




**MCPB**  
Item No. 4A  
Date: 6-24-21

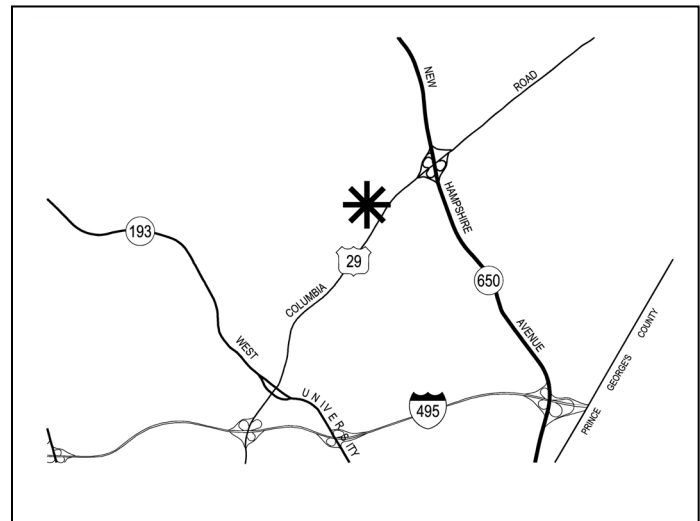
## Burnt Mills Elementary School, Mandatory Referral, MR2021017

-  Luis R. Estrada Cepero, Planner Coordinator, Mid-County Planning, [Luis.Estrada@montgomeryplanning.org](mailto:Luis.Estrada@montgomeryplanning.org) , 301.495.4641
-  Jessica McVary, Supervisor, Mid-County Planning, [Jessica.McVary@montgomeryplanning.org](mailto:Jessica.McVary@montgomeryplanning.org) , 301.495.4723
-  Carrie Sanders, Chief, Mid-County Planning, [Carrie.Sanders@montgomeryplanning.org](mailto:Carrie.Sanders@montgomeryplanning.org) , 301.495.4653

**Completed: 6/18/21**

### Description

- Construction of a new school for a master planned capacity of 740 students; to include improvements to vehicular and bus access, parking, sidewalks, landscape, athletic fields, and stormwater management facilities;
- Location: 11211 Childs Street, Silver Spring MD;
- Property Size: 13.78 acres;
- Zone: R-90, 1997 *White Oak Master Plan*;
- Applicant: Montgomery County Public Schools.



### Summary

- Staff recommends **approval** of the Mandatory Referral, and transmittal of comments to the Montgomery County Public Schools and the Montgomery County Board of Education.
- The proposed Project will increase student capacity and reorganize bus and vehicular areas to increase internal queuing capacity and improve safety.
- The Planning Board action on a Mandatory Referral is advisory.

## RECOMMENDATIONS

Staff recommends approval, with the following changes necessary to the Project:

1. Comply with the approval conditions listed in the regulatory memorandum for the review of the related Final Forest Conservation Plan.
2. Create alternatives for the temporary use of the bus loop and parking lot area when not needed for vehicular use. Consider ways to provide areas for temporary athletic facilities, temporary passive recreation, or weekend neighborhood activities such as farmers markets or community festivals.
3. Submit a completed, executed Montgomery County Department of Transportation (MCDOT) Sight Distances Evaluation certification form for all existing and proposed site entrances onto county-maintained roads, for Montgomery County Department of Permitting Services (MCDPS) review and approval.
4. Explore opportunities to reduce the curb radii at the driveways of the pick-up and drop-off loop and surface parking lot to slow passenger car traffic moving in and out of the site;
5. Provide no less than 37 short-term bicycle parking spaces on site (U rack or equivalent).
6. Coordinate with MDOT SHA and MCDOT to construct a sidepath as recommended by the 2018 *Bicycle Master Plan* on the west side of US 29, along the school's eastern frontage. The sidepath should be a minimum of 11-feet wide, with an eight-foot wide landscape panel and two-foot wide maintenance strip between the travel lanes and the sidepath.

## **SUMMARY**

This report is staff's review of the Mandatory Referral for the construction of Burnt Mills Elementary School, submitted by Montgomery County Public Schools (MCPS), pursuant to the Maryland Land Use Article, Section 20-301. The Planning Board action on a Mandatory Referral is advisory.

## **INTRODUCTION**

Comments were provided for this proposal on two separate occasions. In September 2020, preliminary diagrams for the future school were made available as part of the scoping process for the Applicant's Transportation Impact Study (TIS). Design comments are not usually solicited at this stage, but as an attempt to foster early collaboration with MCPS, Planning staff provided high-level comments on the preliminary diagrams on September 10, 2020. The comments encouraged MCPS to improve the school's presence and visibility from adjacent public streets. The comments also encouraged MCPS to improve connectivity through the property by connecting Childs Street to Oak Leaf Drive, a suggestion that proved infeasible due to the site's steep grading.

In October 2020, MCPS submitted Concept Plan No. 520210070, which was reviewed by the Development Review Committee on November 24, 2020. Comments were provided reiterating the design recommendations made earlier, including several transportation-related concerns about safe pedestrian access to the school from Prelude Drive, improved walkways, and bikeways.

