

THE CORPORATION OF THE CITY OF GRAND FORKS

BYLAW NO. 1425

A Bylaw to Impose Development Cost Charges

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WHEREAS pursuant to the Municipal Act, Council may, by bylaw, impose development cost charges under the terms and conditions of the Act;

AND WHEREAS the development cost charges may be imposed for the purpose of providing funds for the municipality to pay the capital costs of providing, constructing, altering or expanding sewage, water, drainage and highway facilities and for the acquisition of park land or any of them, in order to serve, directly or indirectly, the development in respect of which the charges are imposed;

AND WHEREAS a development cost charge is not payable where:

- a) the development does not impose new capital cost burdens on the municipality, or
- b) a development cost charge has previously been paid for the same development unless, as a result of further development, new capital cost burdens will be imposed on the municipality;

AND WHEREAS in fixing development cost charges imposed by this bylaw, pursuant to Section 983(2) of the Municipal Act, Council has taken into consideration future land use patterns and development, and the passing of works and services, described in an official community plan and Council considers that the charges imposed by this bylaw:

- a) are not excessive in relation to the capital cost of prevailing standards or service in the municipality;
- b) will not deter development in the municipality;
- c) will not discourage the construction of reasonably priced housing or the provision of reasonably priced serviced land in the municipality;

AND WHEREAS in the opinion of Council the charges imposed by this bylaw are related to capital costs attributable to projects involved in the capital expenditure program of the municipality;

NOW THEREFORE the Council of the Corporation of the City of Grand Forks in open meeting assembled enacts as follows:

1. This bylaw may be cited as "Grand Forks Development Cost Charge Bylaw No. 1425, 1994".
2. For the purpose of this bylaw, the definitions of words and phrases that are not included in this section shall have the meaning assigned to them in the Municipal Act.

"Building Lot" means the smallest unit into which land is subdivided as shown on the records of the Land Title Office.

"Floor Area" means the gross area within the perimeter of a building measured at each floor, and includes basements or portions of basements, the total space of enclosed verandahs, porches and other spaces within a building but excluding basement areas with less than 1.8 m vertical clearance.

"Dwelling Unit" means one or more rooms used or intended to be used for the residential accommodation of one family when such room or rooms contain(s) kitchen, bathroom and sleeping facilities for one family.

"Municipality" means the Corporation of the City of Grand Forks.

"Zone" means a zone designated under the current City of Grand Forks Zoning Bylaw.

3. Every person who obtains:
 - a) approval of the subdivision of a parcel of land under the Land Title Act or the Condominium Act, or
 - b) a building permit authorizing the construction, or alteration of buildings or structures for a purpose other than the construction of three (3) or less self-contained dwelling units, or

...../ Continued on Page 3

- c) a building permit authorizing construction, alteration, or extension of a building or structure, other than a building or portion of it used for residential purposes, where the value of the work exceeds Fifty Thousand Dollars (\$50,000) or another amount that the Minister may prescribe

shall pay at the time of the approval of the subdivision or the issue of the building permit, as the case may be, to the municipality the applicable development cost charges as set out in Schedule "A" hereto.

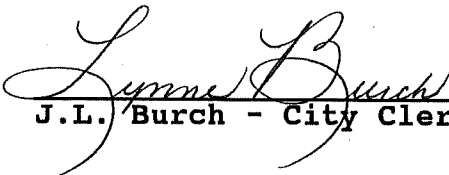
4. If any section, subsection, sentence, clause or phrase of this bylaw is for any reason held to be invalid by the decision of any Court of competent jurisdiction, the invalid portion shall be severed and the decision that it is invalid shall not affect the validity of the remainder of this bylaw.

Read a **FIRST** time this 5th day of December, 1994.

Read a **SECOND** time this 5th day of December, 1994.

Read a **THIRD** time this 16th day of January, 1995.

**Certified a true copy of Bylaw
No. 1425 as at Third Reading.**

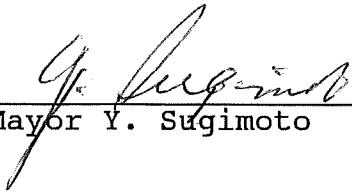


J.L. Burch - City Clerk

APPROVED BY THE INSPECTOR OF MUNICIPALITIES the 10th day of
May, 1995.

