MCPB Item # 1/22/09



MEMORANDUM

DATE:

January 9, 2008

TO:

Montgomery County Planning Board

VIA:

Rose Krasnow, Chief

Catherine Conlon, Subdivision Supervisor

Build Division

FROM:

Patrick Butler, Planner (301-495-4561)

Build Division

REVIEW TYPE:

Preliminary Plan of Subdivision

APPLYING FOR:

Resubdivision of Lot 17, Block K, of the Finlandia Subdivision into two

lots. One new one-family detached dwelling unit and one existing one-

family detached dwelling unit are proposed.

PROJECT NAME: Finlandia

Finlandia 120080380

CASE #:
REVIEW BASIS:

Chapter 50, Montgomery County Subdivision Regulations

ZONE:

RE-2

LOCATION:

Hanson Road, approximately 700 feet northwest of Hilton Road

MASTER PLAN:

Damascus

APPLICANT:

Neal H. King

ENGINEER:

Benning & Associates, Inc.

FILING DATE:

May 30, 2008

HEARING DATE:

January 22, 2009

RECOMMENDATION: Approval subject to the following conditions:

- 1) Approval under this preliminary plan is limited to two lots for two one-family detached dwelling units.
- The applicant must comply with the conditions of approval for the preliminary forest conservation plan prior to recording of a plat or Montgomery County Department of Permitting Services (MCDPS) issuance of sediment and erosion control permit, as applicable.
- The record plat(s) must reflect a Category I Conservation Easement over the entire stream valley buffer and the 5.18 acres of retained forest.
- The applicant must comply with the conditions of the MCDPS stormwater management concept approval dated June 4, 2008. These conditions may be amended by MCDPS, as long as the amendments do not conflict with other conditions of the preliminary plan approval.
- The applicant must comply with the conditions of the MCDPS, Well and Septic Section approval dated October 24, 2008. These conditions may be amended by MCDPS, as long as the amendments do not conflict with other conditions of the preliminary plan approval.
- The applicant must comply with the conditions of the Montgomery County Department of Transportation (MCDOT) letter dated July 15, 2008. These conditions may be amended by MCDOT, as long as the amendments do not conflict with other conditions of the preliminary plan approval.
- 7) The applicant must satisfy provisions for access and improvements as required by MCDOT prior to recordation of plat.
- 8) The Adequate Public Facility (APF) review for the preliminary plan will remain valid for sixty-one (61) months from the date of mailing of the Planning Board resolution.
- 9) The record plat must show necessary easements.

SITE DESCRIPTION (Attachment A – Vicinity Map)

The Subject Property, as shown below and in Attachment A, consists of approximately 10.008 acres in the RE-2 zone. The Property is a recorded lot described as Lot 17, Block A, of the Finlandia Subdivision, located on Hanson Road, approximately 700 feet northwest of Hilton Road in the Damascus Master Plan area. A one-family detached residential dwelling unit currently exists on the Property with driveway access from Hanson Road. The land surrounding the subject property to the north and west is zoned RE-2, while the land abutting and surrounding the subject property to the south and east is zoned RC. The surrounding area can be characterized as rural with a mixture of forest, farms, and pockets of low density residential development.

The Subject Property is located in the Great Seneca Creek watershed. A stream flows through the southwest portion of the Property, which includes a 100-year floodplain and stream valley buffer. There are steep slopes and a small area of erodible soils located within the stream valley buffer. There are approximately 7.66 acres of existing forest, but no identified wetlands on the Subject Property.



PROJECT DESCRIPTION (Attachment B – Proposed Plan)

The applicant proposes to resubdivide the Subject Property and create two lots for two one-family detached dwelling units. The proposed lots are 3.1 acres, and 6.9 acres in size, and will be served by private wells and private septic systems. The applicant is proposing to retain the existing dwelling on the 6.9 acre lot.



