

## **FACTSHEET**

**TITLE: WAIVER NO. 03014**, requested by Lyle Loth of ESP, Inc., on behalf of Donald Spilker, for modifications to the subdivision ordinance requirements as set forth below associated with the Spilkers 4<sup>th</sup> Addition Final Plat, on property generally located at N. 33<sup>rd</sup> Street and Gladstone Street.

**STAFF RECOMMENDATION:** Denial of the waiver of the requirement to dedicate the remainder of the half street (N. 33<sup>rd</sup> Street), and conditional approval of the remaining waiver requests.

**SPONSOR:** Planning Department

**BOARD/COMMITTEE:** Planning Commission  
Public Hearing: 01/07/04  
Administrative Action: 01/07/04

**RECOMMENDATION:** Approval of the staff recommendation (7-1: Carlson, Larson, Marvin, Sunderman, Pearson, Carroll and Bills-Strand voting 'yes'; Krieser voting 'no'; Taylor absent).

### **FINDINGS OF FACT:**

1. The applicant has submitted a proposed two-lot final plat, named Spilkers 4<sup>th</sup> Addition, and is requesting waivers of the following requirements of the subdivision ordinance:
  - A. Dedication of the remainder of the half street of N. 33<sup>rd</sup> Street.
  - B. Improvements to urban standards on N. 33<sup>rd</sup> Street.
  - C. That each lot have access and frontage to a public or private roadway.
  - D. Construction of a public water main.
  - E. Construction of a public sanitary sewer main.The intent is to allow the owner of a new broadcast tower to purchase rather than continue to lease a portion of this property, and waive several subdivision requirements regarding frontage.
2. The staff recommends denial of the request to waive the requirement to dedicate the remainder of the half street (N. 33<sup>rd</sup> Street). Dedication of street right-of-way is a standard requirement for all plats, and in this case, although there is a plan to realign 33<sup>rd</sup> Street, there is no definite alignment and no funding for this improvement. The staff recommends conditional approval of all other waiver requests. The Analysis supporting this recommendation is found on p.3-5. Staff agrees that the proposed lot for the tower merits some special consideration. However, the remainder of the property should not be approved as "buildable" if normal improvements along the fronting street (33<sup>rd</sup> Street) are to be waived.
3. The applicant's testimony is found on p.6-7. The applicant disagrees with the denial of the request to waive the remainder of the half street (N. 33<sup>rd</sup> Street) and also disagrees with the requirement that Lot 2 be created as an unbuildable outlot, testifying that this creates a hardship and injustice to the owner. The applicant's representative, Lyle Loth, submitted Exhibits A, B and C (p.14-16). Exhibit A represents the conditions as they exist today. Exhibit B represents the impact if the requested waivers are granted, which allows KLIN to purchase and own the tower site). Exhibit C represents the staff recommendation. The applicant stated that the plat will be withdrawn if the staff recommendation is approved.
4. There was no testimony in opposition.
5. The Planning Commission discussion with staff is found on p.7-8. Dennis Bartels of Public Works explained that the dedication of the half street is a requirement of the subdivision ordinance. He also explained that the tower site would have no access, thus the requirement for designation of the unbuildable outlot, which would require filing a preliminary plat in the future to create it as a buildable lot with proper access and improvements in order to get a building permit.
6. On January 7, 2004, the Planning Commission voted 7-1 to agree with the staff recommendation as set forth in the staff report (Commissioner Krieser dissenting; Taylor absent).

**FACTSHEET PREPARED BY:** Jean L. Walker

**REVIEWED BY:** \_\_\_\_\_

**REFERENCE NUMBER:** FS\CC\2004\WVR.03014

**DATE:** January 20, 2004

**DATE:** January 20, 2004

# LINCOLN/LANCASTER COUNTY PLANNING STAFF REPORT

for January 7, 2004 PLANNING COMMISSION MEETING

**P.A.S.:** Waiver #03014

**PROPOSAL:** Waive the following requirements associated with Spilkers 4<sup>th</sup> Addition Final Plat #03014:

1. Dedication of the remainder of the half street of N. 33<sup>rd</sup> St.
2. Improvements to urban standards on N. 33<sup>rd</sup> St.
3. That each lot have access and frontage to a public or private road.
4. Construction of a public water main
5. Construction of a public sanitary sewer main

**LOCATION:** N. 33<sup>rd</sup> St. & Gladstone St.

**LAND AREA:** 26.26 acres, more or less

**CONCLUSION:** The purpose of the proposed final plat associated with this application is to create a lot for a broadcast tower. Constructing the required improvements in N. 33<sup>rd</sup> St. would be a hardship and an injustice because such improvements would be destroyed and not needed as part of the Antelope Valley project. The dedication of right-of-way is not a hardship or injustice in that the dedication does not overly restrict the use of the land. Allowing access to the lot whose use is associated to a broadcast tower meets the intent of access and frontage.

If the applicant wishes to withdraw the waiver to the dedication of the remainder of the half street of N. 33<sup>rd</sup> Street, this application would be final action at Planning Commission.

## **RECOMMENDATION:**

- |  |                      |
|--|----------------------|
| 1. Waiver to dedication of the remainder of the half street of N. 33 <sup>rd</sup> St. | Denial               |
| 2. Waiver to improvements to urban standards of N. 33 <sup>rd</sup> St.                | Conditional Approval |
| 3. Waiver that each lot have access and frontage to a public or private road.          | Conditional Approval |
| 4. Waiver to construction of a public water main                                       | Conditional Approval |
| 5. Waiver to construction of a public sanitary sewer main                              | Conditional Approval |

**GENERAL INFORMATION:**

**LEGAL DESCRIPTION:** Lot 162 Irregular Tract, located in the SW 1/4 of Section 7, Township 10 N, Range 7 E, of the 6<sup>th</sup> P.M., Lancaster County, Nebraska

**EXISTING ZONING:** I-1, Industrial

**EXISTING LAND USE:** Undeveloped

**SURROUNDING LAND USE AND ZONING:**

North:	I-1 Industrial	Undeveloped, Salt Creek
South:	I-1 Industrial	Undeveloped and Industrial buildings
East:	I-1 Industrial	Auto salvage yard
West:	B-5 Planned Regional Business District	Salt Creek and Commercial shopping center.

