

CITY OF FORT LAUDERDALE

DEVELOPMENT REVIEW COMMITTEE



CASE COMMENT REPORT

CASE NO. UDP-S24022



CITY OF FORT LAUDERDALE



CASE INFORMATION

CASE:	UDP-S24022
MEETING DATE:	April 23, 2024
REQUEST:	Site Plan Level II Review: 1,400 Square-Foot Office Building
APPLICANT:	EG Group Investments, LLC.
AGENT:	Emmanuel Gonzales
PROJECT NAME:	654 NW 22nd Road – Professional Office
PROPERTY ADDRESS:	654 NW 22nd Road
ZONING DISTRICT:	Community Business District (CB)
LAND USE:	Northwest Regional Activity Center
COMMISSION DISTRICT:	3 - Pamela Beasley-Pittman
NEIGHBORHOOD ASSOCIATION:	Durrs Community Association
CASE PLANNER:	Yvonne Redding

RESUBMITTAL INFORMATION

- Applicant must provide written responses to all DRC comments contained herein.
- Written responses must specify revisions made to the plans and indicate the sheet.
- Resubmitted plan sets must be accompanied by responses to be accepted.
- Any additional documentation must be provided at time of resubmittal.
- Resubmittals must be conducted through the City's online citizen's portal LauderBuild.
- Questions can be directed to the Case Planner assigned to the case.



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CASE COMMENTS:

Please provide a response to the following:

1. Reference the Florida Building Code 7th edition on plan for the proposed development.
2. Specify uses and occupancy classification per Chapter 3 of the 2023 FBC.
3. Show allowable height, allowable number of stories, and allowable area compliance per Chapter 5 of the 2023 FBC.
4. Provide building construction type designation per Chapter 6 of the 2023 FBC.
5. Specify fire-resistance rating requirements based on building separation and construction type per Table 601 and 602 of the 2023 FBC.
6. Provide occupancy loads with compliant life safety egress design per Chapter 10 of the 2023 FBC.
7. Indicate code compliant sprinkler system per Section 903 of the 2023 FBC.
8. Dimension accessibility requirements to site per FBC Accessibility Code.

GENERAL COMMENTS

The following comments are for informational purposes. Please consider the following prior to submittal for Final DRC:

1. The Florida Building Code shall apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures.
2. All projects must consider safeguards during the construction process. FBC Chapter 33 delineates various safeguards that may apply during the construction phase. All structures associated with the protection of pedestrians will require a separate permit. A licensed professional must sign and seal the plans and specifications.
3. The City of Fort Lauderdale is a participating municipality in the National Flood Insurance Program (NFIP). The requirements specific to the City of Fort Lauderdale can be found in

Chapter 14 - FLOODPLAIN MANAGEMENT of the Code of Ordinances and accessed at;

- a. https://library.municode.com/fl/fort_lauderdale/codes/code_of_ordinances?nodeId=COOR_CH14FLMA

Please consider the following prior to submittal for Building Permit:

1. On December 31st, 2023, the 8th Edition of the Florida Building Code was adopted. All work described in Section 101.2, of the Broward County Administrative portion of the Florida Building Code, will govern the administration and enforcement of the proposed work. Each building and or structure will require a separate permit. The following websites will assist in the design considerations:
 - b. <https://www.fortlauderdale.gov/government/departments-a-h/development-services/building-services>
 - c. https://floridabuilding.org/bc/bc_default.aspx
 - d. <http://www.broward.org/codeappeals/pages/default.aspx>

General Guidelines Checklist is available upon request.