On May 3, 2021, the Mandatory Referral was accepted for staff review. After reviewing the submitted Mandatory Referral, Planning staff and other reviewing agencies reiterated many of the comments provided at Concept Plan review. Several stated concerns were addressed after communications between MCPS's team of consultants, MCDOT, and Planning staff. While several design recommendations were ultimately not adopted, comments from reviewing agencies have been addressed and staff recommends approval of the Mandatory Referral. Staff will continue to collaborate with MCPS to refine the review process associated with this type of Mandatory Referrals through the recently initiated School Design Working Group.

### **School Design Working Group**

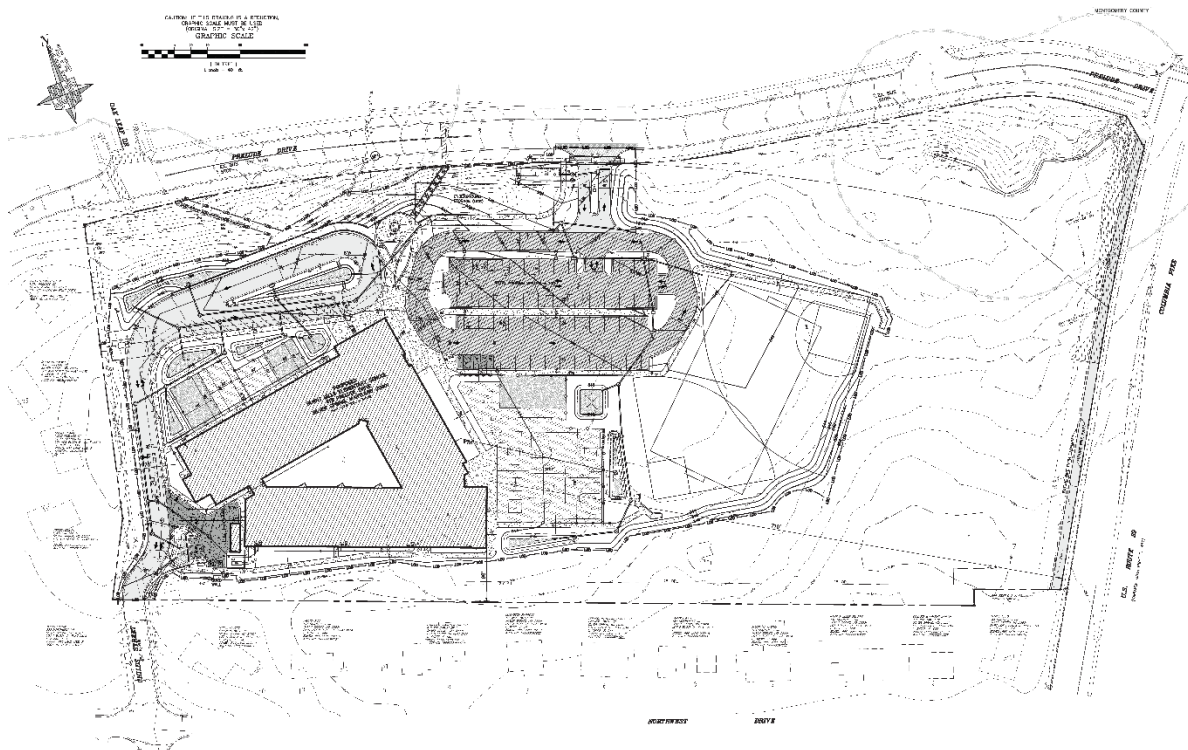
The Planning Department recently began the School Design Working Group, an initiative to establish a shared vision that advances MCPS' and Montgomery Planning's goals for design and access to school facilities, and to better coordinate and streamline the review process. This work group involves staff from MCPS, Montgomery Parks, MCDOT, and MCDPS. The group is collaborating to develop a framework of best practices that advance priorities for safety, Vision Zero, civic and sustainable design, efficient circulation, equitable access to school sites, fiscally smart infrastructure and timely, streamlined regulatory review. Through a series of monthly facilitated discussions and working sessions, the group will jointly identify these shared goals and illustrate principles towards their achievement. The information produced will be compiled into a resource document to guide the county's school design process.