**HISTORY:**

**October 3, 2003** Spilkers 4<sup>th</sup> Addition Final Plat #03044 was submitted to the Planning Department.

**June 16, 2003** Special Permit #2015 for authority to construct a broadcast tower on a part of Lot 162 I.T. was approved by City Council.

**December 30, 1991** Spilker Addition Final Plat, which platted the area southwest of N. 33<sup>rd</sup> St. & Gladstone St., was approved by the Planning Director.

**February 11, 1991** Spilker Addition preliminary plat was approved by City Council.

**April 2, 1979** Crescent Glen Industrial Park Final Plat, located northeast of N. 33<sup>rd</sup> St. & Gladstone St., was approved by City Council.

**December 1890** Crescent Glen subdivision was created. Crescent Glen abuts N. 33<sup>rd</sup> St on the east side.

**UTILITIES:** There is no abutting sanitary sewer or public water.

**TRAFFIC ANALYSIS:** N. 33<sup>rd</sup> St. & Gladstone St. are local streets. N. 33<sup>rd</sup> St. abutting this area is platted as only 1/2 width.

**ANALYSIS:**

1. This request is to waive the following:

- A. Sections 26.23.090, dedication of the remainder of a half-street;
  - B. Section 26.23.140(g), every lot shall have frontage and access to a public or private street;
  - C. Section 26.27.010, all streets abutting a new subdivision shall be paved with curb & gutters;
  - D. Section 26.27.020, sidewalks shall be constructed on the side of the street abutting the subdivision;
  - E. Section 26.27.030, all subdivisions within the corporate limits of the city or within the future urban area as designated in the comprehensive plan shall have a water distribution system constructed in conformance with the water main design standards of the city;
  - F. Section 26.27.040, all subdivisions within the corporate limits of the city or within the future urban area as designated in the comprehensive plan shall have a wastewater collection system constructed in accordance with the design standards of the city.
2. This application is associated with Spilker 4<sup>th</sup> Addition Final Plat #03044.
  3. The proposed final plat shows two lots. One lot is proposed for the placement of a broadcast tower.
  4. Although the Antelope Valley project shows a new street alignment through this property, when and if that street is built is unknown. In the event that the new street alignment is built, the City would be in the position of having the property owner dedicate right-of-way for the new street and the City vacating the right-of-way of N. 33<sup>rd</sup> St. The dedication of the remainder of N. 33<sup>rd</sup> St right-of-way in no way hinders the proposed final plat. The tract is not unusual in shape or size or surrounded by such development or unusual conditions that would result in actual difficulties or substantial hardship or injustice in the dedication of the west half of N. 33<sup>rd</sup> St. abutting this plat. Therefore, the requirement of dedicating the remainder of N. 33<sup>rd</sup> St. should not be waived.
  5. Requiring the improvements of N. 33<sup>rd</sup> St. at this time would result in actual difficulties and substantial hardship or injustice since improvements may be destroyed when N. 33<sup>rd</sup> St. is relocated based on Antelope Valley project. Improvements to N. 33<sup>rd</sup> St. could be waived at this time as long as Lot 2 is changed to an Outlot on the final plat of Spilkers 4<sup>th</sup> Addition, since no development may occur on an Outlot.
  6. The proposed final plat shows Lot 1 as a lot with no access or frontage to a public or private street. The proposed access to Lot 1 is through a private access easement. Planning Department does not object to this waiver as long as the applicant signs a subdivision agreement tied to the final plat stating that Lot 1 will only be used for a broadcast tower and Lot 2 is created as an Outlot.
  7. The applicant has also requested a waiver to Section 26.27.030 to have a water distribution system constructed in conformance with the water main design standards of the city and Section 26.27.040 to have a wastewater collection system constructed in accordance with the design standards of the city. The proposed waivers are acceptable with the stipulation that Lot

2 be changed to an Outlot and if either lot subdivides in the future the lots must connect to city water and sanitary sewer and a preliminary plat shall be required.

8. The proposed waivers must be associated with Spilkers 4<sup>th</sup> Addition and cannot be transferred to any future subdivisions of the area within Spilkers 4<sup>th</sup> Addition.
9. When the Planning Department recommends approval to a waiver(s), the waiver(s) are final action at Planning Commission. However, if the recommendation is denial, then the request must go to the City Council. Where multiple waivers have been requested under one application if any one waiver is recommended for denial then the entire application must go to the City Council.

Prepared by:

Tom Cajka  
Planner

**DATE:** December 22, 2003

**APPLICANT:** Donald Spilker  
1201 Fletcher Ave.  
Lincoln, NE 68521  
(402) 477-0387

**OWNER:** same as applicant

**CONTACT:** Lyle Loth  
ESP  
601 Old Cheney Rd. Suite A  
Lincoln, NE 68512  
(402) 421-2500

# WAIVER NO. 03014

## PUBLIC HEARING BEFORE PLANNING COMMISSION:

January 7, 2004

Members present: Carlson, Krieser, Larson, Marvin, Sunderman, Pearson, Carroll and Bills-Strand (Taylor absent).

Staff recommendation: Denial of the waiver of dedication of the remainder of the half street (N. 33<sup>rd</sup> Street), and conditional approval of the remaining waiver requests.

Ex Parte Communications: None.

### Proponents

**1. Bill Frost**, Chief Engineer with Nebraska Broadcasting--KLIN Radio, presented the application and submitted Exhibits A, B and C. The special permitted radio tower at 33<sup>rd</sup> & Cornhusker Hwy has now been completed. One of the unique aspects of the piece of property upon which the tower is located is that it falls squarely in the path of the proposed extension of 33<sup>rd</sup> Street to go around and across Salt Creek. Because of this location, they worked closely with the Antelope Valley project architects to determine whether access is going to be an issue, both presently and when that project comes to fruition. The staff recommendation for subdividing this Lot 1 from Lot 2 included dedication of half of 33<sup>rd</sup> Street, continuing up the west side of this lot. In addition, the staff recommendation also allows a waiver of the requirement to install sewer and water up that easement because of the anticipated extension of 33<sup>rd</sup> Street because the staff recognized that these improvements would likely be destroyed. The staff has made that concession with the stipulation that Lot 2 be made a nonbuildable outlot. The applicant was surprised by this stipulation because 1) the dedication of 33<sup>rd</sup> Street really doesn't serve any purpose to improve the access or the services to that lot in light of the Antelope Valley project; and 2) to create Lot 2 as a unbuildable outlot creates a hardship and injustice on the owner. A cloud hangs over this lot now because of the existence of this plan, but to place the requirement that this lot now not be buildable seems an extreme request.

