

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

DATE: November 18, 2020

TO: Planning Commission

FROM: Planning Staff

SUBJECT: EXECUTIVE SUMMARY: Consideration of a revised grading schedule and wet season grading operations for the Ascension Heights Subdivision. The project is located in the unincorporated San Mateo Highlands area of San Mateo County.

County File Number: PLN 2002-00517 (Bel Aire Heights LLC)

PROPOSAL

At the February 26, 2020 meeting, the Planning Commission approved the applicant's five-month schedule of grading operations extending through the dry season (ending September 30th). The applicant is seeking approval for a revised approximately nine-month grading schedule, including permission to continue grading through the wet season (October 1st to April 30th).

RECOMMENDATION

Staff recommends approval of the revised grading schedule, including the wet season grading operations, all subject to the conditions included in Attachment A.

SUMMARY

The project site, consisting of a total of approximately 13.25 acres (gross), is located in the unincorporated area of San Mateo County known as the San Mateo Highlands. The subject site is vacant and bordered to the west by Bel Aire Road, Ascension Drive to the south, existing single-family development to the north and west.

The permit requires that the schedule of grading include details of the off-site haul operations, including gravel import site(s), size of trucks, haul route(s), time and frequency of haul trips, dust and debris control measures, and traffic and safety control measures be reviewed by the Planning Commission. The applicant submitted materials to satisfy this condition and obtained Planning Commission approval on February 26, 2020. The Planning Commission's approval of the schedule of grading operations included nine additional Conditions of Approval, which were satisfied prior to the issuance of the Building Permit and Grading Hard Card on July 28, 2020.

The schedule approved by the Planning Commission on February 26, 2020 included grading work that would take place between May 1st and September 30th (the “dry season”). As grading work did not commence for approximately three months after the intended start date, the work was not completed by September 30th.

The applicant requests authorization for a revised eight-month grading schedule, including authorization to continue grading throughout the “wet season” (October 1st – April 30th) subject to the conditions included in Attachment A.

Staff supports approval of the revised grading schedule, including wet season grading, as proposed and conditioned in Attachment A, and Staff recommends that the Planning Commission approve the proposed revised grading schedule.

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

DATE: November 18, 2020

TO: Planning Commission

FROM: Planning Staff

SUBJECT: Consideration of a revised grading schedule, wet season grading operations, and revised hours of operation for the Ascension Heights Subdivision. The project is located in the unincorporated San Mateo Highlands area of San Mateo County.

County File Number: PLN 2002-00517 (Bel Aire Heights LLC)

PROPOSAL

At the February 26, 2020 meeting, the Planning Commission approved the applicant's five-month schedule of grading operations extending through the dry season (ending September 30th). The applicant is seeking approval for a revised approximately nine-month grading schedule, including permission to continue grading through the wet season (October 1st to April 30th), and to amend their hauling hours of operation from 9 am – 3 pm to 8 am – 4 pm.

RECOMMENDATION

Staff recommends approval of the revised grading schedule, including the wet season grading operations, and amending the hauling hours of operation, all subject to the conditions included in Attachment A.

BACKGROUND

Report Prepared By: Kelsey Lang, Planner

Applicant/Owner: Bel Aire Heights LLC

Location: Six contiguous parcels (APNs 041-111-130, -160, -270, -280, -320 and -360), consisting of a total of approximately 13.25 acres (gross), located in the unincorporated area of San Mateo County known as the San Mateo Highlands. The subject site is bordered to the west by Bel Aire Road, Ascension Drive to the south, existing single-family development to the north and west.

APNs: 041-111-130, 041-111-160, 041-111-270, 041-111-280, 041-111-320 and 041-111 360

Existing Zoning: R-1/S-8 (Single-Family Residential/7,500 sq. ft. minimum lot size)

General Plan Designation: Medium Low Density Residential (2.4 – 6.0 dwelling units/acre)

Environmental Evaluation: A Final Environmental Impact Report (FEIR) was published on December 12, 2014 and certified by the Board of Supervisors February 9, 2016. The FEIR discusses impacts and mitigations specific to grading and construction activities listed within the schedule of grading, and those mitigation measures are incorporated in the proposed plan.