Continued on Page 4

FINALLY ADOPTED this 23rd day of May, 1995.



Mayor Y. Sugimoto



J.L. Burch - City Clerk

C E R T I F I C A T E

I hereby certify the foregoing to be a true copy of Bylaw No. 1425 as passed by the Municipal Council of the City of Grand Forks on the 23rd day of May, 1995.

Clerk of the Municipal Council of the
City of Grand Forks

DEVELOPMENT COST CHARGE

SERVICES

| LAND USE CATEGORY | HIGHWAY | STORM DRAINAGE | SANITARY SEWER | WATER | OPEN SPACE | TOTAL | PER UNIT |
|----------------------------|----------------|-----------------------|-----------------------|--------------|-------------------|--------------|-----------------|
| Single Family | n/a | n/a | \$2,377 | \$2,435 | n/a | \$4,812 | lot |
| Two Family & Semi-detached | n/a | n/a | \$3,803 | 3,896 | n/a | \$7,699 | lot |
| Multiple Family | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Mobile Home Park Zone | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Commercial Zones | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Industrial Zones | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Institutional | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

DEVELOPMENT COST CHARGE

SERVICES

| TYPE OF BUILDING | HIGHWAY | STORM DRAINAGE | SANITARY SEWER | WATER | OPEN SPACE | TOTAL | PER UNIT |
|----------------------------------------------|----------------|-----------------------|-----------------------|--------------|-------------------|--------------|-----------------|
| Single & Two Family & Semi-detached dwelling | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Multiple Family | n/a | n/a | \$1,902 | \$1,948 | n/a | \$3,850 | dwelling unit |
| Mobile Home Park | n/a | n/a | \$1,902 | \$1,948 | n/a | \$3,850 | M.H. pad |
| Commercial Building | n/a | n/a | \$4.07 | \$4.97 | n/a | \$9.04 | area in M |
| Industrial Building | n/a | n/a | \$4.07 | \$2.66 | n/a | \$6.73 | area in M |
| Institutional Bldg. | n/a | n/a | \$4.38 | \$4.58 | n/a | \$8.96 | area in M |

Province of British Columbia



No.

Statutory Approval

Under the provisions of section 987
of the Municipal Act

I hereby approve Bylaw No. 1425
of the Corporation of
the City of Grand Forks, *a copy*
of which is attached hereto.

Dated this 10th *day*
of May, *1925*


.....
Deputy Inspector of Municipalities

THE CORPORATION OF THE CITY OF GRAND FORKS

MEMORANDUM

TO: MAYOR & COUNCIL
FROM: PHIL TAYLOR, Administrator
DATE: November 17, 1994
RE: DEVELOPMENT COST CHARGE (D.C.C.)

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Staff has prepared the proposed Development Cost Charge Bylaw to where political input is required. The reason for the bylaw is to assist the community with the anticipated future infrastructure requirements of the City of Grand Forks. A Development Cost Charge Bylaw has not been instituted in Grand Forks, even though the need for one was identified in the early 1980's. Staff are using the work done by Kerr Wood Leidal Engineers as the basis for the infrastructure requirements to be funded by development cost charges.

Development Cost Charges are:

1. Only the responsibility of those building/developing in the community.
2. A means of reducing tax burden to all citizens.
3. The preferred means of financing new capital projects in a community.

The City anticipates infrastructure capital costs of over \$14 million dollars. In the work done by K.W.L., their February presentation to Council, \$8 million was to be future development's share and \$6 million was to be existing development's share.

In the bylaw process, Council will have to set the split and rationale for it. If Council does not implement D.C.C., the taxpayers of Grand Forks would finance all \$14 million, thus contributing to an increased property tax load over the years. Development Cost Charges are a form of user-pay that is strongly encouraged by the Province of B.C.

We need to determine the proposed charges for infrastructure renewal. The proposal submitted by K.W.L. broke the development cost charges into two segments, specified area charges and charges City wide. The results they come up with are in the attached Table - 8, #4 from their summary report.

NOV 21 1994

My feeling is that Development Cost Charges of \$12,000 for Zak's Slough specified area, \$14,000 for Southwest, \$16,000 for the Northwest and \$18,000 for the east side are so high that Council wouldn't be able to implement them. In my opinion, there are three factors Council should consider before developing the bylaw.