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CASE COMMENTS:

Prior to Final DRC sign-off, please provide updated plans and written response to the following review comments:

1. Meet the City's Adequacy requirements for services provided to the public (fire service, water, wastewater, stormwater, transportation, etc.), per ULDR Section 47-25.2 of the City's Code of Ordinances. Assess potential demands and impacts on City services and prepare a design for each that utilizes existing water, wastewater, stormwater, and transportation infrastructure to adequately serve this project. If the adequate infrastructure is not available, prepare a design that extends/expands the connection to the nearest City system to adequately serve this development.
 - a. Prepare service demand calculations for water & wastewater services and obtain a letter of service availability from the City's Public Works – Engineering Department. Submit water and wastewater capacity availability request form and documents/ plans through the city website.
2. Provide on the civil sheets travel lane widths for NW 22 Rd.
3. Clearly depict trash enclosure on site plan.
 - a. Show truck turning movements in and out the proposed dumpster enclosure/ building as applicable.
 - b. Per ULDR Section 47-19.4.D.6, all dumpster enclosures and adjacent service access drive shall be placed on poured concrete, solid or perforated interlocking concrete block paving (ICB), or any existing hardened paving system. A concrete apron shall also be placed entirely on private property.
4. The existing public sidewalks adjacent to the proposed development (to remain) must be inspected by the Engineer of Record to ensure existing sidewalks meet ADA standards and are in good condition. A signed and sealed assessment must be provided indicating sidewalks were inspected and any sidewalk replacement requirements. Plans shall reflect the extent of sidewalk replacement accordingly.
 - a. Sidewalk shall run through proposed driveway as per city detail C2.1
5. Conceptual Water and Sewer Plan:
 - b. The installation of the Y-connections for sewer service is not allowed by the City. Please provide a separate sewer lateral per City standards.
6. Conceptual Paving, Grading, and Drainage Plan:
 - c. Show location of building roof drains, and their proposed connection(s) to the on-site drainage system. Label existing City storm manholes/inlets.
 - d. Additional coordination maybe required for projects located within Durrs neighborhood, which is part of a City Drainage Master Plan.
7. Show and label all existing and proposed utilities (utility type, material, and size) on landscaping plans for potential conflict. A min. 5 feet and 10 feet horizontal clearance horizontal separation is required between city utilities infrastructure and proposed small and large trees, respectively (including



proposed water and sewer services to the development). Any new trees (located within or adjacent to City Right-of-Way) should be placed with sufficient horizontal and vertical distances (per City, County, and State guidelines) to / from City's public infrastructure, including stormwater assets, to allow for continued Public Works maintenance without obstruction. If this cannot be accommodated due to field conditions, then the developer shall relocate the existing City's public infrastructure to resolve the conflict(s) and to comply with Cities, County's & State's engineering standards/permits/policies. Ensure separation is provided and include a note regarding horizontal clearance requirement on the landscape plans.

8. Provide sufficient existing and proposed grades and information on conceptual Paving, Grading, and Drainage Plan and details to demonstrate how stormwater runoff will remain onsite.
9. Depict proposed building doors and provide sufficient grades/details on conceptual paving, grading and drainage plans to verify ADA accessibility design for the site, especially ground floor access to the new building, as well as crossing proposed driveways and connecting to existing sidewalks (at intersections and with adjacent property) as appropriate; coordinate proposed site grading and 1st Level Finished Floor Elevations to meet ADA accessibility requirements.
10. Per ULDR Sec. 47-20.13.D - On-site stormwater retention shall be provided in accordance with the requirements of the regulatory authority with jurisdiction over stormwater management System. Therefore, please provide drainage calculation showing the proposed design will meet applicable South Florida Water Management District design criteria.
11. Drainage mitigation is required for any impacts within adjacent City of Fort Lauderdale Right-of-Way, such as increased runoff, additional impervious areas, and reduction of existing storage or treatment (i.e. swale areas). Engineer of Record (EOR) shall evaluate the adjacent City roadway system capacity and demonstrate that the proposed improvements will not negatively impact the City's existing drainage system and provide recommendations in compliance with the City's Comprehensive Plan (i.e. meets or exceeds the 10-year/1-day storm event drainage criteria).
12. Provide storm runoff calculations, signed, and sealed by a Florida registered professional engineer, which demonstrate how minimum criteria regarding adjacent street crown, water quality and finished floor elevations are met. For the 25-year, 3-day storm, please demonstrate that the design stage is equal to or less than the pre-condition, or revise and resubmit all affected plans showing the perimeter grade (including entrance and exit driveways) at or above the 25-year, 3-day design storm stage. Please also comply with the City of Fort Lauderdale Comprehensive Plan (Ordinance C-08-18), Objective 4.1 under Infrastructure Elements, and be advised that effective 7/1/2017, all projects must comply with the Broward County 'Future Conditions Average Wet Season Groundwater Level' map.
13. Show and label all existing and proposed utilities (utility type, material, and size) on civil and landscaping plans for potential conflict, (per City Utility Atlas Maps). A min. 5 feet and 10 feet horizontal clearance horizontal separation is required between city utilities infrastructure and proposed small and large trees, respectively (including proposed water and sewer services to the development). Any new trees (located within or adjacent to City Right-of-Way) should be placed with sufficient horizontal and vertical distances (per City, County, and State guidelines) to / from City's public infrastructure, including stormwater assets, to allow for continued Public Works maintenance without obstruction. If this cannot be accommodated due to field conditions, then the developer shall relocate the existing City's public infrastructure to resolve the conflict(s) and to comply with Cities, County's & State's engineering standards/permits/policies. Ensure separation is provided and include a note regarding horizontal clearance requirement on the landscape plans.