**2. Lyle Loth from ESP** referred to the three exhibits.

Exhibit A represents the situation as it exists today and will remain in the event that these requested waivers are denied and the final plat is withdrawn. It consists of Lot 162 IT, which is approximately a 27-acre tract consisting of about 2.8 acres for the radio tower site, a 7.2 acre easement area to lower Platte South NRD for Salt Creek, and the remaining 16 acres of Lot 162 IT. Lot 162 IT is zoned I-1 and has 80' of access and frontage to 33<sup>rd</sup> Street at the very southeast corner of that lot. It also has access to water and sanitary sewer at that intersection.

Exhibit B represents the circumstance if the waivers are granted and the final plat is processed, resulting in Lot 1 (the radio tower site), which would be sold to KLIN. Lot 1 would have an access easement to the south along Dead Man's Run, and it would also contain Lot 2, which would be 16+ acres of I-1, also having the 80' of access and frontage to 33<sup>rd</sup> Street as well as access to water and sanitary sewer. Outlot A would contain 7.2 acres, which could be donated to the NRD for their right-of-

way. The access to Lot 1 is “down along here and continues clear on south to about a block north of Cornhusker Hwy”.

Exhibit C represents the staff recommendation. That circumstance would leave the radio tower site (Lot 1), and it could be sold to KLIN. Lot 16 would be changed to Outlot B and would be nonbuildable (a 15+ acre lot that could not be developed). Outlot A could be donated to the NRD. However, Loth indicated that this is not an acceptable alternative. If the staff recommendation is approved, the plat will be withdrawn and they would revert to Exhibit A.

Loth noted that if the applicant were to withdraw the waiver of the requirement for right-of-way dedication along 33<sup>rd</sup> and agree to change Lot 2 to an outlot, this application could be final action by the Planning Commission; however, these two conditions are not acceptable to the applicant. Loth suggested that the staff could revise their recommendation to grant the waiver of the right-of-way dedication along 33<sup>rd</sup> Street and remove the condition that outlot designation be applied to Lot 2. That would enable the Planning Commission action to be final and it would not be necessary to take this application to the City Council.

Carlson inquired about the access to Lot 1. Loth stated that the access to Lot 1 is the same in all three exhibits. It is along the west side of the property—the 30<sup>th</sup> Street access easement which ties into the 31<sup>st</sup> Street Circle. The easement will be filed with the Register of Deeds. Loth believes that the designation of a lot as an outlot is an unfair circumstance. As far as the dedication along 33<sup>rd</sup> Street, Loth believes it extremely unlikely that 33<sup>rd</sup> Street in that location will ever be open. It is unfair to ask the owner to dedicate that right-of-way. He thinks dedicating the right-of-way gives the city some trading power when it comes time for right-of-way for the Antelope Valley project. Referring to Exhibit A, Loth pointed out that they have 16 acres of Lot 162 that could be developed as light or heavy industrial without any hearing process. However, their preference would be to do a plat so that KLIN could have ownership of their site. In the event that does not occur, the owner would be willing to accept a lease arrangement for that site. Loth believes it is a stretch that they are subdividing Lot 2. For all practical purposes, it is still Lot 162.

There was no testimony in opposition.

### Staff questions

Carlson asked staff to explain the rationale for designation of an outlot versus letting them keep a lot. Tom Cajka of Planning staff explained that by designation of the outlot, they could not build on it at this time. As a buildable lot, it should have access to streets, public water, sanitary sewer, street improvements, etc. The staff has agreed to allow those waivers as long as that is not a buildable lot at this time. They would need to put in the improvements if it becomes a buildable lot. In addition, the subdivision ordinance requires that you dedicate that half of the street.

Dennis Bartels added further clarification. If Lot 2 is to be platted, the subdivision ordinance would require dedication of the rest of 33<sup>rd</sup> Street, paving, and construction of sewer and water, but before we do that we would want a grading plan because it is in the floodplain. He does not believe there is

acceptable frontage for that lot on a development of 16 acres. If Lot 2 was going to be created as a buildable lot, he would like to see a preliminary plat to provide a reasonable opportunity to review what other improvements might be necessary to make it a conventional lot.

If it moves forward as an outlot, Carlson assumes they would submit a preliminary plat just like every other lot in town. What about the road network? Bartels suggested that if they came in with a preliminary plat, it would be difficult because of the conceptual nature of the Antelope Valley project. We could not deny a preliminary plat and some use on this property if it met all the subdivision requirements. As long as it was just for purposes of the tower, Bartels thought it would be okay to have Lot 1 with no access. But if the tower ever goes away, then you have a piece of property that could be sold with potentially an untenable street situation. If Lot 2 was subdivided, Public Works would be asking for some kind of local street system to provide frontage for Lot 1, etc.

Cajka further advised that the staff did consider the possibility of having them put an easement on the plat showing the location of the road. But since the roadway has not been decided in the Antelope Valley process, Law Department indicated that we could not request an easement. Thus, we went back to the subdivision ordinance that states that they need to grant the other half of the dedicated street.

Larson believes that an easement would be appropriate. Cajka reiterated that the potential location of the Antelope Valley roadway is still conceptual. The staff cannot ask for an easement based on a "conceptual" location.

Larson inquired about the area north of Gladstone and east of 33<sup>rd</sup>. Cajka stated that part of it is a salvage yard.

Pearson noted that the owner indicated that making Lot 2 an outlot was untenable for them. Even if it is a lot, then they still have to go through the requirements to make this a plat, don't they? What's the difference between making it an outlot and a lot? Cajka explained that an outlot is unbuildable. Bartels further explained that Lot 162 as it sets today is a buildable parcel, but you cannot sell it off without formal subdivision. If it is an outlot, you would have to go through the subdivision process and create it as a buildable lot before you could get a building permit, which would be the result if the staff recommendation is approved.