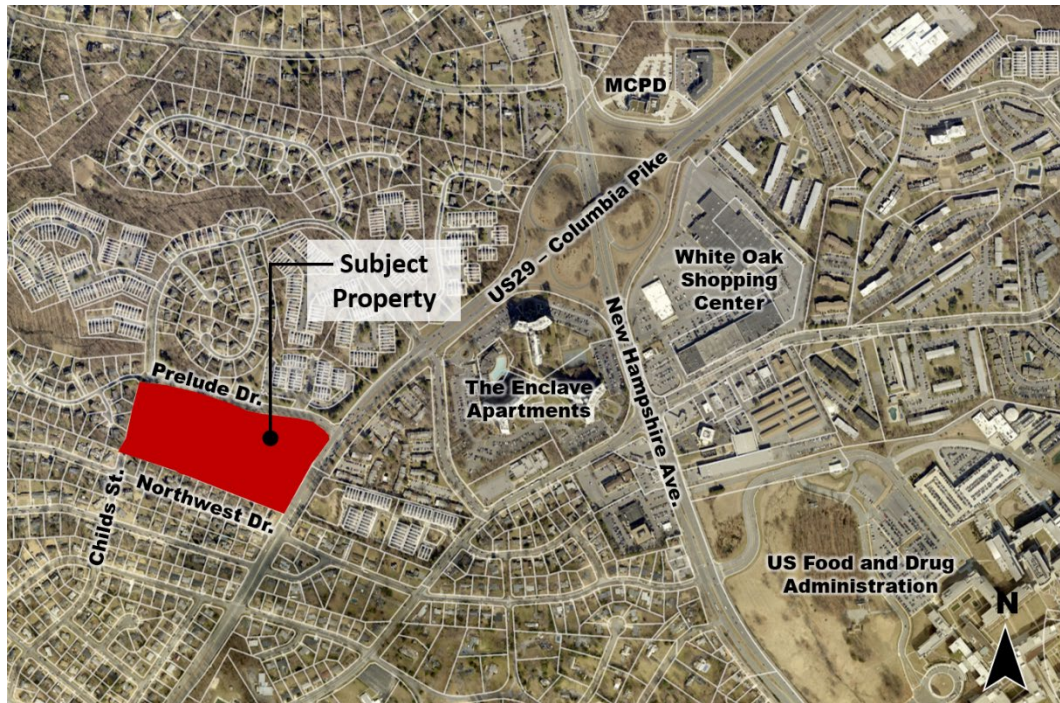
*Figure 1: Existing School Building*

## Background

Burnt Mills Elementary School was originally built in 1964 and renovated in 1990. It currently serves approximately 600 students in a 57,318 square foot structure. The property also includes 71 parking spaces, a bus loop, playfields, and several portable classrooms. Currently, both buses and cars share the Childs Street access. The new building will be constructed over 18 months beginning in early 2022 and ending in the summer of 2023. Students will be relocated off-site to the Fairland Center located nearby at 13313 Old Columbia Pike during construction.



*Figure 2: Submitted Site Plan*



*Figure 3: Location and Vicinity Map*

### **Site Description**

Burnt Mills Elementary School (“Subject Property” or “Property” – shown in red in Figure 3) is located at 11211 Childs Street in Silver Spring, along the western side of US 29/Columbia Pike, between Northwest Drive and Prelude Drive. There is access for pedestrians from Prelude Drive and Childs Street, and the primary vehicular access is from Childs Street. The site consists of two separate but adjacent parcels, both owned by the Board of Education. The larger parcel (number 1 on Figure 4) is 13.78 acres, and includes all the improvements discussed in this report. The combined total area for both is 15.15 acres which is the area covered by the Final Forest Conservation Plan discussed by a separate staff report.





Figure 4: Site Map

The Subject Property is bounded by residential properties and Childs Street to the west, residential properties fronting onto Northwest Drive to the south, US29/Columbia Pike to the east, and Prelude Drive to the north. This Property is currently zoned R-90. The Subject Property currently supports Burnt Mills Elementary School, athletic fields, tennis courts, parking for the school, and forested areas. The school structure sits at a level area central to the property, with substantial slopes around the perimeter of the property. The entire site slopes down from southeast to northwest with an overall drop in elevation of approximately 50 feet.



Figure 5: Proposed School Building – Looking Southeast from Prelude Drive

## Project Description

The project proposes to replace the existing school building with a new two-story school, renovation of the existing bus loop, new student drop-off, additional parking, new basketball courts, playgrounds, playfields, and associated pedestrian and vehicular access on the existing school site. The new school building is approximately 94,560 square feet with a capacity of 647 students, and master-planned for 740 students.