First, Council may wish to reduce the charge by creating a larger assist factor picked up by the general taxpayer. This could be appropriate in light of the large number of new dwellings added in the last seven years (222) and the fact residential units or subdivisions of three or less are exempt.

Secondly, drainage and roadways are an expensive component that might not be appropriate for D.C.C.'s and finally, the numbers proposed don't reflect Provincial or Federal grants received. We need your input on these items before the columns can be filled in.

In addition to changes that may result from the above, Council is reminded that only projects listed in the expenditures program bylaw are eligible to be funded by D.C.C.'s. The City of Grand Forks 1994 Bylaw lists only a few that K.W.L. used to derive these charges. The D.C.C. Bylaw would have to be amended each time a project was completed or new projects worked their way onto the Capital Expenditure Program Bylaw (normally 5 years).

The following is an analysis of the projects identified, objectives, the time frame for construction, the cost estimate, the funding options and reference documents.

WATER PROJECT

PROJECT: West side reservoir (1.0 million gallons)

OBJECTIVE: Required to balance the system and provide the required level of fire-flow protection to all areas of the City.

PROPOSED CONSTRUCTION SCHEDULE: 1996

COST ESTIMATE: \$1,391,000

FUNDING: D.C.C. & Water Fund (note: get on Canada/B.C. Infrastructure program consider for revenue sharing 25% to 50%)

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PROJECT: Westside Feedermain Project

OBJECTIVE: New feedermain along 76th Ave. from reservoir to Donaldson Dr. 1450 m of 300 mm & 300 m of 250 mm.

PROPOSED CONSTRUCTION SCHEDULE: 1996

COST ESTIMATE: \$787,306

FUNDING: D.C.C. & Water Fund (as with reservoir, not on Canada/B.C. Infrastructure program, consider for revenue sharing).

PROJECT: Johnson Flats

OBJECTIVE: To provide the following water main extensions:

- 18th St. feedermain 1000m of 300 mm dia. between 68th & 59th Ave.;
- 60th Ave. distribution link 180 m of 150 mm dia. between 18th & 19th St.;
- 59th Ave. distribution loop 400 m of 200 mm dia. between 18th & 12th St.;
- 12th St. distribution loop 670 m of 150 mm dia. between 59th Ave. and north end of DL 382;
- 56th Ave. distribution link 50 m of 150 mm dia. at Boundary Drive intersection;
- 17th St. distribution link 60 m of 150 mm dia. at 78th Ave. intersection.

PROPOSED CONSTRUCTION SCHEDULE: 1995

COST ESTIMATE: \$445,000

FUNDING: Approved Infrastructure Grant:
Federal Gov't. \$148,333
Provincial Gov't. \$148,333
City Slag Fund \$148,333

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PROJECT: New Water Well

OBJECTIVE: To develop a new groundwater well No. 6 in Johnson Flats area to increase water supply.

PROPOSED CONSTRUCTION SCHEDULE: 1997

COST ESTIMATE: \$160,000

FUNDING: D.C.C. Water Fund

PROJECT: Construct groundwater well, Pump station No. 6

OBJECTIVE: Put new well into service.

PROPOSED CONSTRUCTION SCHEDULE: 1998

COST ESTIMATE: \$279,000

FUNDING: D.C.C. Water Fund

PROJECT: Replace East side booster pump station.

OBJECTIVE: Upgrade East side booster pump station. Replace U/V treatment with chlorination plant.

PROPOSED CONSTRUCTION SCHEDULE: 1998

COST ESTIMATE: \$97,000

FUNDING: D.C.C. Water Fund.

PROJECT: Strengthen feedermain system on West side.

OBJECTIVE:

PROPOSED CONSTRUCTION SCHEDULE: 1999

COST ESTIMATE: \$687,000

FUNDING: D.C.C., Water fund.

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PROJECT: Replace Overton Creek Ultra violet
disinfection facility.

OBJECTIVE:

**PROPOSED
CONSTRUCTION
SCHEDULE:** 2004

COST ESTIMATE: \$200,000

FUNDING: D.C.C. Water Fund.

PROJECT: Upsize feedermain system in Ruckles Area.

OBJECTIVE:

**PROPOSED
CONSTRUCTION
SCHEDULE:** 2009

COST ESTIMATE: \$384,000

FUNDING: D.C.C. Water Fund.