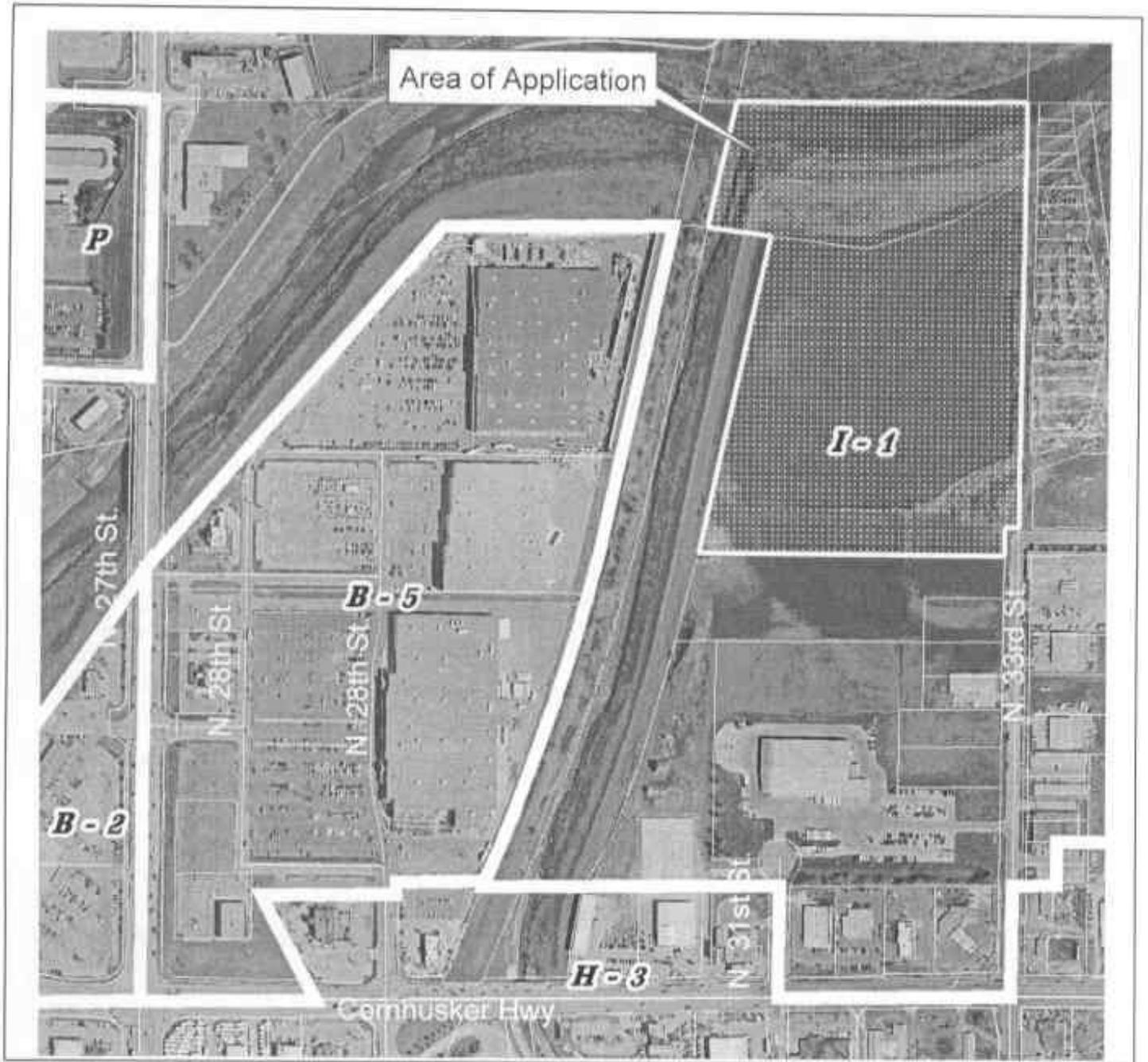
**ADMINISTRATIVE ACTION BY PLANNING COMMISSION:**

January 7, 2004

Carlson moved to approve the staff recommendation, seconded by Marvin.

Carlson believes that the operative word is that you "designate it as an outlot for future development". It does not remove the opportunity to do something in the future. It is common that when you subdivide you have to dedicate the half of the street.

Motion approving the staff recommendation carried 7-1: Carlson, Larson, Marvin, Sunderman, Pearson, Carroll and Bills-Strand voting 'yes'; Krieser voting 'no'; Taylor absent. This is a recommendation to the City Council.