ANALYSIS AND FINDINGS

Master Plan Compliance

The Damascus Master Plan supports the retention and reconfirmation of the RE-2 zone and residential land-use for the Subject Property. The proposed application has been reviewed by jurisdictional agencies, and it has been determined that the proposed use will not adversely impact environmental, land use and zoning, transportation, or community facilities as identified by the Plan. The proposed application would create two lots that are consistent with the zoning and larger-lot, residential use identified by the master plan. Therefore, the proposed application conforms to the Damascus Master Plan.

Public Facilities

Roads and Transportation Facilities

The proposed lots do not generate 30 or more vehicle trips during the morning or evening peakhours. Therefore, the application is not subject to Local Area Transportation Review. In addition, Transportation Planning staff has determined the application is not subject to Policy Area Mobility Review. Hanson Road is a secondary street, requiring 60 feet of right-of-way. Sixty feet of right-of-way currently exists, therefore, no additional dedication is required. Sidewalks are not required for lots in the RE-2 zone, and no sidewalk currently exists on either side of Hanson Road. Proposed vehicular and pedestrian access for the subdivision will be safe and adequate with the existing public road and proposed private driveways.

Other Public Facilities and Services

Other public facilities and services are available and will be adequate to serve the proposed dwelling units. The application meets the Montgomery County Fire and Rescue Service requirements for fire and rescue vehicle access. Other public facilities and services, such as schools, police stations, firehouses and health services are currently operating within the standards set by the Growth Policy Resolution currently in effect. Electrical and telecommunications services are also available to serve the Property. The Subject Property is not within a school moratorium area and is not subject to a School Facilities Payment.

Environment

Stormwater Management & Sediment Control

The MCDPS Stormwater Management Section approved the stormwater management concept for the project on June 4, 2008. The stormwater management concept includes on-site water quality control and recharge via the use of nonstructural practices. Channel protection is not required because the one-year post-development peak discharge is less than two cubic feet per second.

Environmental Guidelines

Environmental Planning staff approved the Natural Resource Inventory/Forest Stand Delineation for the site on September 6, 2007. The NRI/FSD identifies 7.66 acres of forest, a stream and associated 100-year floodplain, and environmental buffer. There are five specimen trees and ten large trees on the property. The topography on the property includes steep slopes and a small area of highly erodible soils. The environmentally sensitive areas of this plan will be protected by a Category I Conservation Easement with no encroachment. Therefore, this plan complies with the Montgomery County Environmental Guidelines.

Forest Conservation

The applicant submitted a preliminary forest conservation plan as part of the preliminary plan of subdivision. Currently, there are approximately 7.66 acres of forest on the Subject Property. The preliminary forest conservation plan proposes 5.18 acres of forest retention and 2.48 acres of forest clearing. The forest retention area is located on the southwest portion of the proposed lots. The forest retention area will be protected through a Category I Forest Conservation Easement, which also protects the stream valley buffer, the areas of steep slopes, and the small area of erodible soils. The amount of retained forest more than compensates for the proposed forest clearing, thus no reforestation planting is required for this plan. The application satisfies the requirements of the forest conservation law.

<u>Compliance with the Subdivision Regulations and Zoning Ordinance</u> (Attachment C – Agency Correspondence)

This application has been reviewed for compliance with the Montgomery County Code, Chapter 50, the Subdivision Regulations. The application meets all applicable sections, including the requirements for resubdivision as discussed below. The proposed size, width, shape and orientation of the lots are appropriate for the location of the subdivision.

The lots were reviewed for compliance with the dimensional requirements for the RE-2 zone as specified in the Zoning Ordinance. The proposed lots will meet the dimensional requirements for area, frontage, width, and setbacks in that zone. A summary of this review is included in attached Table 1. The application has been reviewed by other applicable county agencies, all of whom have recommended approval of the plan.

<u>Conformance with Section 50-29(b)(2)</u> (Attachment D – Neighborhood Map & Resubdivision Data Table)

A. Statutory Review Criteria

In order to approve an application for resubdivision, the Planning Board must find that the proposed lot(s) comply with all seven of the resubdivision criteria, set forth in Section 50-29(b)(2) of the Subdivision Regulations, which states:

Resubdivision. Lots on a plat for the Resubdivision of any lot, tract or other parcel of land that is part of an existing subdivision previously recorded in a plat book shall be of the same character as to street frontage, alignment, size, shape, width, area and suitability for residential use as other lots within the existing block, neighborhood or subdivision.

