

**BOROUGH OF PARK RIDGE  
RESOLUTION NO. 025-062**

**RESOLUTION OF THE COUNCIL OF THE BOROUGH  
OF PARK RIDGE COMMITTING TO ROUND 4 PRESENT  
AND PROSPECTIVE NEED AFFORDABLE HOUSING  
OBLIGATIONS**

**WHEREAS**, on March 20, 2024, Governor Murphy signed into law P.L. 2024, c.2 (hereinafter “A4” or “Amended FHA”); and

**WHEREAS**, A4 calculates the size of the regional affordable housing need as follows: “projected household change for a 10-year-round in a region shall be estimated by establishing the household change experienced in the region between the most recent federal decennial census, and the second-most recent federal decennial census. This household change, if positive, shall be divided by 2.5 to estimate the number of low- and moderate-income homes needed to address low- and moderate-income household change in the region, and to determine the regional prospective need for a 10-year-round of low- and moderate-income housing obligations...”; and

**WHEREAS**, this means that the regional need equates to 40% of regional household growth; and

**WHEREAS**, the 1985 version of the Fair Housing Act and A4 both prohibit a result that would compel a municipality to spend its own money on compliance; and

**WHEREAS**, the theory which permits a municipality to meet its obligations without municipal subsidy is zoning for “inclusionary zoning”; and

**WHEREAS**, inclusionary zoning most typically requires a 15% or 20% set aside; and

**WHEREAS**, it is not clear how a regional need predicated upon 40% of anticipated growth can be met with 15-20% set asides and without municipal subsidy; and

**WHEREAS**, this is exacerbated by the fact that certain other municipalities in the region have an allocation of 0% of the prospective need (new construction obligation), irrespective of the growth in that particular municipality; and

**WHEREAS**, A4 yields a statewide new construction obligation of over 8,400 affordable units per year; and

**WHEREAS**, this is a substantially higher annual number than was imposed by COAH in the “Prior Round” or any iteration of its Round 3 regulations; and

**WHEREAS**, A4 determines the size of the regional need, but does not calculate allocation of the need to individual municipalities; and

**WHEREAS**, instead, A4 required the Department of Community Affairs (“DCA”) to produce non-binding estimates of need on or before October 20, 2024, which it did provide on October 18, 2024 (“DCA Report”); and

**WHEREAS**, the DCA Report calculates the Borough’s Round 4 (2025-2035) obligations as follows: a Present Need or Rehabilitation Obligation of 137 units and a Prospective Need or New Construction Obligation of 138 units; and

**WHEREAS**, the Borough accepts the conclusions in the DCA Report, except regarding the land capacity allocation factor; and

**WHEREAS**, as to the **Land Capacity Allocation Factor**, the Borough notes that the DCA belatedly provided the data it used to establish this factor, i.e., on or about November 25, 2024 instead of by October 20, 2024; and

**WHEREAS**, the Borough further notes that the link to the DCA GIS data that the DCA belatedly made available to municipalities includes the following language: “The land areas identified in this dataset are based on an the best available data using publicly available data enumerated in N.J.S.A. 52:27D-304.3c.(4) to estimate the area of developable land, within municipal and regional boundaries, that may accommodate development. **It is important to note that the identified areas could be over or under inclusive depending on various conditions and that municipalities are permitted to provide more detailed mappings as part of their participation in the Affordable Housing Dispute Resolution Program.**” (emphasis added); and

**WHEREAS**, the DCA maintains that the areas the DCA identified as developable are indeed overinclusive and, consequently, the Borough’s Professional Planner has prepared a report, attached hereto as Exhibit A; and

**WHEREAS**, correcting the allocation factors results in the Borough’s Round 4 Prospective Need Obligation being 119 units rather than the 138 units the DCA calculated; and

**WHEREAS**, Section 3 of A4 provides that: “the municipality’s determination of its fair share obligation shall have a presumption of validity, if established in accordance with sections 6 and 7” of A4; and

**WHEREAS**, the Borough’s calculation of need is entitled to a “presumption of validity” because it complies with Sections 6 and 7 of A4; and