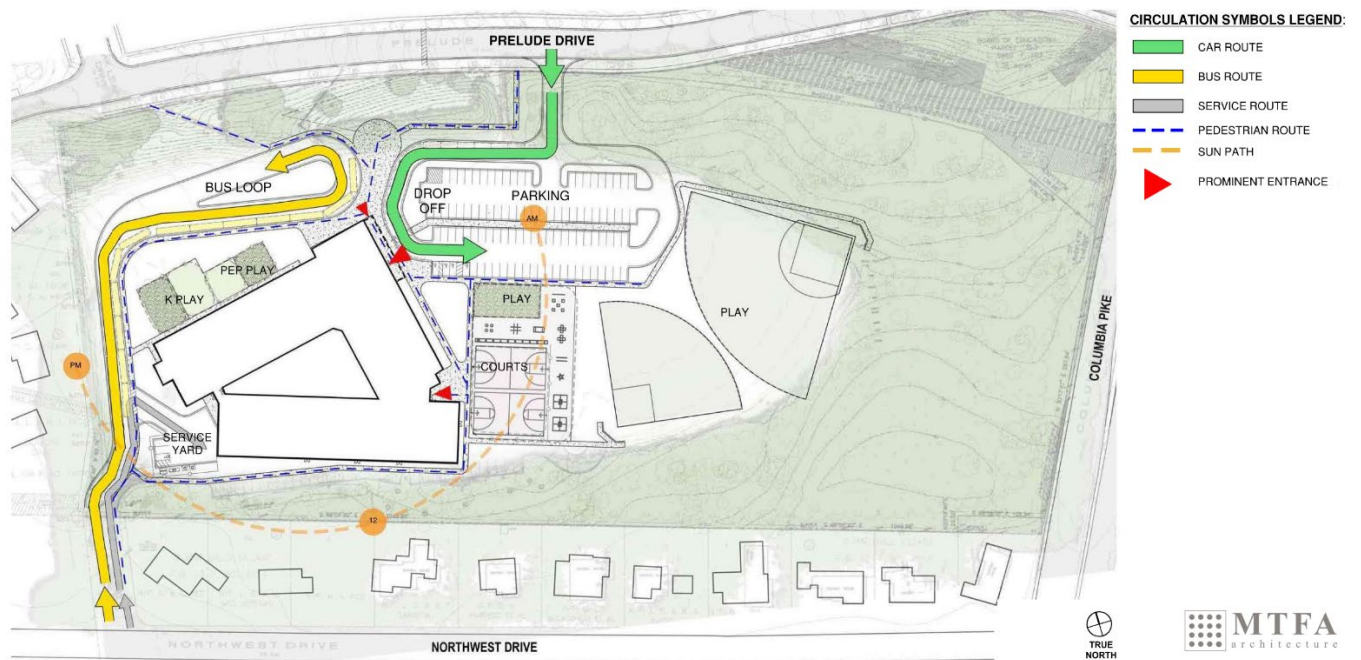


Figure 6: MCPS Proposed Site Plan

The proposal separates the pedestrian access, the car drop-off traffic and the bus loop traffic for safety. The main school entrance has been relocated to the north side, fronting on Prelude Drive, where a shared location is provided to connect all circulation types in front of the school's main entrance.

Buses will continue to enter the school via the existing entrance on Childs Street at the southwest corner of the site. The bus loop is located on the northwest side of the proposed building to provide queuing room for 13 buses. The student drop-off area with associated parking lot is accessed via a new driveway entrance on Prelude Drive, located on the north side of the site. The bus loop and student drop-off converge at the northernmost point of the building at a common entry plaza. A parking lot with 100 parking spaces is located east of the student drop-off and is accessed via the new driveway entrance on Prelude Drive. The loading area is located at the southwest corner of the building, near the bus entrance. Americans with Disabilities Act (ADA) compliant paths are provided from the new driveway entrance on Prelude Drive to the plaza in front of the main entrance and also at the Childs Street entrance.

Play and athletic amenities include separate paved and mulch play areas for pre-kindergarten, kindergarten, and grades 1-5. The pre-kindergarten and kindergarten play areas are located within a fenced area between the bus loop and the school building, with direct access to classrooms along the northwest wall of the building. The play areas for grades 1-5 are located to the east of the building, adjacent to the gym entrance. Incorporated into this play area are two paved, full-sized basketball courts.

A playfield is located on the east side of the site and has ADA compliant walking paths leading to the backstops.

## **ANALYSIS**

### **Master Plan**

The application is within the boundaries of the 1997 *White Oak Master Plan*. The Plan supports retaining existing land use patterns and recommends strengthening the link between community facilities and the residents they serve, to meet their recreational, social, and human service needs. While the Plan offers no specific guidance for this property, the proposal accomplishes these goals by:

- Expanding and renovating an existing school facility which fulfills an educational purpose and also provides space for public use under the Montgomery County Community Use of Public Facilities Program;
- Improving access to the school and connecting to existing sidewalks and pathways; and
- Rebuilding and providing connections to athletic fields and open space.

The proposal is in conformance with the recommendations in the Master Plan.

### **Zoning Analysis**

The Subject Property is zoned R-90, as is the surrounding residential neighborhood. The proposed Project was analyzed for conformance with applicable development standards; the project is in conformance with the standards of the R-90 zone.

### **Neighborhood Compatibility**

With this Proposal, the Subject Property will continue the same use that has been in place since the existing building was constructed in 1964. The proposed school's footprint is slightly larger than the existing, and has been situated to allow for the reorganization of vehicular services on the property while maintaining athletic facilities. The existing school is surrounded by single-family residential uses and significant tree canopy, so visibility from surrounding streets is minimal. The proposed school will be similarly situated, so its visual impact on the surrounding neighborhood will be comparable to that of the existing school.

### **Environmental Analysis**

#### Environmental Guidelines

Staff approved a Natural Resource Inventory/Forest Stand Delineation (NRI/FSD No. 420210500) for Burnt Mills Elementary School on October 5, 2020. There are 6.13 acres of forest on the Property. A partially piped tributary to the Northwest Branch runs across the northeast corner of the Property, with 1.66 acres of stream valley buffer associated with it. No disturbance is proposed in the stream valley buffer and the plan is in compliance with the Environmental Guidelines.

#### Forest Conservation

The Property is subject to the Montgomery County Forest Conservation Law (Chapter 22A of the County Code) and the Applicant has submitted a Final Forest Conservation Plan (FFCP) in conjunction with the Mandatory Referral. The FFCP is covered in detail in a separate regulatory memo. All forest conservation requirements will be met on-site through the preservation of existing forest.