14. If trees shall be installed a min. 4 feet behind proposed curbs when adjacent to travel lanes and a min. 6 feet away from adjacent travel lanes when no curb is present.
15. Within adjacent City Right-of-Way, staging/storage will not be allowed, construction fence shall not encroach within intersection corner sight triangles, construction fence gates shall not swing into the public Right-of-Way, and any loaded Jib Crane radius shall not extend beyond private property boundaries. Any City Right-of-Way closure over 72 hours requires a Revocable License Agreement, processed by Property Right-Of-Way Committee (DRC) and approved by the City's Commission, prior to Right-of-Way permit issuance by the Department of Sustainable Development for Maintenance of Traffic.

For Engineering General Advisory DRC Information, please visit our website at:

<https://www.fortlauderdale.gov/home/showdocument?id=30249>

Additional comments may be forthcoming at the DRC meeting and once additional/ revised information is provided on plans.

Advisory: If dewatering activities are anticipated, a notarized City dewatering affidavit shall be filed at City's building department when submitting a demolition or foundation permit along with any applicable dewatering permit form regulatory agencies such as the South Florida Water Management District or Broward County Department of Environmental Protection.



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CASE COMMENTS:

Please provide a response to the following:

1. 2020 FEMA FIRM-0.2 X, Structure is not located in a Special Flood Hazard Area.

GENERAL COMMENTS

The following comments are for informational purposes.

1. Additional comments may follow pending submission of the complete plan set.



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CASE COMMENTS:

Please provide a response to the following.