**WHEREAS**, the Borough specifically reserves the right to adjust those numbers based on one or any of the foregoing adjustments: 1) a Structural Conditions Survey or similar exterior survey which accounts for a higher-resolution estimate of present need; 2) a Vacant Land Adjustment predicated upon a lack of vacant, developable and suitable land; 3) a Durational Adjustment (whether predicated upon lack of sewer or lack of water); and/or 4) an adjustment predicated upon regional planning entity formulas, inputs or considerations, including, but not limited to the Highlands Regional Master Plan and its build out, the Pinelands or Meadowlands regulations and planning document; and

**WHEREAS**, in addition to the foregoing, the Borough specifically reserves all rights to revoke or amend this resolution and commitment, as may be necessary, in the event of a successful challenge to A4 in the context of the Montvale case (MER-L-1778-24), any other such action challenging A4, or any legislation adopted and signed into law by the Governor of New Jersey that alters the deadlines and/or requirements of A4; and

**WHEREAS**, in addition to the foregoing, the Borough reserves the right to take a position that its Round 4 Present or Prospective Need Obligations are lower than described herein in the event that a third party challenges the calculations provided for in this Resolution (a reservation of all litigation rights and positions, without prejudice); and

**WHEREAS**, in light of the above, the Mayor and Council finds that it is in the best interest of the Borough to declare its obligations in accordance with this binding resolution and in accordance with the Act; and

**WHEREAS**, in addition to the above, the Acting Administrative Director issued Directive #14-24, dated December 13, 2024, and made the directive available later in the week that followed; and

**WHEREAS**, pursuant to Directive #14-24, a municipality seeking a certification of compliance with the Act shall file an action in the form of a declaratory judgment complaint . . . within 48 hours after adoption of the municipal resolution of fair share obligations, or by February 3, 2025, whichever is sooner; and

**WHEREAS**, nothing in this Resolution shall be interpreted as an acknowledgment of the legal validity of the AOC Directive and the Borough reserves any and all rights and remedies in relation to the AOC Directive; and

**WHEREAS**, the Borough seeks a certification of compliance with the Act and, therefore, directs its Affordable Housing Counsel to file a declaratory relief action within 48 hours of the adoption of this resolution; and

**NOW, THEREFORE, BE IT RESOLVED** on this 29th day of January, 2025, by the Council of the Borough of Park Ridge, Bergen County, State of New Jersey, as follows:

1. All of the Whereas Clauses are incorporated into the operative clauses of this resolution.

2. The Mayor and Council hereby commit to a Present Need Obligation of 137 units and the Round 4 Prospective Need Obligation of 119 units as described in this resolution subject to all reservations of rights, which specifically include:

a) The right to adjust the number based on an exterior survey, lack of land, sewer, water, regional planning inputs, or any combination thereof;

b) As described in the WHEREAS section, all rights to revoke or amend this resolution in the event of a successful legal challenge, or legislative change, to A4;

c) All rights to take any contrary position in the event of a third-party challenge to the obligations.

3. The Borough hereby directs its Affordable Housing Counsel to file a declaratory judgment complaint within 48 hours after adoption this resolution attaching this resolution.

4. The Borough hereby directs its Affordable Housing Counsel to file this Resolution with the "Program" pursuant to the requirements on A4.

5. The Borough hereby directs that this Resolution be published on the municipal website within 48 hours of its passage, pursuant to A4.

6. This resolution shall take effect immediately, according to law.

Adopted 1/28/25 on roll call vote as follows:

	Introduced	Seconded	AYES	NAYES	ABSENT	ABSTAIN
Cozzi			✓			
Fenwick			✓			
Goldsmith			✓			
Hoffman		✓	✓			
Metzdorf			✓			
Mintz	✓		✓			

APPROVED:

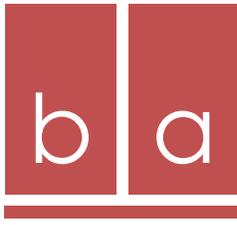
  
 \_\_\_\_\_  
 KEITH J. MISCIAGNA, MAYOR

Attest:

  
 \_\_\_\_\_  
 Magdalena Grandomenico  
 Borough Clerk / Administrator

# Fourth Round Present and Prospective Need Analysis

Borough of Park Ridge  
Bergen County, New Jersey



Community Planning  
Land Development and Design  
Landscape Architecture

B U R G I S  
A S S O C I A T E S , I N C .