### Stormwater Management

The Montgomery County Department of Permitting Services (DPS) approved a stormwater management concept plan on May 19, 2021. The stormwater management plan includes enhanced microbioretenion facilities, permeable pavement, and underground structural sandfilters.

### Green Building

The proposed building is registered and will receive a rating of two (2) Green Globes in conformance with Green Globes for New Construction 2013 through the Green Building Initiative.

### **Parks Department**

The Department of Parks indicates that maintaining, enhancing and potentially expanding field and open space should be a priority of MCPS. The proposal will deliver new athletic fields, similar in capacity to those existing. The project will have no impacts to public parkland or land owned by M-NCPPC.

### **Transportation Analysis**

Planning staff reviewed the submitted materials and have the following transportation-related findings for transmission to the Montgomery County Schools (MCPS):

1. Coordinate with MDOT SHA and MCDOT to construct a sidepath along the school's frontage with US 29. The sidepath should be a minimum of 11-feet wide, with an eight-foot landscape panel and two-foot maintenance strip between the travel lanes and the sidepath.
2. Explore opportunities to reduce the curb radii at the driveways of the pick-up and drop-off loop and surface parking lot to slow passenger car traffic moving in and out of the site;
3. Provide 37 short-term bicycle parking spaces on site (U rack or equivalent).

### School Location and Vehicular Access Points

The Applicant proposes vehicular and pedestrian access points from Childs Street (existing) and from Prelude Drive (new). School buses will exclusively access the site from Childs Street, while all other vehicles will access the site from Prelude Drive, which serves student pick-up/drop-off and provides access to the newly proposed surface parking lot. While wider curb radii and driveways are necessary for bus operations, MCPS should work to reduce the width of the access point from Childs Street (which is 26-30 feet wide) and the access point from Prelude Drive (each travel lane is 15 feet wide). Additionally, the curb radii could be tightened to slow vehicle turning speeds across sidewalks traversed by students. Per Article 59-6, Section 6.1.3(A)(2), uses should "limit vehicle access across primary pedestrian, bicycle, or transit routes where feasible." Because of the nature of the use, staff recommends that MCPS evaluate ways to improve safety across the existing vehicular and pedestrian access points.

### Pedestrian and Bicycle Facilities

The internal sidewalks proposed are a minimum of six feet wide, but ADA-compatible curb ramps should be provided adjacent to accessible parking spaces and at all marked crosswalks. At the new entrance to Prelude Drive, the sidewalks should be widened to six feet (within the Limits of Disturbance). Additionally, MCPS should evaluate the feasibility of raised pedestrian crosswalks or additional crosswalks between the surface parking lot and the recreation fields to maximize pedestrian safety and access.

No bicycle facilities are proposed on Childs Street or Prelude Drive. The 2018 *Bicycle Master Plan* recommends a sidepath on the west side of US 29, along the school's eastern frontage. The sidepath should be a minimum of 11-feet wide, with an eight-foot wide landscape panel and two-foot wide maintenance strip between the travel lanes and the sidepath.

To accommodate students who travel to the school via bicycle, staff recommends consideration of bicycle parking in a minimum amount equivalent to the requirement for private schools (5 percent of the student population), which equates to 37 short-term bicycle parking spaces. The Applicant should continue to coordinate with MDOT SHA and MCDOT regarding the LATR study and construction of future pedestrian and bicycle improvements.

#### Master-Planned Roadways

Neither Childs Street nor Prelude Drive are classified in the *Master Plan of Highways and Transitways*. East of the site, US 29 is designated as a Major Highway with Planned Bus Rapid Transit (BRT) in the adjacent 2014 *White Oak Science Gateway Master Plan*, with six travel lanes and a 122-foot right-of-way.

#### Public Transit Service

Multiple bus stops are located near Burnt Mills Elementary School. Transit stops along Prelude Drive provide access to Ride On Route 21, which operates between Fairland and the Paul S. Sarbanes Transit Center in downtown Silver Spring. Bus stops on US 29 provide access to Ride On Route 22 and Metrobus Z7. Ride On Route 22 operates between Hillandale and the Paul S. Sarbanes Transit Center; Metrobus Z7 is an express peak-hour only route that provides service between Laurel, Burtonsville, and downtown Silver Spring. Additionally, a Flash BRT station is located approximately 0.5 miles east of the school at the intersection of Lockwood Drive and Northwest Drive.

#### Local Area Transportation Review

MCPS submitted a transportation impact study (TIS) to review the impact of the net increase of 180 students on the local area's transportation network. Figure 7 below shows the morning and afternoon trips generated by the existing 560 students during peak morning and evening hours and trips generated by the proposed 740 students during the peak morning and evening hours.

**Figure 7: Existing and Proposed Trip Generation**

Trip Generation - Existing & Proposed	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Existing Trips (560 students)	202	173	375	85	105	190
Additional Proposed Trips (180 students)	66	55	121	28	34	62
<i>Total Anticipated Trips (740 students)</i>	268	228	496	113	139	252

The school is in the Fairland/Colesville Policy Area, with an intersection congestion standard of 59 seconds of delay per vehicle (Highway Capacity Manual) and a Critical Lane Volume (CLV) congestion equivalent to 1,475 (0.92). As Fairland/Colesville is a Yellow Policy Area, the CLV level of service applies

to study intersections. The Transportation Impact Study analyzed vehicular capacity and congestion at eight nearby intersections (see Figure 8). As shown in the table, the additional students have minimal impact on the transportation network, and each intersection will continue to operate well below the 1,475 CLV congestion standard.