B. Neighborhood Delineation

In administering Section 50-29(b)(2) of the Subdivision Regulations, the Planning Board must determine the appropriate "Neighborhood" for evaluating the application. In this instance, the Neighborhood selected by the applicant, and agreed to by staff, consists of 8 lots. From Hilton Road, the Subject Property can be accessed by Hanson Road, therefore, the Neighborhood includes lots along Hanson Road adjacent to and confronting the Subject Property, and lots located on Hanson Road north and west of the Subject Property. All the lots share the same zoning classification as the Subject Property. The designated Neighborhood provides an adequate sample of the lots and development pattern of the area.

C. Analysis

Comparison of the Character of Proposed Lots to Existing

In performing the analysis, the above-noted resubdivision criteria were applied to the delineated Neighborhood. The proposed lots are of the same character with respect to the resubdivision criteria as other lots within the defined neighborhood. Therefore, the proposed resubdivision complies with the criteria of Section 50-2(b)(2). As set forth below, the attached tabular summary and graphical documentation support this conclusion:

<u>Frontage</u>: In the designated Neighborhood, lot frontage ranges from 25 feet to 375 feet. The proposed Lot 1 has 401 feet of frontage, and the proposed Lot 2 has 159 feet of frontage on Hanson Road. The proposed Lot 2 falls within the midrange of the Neighborhood. The proposed Lot 1, although still at the high end of the range regarding frontage, reduces the current frontage of the Subject Property (562 feet), which makes the proposed frontage of Lot 1 more comparable to the surrounding Neighborhood. Therefore, the proposed lots will be of the same character as existing lots in the Neighborhood with respect to lot frontage.

Alignment: In terms of alignment, the road network is curvilinear and the lots in the Neighborhood are a mixture of perpendicular, radial, and flag lots in relationship to Hanson Road. Three of the eight lots in the Neighborhood are perpendicular, three are flag lots, and two are radial. The proposed lots are perpendicular in alignment. The proposed lots are of the same character as existing lots with respect to the alignment criterion.

<u>Size</u>: Lot sizes in the Neighborhood range from 2.5 acres to 10.0 acres. Three of the existing lots in the Neighborhood are 3.2 acres or smaller, four of the existing lots in the

Neighborhood are 6.2 acres or larger, and one lot is 4.5 acres in size. The proposed lots are 3.1 and 6.9 acres in size. The size of the proposed lots is in character with the existing lots in the neighborhood.

<u>Shape:</u> With respect to shape, five existing lots in the Neighborhood are irregular, two lots are flag, and one lot is pie. The proposed lots are irregular much like the majority of existing lots in the Neighborhood. The shape of the proposed lots will be in character with shapes of the existing lots.

<u>Width:</u> Lot widths in the Neighborhood range from 125 feet to 815 feet. Excluding the lot that is 815 feet wide, there are two lots less than 200 feet wide, and five lots between 240 feet and 340 feet wide. The proposed lots have lot widths of 201 feet and 334 feet. The proposed lots will be in character with existing lots in the neighborhood with respect to width.

Area: When evaluating buildable area, existing lots in the Neighborhood range from 0.65 acres to 6.34 acres of buildable area. Four of the existing lots have a buildable area of 1.9 acres or less, while three of the existing lots have a buildable area of 4.4 acres to over 6 acres. The proposed lots will be comfortably near the middle of this range at 2.09 acres and 3.82 acres. The proposed lots will be of the same character as other lots in the neighborhood with respect to buildable area.

<u>Suitability for Residential Use:</u> The existing and the proposed lots are zoned residential and the land is suitable for residential use.

Citizen Correspondence and Issues

As of the date of this report, no citizen concerns have been brought to Staff's attention regarding the proposed subdivision. On March 6, 2008 a pre-submission meeting was held, as required, and on June 2, 2008 the applicant properly notified adjacent and confronting property owners and civic associations of the preliminary plan submission. The application information was properly posted on the Property.