Principals:

*Joseph H. Burgis PP, AICP*  
*Edward Snieckus, Jr. PP, LLA, ASLA*  
*David Novak PP, AICP*

# Fourth Round Present and Prospective Need Analysis

Borough of Park Ridge  
Bergen County, New Jersey

Prepared for the Borough of Park Ridge  
Mayor and Council

BA# 4157.04

The original document was appropriately signed and sealed on January 21, 2025 in accordance with Chapter 41 of Title 13 of the State Board of Professional Planners

Joseph H. Burgis, AICP, PP  
Professional Planner #2450

Robyn K. Welch, AICP, PP  
Professional Planner #5971

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# Executive Summary

The following Present and Prospective Need Analysis has been prepared for the Borough of Park Ridge in Bergen County, New Jersey.

By way of background, Governor Murphy signed A-40/S-50 into law on March 20, 2024 after the Senate and Assembly adopted it. This legislation (hereinafter "Amended FHA" or "Act") overhauled the Fair Housing Act (FHA) by abolishing the Council on Affordable Housing (COAH) and created a new process that involved the Department of Community Affairs (DCA) and the Administrative Office of the Courts (AOC).

The Amended FHA directed the New Jersey Department of Community Affairs ("DCA") to report the present need (also referred to as the rehab obligation) and the prospective need for Round Four based upon the standards set forth in the Act. The DCA issued its report on October 18, 2024; and, in accordance with the Act, made clear that the report was advisory only. For Park Ridge, the DCA Report identifies a Present Need of 137 and a Prospective Round Four Need of 138.

Since the DCA report is non-binding, each municipality has the opportunity to study and define why its obligations should be different based on the standards in the Act. However, the municipality must adopt a binding resolution by January 31, 2025, identifying the present and prospective need obligation to which it is committing.

As to the Present Need (also known as the rehab obligation), the Act allows municipalities to rely on COAH standards that the Act has not eliminated. N.J.S.A 52:27D-311(m). Over each housing cycle, COAH permits municipalities to adjust their rehab obligation through a structural conditions survey. Accordingly, while the Borough could conduct a structural conditions survey pursuant to NJAC 5:93-5.2(a) to more accurately reflect those units in need of rehabilitation, the Borough has chosen to accept the DCA statistical calculation of the Borough's Present Need Obligation of 137 units at this time. The Borough reserves the right to perform such structural conditions survey in accordance with the applicable regulations at a later time.

As to the Round Four Prospective Need of 138 units that the DCA reported on October 18, 2024, the methodology used to determine a municipality's prospective fair share obligation requires an initial determination of the regional prospective need. The region that Park Ridge is in consists of all municipalities in Bergen, Hudson, Passaic and Sussex counties. To determine a municipality's share of the regional need, the Act requires a calculation of three factors: (1) the equalized nonresidential valuation factor; (2) the income capacity factor; and (3) the land capacity factor. The Act then requires these three factors to be averaged and applied to the regional need to determine the share of the regional need for each municipality that is not a Qualified Urban Aid Municipality ("QUAM"). The Act therefore imposes no prospective need obligation on QUAMs; it instead distributes the obligation to the other municipalities in the respective housing region.

The Borough does not dispute the DCA’s calculation of the Equalized Nonresidential Valuation Factor or the Income Capacity Factor. However, the Borough does dispute the calculation of the Land Capacity Factor. More specifically, the Borough accepts the DCA’s invitation to examine the Land Capacity Factor and the lands that the DCA deemed developable for purposes of calculating this factor.

For the reasons set forth herein, the DCA calculation under the Land Capacity Factor analysis was overinclusive. Once appropriate corrections are made to the land that is developable, the Borough’s Prospective Need Obligation should be adjusted from the 138 figure the DCA reported to 119 units. With the findings in this report, the following summarizes the comparison of the three allocation factors as adjusted by the analysis provided herein.