WASTEWATER COLLECTION PROJECTS

PROJECT: Upgrade Pump Stations and install SCADA
System.

OBJECTIVE: Upgrade efficiency and meet new WCB
regulations.

**PROPOSED
CONSTRUCTION
SCHEDULE:** 1995 (note: very unlikely)

COST ESTIMATE: \$318,000

FUNDING: Infrastructure grant - unlikely.
D.C.C. Sewer Fund.

NOV 21 1994

PROJECT: Replace North side trunk sewer.

OBJECTIVE:

**PROPOSED
CONSTRUCTION
SCHEDULE:** 1995

COST ESTIMATE: \$375,000

FUNDING: Approved Infrastructure Grant:
Federal Gov't. \$125,000
Provincial Gov't. \$125,000
City Slag Fund \$125,000

PROJECT: Upgrade West side trunk sewer.

OBJECTIVE:

**PROPOSED
CONSTRUCTION
SCHEDULE:** 1997

COST ESTIMATE: \$91,000

FUNDING: D.C.C. & Sewer Fund.

WASTEWATER TREATMENT PROJECTS

PROJECT: Rehabilitate lagoon treatment system.

OBJECTIVE: Clean out sludge accumulations to meet environmental discharge criteria.

**PROPOSED
CONSTRUCTION
SCHEDULE:** 1995

COST ESTIMATE: \$250,000

FUNDING: D.C.C., Infrastructure, Slag.

NOV 21 1994

PROJECT: Construct Phase 1 of a replacement wastewater treatment facility.

OBJECTIVE: Move from primary to secondary treatment, meet new environmental standards, be prepared to accommodate growth.

PROPOSED CONSTRUCTION SCHEDULE: 1995/96

COST ESTIMATE: \$2,170,000 - Phase 1.B

FUNDING: Infrastructure - likely \$1,200,000 remainder D.C.C.'s, sewer fund, slag fund.

PROJECT: Construct Phase 1.B of Wastewater Treatment Facility.

OBJECTIVE: Needed to be done as soon after phase 1.A as funding available. 1.A works but 1.B needed to treat sludge.

PROPOSED CONSTRUCTION SCHEDULE: 1996/97

COST ESTIMATE: Remainder of \$2,170,000 left from 1.A

FUNDING: D.C.C., Revenue sharing, long term debt sewer fund.

PROJECT: Construct Phase 2 of treatment facility.

OBJECTIVE: Upsize to meet population increase from 5,000 to 7,000

PROPOSED CONSTRUCTION SCHEDULE: 2014

COST ESTIMATE: \$1,379,000

FUNDING: D.C.C., sewer fund, grants.

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ROADWAY UPGRADING PROJECTS

PROJECT: Reconstruct Boundary Dr. to a collector standard.

OBJECTIVE:

**PROPOSED
CONSTRUCTION
SCHEDULE:** 1996

COST ESTIMATE: \$412,000

FUNDING: D.C.C., General taxation (doesn't qualify for revenue sharing).

PROJECT: Reconstruct Granby Road to an arterial standard.

OBJECTIVE: Alleviate heavy traffic from Valley Heights and out of town subdivisions.

**PROPOSED
CONSTRUCTION
SCHEDULE:** 1999

COST ESTIMATE: \$513,000

FUNDING: Revenue sharing 50%, D.C.C., and General taxation.

PROJECT: Complete Phase 1 of 68th Ave./19th St.

OBJECTIVE: Upgrading to collector standard.

**PROPOSED
CONSTRUCTION
SCHEDULE:** 2004

COST ESTIMATE: \$200,000

FUNDING: General taxation.

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PROJECT: Complete Phase 2 of 68th Ave./19th St.
OBJECTIVE: Upgrading to collector standard.
PROPOSED CONSTRUCTION SCHEDULE: 2009
COST ESTIMATE: \$200,000
FUNDING: General taxation.

PROJECT: Complete Phase 3 of 68th Ave./19th St.
OBJECTIVE: Upgrading to collector standard.
PROPOSED CONSTRUCTION SCHEDULE: 2014
COST ESTIMATE: \$1,200,000
FUNDING: General taxation.

SURFACE DRAINAGE COMPONENTS

PROJECT: Install Boundary Dr. storm sewer in conjunction with road reconstruction.
OBJECTIVE:
PROPOSED CONSTRUCTION SCHEDULE: 1996
COST ESTIMATE: \$166,000
FUNDING: D.C.C., General taxation.