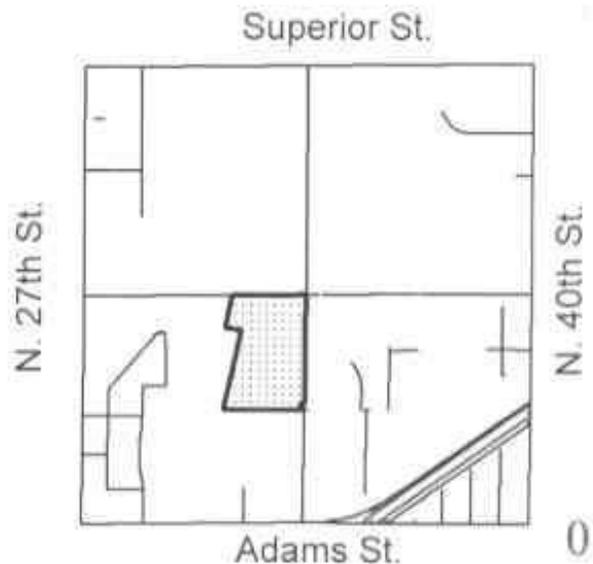
2002 aerial

## Waiver #03014 33rd & Glandstone

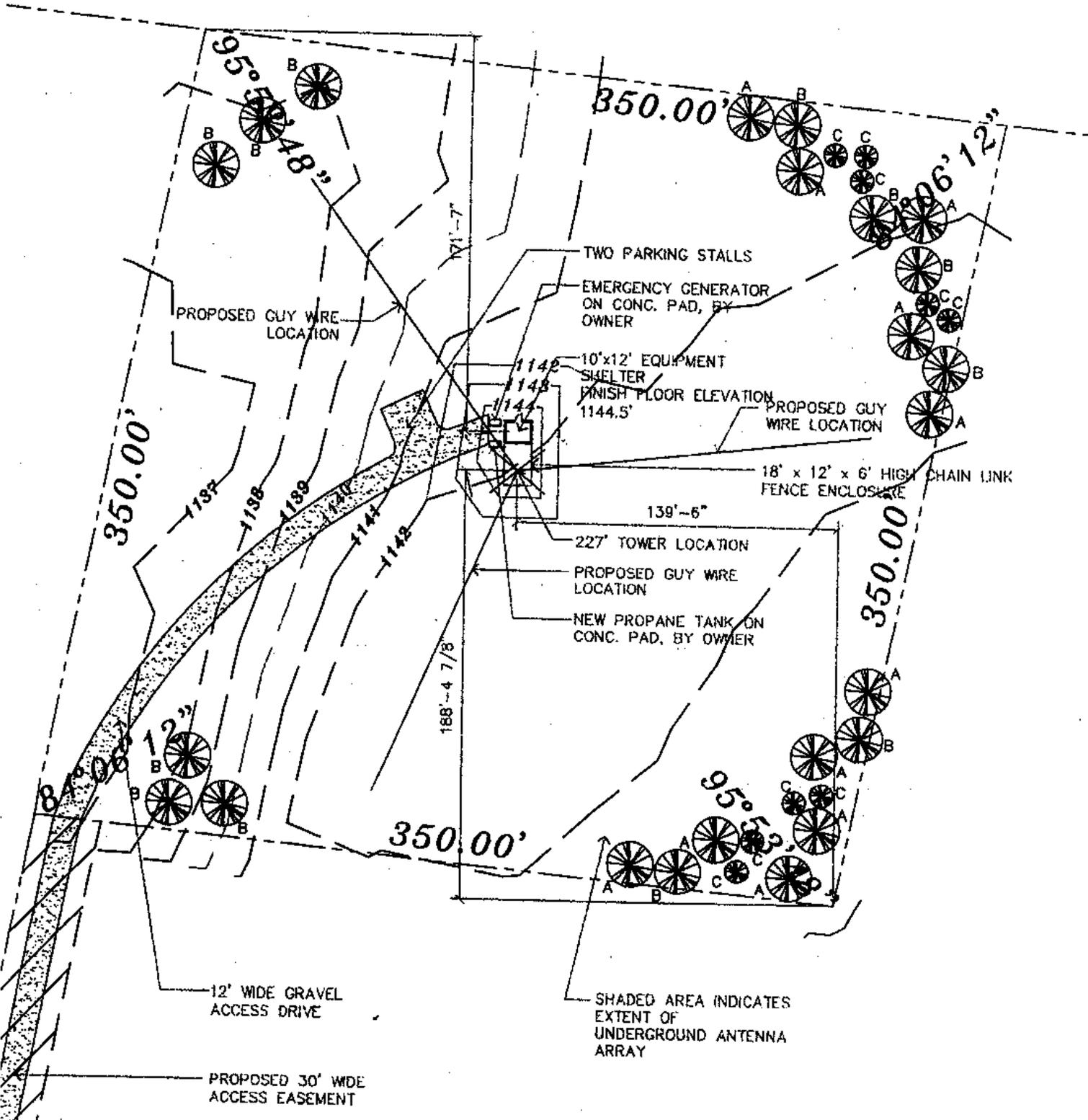
### Zoning:

- R-1 to R-8 Residential District
- AG Agricultural District
- AGR Agricultural Residential District
- R-C Residential Conservation District
- O-1 Office District
- O-2 Suburban Office District
- O-3 Office Park District
- R-T Residential Transition District
- B-1 Local Business District
- B-2 Planned Neighborhood Business District
- B-3 Commercial District
- B-4 Lincoln Center Business District
- B-5 Planned Regional Business District
- H-1 Interstate Commercial District
- H-2 Highway Business District
- H-3 Highway Commercial District
- H-4 General Commercial District
- I-1 Industrial District
- I-2 Industrial Park District
- I-3 Employment Center District
- P Public Use District

One Square Mile  
Sec. 7 T10N R7E



009



**SITE PLAN**

SCALE: 1" = 60'-0"

SHEET NO. <b>A1.</b>	DATE 8-23-83	REVISIONS
	PROJECT NO. 83-027	
	COMPILED A.D.A. 2003	

**KLIN Radio Tower**

Lincoln, NE.

010

# SPILKER'S 4TH ADDITION

N 89°34'57" E  
2592.99'(M)

N 89°34'57" E  
875.20'(M)

SALT - CREEK

**OUTLOT "A"**

313,782. Sq. ft.  
7.203 Ac.

S 00°29'14"  
197.95'(I)  
197.89'(I)

Fnd. 1" Pin  
on SW side  
4"x7.0' pipe  
corner for  
center

N 12°11'49" E  
373.16'(M)

N 88°36'21" W  
188.95'(M)  
190.00'(P)

283.85'(M)  
283.73'(R)  
N70°54'22"E  
271.20'

N62°05'54"E  
254.41'

Fnd. 1"  
Pipe  
(old)

Fnd. 1"  
Pipe  
(old)

S 83°56'38" E  
350.00'

**1**

121,857. Sq. ft.  
2.797 Ac.

TOTAL AREA =  
26.266 Ac.

**2**

708,509. Sq. ft.  
16.265 Ac.

N 11°55'41" E  
968.45'(M)

S 83°56'38" E  
350.00'

S 11°55'41" W  
350.00'

S 00°30'26" W  
1034.60'(M)

33RD ST.

LOT 38 I.T.  
(FORMERLY C & NW R.R. R.O.W.)

LOT 177 I.T.

100.0'

40' R.O.W.

S 89°07'20" W  
39.88'(M)  
40.00'(P)

S 00°29'23" W  
80.00'(P&M)

GLADSTONE

Fnd. 1" Pipe

S 89°21'40" W  
913.89'(M) 914.20'(P)

Fnd. 1/2" Pipe

S. Ctr. 1/16  
Sec. 7 (10-7)  
Position is  
0.38' W. of  
N-S Sec. line

Fnd. 1" In monu

S 1/4 Cor. Sec.  
7 (10-7)  
Fnd. 1" Pin  
in monument well



North

# Memorandum

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<b>To:</b>	Tom Cajka, Planning Department
<b>From:</b>	Dennis Bartels, Engineering Services
<b>Subject:</b>	Spilker's 4th Addition Waivers
<b>Date:</b>	November 21, 2003
<b>cc:</b>	Randy Hoskins Bruce Briney

Engineering Services has reviewed the requested waivers to Spilker's 4th Addition and has the following comments:

1. Public Works objects to the waivers requested especially if Lot 2 is shown as a buildable lot. It is not appropriate to plat Lot 2 as a buildable lot without an approved preliminary plat showing appropriate improvements meeting design standards. There is no abutting pavement except the right angle 90° intersection frontage of Gladstone and 33rd. A driveway for an industrial lot is inappropriate. A minimum use driveway providing access to the proposed tower lot can probably be approved. The justification for waivers addresses Lot 1. The letter provides no justification for the Lot 2 requirements.
2. Engineering Services suggests that rather than waive subdivision improvement requirements, both lots be platted as outlots with provisions made to allow the tower to be constructed on the outlot shown as Lot 1. Neither lot has the improvements required for subdivision or the improvements necessary for the uses allowed per the zoning code.



