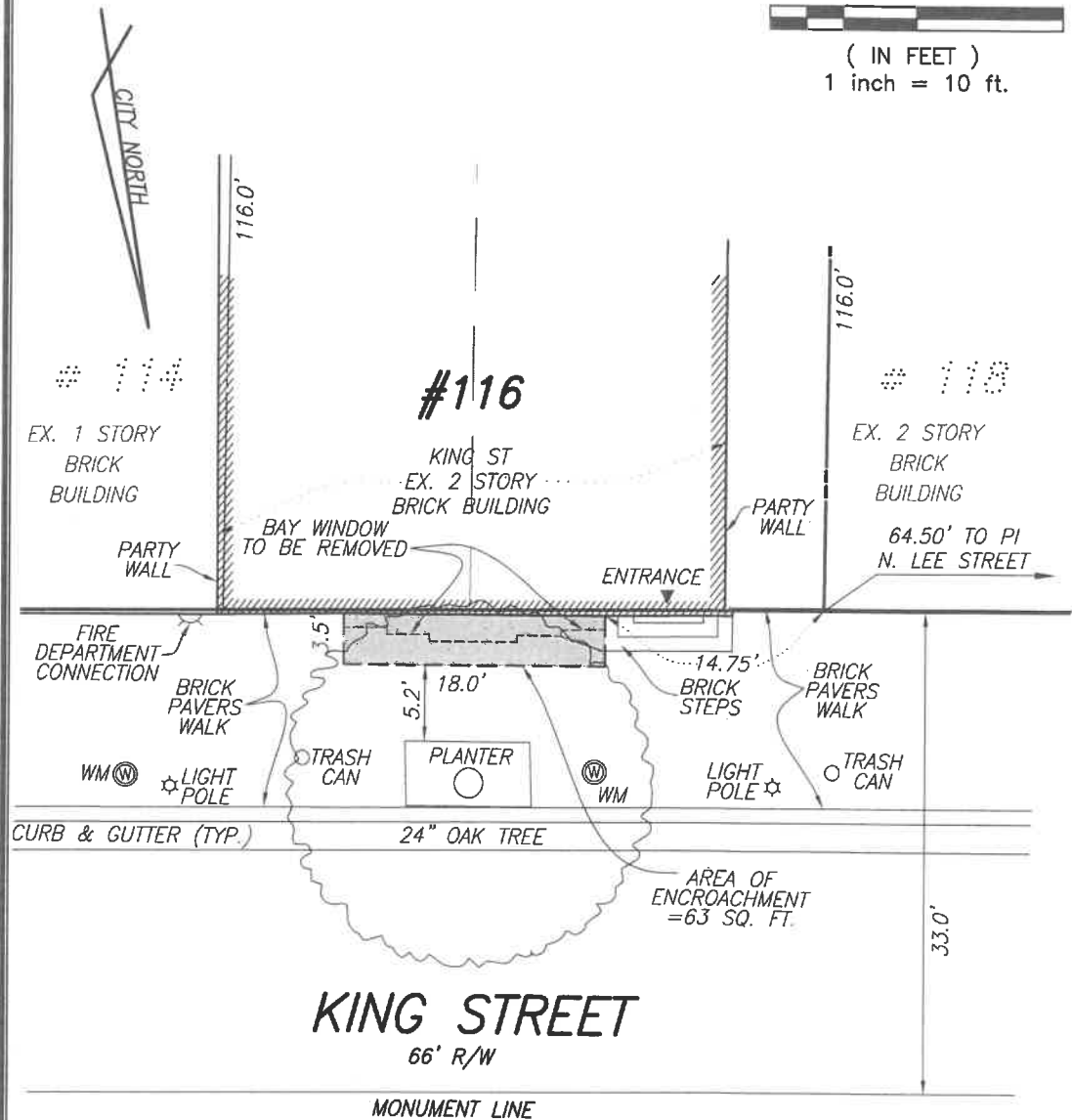
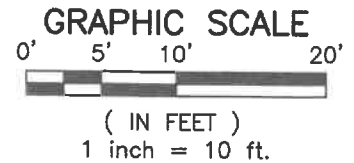
This analysis does not constitute a fully documented real property appraisal report and should not be purported as such. The analysis is based on the current 2018 per square-foot assessed land values of the subject and similarly zoned parcels in the immediate area of the subject property, and complies with City policies and guidelines.

Attachments

Encroachment Plat (ENC# 2018-0008)

cc: Ann Horowitz, Urban Planner II
Heba ElGawish, Urban Planner

NOTE: TAX ASSESSMENT MAP NUMBER: 075.01-06-04



ENCROACHMENT PLAT

SHOWING AREA OF ENCROACHMENT
FOR WINDOW (PASS THRU SERVICE)
ON THE PROPERTY LOCATED AT

#116 KING STREET

DB. 383, PG. 481

CITY OF ALEXANDRIA, VIRGINIA

SCALE: 1" = 10'
DATE: JUNE 26, 2018

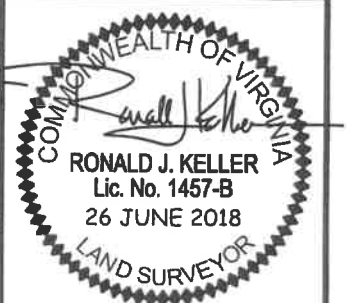
INSTR.: #170012792
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TITLE REPORT NOT FURNISHED,
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OWNER: OLD TOWN 2 LLC.
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I HEREBY CERTIFY THAT THE POSITIONS OF ALL THE EXISTING IMPROVEMENTS HAVE
BEEN CAREFULLY ESTABLISHED BY A TRANSIT TAPE SURVEY AND/OR WITH
CALIBRATED ELECTRONIC DISTANCE MEASURING EQUIPMENT AND, UNLESS
OTHERWISE SHOWN, THERE ARE NO VISIBLE ENCROACHMENTS.

DRAFTED: JN CHECKED: WDS





TOTAL
EXISTING
BAY TO
BE REMOVED

#1