Setting: The subject site is located at the northeast corner of the intersection of Bel Aire Road and Ascension Drive. It is situated on a hillside with average slopes of 40 percent. The site is surrounded by single-family dwellings, including the Baywood Park neighborhood to the northeast, the Enchanted Hills neighborhood to the southeast and southwest, and the Starlite Heights neighborhood to the northwest. The College of San Mateo campus is located less than 1/4-mile northeast of the site via Parrott Drive. At the center of the site is an existing potable water tank on a separate 22,500 sq. ft. parcel owned and operated by the California Water Service Company with several cellular communications facilities established on the parcel.

The site was graded over 40 years ago, by excavating the sides of the hill for the construction of Ascension Drive and Bel Aire Road during the grading for the Enchanted Hills subdivision. Eight-foot-wide benches were created along Ascension Drive at 30-foot elevational intervals. Surface runoff from these benches has eroded the slope over the years, most significantly in the southwest corner adjacent to the intersection of Ascension Drive and Bel Aire Road. The site is characterized by grassland, small brush, and trees such as oak, pine and eucalyptus.

Chronology:

<u>Date</u>	<u>Action</u>
August 28, 2002	- Application submitted for proposed 25-lots.
December 9, 2009	- Planning Commission denied the proposed subdivision.
June 29, 2010	- Board of Supervisors considered an appeal by the applicant and remanded the project back to the Planning Commission for consideration of a revised project.

- January 28, 2015 - Planning Commission considered the revised subdivision project and certification of the FEIR and continued the hearing to hear additional public testimony.
- October 14, 2015 - Planning Commission approved the project.
- October 28, 2015 - Applications of appeal received.
- February 9, 2016 - Board of Supervisors approved the project.
- March 2016 - Petition for judicial review of approval filed.
- May 2018 - Court of Appeal decision upholding County approval.
- December 12, 2018 - Planning Commission initial review of landscaping plan.
- February 25, 2019 - Planning Commission final review and approval of landscaping plan.
- September 25, 2019 - Planning Commission review of proposed schedule of grading operations and haul routes; Planning Commission continued the item to a future date.
- February 26, 2020 - Planning Commission review and approval of grading operation and haul routes.
- May 18, 2020 - Applicant held public information meeting per Planning Commission Condition of Approval 7 from February 2020 meeting.
- July 28, 2020 - Building Permit issued with Grading Hard Card to begin grading operations.
- November 18, 2020 - Planning Commission consideration of a revised grading schedule.

DISCUSSION

A. BACKGROUND

The approved project is a modification of the original 25-lot subdivision application that was denied by the Planning Commission in 2009. Based on feedback from the Planning Commission at that time, the applicant revised the design to reduce the size of the subdivision to 19 lots. The Planning Commission reviewed and considered the revised project at three Planning Commission hearings in 2015

and approved the project on October 14, 2015. An appeal to the Board of Supervisors was received on October 28, 2015 from community members. On February 9, 2016, the Board of Supervisors upheld the decision of the Planning Commission's approval subject to 51 conditions of approval. One of the Board of Supervisors' conditions of approval required that the Planning Commission review and consider approval of a schedule of grading operations – a task that is typically performed by the Departments of Public Works and Planning and Building for projects with approved grading permits. The applicant submitted materials to satisfy this condition and obtained Planning Commission approval on February 26, 2020. The Planning Commission's approval of the schedule of grading operations included nine additional Conditions of Approval, which were satisfied prior to the issuance of the Building Permit and Grading Hard Card on July 28, 2020.

The schedule approved by the Planning Commission on February 26, 2020 included grading work that would take place between May 1st and September 30th (the "dry season"). As grading work did not commence for approximately three months after the intended start date, the work was not completed by September 30th.

The applicant requests authorization for a revised eight-month grading schedule, including authorization to continue grading throughout the "wet season" (October 1st – April 30th), and a revision to the condition controlling hours of off-haul to permit off-haul during the hours of 8 am to 4 pm, subject to the conditions included in Attachment A.