File No. 03-0007  
November 18, 2003

Marvin S. Krout  
Director of Planning  
Planning Department  
555 South 10<sup>th</sup> Street  
Lincoln, NE 68508

**LYLE L. LOTH, P.E./L.S.**

Suite A - 601 Old Cheney Road  
Lincoln, NE 68512

Phone (402) 421-2500  
Fax (402) 421-7096

Email: lyle@espeng.com

Re: Waivers Requested for Spilker's 4<sup>th</sup> Addition Final Plat

Dear Mr. Krout:

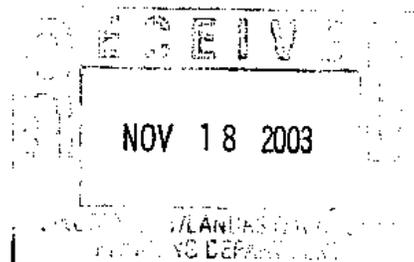
On behalf of the Owner, Don Spilker, we respectfully request the following waivers to allow for the processing of the referenced final plat:

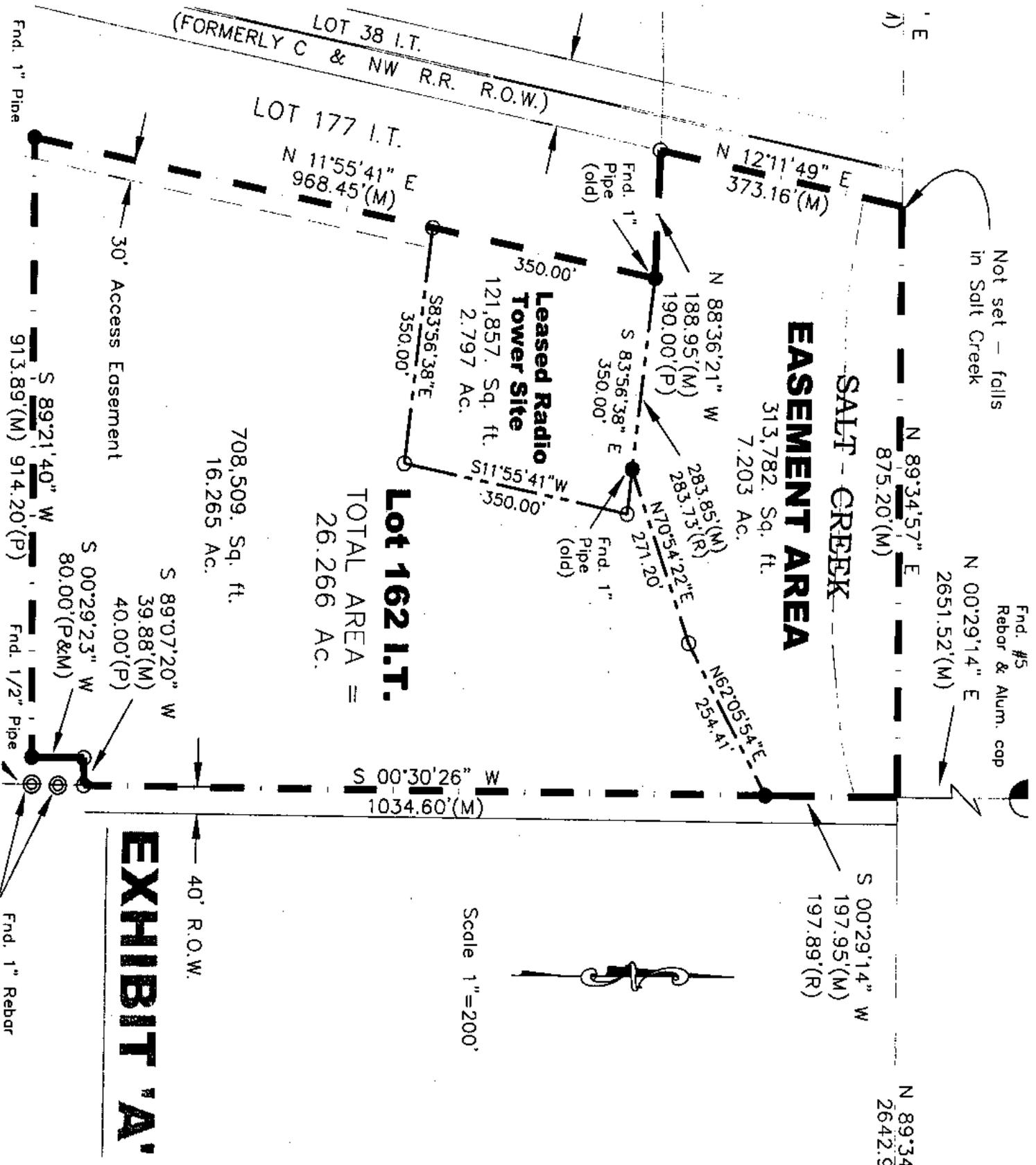
1. Waiver of Land Subdivision Title Section 26.23.090 requiring the dedication of the remainder of a half street adjoining a new subdivision. The Antelope Valley Redevelopment study shows the proposed new roadway between Adams and Superior Streets to be located in this general vicinity but not along the exact alignment of North 33<sup>rd</sup> Street. Consequently, any right-of-way dedication and improvements to North 33<sup>rd</sup> Street at this time would undoubtedly need to be removed.
2. Waiver of Land Subdivision Title Section 26.23.140(g) requiring that every lot shall front upon and have access to a public street. Access to this plat will be provided by a private access easement filed with the plat at the Register of Deeds, so access and frontage to a public street is not necessary.
3. Waiver of Land Subdivision Title Section 26.27.030 requiring the construction of and connection to the City's water distribution system. The proposed radio tower improvement to be constructed on Lot 1 will be an uninhabited facility that does not require water service.
4. Waiver of Land Subdivision Title Section 26.27.040 requiring the construction of and connection to the City's wastewater collection system. The proposed radio tower improvement to be constructed on Lot 1 will be an uninhabited facility that does not require wastewater service.