CONCLUSION

Section 50-29(b)(2) of the Subdivision Regulations specifies seven criteria with which resbudivided lots must comply. They are street frontage, alignment, size, shape, width, area and suitability for residential use within the existing block, neighborhood or subdivision. As set forth above, the proposed lots are of the same character as the existing lots in the defined neighborhood with respect to each of the resubdivision criteria, and therefore, comply with Section 50-29(b)(2) of the Subdivision Regulations. The proposed lots also meet all other requirements established in the Subdivision Regulations and the Zoning Ordinance, and the proposed lots substantially comply with the recommendations of the Damascus Master Plan. Access and public facilities will be adequate to serve the proposed lots, and the application has been reviewed by other applicable county agencies, all of whom have recommended approval of

the plan. Therefore, approval of the application with the conditions specified above is recommended.

Attachments

Attachment A – Vicinity Map

Attachment B – Proposed Plan

Attachment C – Agency Correspondence

Attachment D – Neighborhood Map & Resubdivision Data Table

Table 1: Preliminary Plan Data Table and Checklist

Plan Name: Finlandia Plan Number: 120080380 Zoning: RE-2 # of Lots: 2 # of Outlots: 0 Dev. Type: Standard **PLAN DATA Zoning Ordinance** Proposed for Verified Date Development Approval by the Standard **Preliminary Plan** PB 135,036 sq. ft. is 12/30/08 Minimum Lot Area 87,120 sq. ft. minimum proposed 150 ft. 201 ft. is minimum PB 12/30/08 Lot Width proposed 25 ft. 159 ft. is minimum PB 12/30/08 Lot Frontage proposed Setbacks Must meet minimum¹ Front 50 ft. Min. PB 12/30/08 Side 17 ft. Min./35 ft. total Must meet minimum¹ PB 12/30/08 35 ft. Min. Must meet minimum¹ Rear PB 12/30/08 May not exceed PB 12/30/08 50 ft. Max. Height maximum¹ Max Resid'l d.u. or PB 12/30/08 Comm'l s.f. per 5 dwelling units 2 dwelling units Zoning PB **MPDUs** No 12/30/08 **TDRs** No PB 12/30/08 Site Plan Reg'd? No PB 12/30/08 **FINDINGS** SUBDIVISION Lot frontage on Public Street Yes PB 12/30/08 Road dedication and frontage improvements N/a Agency letter 7/15/08 **Environmental Guidelines** Yes Staff memo 12/9/08 **Forest Conservation** Staff memo 12/9/08 Yes Master Plan Compliance Yes Staff memo 12/9/08 Other (i.e., parks, historic preservation) ADEQUATE PUBLIC FACILITIES Stormwater Management Yes Agency letter 6/4/08 Water and Sewer (WSSC) 12/30/08 N/A PB Agency 7/14/08

10-yr Water and Sewer Plan Compliance

Transportation Management Agreement

Well and Septic

Fire and Rescue

Local Area Traffic Review

School Facilities Payment

Policy Area Mobility Review

School Cluster in Moratorium?