Table 1: Summary of Adjusted Factors

	Equalized Nonresidential Valuation Factor	Income Capacity Factor	Land Capacity Factor
DCA Analysis	0.07%	1.21%	0.21%
Borough Analysis	0.07%	1.21%	0.00%

Accordingly, the remainder of this report reviews the Land Capacity Factor calculated by the DCA. It finds that an analysis of the lands identified as being “developable” by the DCA revealed several inaccuracies. Correcting these inaccuracies adjusts the Borough’s weighted land area from 4.08 acres to 0.00 acres. This results in an adjustment of the Borough’s calculated share of the region’s land capacity from 0.21% to 0.00%.

The methodology used to identify and exclude parcel types listed in the analysis contained within this report is consistent with the published DCA Report. The data, data sources, methodology, criteria and formulas relied upon in completing this analysis and arriving at these opinions, including the calculation of the Borough’s Prospective Need Obligation, was performed in accordance with sections 6 and 7 of P.L. 2024, c. 2 (N.J.S.A. 52:27D-304.2 and N.J.S.A. 52:27D-304.3). All opinions and conclusions set forth herein are within a reasonable degree of professional planning certainty. We reserve the right to amend and supplement our findings, opinions and conclusions should additional information be made available at a later date.

# Land Capacity Factor Analysis

The DCA issued the data and mapping that was the basis for the land capacity factor on November 25<sup>th</sup>, over a month after the DCA deadline to issue its non-binding numbers under the Amended FHA.

The following language is contained in the link to the DCA GIS data and the description section (<https://njdca.maps.arcgis.com/home/item.html?id=12acdf0a5104f8f8a2f604e96063e74>):

"The land areas identified in this dataset are based on an [sic] the best available data using publicly available data enumerated in N.J.S.A. 52:27D-304.3c.(4) to estimate the area of developable land, within municipal and regional boundaries, that may accommodate development. It is important to note that the identified areas could be over or under inclusive depending on various conditions and that municipalities are permitted to provide more detailed mappings as part of their participation in the Affordable Housing Dispute Resolution Program." (emphasis added)

The areas identified as developable in the DCA's calculation of the Land Capacity Factor are indeed overinclusive. Accordingly, we believe that the land capacity allocation factor should be adjusted from 4.08 acres to 0.00 acres. When this correction is made, Park Ridge's Round Four Prospective Need number should be 119 instead of the 138-unit figure identified by DCA.

While the basis for removing land treated as developable in the DCA's calculation is set forth below, it is important to note that the analysis to correct the land allocation factor is different than the analysis used to determine a municipality's entitlement to a vacant land adjustment. While the analysis to correct the Land Capacity Factor focuses on developable land, the analysis to support a vacant land adjustment focuses on land suitable for inclusionary development. Therefore, just because a site was not removed for purposes of calculating the Land Capacity Factor has no bearing on whether it should be removed to calculate entitlement to a vacant land adjustment.

In this regard, the Borough will seek a vacant land adjustment in Round Four in conjunction with its preparation of a Housing Element and Fair Share Plan. Nothing herein should be construed as a waiver of those rights that are explicitly reserved.

An analysis of the lands identified by the DCA as being "developable" revealed several inaccuracies. In summary, these inaccuracies generally included lands which were: artifacts of error as described by the DCA; located on developed properties or environmentally constrained lots; located on open space properties; and located on properties with active site plan approvals. Correcting these inaccuracies adjusts the Borough's weighted land area from 4.08 acres to 0.00 acres. This results in an adjustment of the Borough's calculated share of the region's land capacity from 0.21% to 0.00%.

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## 1: Basis of Calculation

As per the adopted legislation, a municipality's Land Capacity Factor shall be determined by:

*"estimating the area of developable land in the municipality's boundaries, and regional boundaries, that may accommodate development through the use of the 'land use / land cover data' most recently published by the Department of Environmental Protection, data from the American Community Survey and Comprehensive Housing Affordability Strategy dataset thereof, MOD-IV Property Tax List data from the Division of Taxation in the Department of the Treasury, and construction permit data from the Department of Community Affairs and weighing such land based on the planning area type in which such land is located. After the weighing factors are applied, the sum of the total developable land area that may accommodate development in the municipality and in the region shall be determined. The municipality's share of its region's developable land shall be its land capacity factor. Developable land that may accommodate development shall be weighted based on the planning area type in which such land is located."*

The legislation identifies the primary data sources and weighing factors to utilize in calculating a municipality's land capacity factor. However, unlike the equalized nonresidential valuation factor and the income capacity factor, the legislation did not establish a delineated process to combine the aforementioned data sources into one comprehensive and coherent formula.