**Figure 8: Delay Analyses, Existing and Future Conditions**

CLV Delay	Total AM Traffic		Total PM Traffic	
	Existing (2020)	Future (2023)	Existing (2020)	Future (2023)
US 29 at Prelude Drive	871	1151	805	951
US 29 at Northwest Drive	818	885	786	832
US 29 at Burnt Mills Avenue	900	983	819	871
US 29 at Southwest Drive	810	854	782	882
Prelude Drive at Oak Leaf Drive	96	123	109	122
Prelude Drive at Legato Way	119	317	92	208
Northwest Drive at Childs Street	16	52	18	50
Prelude Drive at School Access	--	548	--	293
Existing enrollment is 560 students; proposed future enrollment is 740 students.				

### Community Outreach

The Applicant coordinated several meetings for the school community that were advertised to parents, the public, adjacent neighbors, and neighborhood associations. These meetings were held virtually on July 29, 2020, August 12, 2020, and September 30, 2020. A project that incorporated community feedback was presented to the Board of Education on January 28, 2021.

After receiving the Mandatory Referral application, staff notified local civic associations and other interested parties of the submittal and invited comments. Staff has received no comments or requests for information.

### Attachments

1. Mandatory Referral
2. Department of Permitting Services letter



MISS UTILITY

CALL "MISS UTILITY" AT 1-800-257-7777, 48 HOURS PRIOR TO THE START OF WORK. THE EXCAVATOR MUST NOTIFY ALL PUBLIC UTILITY COMPANIES WITH UNDERGROUND FACILITIES IN THE AREA OF PROPOSED EXCAVATION AND HAVE THOSE FACILITIES LOCATED BY THE UTILITY COMPANIES PRIOR TO COMMENCING EXCAVATION. BEFORE EXCAVATION THE CONTRACTOR IS RESPONSIBLE FOR CALLING TICKET CHECK AT 1-866-821-4226 TO VERIFY THAT ALL UTILITIES HAVE BEEN MARKED, 48 HOURS AFTER CALLING MISS UTILITY. THE EXCAVATOR IS RESPONSIBLE FOR COMPLIANCE WITH REQUIREMENTS OF CHAPTER 36A OF THE MONTGOMERY COUNTY CODE.

NOTE:

THE CONTRACTOR IS ALSO RESPONSIBLE FOR LOCATING ALL PRIVATE UTILITIES (NOT LOCATED BY MISS UTILITY) WITHIN MCPS PROPERTY AT THEIR EXPENSE. ALL UTILITIES SHOWN ON THE PLANS ARE PROVIDED FOR INFORMATION ONLY AND SHALL BE CONSIDERED APPROXIMATE. MCPS SHALL NOT BE RESPONSIBLE FOR LOCATING UNDERGROUND UTILITIES. ANY UTILITIES OR OTHER UNDERGROUND FACILITIES DAMAGED DURING CONSTRUCTION SHALL BE REPAIRED/REPLACED AT THE CONTRACTOR'S SOLE EXPENSE.

	REQUIRED	PROPOSED
MAIN BUILDING SETBACK FROM STREET	30 FEET	178 FEET
SIDE YARD—ONE SIDE	8 FEET	75 FEET
SIDE YARD—SUM OF BOTH SIDES	25 FEET	785 FEET
REAR YARD	25 FEET	66 FEET
MAX. BUILDING HEIGHT	35 FEET	FEET
MAXIMUM COVERAGE	30%	9.54%

BUILDING COVERAGE

SITE AREA = 604,177 SF  
LIMITS OF DISTURBANCE = 364,014 SF  
EXISTING BUILDING = TO BE RAZED  
PROPOSED BUILDING = 57,662 SF  
PROPOSED BUILDING COVERAGE = 9.54%  
GROSS BUILDING SQ. FT. = 94,560 SF

BURNT MILLS ELEMENTARY SCHOOL  
PROPOSED PARKING TABULATION

STANDARD SPACES (9'x 18').....98  
ACCESSIBLE SPACES (8'x 18').....3  
VAN ACCESSIBLE SPACES .....2  
TOTAL PROPOSED .....103

LEGEND

PROPERTY LINE

PROP. BUILDING  
(SEE ARCH DWG'S)