Yes

Yes

N/a

N/a

No

No

No

Yes

comments

Agency letter

Staff memo

Staff memo

Staff memo

PB

PB

Agency letter

10/24/08

7/14/08

7/14/08

7/14/08

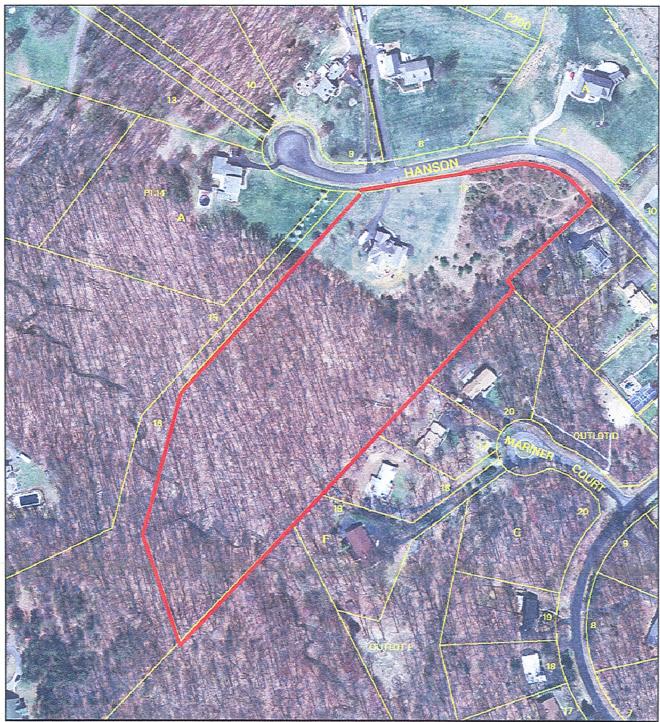
12/30/08

12/30/08

11/25/08

¹ As determined by MCDPS at the time of building permit.

FINLANDIA (120080380)



Map compiled on June 02, 2008 at 10:57 AM | Site located on base sheet no - 234NW08 | Date of Orthophotos: April 2006 - Used with permission from Montgomery County Government

NOTECE

The planimatria, property, and topographic information shown on this map is based on copyrighted Map Products from the Montgemery County Department of Park and Planning of the Maryland -National Capital Park and Planning Commission, and may not be copied or reproduced without written permission from M-NCPPC.

reproduced without Written permission from M-NUPPC.

Property lines are compiled by adjusting the property lines to topography created from aerial photography and should not be interpreted as actual field surveys. Planimetric features were compiled from 1:14400 scale serial photography using starse photogrammetric methods.

This map is created from a variety of data sources, and may not reflect the most current conditions in any one location and may not be completely accurate or up to date. All map features are approximately within five feet of their true location. This map may not be the same as a map of the same are a map of the same are an are possible of an earlier time as the data is continuously updated. Use of this map, other than for general planning purposes is not recommended. - Copyright 1958