1. For multi-family and commercial: Sec. 47-21.6 Name, address and telephone number of the person who has prepared the landscape plan. Landscape plans submitted for approval must be prepared by a registered Landscape Architect, dated signed and stamped with his or her seal.
2. As per ULDR 47-21.2.A, "net lot area" is defined as the total square footage of a parcel of land after subtracting the square footage area of any vehicular use area including the VUA required landscaping, building footprint, walls, walks and swimming pools or any other impervious area. The Sheet L-1.0 Minimum Landscape Requirements table uses gross lot area for calculations. Please revise for consistency.
3. Provide required street trees in the right of way swale area, as per ULDR 47-21.13. B.16. Street trees are to be a minimum of 12 feet tall and provided at a ratio of one street tree per forty feet of street frontage or greater fraction thereof not subtracting ingress and egress dimensions. When overhead utilities exist, required street trees may be small trees provided at a minimum of a ratio of one street tree per twenty feet frontage or greater fraction thereof not subtracting ingress and egress dimensions.
4. A minimum separation of 6 feet is required between the tree trunk and travel lane when curb and gutter DO NOT exist, and a minimum separation of 4 feet is required between the tree trunk and travel lane when curb and gutter DO exist. Illustrate this clearance.
5. Tree canopy within a sight triangle requires a clearance of 8 feet. Please maintain tree canopy 60% to tree clear trunk 40% ratio heights adjust overall height of trees in sight triangles.
6. A 10 feet sight triangle is required at the intersection of a driveway and street, measured from where the intersection of the driveway and paved travel lane meet. This area must be clear of obstructions between 2.5 feet and 8 feet above elevation of adjoining pavement, per ULDR 47-2.2. Q.1 and ULDR 47-35. Illustrate and label this triangle on landscape plan, and confirm landscaping is installed outside of sight triangles.
7. Illustrate and label the horizontal clearance from tree trunk to edge of utility on the landscape plan. Landscaping must provide a minimum horizontal clearance of 5 feet for small trees and palms, and a minimum of 10 feet for large trees and palms from underground utilities.
8. Utilities must be protected using a root barrier fabric wrap or equivalent. Landscape Plans must illustrate and label existing and proposed utilities in the right-of-way to confirm no utility conflicts exist and illustrate the above setback and wrap requirement if applicable. Provide root barrier fabric wrap detail.
9. Utilities and site amenities such as walkways, flagpoles, transformers, fire hydrants, sewer and water supply lines, trash enclosures, and similar items located on the site shall not be placed adjacent to, in, or under required tree planting areas, as per ULDR Section 47-21.12. Confirm with civil, site and life safety plan that utilities and site amenities are not causing conflicts with proposed landscaping. Where conflicts exist, shift the utility and/or site amenities.
10. In order to improve the appearance of vehicular use areas and to protect and preserve the appearance, character and value of the surrounding neighborhoods, minimum landscape requirements are established for such Vehicular Use Areas. Review ULDR Section 47-21.12 for landscape requirements for vehicular use areas and illustrate such requirements on plans and in landscape calculations table.



11. As per Section 47-21.12. C.1.a. the first twenty-five percent (25%), or fraction thereof, of the required VUA trees shall be shade species with a three and one-half (3 ½) inch minimum trunk caliper and shall be evenly distributed between interior and perimeter landscape areas. The second twenty-five percent (25%), or fraction thereof, of required trees shall be shade species with a two and one-half (2 ½) inch minimum trunk caliper.
12. As per Section 47-21.9.G. Each tree shall have pervious area surrounding it sufficient to support the species, as determined by the department. Shade species with a minimum caliper of three (3) inches, two hundred and twenty-five (225) square feet with fifteen (15) feet being the smallest dimension. Shade species with a minimum caliper of two (2) inches, ninety (90) square feet with eight (8) feet being the smallest dimension.
 - a. Tree planting areas that are reduced in width will require structural soil or a product engineered for root growth under paved areas to provide this root development area.
13. The use of structural soil is required in paved sites to provide adequate soil volumes for tree roots under pavements, as per ULDR Section 47-21.13. Structural soil details and specifications can be obtained at <http://www.hort.cornell.edu/uhi/outreach/index.htm#soil> This is to be provided at a minimum of 8' radii of tree trunks, and is to be consistently illustrated and noted on landscape, site and civil plans.

The structural soil drain is required when percolation rates are less than 4" vertical clearance per hour. Provide documentation of the report used to prove this calculation. The drain and connections are to be illustrated on civil plans.

 - a. Demonstrate hashing on landscape, site, and civil plans as to the extent of use of the Structural Soil.
 - b. Provide Structural Soil Detail and composition.
14. A suspension modular paving system product may be used in place of CU Structural Soil. Please look into the use of the Green Blue Urban soil cell, Silva cell or like product for this and all future site developments. Provide a detail of product of use for root development under paved areas.
15. Additional comments may be forthcoming after the next review of new plans and written comment responses.