CONCRETE SIDEWALK

LIGHT DUTY ASPHALT

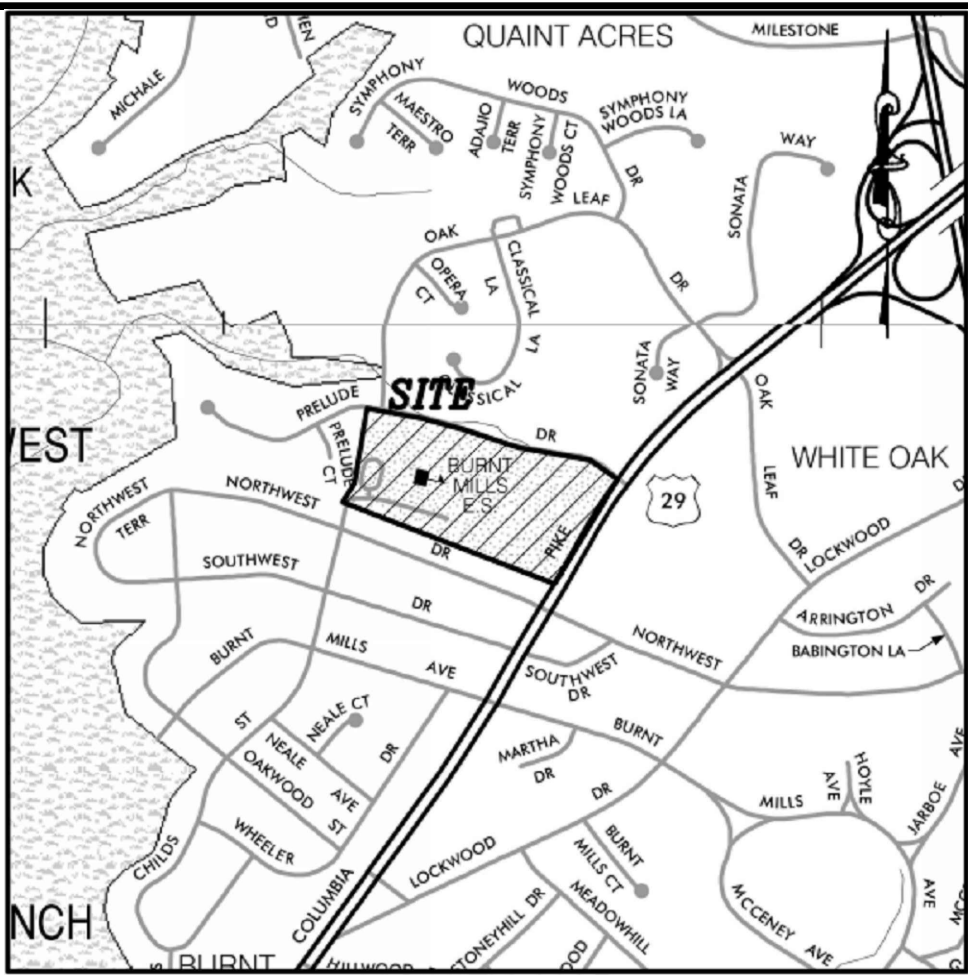
REGULAR DUTY ASPHALT

HEAVY DUTY CONCRETE

RIGHT OF WAY ASPHALT

2" MILL & OVERLAY

PERVIOUS PAVEMENT



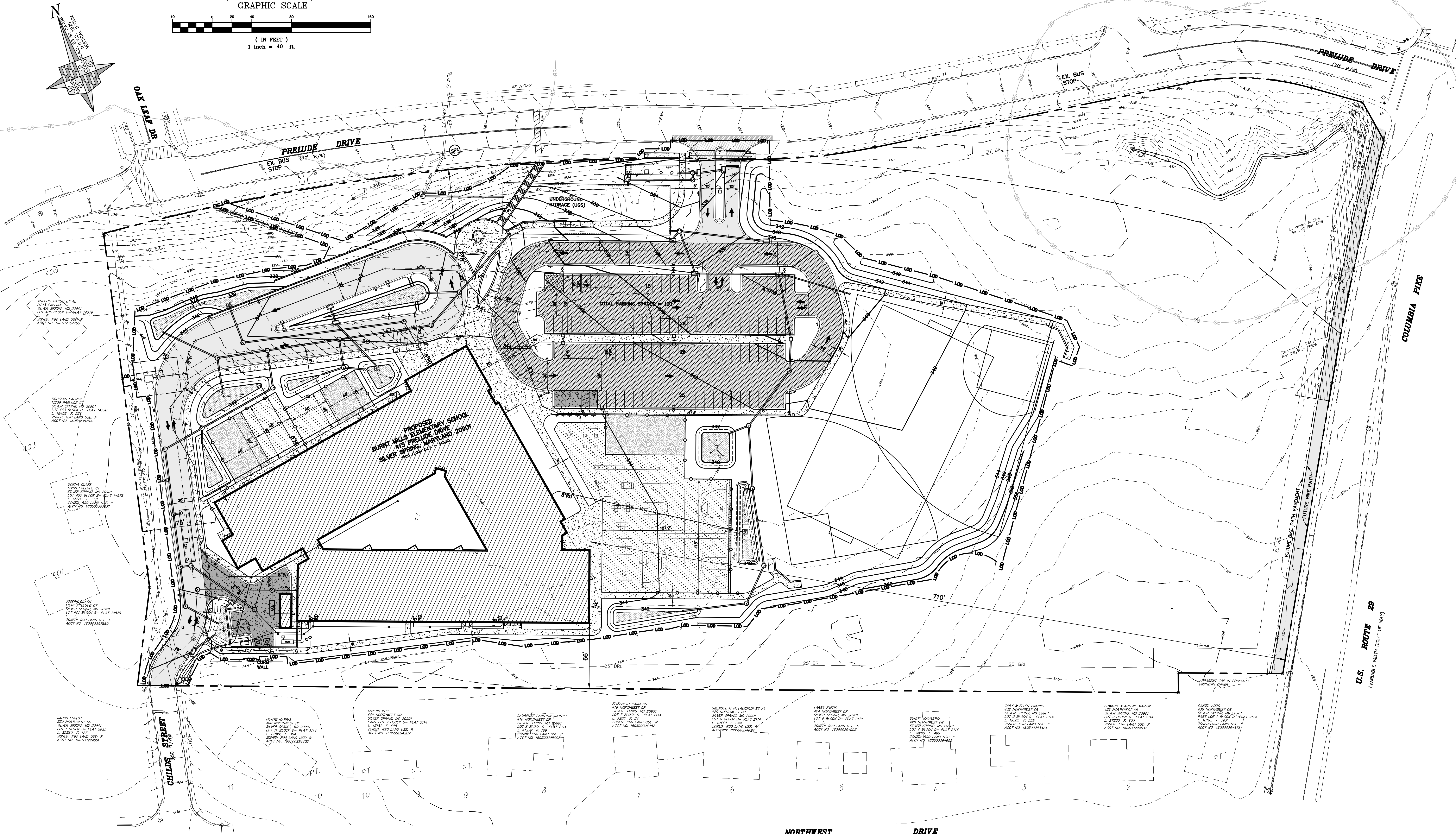
VICINITY MAP  
SCALE: 1" = 1,000'  
(WSSC GRID: 214 NE 01)  
MONTGOMERY COUNTY

CAUTION: IF THIS DRAWING IS A REDUCTION,  
GRAPHIC SCALE MUST BE USED  
(ORIGINAL SIZE = 30" x 42")

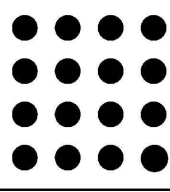
GRAPHIC SCALE



( IN FEET )  
1 inch = 40 ft.



MTFA  
architecture



3300 LEE HIGHWAY, ARLINGTON, VIRGINIA 22207  
P. 703.524.6636 WWW.MTFA.NET

Burnt Mills  
Elementary  
School

MONTGOMERY COUNTY  
PUBLIC SCHOOLS

415 PRELUDE DRIVE  
SILVER SPRING, MD 20901

CIVIL ENGINEER

ADTEK ENGINEERS, INC.  
150 South East Street, Suite 201  
Frederick, MD 21701  
301.360.4345

MEP/FP

2RW Consultants, Inc.  
2750 Prosperity Ave., Suite 200  
Fairfax, VA 22031  
703.718.4335

STRUCTURAL

Linton Engineering  
46091 Linn Center Plaza, Suite 309  
Potomac Falls, VA 20155  
571.323.0320

PROJECT #

20042

DATE:

01/29/2021 IAC SD Submission  
04/27/2021 Design Development

DRAWN:

AMM

CHECKED:

SPB

SCALE:

1" = 30'

SHEET TITLE:

MANDATORY  
REFERRAL SITE  
PLAN

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SHEET #

03-MRPLAN-MR2021017-001



# ATTACHMENT 2



## DEPARTMENT OF PERMITTING SERVICES

Marc Elrich  
County Executive

Mitra Pedoeem  
Director

May 19, 2021

Mr. Shawn Benjaminson  
ADTEK Engineers  
150 South East St., Suite 201,  
Frederick MD 21701