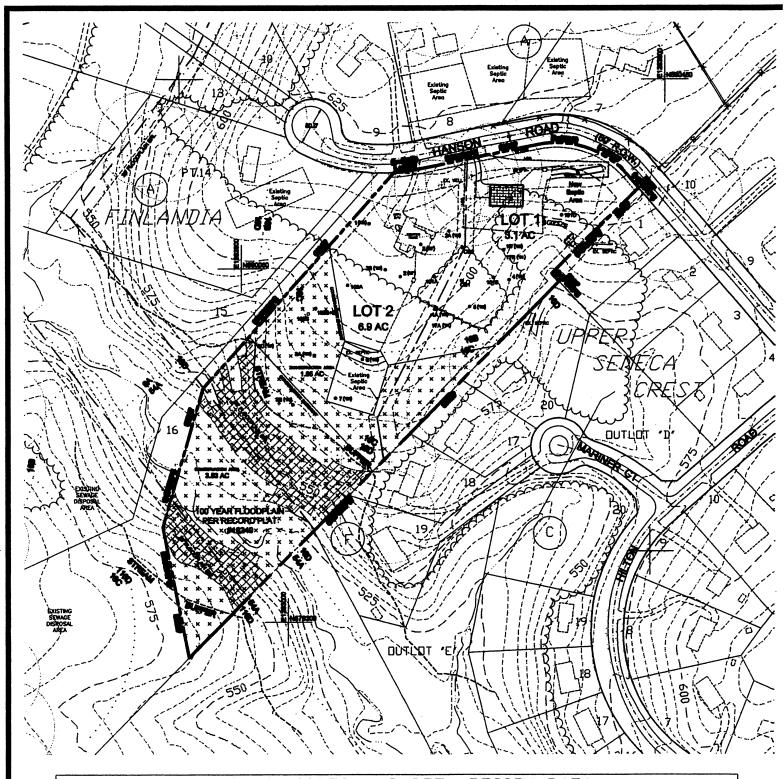












				SEWA	4GE	DIS	POSA	L S	SYS	TEM	DE	SIG	N I	TAC	A:				
LOT	# Bedrns.	Test Site	Tine (nin.)	Depths	Test Site	Tine (nin,)	Depths	Test Site	Time (nin.)	Depths	Ave. Rate	inv. Low Fixture	Inv. In	Inv. Out	Inv. Beg.	Length Initial	Depth of Stone	Total Length	Usable Area
1	6	101C	16	4 L 13'	101D	9	4.5 L 12.5'				13	614.5	610.9	610.6	609.3	217'	4'	668	10,000 +72
2	5	6	17	3 L 105'	7	11	3 L 10.5'				14	Ex. House	Existing Tank	Existing Tank	Ex. Fleid	274'	3.5'	1,096*	10,000 +72



Attachment C

DEPARTMENT OF PERMITTING SERVICES

Isiah Leggett
County Executive

June 4, 2008

Carla Reid Joyner

Director

Mr. David McKee Benning & Associates, Inc. 8933 Shady Grove Court Gaithersburg, MD 20877

Re:

Stormwater Management CONCEPT Request

for Finlandia

Preliminary Plan #: TBA SM File #: 233676

Tract Size/Zone: 10.1 ac./ Re-2 Total Concept Area: 3.1ac.

Lots/Block: 1 Parcel(s):

Watershed: Great Seneca Creek

Dear Mr. McKee:

Based on a review by the Department of Permitting Services Review Staff, the stormwater management concept for the above mentioned site is **acceptable**. The stormwater management concept consists of on-site water quality control and recharge via the use of nonstructural practices. Channel protection volume is not required because the one-year post development peak discharge is less than or equal to 2.0 cfs.

The following **conditions** will need to be addressed **during** the detailed sediment control/stormwater management plan stage:

- 1. Prior to permanent vegetative stabilization, all disturbed areas must be topsoiled per the latest Montgomery County Standards and Specifications for Topsoiling.
- 2. A detailed review of the stormwater management computations will occur at the time of detailed plan review.
- 3. An engineered sediment control plan must be submitted for this development.
- 4. The driveway should have a minimum 2% pitch to ensure adequate flow to the grassed area.
- 5. The drywells will need to be located out of the well arcs which are shown on the plan.
- 6. The dry well shown at the right rear of the house may be replaced with the existing tree canopy in that area if there is no grading or limited grading at that specific location.

This list may not be all-inclusive and may change based on available information at the time.

Payment of a stormwater management contribution in accordance with Section 2 of the Stormwater Management Regulation 4-90 is not required.



This letter must appear on the sediment control/stormwater management plan at its initial submittal. The concept approval is based on all stormwater management structures being located outside of the Public Utility Easement, the Public Improvement Easement, and the Public Right of Way unless specifically approved on the concept plan. Any divergence from the information provided to this office; or additional information received during the development process; or a change in an applicable Executive Regulation may constitute grounds to rescind or amend any approval actions taken, and to reevaluate the site for additional or amended stormwater management requirements. If there are subsequent additions or modifications to the development, a separate concept request shall be required.

If you have any questions regarding these actions, please feel free to contact Blair Lough at 240-777-6335.

Richard R. Brush, Manager Water Resources Section

Division of Land Development Services

RRB:dm bll

CC:

C. Conlon

S. Federline

SM File # 233676

QN -not required; Acres: 3.1

QL - on-site; Acres: 3.1

Recharge is provided



DEPARTMENT OF PERMITTING SERVICES

Isiah Leggett
County Executive

Carla Reid
Director

MEMORANDUM

October 24, 2008

TO:

Cathy Conlon, Development Review,

Maryland National Capital Park and Planning Commission

FROM:

Carla Reid, Director

Department of Permitting Services

SUBJECT:

Status of Preliminary Plan:

1-20080380,

Finlandia, Lots 1 & 2

This is to notify you that the Well & Septic Section of MCDPS approved the plan received in this office on July 24, 2008.

Approved with the following reservations:

1. The record plat must be at the same scale as the preliminary plan, or submit an enlargement of the plat to match the preliminary plan.