B. COMPLIANCE WITH CONDITIONS OF THE LAST APPROVAL (FEBRUARY 2020)

Compliance with the Planning Commission's conditions of approval from February 26, 2020 are assessed below:

- a. **The applicant shall install two signs at the property. One sign shall specify the days and hours of construction, parking rules for contractors and their staff and the company name of the project owner and be located as near as is feasible to the project entrance. Another sign shall include the name of the project, the names and phone numbers of representatives from Bel Aire Heights LLC or their successors or assigns that are available to respond to questions and complaints, and the name and phone number of the County's compliance monitoring consultant, AES Environmental, or their successor, and be located in a prominent location, visible from Bel Aire Road and Ascension Avenue. The two signs shall remain in place until all grading and site improvement work is completed.**

Compliance with Condition? Yes, two signs were installed on May 3, 2020. The applicant provided photo evidence of their installation.

- b. The applicant shall provide flagmen at the entrance to the site at all times that trucks and equipment will be exiting and entering the site during the grading operation, and additional flagmen at locations with limited sight distance along the Phase 1 haul routes, including the Rainbow Drive and Lakeshore intersection, and any other intersections or locations as determined by the Department of Public Works, when trucks are hauling material to and from the site.**

Compliance with Condition? Yes, the County's contracted Environmental Site Inspector confirmed that flaggers are present at the construction entrance and the corner of Bel Aire Rd and Laurie Lane, and at the Rainbow Drive and Lakeshore intersection when hauling is occurring.

- c. All contractor parking shall be located on the project site.**

Compliance with Condition? Yes, the County's contracted Environmental Site Inspector confirmed that all contractor parking is occurring on-site.

- d. The applicant shall install temporary orange plastic fencing affixed to fence posts delineating the limits of work on the project site, in addition to the required tree protection fencing, which shall remain in place during the entirety of the grading operations. No parking or any other activity shall be allowed within these no-work areas, and signs shall be affixed to the fencing indicating these areas as off-limits.**

Compliance with Condition? Yes, the County's contracted Environmental Site Inspector can confirm that the limits of work are delineated by orange fencing and that signs have been observed indicating the areas as off-limits.

- e. All trucks used for hauling material to and from the site, including all empty trucks arriving at the site to haul material, shall always be covered by tarpaulins.**

Compliance with Condition? No, the County's contracted Environmental Site Inspector confirmed that all haul trucks leaving the site have been covered by tarpaulins, however approximately 75% of returning trucks have not been covered by tarpaulins. An additional Condition of Approval has been added to Attachment A stating that any trucks arriving without a tarpaulin cover will not be permitted to enter the site that day.

- f. The applicant shall organize a public meeting with the neighbors to be held at the San Mateo Highlands Recreation Center to inform the residents of the upcoming grading activities. The meeting shall be held in late April, prior to the commencement of grading. The applicant shall use a list of interested**

parties provided by the County to notify residents of the meeting at least two weeks in advance, and subsequent to the meeting, shall provide residents with monthly email updates regarding grading activities completed and upcoming until grading is completed in September 2020.

Compliance with Condition? Yes, the applicant's public meeting was held on May 18, 2020. The applicant has provided monthly email updates regarding grading activities to interested parties.

- g. The applicant shall conduct tailgate meetings together with the County's compliance contractor or their representative for workers on the project site prior to the commencement of grading activities and monthly thereafter to inform contractors and workers of the conditions of approval and mitigation measures they must adhere to. The applicant shall use resources as a reference for subjects the trainings, including but not limited to the conditions of approval, the environmental impact report mitigation measures and Building Permit conditions and approved construction document notes.**

Compliance with Condition? Yes, the County's contracted Senior Project Manager conducts these meetings and presented the contractors with copies of the conditions of approval.

- h. The applicant shall apply for and obtain an after the fact tree removal permit for the Coast Live Oak with approximately 16-inch diameter at breast height, including necessary permit fees and penalties, prior to the issuance of a grading hard card.**

Compliance with Condition? Yes, the applicant applied for and obtained the after-the-fact tree removal permit under PLN2020-00111, and final approval was issued on May 4, 2020.

C. REVISED SCHEDULE OF GRADING ACTIVITIES

1. Revised Grading Schedule Description

While issuance of the Grading Hard Card was originally anticipated in early May, due to a combination of factors, it was not issued until July 28, 2020. The grading schedule that was previously approved by the Planning Commission extended over the five months of the dry season (May – September). If this schedule was maintained, but shifted due to the delayed start date, the expected completion date would be December 27, 2020. However, the revised schedule proposed by the applicant identifies April 26,

2021 as the expected completion date, approximately four months (17 weeks) longer than the original schedule.