The DCA subsequently released a workbook entitled "Affordable Housing Obligations for 2025-2035 (Fourth Round) Methodology and Background" (herein referred to as the "DCA Workbook" or the "Workbook") which established that department's interpretation on how to calculate the land capacity factor. In summary, that workbook identified the following steps:

1. First, the DCA divided the weighing regions established by the legislation by municipality.
2. Next, land use/land cover areas were used to identify vacant, developable lands. The workbook identifies the codes and descriptions of the land use/land cover data used in this process. In short, they include: cropland and pastureland; orchards/vineyards/nurseries/horticultural areas; deciduous forest areas; coniferous forest areas; plantations; mixed forest areas; old field areas; phragmites dominate old field areas; deciduous brush/shrubland; coniferous brush/shrubland; mixed deciduous/coniferous brush/shrubland; severe burned upland vegetation; and undifferentiated barren lands.
3. These initial vacant, developable lands were then refined to remove rights-of-way as well as developed properties. For the latter, the DCA utilized MOD-IV tax data and selected underlying tax parcels with property class codes for residential, commercial, industrial, apartment, railroad, and school.

4. Construction permit data was then analyzed to capture more recent development activities that may not have otherwise been reflected by the land use/land cover data or MOD-IV tax data.
5. Other limiting factors were utilized to remove initial vacant, developable lands. These include: open space, preserved farmland, category 1 waterways and wetlands (and associated buffers based on special area restrictions), steep slopes exceeding 15 percent, and open waters.
6. Due to limitations resulting from inconsistencies between data sources, the resulting mapping included instances of small land areas caused by an incongruous alignment of geospatial layers. To eliminate these "slivers" of leftover land, the DCA eliminated any feature part with an area of less than 2,500 square feet. This presumed that a 25' by 100' foot area could be a developable property.
7. Finally, the resulting land area for each municipality was summed with the resulting land areas for all other municipalities within each housing region to then determine the municipal percentage of land capacity for the housing region.

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## **2: Analysis of Calculation**

The calculation conducted by the DCA determined that the Borough has 4.08 acres of developable land which accounts for a 0.21% share of the region's land capacity factor. Overall, the Borough finds the general methodology utilized by the DCA to calculate its land capacity factor acceptable. However, an analysis of the DCA's resultant mapping discovered the following:

1. Several of the lands identified as "developable" by the DCA represent slivers which "are considered artifacts of error that are common when overlaying polygons and vectors from non-coincident data sources." The DCA initially tried to eliminate these slivers by deleting any feature parts with an area of less than 2,500 square feet. However, areas less than the minimum 25' width threshold identified by DCA for developability were nevertheless identified as developable.
2. Other lands identified as "developable" by the DCA are located on properties with development. To eliminate "developable" lands on developed properties, the DCA had removed any lands where the underlying tax parcels had property class codes for residential, commercial, industrial, apartments, railroad, and school. However, the property classifications identified by the DCA did not account for houses of worship, properties developed with nonprofit facilities, and properties developed with public facilities.
3. Some lands identified as "developable" by the DCA were in fact located on preserved open space.

4. Some other “developable” areas did not account for areas with site-specific surveys showing more extensive environmental constraints than suggested by NJDEP data.
5. Finally, several lands identified as “developable” by the DCA are located on Third Round Plan compliance sites with active site plan approvals, and therefore are no longer available for development.

These discrepancies are summarized in Table 2 utilizing the Land Capacity Analysis and are detailed in the mapping in Appendix A of this analysis. Removing these lands would adjust the Borough’s weighted land area from 4.08 acres to 0.00 acres. This results in an adjustment of the Borough’s calculated share of the region’s land capacity from 0.21% to 0.00%.