PROJECT: Install Granby Rd. storm sewer in conjunction with road reconstruction.
OBJECTIVE:
PROPOSED CONSTRUCTION SCHEDULE: 1999
COST ESTIMATE: \$246,000
FUNDING: D.C.C., General taxation.

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PROJECT: Upgrade drainage outlet for Northwest specified area.

OBJECTIVE:

PROPOSED CONSTRUCTION SCHEDULE: 2004

COST ESTIMATE: \$526,000

FUNDING: D.C.C., Northwest specified area.

PROJECT: Upgrade drainage outlet for Eastside specified area.

OBJECTIVE:

PROPOSED CONSTRUCTION SCHEDULE: 2004

COST ESTIMATE: \$126,000

FUNDING: D.C.C., Eastside specified area.

PROJECT: Complete Phase 1 of storm sewer system for Southwest specified area.

OBJECTIVE:

PROPOSED CONSTRUCTION SCHEDULE: 2009

COST ESTIMATE: \$400,000

FUNDING: D.C.C., Southwest specified area.

These are the projects that have been identified to be included in the Development Cost Charge philosophy. The City is restricted by the Municipal Act about how it can calculate and implement development cost charges. Things for Council to watch for in considering how to charge are:

exemptions - less than 4 self contained dwelling units.
- doesn't impose new capital cost burdens.

amounts - maybe varied for different zones, areas, uses
capital costs for classes of development, size of lots, or numbers of lots.

future considerations - costs can't be excessive in relation to the capital cost of prevailing standards of service.

- can't deter development.

- can't discourage reasonably priced housing or land.

adoption procedure - requires Inspector of Municipalities approval.

- has to relate to capital costs in capital expenditure bylaw.

Council has been considering development cost charges on documentation prepared by Kerr Wood Leidal. The first run of the numbers was for sewer, water, roads and drainage broken into 4 specified areas. These numbers are suspect as they don't consider the capital expenditure bylaw, the costs might be considered excessive, deter development and discourage reasonably priced housing and land.

One of the main issues included in these calculations is drainage which imposes new capital cost burdens on new development that hasn't been the practise in Grand Forks. I would also note that the new development in the last few years, as well as those that are exempt, should increase the proportion the general taxpayer has to pay and reduce the portion new development has to pay.

Summary of costs the City of Grand Forks can include in a Development Cost Charge Bylaw based on 1994 Capital Expenditure Program Bylaw.

| ITEM | TOTAL COST | LESS GRANTS | LESS PRORATE TO EXISTING | NET COST FOR D.C.C. BYLAW CALCULATION |
|------------------------------------------------|--------------------|--------------------|--------------------------|---------------------------------------|
| Johnson Flats | \$ 445,000 | \$ 296,667 | \$ 148,333 | \$ 0 |
| Westside Reservoir & Watermain Project | \$2,178,000 | \$ 0 | \$1,742,400 | \$ 435,600 |
| Develop Groundwater Well No. 6 | \$ 160,000 | \$ 0 | \$ 80,000 | \$ 80,000 |
| Groundwater Well No. 6 Pump Station | \$ 279,000 | \$ 0 | \$ 139,500 | \$ 139,500 |
| Replace Eastside Booster Pump Station | \$ 97,000 | \$ 0 | \$ 48,500 | \$ 48,500 |
| Replace Northside Trunk Sewer | \$ 375,000 | \$ 250,000 | \$ 125,000 | \$ 0 |
| Upgrade Pump Station & Install SCADA System | \$ 348,000 | \$ 0 | \$ 261,000 | \$ 87,000 |
| Sewage Treatment Plant | \$2,400,000 | \$1,000,000* | \$ 800,000 | \$ 600,000 |
| Reconstruct Boundary Dr. to collector standard | \$ 412,000 | \$ 0 | \$ 412,000 | \$ 0 |
| Install Boundary Dr. Storm Sewer | \$ 166,000 | \$ 0 | \$ 166,000 | \$ 0 |
| TOTALS | \$6,860,000 | \$1,546,667 | \$3,922,733 | \$1,390,600 |

*This is not confirmed. This number is as a result of consultation with Minister Clarke's office and K.W.L. Therefore total to be included in D.C.C. calculations is **\$1,390,600.**

Proposal to allocate infrastructure requirements between existing population (plus exempt) and new growth.