The additional 17 weeks of extra grading time includes a two-week weather delay buffer and assumes that the Planning Commission approves the request for increased hauling hours, which the applicant anticipates will reduce grading time by three weeks (see Section D below for discussion).

The explanation for the additional weeks is summarized below, and is described in further detail in Attachment B:

- a. In the original grading schedule, it was assumed that land clearing and site preparation would be permitted to occur prior to the issuance of the grading hard card. This assumption was not correct, and the grading schedule was delayed while this work was occurring after the issuance of the grading hard card.
- b. When the start of grading was delayed from the beginning of May, the contractor took additional work, and did not have the number of employees available that were anticipated in the original schedule. The original dump site for off-haul was no longer available by the time the grading started, and the new site was further away meaning fewer loads could be hauled per day.
- c. The approved grading hours and off-haul hours were shorter than anticipated in the original grading schedule, meaning less work occurred each day than anticipated.
- d. The original schedule anticipated that the 10" Cal Water main line would be disconnected prior to issuance of the grading hard card, however, Cal Water required proof of issuance prior to scheduling, which delayed this work.
- e. Coordination with PG&E regarding power supply required changing the plan layout for Lot 7 and the grading sequence for lots 6, 7, 11, and 12, which became less efficient. The applicant did not learn of the new PG&E requirements until late June 2020.
- f. The impacts of COVID-19 created delays and required work place modifications that were not anticipated in the original grading schedule. Further, the poor air quality and visibility from the August fires created additional delays.

Staff supports approval of the revised grading schedule, including wet season grading, as proposed and conditioned in Attachment A.

2. Revised Grading Schedule Details

As summarized in Attachment C, the grading activities will be done in three phases. Phase 1 consists of land clearing, construction of the road base of the new access road, and grading for lots 1, 2, 3, & 4. The majority of Phase 1 tasks have been completed. Phase 2 involves the grading for lots 13 - 19, landslide area repairs, and installation of a new entrance. Phase 3 involves the grading for lots 5 – 11. Dates are included along with the estimated number of days, as there are overlapping periods between each task and phase. These estimates include the original five-month schedule plus the additional 19 weeks due to the above-noted delays.

- a. Remaining Phase 1 Ascension Heights Grading Operations (October 12 – December 14: approximately 52 days):
 - (1) Phase 1 B grading new driveway between lot 1 & 8 (October 12 – December 14: 36 days)
 - (2) Major dirt off-haul for 1B (October 26 – November 17: 16 days)

- b. Phase 2 Ascension Heights Grading (November 5 – February 17: approximately 120 days):
 - (1) Land slide area repair (November 5 – December 16: 30 days)
 - (2) Phase 2A grading downhill, lots 13-19 (November 10 – January 5, 2021: 40 days)
 - (3) Phase 2B new entrance (December 17 – January 20: 25 days).
 - (4) Install S.S. offsite (January 14 – January 27: 10 days)
 - (5) Install S.D. offsite (January 28 – February 17: 15 days)

- c. Phase 3 Ascension Heights Grading (February 19 – April 26: approximately 53 days):
 - (1) Phase 3A grading cut lots 8, 9, 10 (February 19 – March 25: 20 days)
 - (2) Last dirt off haul for 3A (February 25 – March 3: 5 days)

- (3) Phase 3B grading cut lots 5, 6, 7,11 (March 17 – April 26: 28 days)

D. REQUEST FOR REVISION OF HAULING HOURS

The applicants have requested a revision in the grading hours that were approved at the February 26, 2020 Planning Commission meeting. The approved hours for grading were 8 am – 5 pm, while the approved hours for hauling were 9 am – 3 pm. The applicants are requesting that the hauling hours are revised to 8 am – 4 pm.

The applicants indicate that their understanding of the reason for the reduced hauling hours was because of neighborhood traffic, specifically school buses and other school-related traffic. They indicate that with schools operating remotely and the “shelter in place” regulations in effect, they believe that the extended hauling hours would not have any safety impacts to traffic or school children. Should the extended hours be granted, the applicant indicates that grading schedule could be reduced by three weeks.

Given the reduction in school-related traffic and the anticipated reduction in grading time, Staff support this amendment to the hauling hours of operation.