Irrespective of the land capacity factor analysis established herein, the Borough reserves the right to conduct a vacant land adjustment (VLA) to determine its realistic development potential (RDP) at a later date.

Table 2: Summary of Land Capacity Factor Analysis – Park Ridge

Shapefile Object ID*	Initial Weighted Area* (acres)	Developable?	Comments	Weighted Area Recalculated (acres)
28208	0.1000	No	Wood Dale County Park. Preserved open space (on ROSI). Also, sliver less than 25' wide. (Misalignment of open space and parcel shapefiles.)	0.000
28209	0.0999	No	Not vacant. Developed with place of worship. Also, all but 918 sq ft is sliver less than 25' wide. (Remainder is less than 2,500 sq ft threshold to qualify as developable.)	0.000
28210	0.5062	No	Property has site plan approval for Landmark inclusionary development. 3rd Round Compliance Site (not developable for 4th Round).	0.000
28211	0.7377	No	Property has site plan approval for Landmark inclusionary development. 3rd Round Compliance Site (not developable for 4th Round).	0.000
28212	0.9107	No	Site-specific survey identifies property as fully constrained by wetlands, 50' wetland buffers and steep slopes. No development potential.	0.000
28213	1.5543	No	Property has site plan approval for Landmark inclusionary development. 3rd Round Compliance Site (not developable for 4th Round).	0.000
28214	0.1717	No	Part of commercially developed property assessed in Montvale (Block 3201 Lot 9).	0.000
		<b>TOTAL</b>		<b>0.000</b>

\* Object ID and area computations identified were obtained from the NJDCA published Vacant and Developable Land Analysis.

## Appendix A: Land Capacity Factor Analysis Map

The following map shows in more detail the specific mapping of the various land capacity areas as identified in the DCA analysis provided through the Land Capacity Analysis for P.L. 2024, c.2. They are obtained from the web based ArcGIS online mapping utilizing feature layers (hosted) by NJDCA and incorporating other layer features available through NJDEP and ArcGIS Online services.

 <p><b>BURGIS ASSOCIATES, INC.</b> CONSULTING ENGINEERING LAND DEVELOPMENT ARCHITECTURE PLANNING AND DESIGN</p> <p>25 Woodcliff Avenue Woodcliff Park, NJ 07074 P: 201.466.1811 F: 201.466.1812 WWW.BURGISASSOCIATES.COM</p>	<p>Project Title: <b>4th Round Affordable Housing</b></p> <p>BOROUGH OF PARK RIDGE BERGEN COUNTY, NEW JERSEY</p>		<p>Develepiable Area Per DCA</p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #FF00FF; border: 1px solid black; margin-right: 5px;"></span> Parcels</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #00FFFF; border: 1px solid black; margin-right: 5px;"></span> Water Bodies</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #0000FF; border: 1px solid black; margin-right: 5px;"></span> C-1 Streams</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #FFFF00; border: 1px solid black; margin-right: 5px;"></span> 300' C1 Stream Buffer</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #90EE90; border: 1px solid black; margin-right: 5px;"></span> Wetlands</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #FFD700; border: 1px solid black; margin-right: 5px;"></span> 50' Wetlands Buffer</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #FF00FF; border: 1px solid black; margin-right: 5px;"></span> Roadway</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #800080; border: 1px solid black; margin-right: 5px;"></span> Slopes &lt;15%</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #800000; border: 1px solid black; margin-right: 5px;"></span> Steep Slopes 15% or &gt;</li> </ul>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Page</th> <th>Description</th> <th>Date</th> <th>Drawn</th> <th>Checked</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> <p>Drawn Title: Analysis of DCA Land Capacity Factor</p> <p>Graphic Scale: 0 325 650 1300 Feet</p>	Page	Description	Date	Drawn	Checked						<p>Project No.: 017/2024 Sheet No.: 1 of 1 Date: 01/29/25 Drawn: AN Checked: AN Scale: 1" = 1000'</p> <p>Drawn By: Checked By: Date: 01/29/25</p> <p>2025 COPYRIGHT BY BURGIS ASSOCIATES, INC.</p>
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