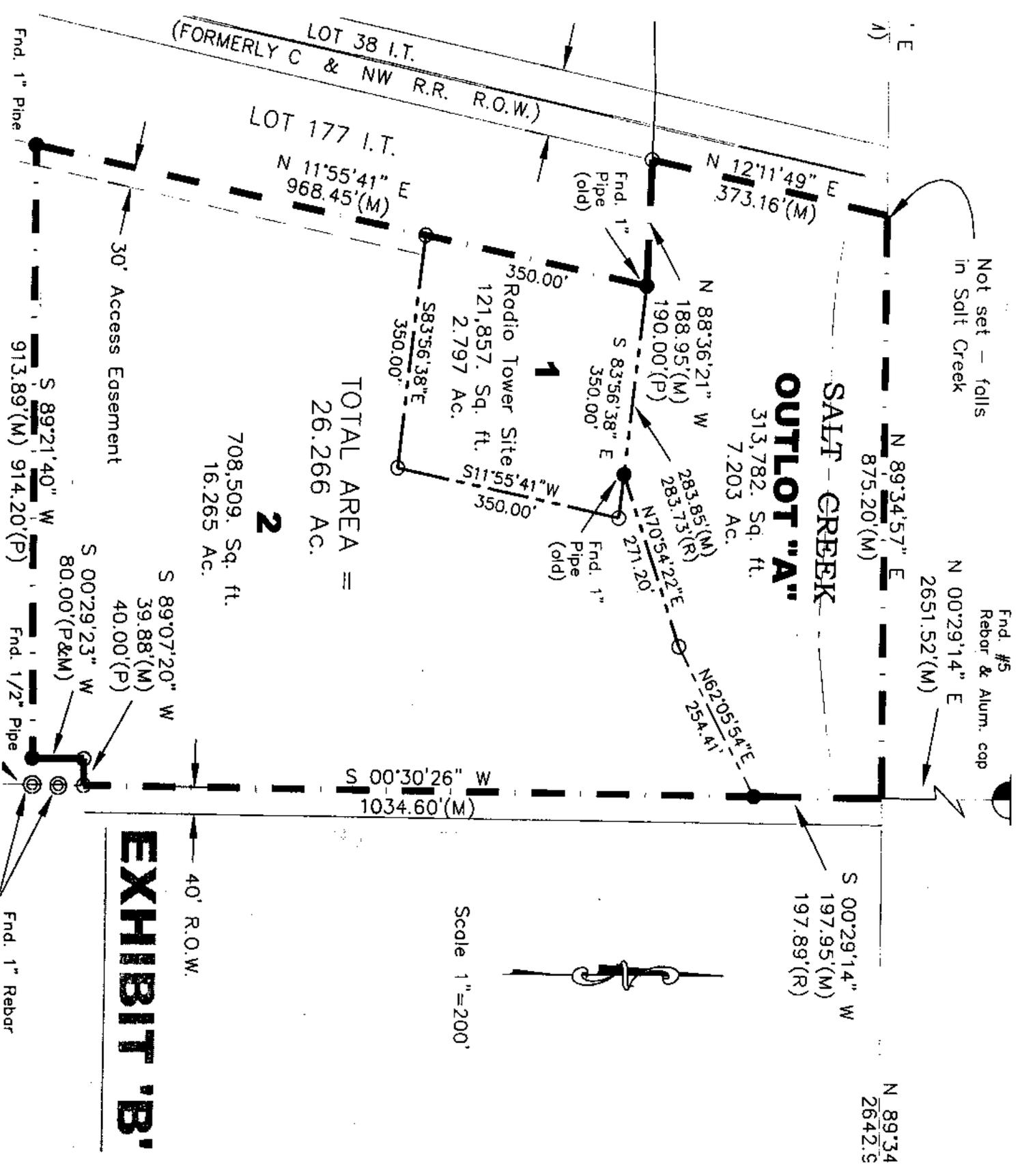
**E-S-P**  
**Engineering-Surveying-Planning**