ATTACHMENTS

- A. Recommended Finding
- B. Revised Grading Request
- C. Grading Schedule Details

County of San Mateo
Planning and Building Department

RECOMMENDED FINDING AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2002-00517 Hearing Date: November 18, 2020

Prepared By: Kelsey Lang, Planner For Adoption By: Planning Commission

RECOMMENDED FINDING

The proposed schedule of grading operations and haul routes conform with the adopted conditions of the subdivision approval.

CONDITIONS OF APPROVAL:

1. A Building Permit, including payment of inspection fees, is required to track weekly wet season Erosion Control inspections.
2. Applicant must comply with all conditions of approval of the Grading Permit.
3. If grading period must be extended, the applicant must provide an updated schedule to the Community Development Director (Director) for review by the Planning Commission, unless the Director determines that the proposed schedule modification is minor in nature.
4. Grading may occur only on dry days. No grading shall occur within 24-hours after a rain event.
5. Applicant shall send photos of final stabilization to the project planner within one week of completion of grading.
6. Any empty hauling trucks arriving in the neighborhood without a tarpaulin cover will not be permitted to enter the site for 12 hours and shall only be allowed onsite if covered when arriving or leaving the site.

HPL Development, LLC

Real Estate Investment, Development and Construction

MEMO

To : Joe LaClair, Planning Manager, County of San Mateo
Dated : October 28, 2020
RE : Issues Related to Grading at Ascension Heights Subdivision

Thank you for giving us the opportunity to provide a detailed explanation to the revised grading schedule for Ascension Heights Subdivision. We want to thank all the County staff who has worked so hard during this very difficult period. Bel Aire Heights is committed to be proactive and continue to satisfy the County's requirements, the work schedules of various utility agencies as well as to keep our neighbors well informed of all developments.

Because of a combination of factors, the actual Grading Hard Card was not issued until 7/28/2020. Using the original schedule of 5 months of grading work as a baseline, the new completion date would be 12/27/2020. However, a list of factors prevented us from meeting this original timeline. Our revised schedule listed 4/26/2021 as the end of all grading, approximately four months (17 weeks) beyond the original schedule. These 17 extra weeks are essential to offset unforeseen events that occurred after the hearing in February of 2020.

Below is a brief summary of the events that occurred between late 2019 to July 28th, 2020, when the grading hard card was eventually issued. It will explain why the project needs the extra 17 weeks to complete the grading phase of the project during the winter season of 2020. (Please note that in the revised schedule provided to the County, a 2-week "weather related delays" is already built-in.)

The summary of events that occurred is as follows:

7/28/2020 – Issuance of grading Hard Card;

1. Site Condition – In 2019, approximately 300 trees and brushes were cut around the property in preparation for the grading work. When grading approval was delayed, the tree stumps were left in the ground for erosion control purposes through the winter months of 2019. When grading was finally approved on 7/28/2020, the tree stumps removal and site preparation took 3 weeks to complete, on or about 8/17/2020. Tree and tree stumps removal were not in the original approved grading schedule provided to the County. Therefore, after their removal, the actual grading did not start until late August of 2020. **3 weeks were lost from the grading schedule.**

2. Grading Contractor – Our grading contractor have already taken up another job after it was clear that we could not start grading in May of 2020. When our grading permit was granted, the grading contractor was still working on the another job. Also, a number of his crew tested positive for COVID-19 and therefore was not able to provide a full work crew immediately to our site when grading commenced on 8/17/2020. Grading also have several issues that prevented the contractor from moving forward as planned. They are:

- i) Cal Water & Cell Tower relocation work that are detailed in Item 3 below.
- ii) Grading hours changed from the regular “7am- 6pm” work hours to “8am-5pm”, as specified in the February, 2020 conditional approval. The 20% less in grading activities per day in the original “5-month grading schedule” equals to approximately **4 weeks** of loss grading activities. This lost time could not be gained back even if grading hours are extended now as the day gets dark early in the winter months;
- iii) Off-haul hours changed from the original schedule of “8am-4pm” to “9am-3pm” in the February 2020 approval hearing. The reduced off-hauling not only reduces the number of off-hauls by 25% per day, it also reduces the number of truckers who are unwilling to work on a shorter “6-hour” work-day. These changes caused a loss of at least **3+ weeks*** in the grading schedule.
(However, off-hauling has progressed smoothly and if there are no weather related delays, most major off-hauling will cease before the end of November, 2020.)
- iv) The Delay of grading “start date” from May to August also caused the loss of a nearby off-hauling dump site. The current dump site is further away from the jobsite and as a result, the off-hauling reduced one trip per day. The result is a loss of approximately **3 weeks in the grading schedule**.