1. **Johnson Flats** - No growth potential. City picks up cost.
2. **Westside Reservoir** - Advantage to existing population in that it upgrades capacity and accommodates fire flows. On a population basis, 5 yr. horizon is to go from 4,000 to 5,000, 80% to existing 20% to new growth, City wide.
- 3.& 4. **Ground water Well #6 & Pump Station** - K.W.L. has identified significant growth potential in this area. This may be somewhat mitigated by floodplain and A.L.R. constraints, however, an estimate of at least 50% of this capacity increase is driven by new growth. K.W.L. advises that strengthening the supply and the feedermain network provides a uniform benefit in terms of an improved level of service so this should be considered City wide.
5. **Replace Eastside Booster Pump Station** - This has considerable benefit to existing, while enabling growth. Likely 50% share to new growth is appropriate City wide.
6. **Replace Northside Trunk Sewer** - This project is included in Infrastructure funding and likely will be completed before significant D.C.C.'s are collected. The non-grantable portion would be picked up by existing.
7. **Upgrade Pump Stations and Install SCADA System** - This is in infrastructure grants but it is unlikely it will be funded. This is important to existing as we are at risk on these (they didn't meet current standards). Suggest 75% existing and 25% D.C.C.
8. **Sewage Treatment Plant Upgrade** - We are lobbying to have some of this funded through infrastructure program. Best guess would be about \$1,000,000 in funding. The remaining \$1.4 million is hard to assess due to the fact that about \$1.5 million of the \$2.4 million will bring us into compliance but without the additional \$.9 million we won't be upgraded to secondary treatment. I would suggest the split is as follows: \$1.0 million to grants, \$.5 million and \$.3 million = \$.8 million to existing and \$.6 million to D.C.C.'s. The portion to D.C.C.'s might be too high considering that Phase 2 of the project may be needed relatively soon if Grand Forks reaches the 5,000 population before the end of this 5 year cycle.
9. **Reconstruct Boundary Drive** - This is a local road that is meant to eliminate existing traffic bottleneck. Should be 100% funded by existing.

10. **Storm Sewer Boundary Drive** - Again, this is in conjunction with planned roadway project. Council has to determine if it is desirable to implement D.C.C.'s for drainage. This would be hard to justify. Recommend all is charged to existing.

Number of Dwelling Units - In K.W.L. study, scenario A takes Grand Forks population from present estimate of 4,000 to 5,000. They indicate that this relates to a potential 289 additional dwelling units.

Calculation of Base Charge -

| | |
|-------------------------------------------|--------------|
| Total Net Cost attributable to new growth | \$1,390,600 |
| Estimated number of new units | <u>289</u> |
| Development Cost Charge | \$4,812/unit |

This would provide a basis for residential single family rate. However, D.C.C.'s will be charged on multi-family and industrial which will require a formula to calculate.

The following table could be used to determine suitable relationship.

| TYPE OF DEVELOPMENT | PER UNIT | EQUIVALENT FACTORS | | | |
|--------------------------|------------------------|--------------------|--------|---------|--------|
| | | WATER | RATIO | SEWER | RATIO |
| One family residential | lot | \$2,435 | 1 | \$2,377 | 1 |
| Two family residential | lot | \$3,896 | 1.6 | \$3,803 | 1.6 |
| Med. density residential | dwelling unit | \$1,948 | .8 | \$1,902 | .8 |
| Commerical | area in M ² | \$4.97 | .00204 | \$4.07 | .00171 |
| Industrial | area in M ² | \$2.66 | .00109 | \$4.07 | .00171 |
| Institutional | area in M ² | \$4.58 | .00188 | \$4.38 | .00184 |

NOV 21 1991

I have used data available to develop what I feel are achievable development cost charges. Developers will approach Council stating that the imposition of these charges makes their project unattainable. This proposal can be reworked however Council wishes, however this proposal has developers paying \$4,812/unit while the existing population pays \$10,628 for infrastructure improvements partially triggered by new growth.

Council should satisfy themselves that the concept is sound, determine if I have used the right components. I recommend Council receive this information and review the attached bylaw which will formally be submitted at a later meeting at the direction of Council.

Respectfully Submitted,



P.A. (Phil) Taylor
Administrator

NOV 21 1984