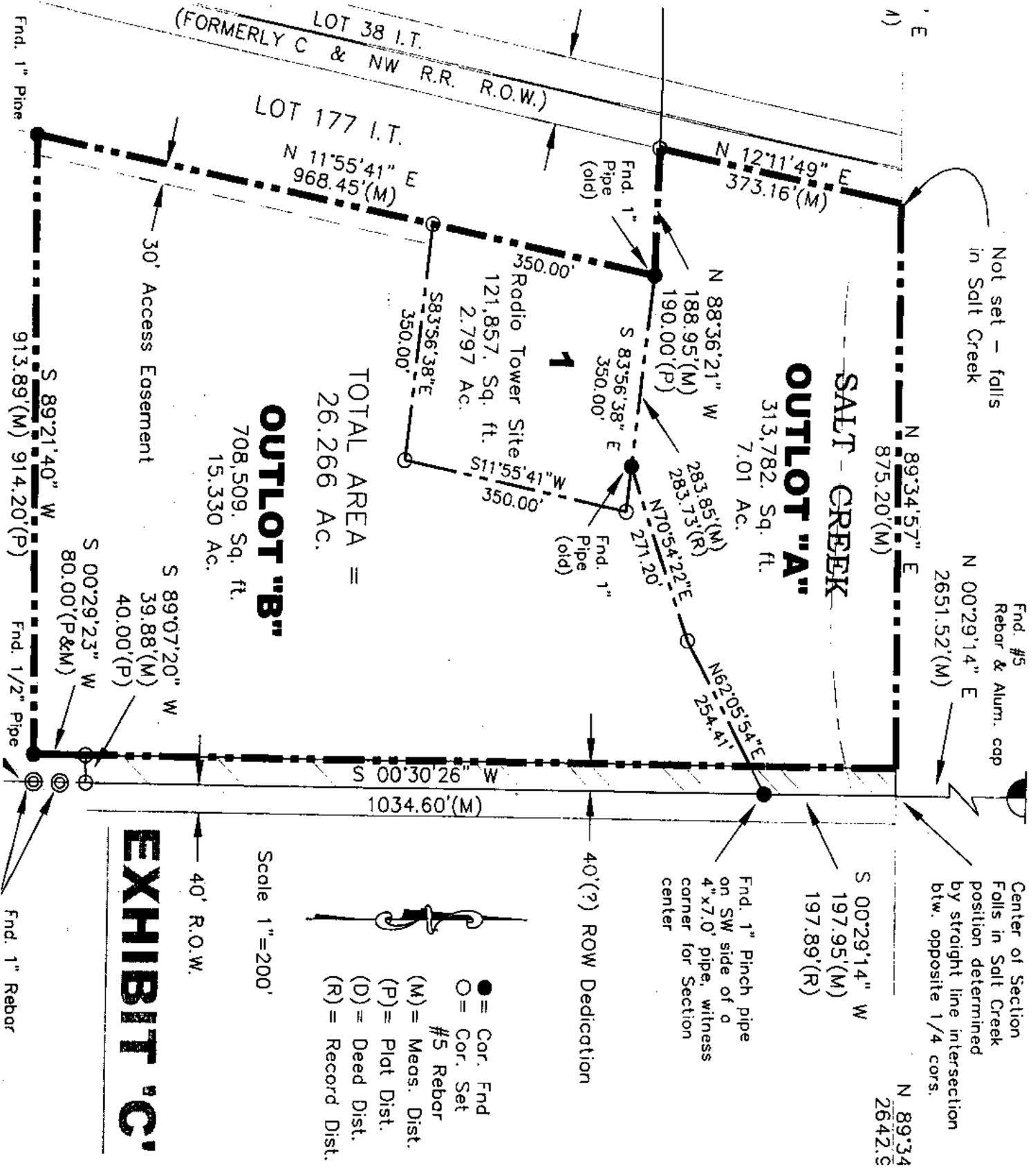
  
Lyle L. Loth, P.E.  
For the Firm

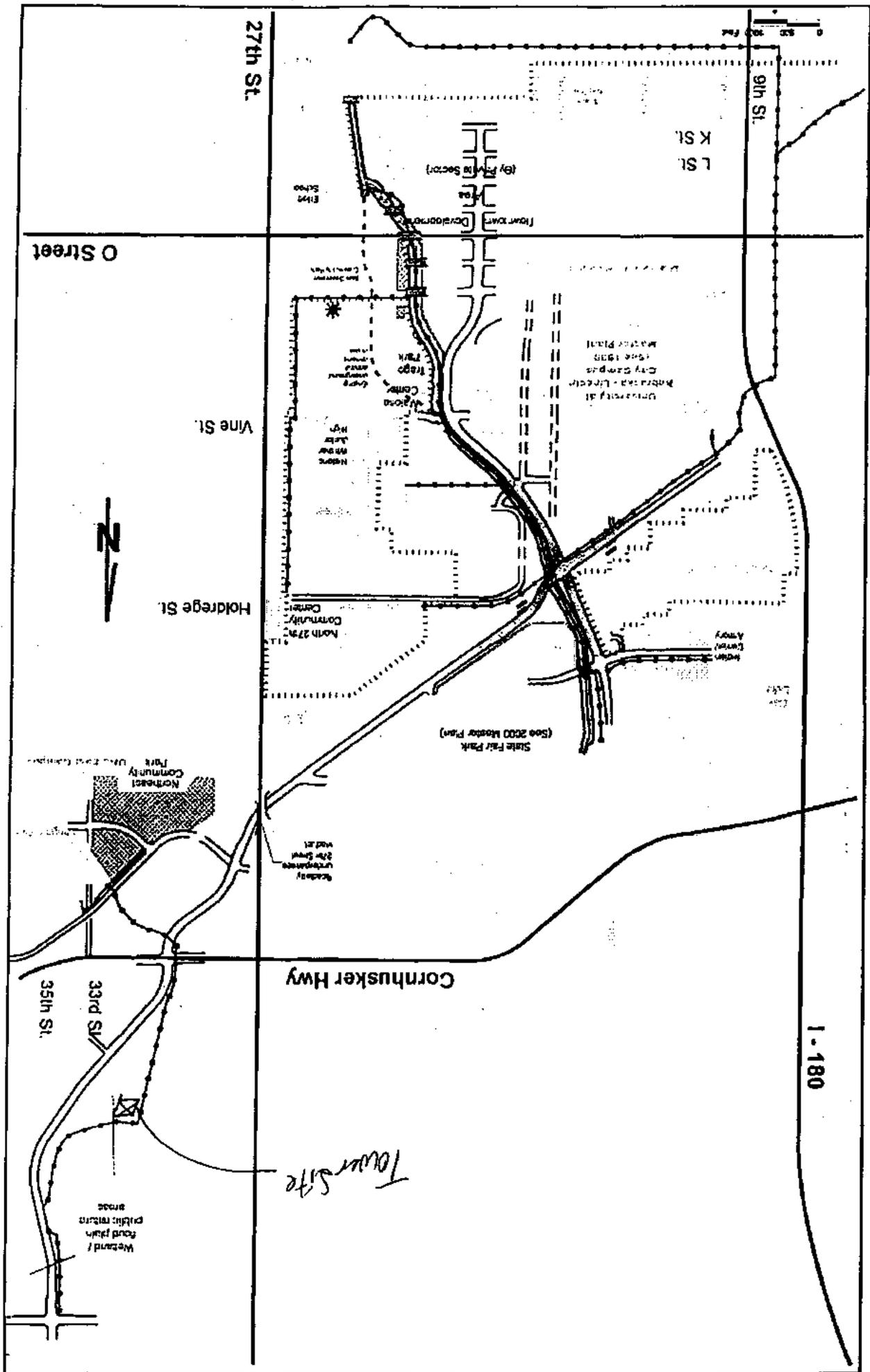
Cc: Don Spilker  
Bill Frost











# ANTELOPE VALLEY STUDY

Potential Wetland Mitigation Site A

Potential Wetland Mitigation Site E

## GLADSTONE

3310

31st Street

33rd Street

Corpuscular Highway

Adams Street