All buildings must be shown on the Record Plat.

If you have any questions, contact Gene von Gunten at (240) 777-6319.

CC:

Surveyor File





DEPARTMENT OF TRANSPORTATION

Isiah Leggett
County Executive

Arthur Holmes, Jr.

Director

July 15, 2008

Ms. Catherine Conlon, Subdivision Supervisor Development Review Division The Maryland-National Capital Park & Planning Commission 8787 Georgia Avenue Silver Spring, Maryland 20910-3760

RE:

Preliminary Plan #1-20080380

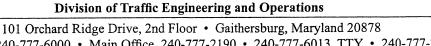
Finlandia

Dear Ms. Conlon:

We have completed our review of the preliminary plan dated 04/07/08. This plan was reviewed by the Development Review Committee at its meeting on July 14, 2008. We recommend approval of the plan subject to the following comments:

All Planning Board Opinions relating to this plan or any subsequent revision, project plans or site plans should be submitted to DPS in the package for record plats, storm drain, grading or paving plans, or application for access permit. Include this letter and all other correspondence from this department.

- 1. Show/label all existing planimetric and topographic details specifically storm drainage and driveways adjacent the site on the preliminary plan.
- 2. Right of way dedication for Hanson Road as necessary.
- 3. Grant necessary slope and drainage easements. Slope easements are to be determined by study or set at the building restriction line.
- 4. Wells and septic systems cannot be located within the right of way nor slope or drainage easements.
- 5. The sight distances study has been accepted. A copy of the accepted Sight Distances Evaluation certification form is enclosed for your information and reference.
- 6. Revise the plan as necessary to meet the requirements of the Montgomery County Department of Permitting Services with regard to wells and/or septic systems.
- 7. Relocation of utilities along existing roads to accommodate the required roadway improvements shall be the responsibility of the applicant.





Ms. Catherine Conlon Preliminary Plan No. 1-20080380 Date July 15, 2008 Page 2

- 8. If the proposed development will alter any existing street lights, signing, and/or pavement markings, please contact Mr. Fred Lees of our Traffic Control and Lighting Engineering Team at (240) 777-6000 for proper executing procedures. All costs associated with such relocations shall be the responsibility of the applicant.
- 9. Trees in the County rights of way species and spacing to be in accordance with the applicable DOT standards. A tree planting permit is required from the Maryland Department of Natural Resources, State Forester's Office [(301) 854-6060], to plant trees within the public right of way.
- 10. Coordinate with DPS to assure the road is built to ultimate condition and accepted for maintenance and then obtain a release letter for slope easement from DOT property acquisition section, otherwise septic system should not exceed beyond BRL.

Thank you for the opportunity to review this preliminary plan. If you have any questions or comments regarding this letter, please contact me at sam.farhadi@montgomerycountymd.gov or (240) 777-6000.

Sincerely,

Sam Farhadi, P.E.
Development Review Group
Traffic Engineering and Operations Division

m:/subdivision/farhas01/preliminary plans/ 1-20080380, Finlandia.doc

Enclosures (1)

cc: Neal H. King
David McKee, Benning & Associates
Joseph Y. Cheung; DPS RWPPR
Sarah Navid; DPS RWPPR
Henry Emery; DPS RWPPR
Shahriar Etemadi; M-NCPPC TP
Gregory Leck, DOT DTEO
Preliminary Plan Folder
Preliminary Plans Note Book



FIRE MARSHAL COMMENTS

DATE:

25-Nov-08

TO:

Patrick Perry

O. I au

Benning and Associates

FROM:

Tyler Mosman

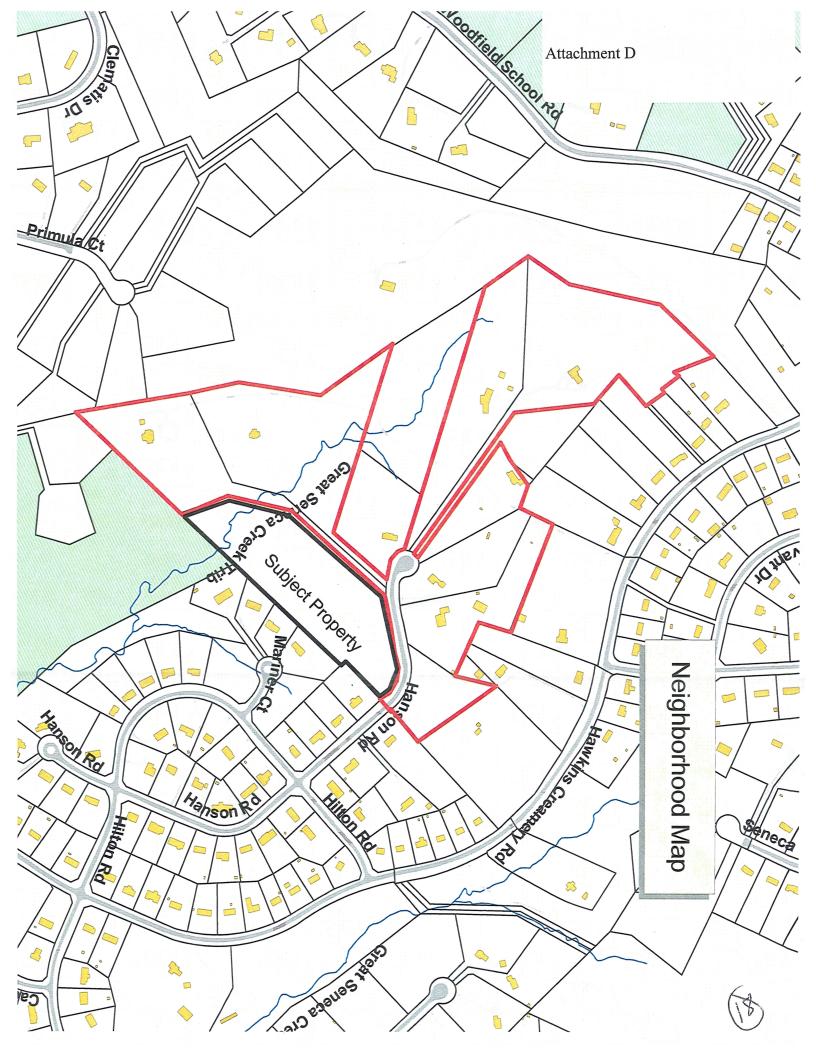
RE:

Finlandia - Hanson Road

120080390

PLAN APPROVED

- 1. Review based only upon information contained on the plan submitted 25-Nov-08. Review and approval does not cover unsatisfactory installation resulting from errors, omissions, or failure to clearly indicate conditions on this plan.
- 2. Correction of unsatisfactory installation will be required upon inspection and service of notice of violation to a party responsible for the property.



	Resul	odivision (Resubdivision Criteria: Finlandia,		_ot 17 of	ot 17 of Block A	
Lot#	Frontage	Alignment	Size (ac)	Shape	Width	Area (ac)	Suitability
_	401.21'	Perpendicular	3.1	Irregular	334'	2.09	RE-2
2	159.05'	Perpendicular	6.9	Irregular	201'	3.82	RE-2
7A	374.64'	Perpendicular	2.453	Irregular	251'	1.45	RE-2
8A	195.00'	Perpendicular	4.460	lrregular	247	2.67	RE-2
9A	261.40'	Perpendicular	3.266	Irregular	241'	1.83	RE-2
10A	31.70'	Radial	2.783	Pie	278'	0.65	RE-2
12A	25.78'	Flag	10.000	Irregular	125'	6.34	RE-2
13A	31.57	Radial	6.874	Irregular	333'	1.90	RE-2
15A	31.57'	Flag	10.000	Flag	816'	4.92	RE-2
16A	33.99'	Flag	6.211	Flag	125'	4.40	RE-2
Range	25.78-375'		2.453-10.0		125-815'	0.65-6.34	
Average	123.21'		5.76		302'	3.02	