3. External factors – There are other significant external factors that are beyond our control. They are:

- i) Cal Water & Cell Tower cables – Cal Water would not disconnect its 10” main line for relocation until the grading permit is officially issued. Since we did not know the date of the “hard card” issuance and was not able to inform Cal Water in advance. As a result, the scheduling, disconnecting and testing of the Cal Water line took 2 extra weeks to complete. Cell Tower work at the start of grading also delayed normal grading activities at the same time. These work delayed approximately **2 weeks** of initial grading work.
- ii) PG&E – PG&E would not supply temporary power to the Cal Water site. They had given us a “Will Serve” letter but now stated that the permanent trench for power to

the Cal Water equipment needed to be complete and inspected before they would switch over from the current supply lines, The impact is significant. The entire plan layout for Lot 7 was changed and lots 6,7,11 and 12 grading would have to be done out of sequence. PG&E failed to inform applicant of this until late June, 2020. This will **extend grading by 3 weeks** after the completion of the underground utilities.

- iii) COVID-19 & other natural disasters – The general “shelter in Place” and “essential worker” order in March to July, 2020 as well as other COVID-related preventive measures and protocols affected the project significantly. The general “Shelter in Place” measure not only affected significantly to the grading start date, but continues to be a significant factor in our day-to-day operations, such as social distancing of our crew, the absence of efficient face to face meetings with engineers, consultants, subcontractors and most importantly, meetings with various utility stakeholders, County staff and inspectors. The unprecedented fire storms in the summer also contributed to unhealthy air conditions and low visibility which caused grading stoppages for several days. We estimated that these events contributed to at least **2 weeks** in actual loss of productivity.

An excerpt of delays not anticipated in the original schedule are as follows:

Tree Stumps removal (not in original grading schedule)	3 Weeks
Grading Hours shortened (not in original grading schedule)	4 Weeks
Outhaul Hours Shortened (not in original grading schedule)	3 Weeks
Loss of close by dump site originally secured in May, 2020	3 Weeks
Cal Water & Cell Tower Work Rescheduled	2 Weeks
PG&E Temporary Power causing grading out of sequence	3 Weeks
COVID-19 & other natural disasters affected productivity	<u>2 Weeks</u>
SUB – TOTAL of Estimated Extra Weeks:	20 Weeks
Grading Efficiency & Drier Weather reduced the schedule by:	<u>- 3 Weeks</u>
Revised Total Extra Weeks based on Calculation:	17 Weeks
TOTAL EXTRA WEEKS OF GRADING IN REVISED SCHEDULE :	17 WEEKS

Based on the above calculations, the delays caused close to 20 extra weeks of grading. However, we are gaining back some efficiency because of the better soil conditions as well as better work scheduling. The grading contractor will be adding an extra set of crew to the job site for the repair of the slide area. Overall, we are requesting 17 weeks of extra grading time, from December 28th, 2020 to April 26th, 2021.

We have already mobilized for the repair of the slide areas. The 1 ½ months of repair work is scheduled to be completed before the end of the year, provided that weather conditions continue to be favorable. The repair of the slide area is a major concern to a number of our neighbors and we are committed to complete this work as soon as possible.

Major off-hauling activities will end before the end of November, 2020. After that, we anticipate only one additional week of off-hauling activities toward the end of February after grading activities on Lot 8,9 and 10 (Phase 3A).

The “out-of-sequence” grading of Lot 5, 6, 7 & 11 will be from March 17th to April 26th, 2021 when all underground utility work is completed. The underground utility work and this phase of grading activity will not create any off-hauling activities and should have minimal effort on the neighbors.

We respectfully request the approval of the revised grading completion date of April 26th, 2021 because it is reasonable based on the events and reasons above. We are confident that this revised schedule will be met based on our grading contractor’s experience, extra manpower and favorable site conditions.

Please let us know whether there are other areas of concern that we could address to the County.

Best Regards.

Respectfully,

Louis Leong
Electronic Signature

Vice President
Bel Aire Heights, LLC
For: Ascension Heights Subdivision