Re: **COMBINED STORMWATER MANAGEMENT  
CONCEPT/SITE DEVELOPMENT  
STORMWATER MANAGEMENT PLAN** for  
Burnt Mills Elementary School  
Mandatory Referral #: 2021017  
SM File #: 286813  
Tract Size/Zone: 15.15  
Total Concept Area: 8.37  
Parcel(s): 400 & 353  
Watershed: Northwest Branch (IV)

Dear Mr. Benjaminson:

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 proposes to meet required stormwater management goals via Enhanced MicroBioretention, Permeable Pavement, Underground Structural Sandfilters.

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

1. A detailed review of the stormwater management computations will occur at the time of detailed plan review.
2. An engineered sediment control plan must be submitted for this development.
3. All filtration media for manufactured best management practices, whether for new development or redevelopment, must consist of MDE approved material.

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



2425 Reedie Drive, 7th Floor, Wheaton, Maryland 20902 | 240-777-0311  
[www.montgomerycountymd.gov/permittingervices](http://www.montgomerycountymd.gov/permittingervices)

*Mr. Shawn Benjaminson*  
*May 19, 2021*  
*Page 2 of 2*

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 Bill Musico at 240-777-6340.

Sincerely,



Mark C. Etheridge, Manager  
Water Resources Section  
Division of Land Development Services

MCE: WJM

cc: N. Braunstein  
SM File # 286813

ESD: Required/Provided 1.76 cf / 1.65 cf  
PE: Target/Achieved: 28,200"/26,555"  
STRUCTURAL: 52,650 cf  
WAIVED: 0.00.