GENERAL COMMENTS:

The following comments are for informational purposes. Please consider the following:

1. A separate sub-permit application for Tree Removal, Relocation, and General Landscaping for site is required at time of master permit submittal. These are Landscape and Tree permit application documents different than the Broward County standard applications. Please do not apply for these at time of DRC submittal.
2. Note that tree removal at time of demolition will not be permitted unless the Master Permit for redevelopment has been submitted for review.
3. Proposed landscaping work in the City's right of way requires engineering approval. This approval requires documents to be submitted for Engineering review. Note that Landscape will not approve permit review without these Engineering documents being submitted.
4. Provide separate Plumbing sub permit application for irrigation. Irrigation plans are required at time of Building permit submittal. Plans are to be in compliance with ULDR 47-21.6. A.11 and 47-21.10. Note that



planting areas are to be irrigated in a separate zone than the turf areas so that once the plants are established, that particular zone can be shut off based on the season. The overall goal is to decrease water use through irrigation. Plant material must be grouped together based on watering needs (hydrozone) and turf areas must be limited and/or consolidated to less than 50% of the landscaped area. Illustrate hydrozones on planting plan and include calculations in table.



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CASE COMMENTS:

Please provide a response to the following:

1. Entry doors should be solid, impact resistant or metal and should be equipped with a 180-degree view peephole if it is a solid door.
2. Exterior doors should be equipped with burglary resistant lock systems such as latch guards or security plates and hinge pins where applicable.
3. All glazing should be impact resistant.
4. The business should be pre-wired for an alarm system, to include duress, motion, and door contacts.
5. A video surveillance system (VSS) should be employed throughout the property with a focus on entry/exit points, hallways, and common areas. Exterior parking areas should be incorporated into the VSS installation. It should be capable of retrieving an identifiable image of a person and video retention should be a minimum of 30 days.
6. All Lighting, including at the remote parking lot, should conform to IES standards and landscaping should follow CPTED guidelines.

General Comments:

It is highly recommended that the managing company arrange for private security during construction.

Please submit responses in writing prior to DRC sign off.



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CASE COMMENTS:

Please provide a response to the following:

1. Garbage, Recycling and Bulk Trash shall be provided.
2. Recycling reduces the amount of trash your business creates, and it is the best way to reduce monthly waste disposal costs and improve your company's bottom line.
3. Solid Waste Services shall be provided by a Private Contractor licensed by the City.
4. Solid Waste charges shall be collected in monthly lease with Sanitation account for property under one name (Commercial).
5. Service Days shall be: No restriction for Commercial collection. Service may not occur earlier than 7:00 am or later than 10:00 pm within 250 feet of residential.
6. Solid Waste Collection shall be on private property container shall not be placed, stored, or block the public street to perform service (large multifamily and commercial parcels).
7. Provide on the site plan a garbage truck turning radius for City review. Indicate how truck will circulate within property.
8. Show solid waste and recycling cart placement on the property. Carts should be placed out of site on non service days.
9. Containers: must comply with 47-19.4
10. Submit a Solid Waste Management Plan on your letterhead containing the name of project, address, DRC case number, number of units if applicable, and indicate whether it is Pre or Final DRC.
 - *This letter is to be approved and signed off by the Sustainability Division and should be attached to your drawings. Please email an electronic copy to Gwoolweaver@fortlauderdale.gov . The letter should include an analysis of the expected amounts of solid waste and recyclables that will be generated (if different from current capacity), and containers requirements to meet proposed capacity.*
 - *Community Inspections will reference this Solid Waste Plan for sanitation compliance issues at this location.*

GENERAL COMMENTS

The following comments are for informational purposes. Please consider the following prior to submittal for Final DRC:

Please provide specific details of solid waste and recycling collection per building.



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CASE COMMENTS:

1. Show inbound and outbound stacking requirements from the property line to the first conflict point according to Section 47-20.5 General design of parking facilities for each proposed driveway.
 - a. The minimum inbound and outbound stacking requirements is one (1) space off NW 22nd Rd, the stacking measurement starts at the back of proposed sidewalk and measured into the site. Parking spaces conflict with the inbound and outbound stacking requirements requirement.
2. For a development which generates less than five hundred (500) trips per day, a lesser number of stacking spaces may be authorized by the reviewing authority based on a traffic impact statement prepared by a licensed engineer which indicates that characteristics of the proposed use or abutting right-of-way support a determination that the need for stacking spaces is less than that required by the ULDR. These characteristics may include, but are not limited to, the following:
 - a. A deceleration lane will be located at the driveway, or
 - b. The peak hour directional traffic volumes on the abutting right-of-way do not coincide or conflict with peak hour usage on the site, or
 - c. Characteristics of the proposed use such as low traffic generation or low turnover of parking spaces support a finding that the number of stacking spaces provided will be sufficient to protect the safety of those traveling on and off site.
3. Bicycle parking is strongly encouraged. Consult the APBP Bicycle Parking Guidelines, city of Fort Lauderdale Parking Standards and Broward County End-of-Trip Bicycle Facilities Guide. Look to provide the minimum long term and short-term bicycle parking based on requirements in the guide and include total counts on the site plan data sheet. Bicycle parking needs to be located on the site so that it is accessible to the public.
4. Additional comments may be provided upon further review.

GENERAL COMMENTS

Please address comments below where applicable.

1. The City's Transportation & Mobility Department encourages the use of sustainable materials such as permeable pavement and electric car charge stations and installation of multimodal facilities such as bicycle pump stations and bike lockers.
2. Please note that any work within the City's right-of-way will require an MOT approved by Transportation and Mobility and Engineering for permitting. Any full closure of roadways, alleys, or sidewalks that are over 72 hours will require a Revocable License Agreement (RLA) with the City of Fort Lauderdale.

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CASE COMMENTS:

Please provide a response to the following:

- 1) Pursuant to State Statute 166.033(1) the application must be deemed approved, approved with conditions, or denied within 120 days of completeness determination, on or before *July 24, 2024*, unless a mutually agreed upon time extension is established between the City and the applicant. Please provide a statement requesting and agreeing to a waiver of these timeframes, or request a specified amount of additional time to address the comments and provide sufficient time for review and approval. Failure to meet the applicable timeframe or request an extension may result in the application being denied by the City and the applicant may be required to refile a new application and fees to proceed.
- 2) The site is designated NW Regional Activity Center on the City's Future Land Use Map. The proposed use is permitted in these designations. This is not a determination on consistency with Comprehensive Plan Goals, Objectives and Policies.
- 3) The proposed project must be consistent with the latest recorded plat restrictions. Provide a Plat Determination Letter from Broward County Planning Council verifying whether the property needs to be platted or re-platted by following the [Platting Determination Submittal Requirements](#) or contact the Broward County Planning Council, at (954) 357-6695. If a plat note or non-vehicular access line (NVAL) amendment is needed, a separate application is required, which is reviewed administratively and can be found here: [Administrative Review Application](#).
- 4) Pursuant to Section 47-25.3, Neighborhood Compatibility requirements, provide a detailed explanation of how the architectural style of the project is compatible and complementary with adjacent structures. Please note the structure does not need to resemble a single family home, but should provide the required details and embellishments as stated in the code.
- 5) Provide the following changes on site plan:
 - a. Indicate location of mechanical equipment, including setbacks. If roof mounted structures such as air conditioners and satellite dish antennae shall be required to be screened with material that matches the material used for the principal structure and shall be at least six (6) inches high above the top most surface of the roof mounted structure.
 - b. Indicate all adjacent building footprints, indicating their uses and heights, and dimension approximate setbacks.
 - c. Indicate location of refuse collection bins within the building and for collection.
- 6) Provide the following changes on elevations:
 - a. Identify and label all architectural elements including proposed colors and materials.
 - b. Indicate all openings on elevations, including windows and doors.
- 7) Provide color renderings of all facades.
- 8) Storage and/or warehouse use is not a permitted use at this location.
- 9) An application for a parking reduction on property located within the Northwest-Progresso-Flagler Heights Community Redevelopment Area requires Site Plan Level I approval pursuant to Section 47-24.2. Discuss the parking reduction methodology and process with Engineering Design Manager. Please note



that there is an associated fee for the parking reduction review that will be billed when complete. The associated parking reduction order must be recorded prior to Final DRC approval.

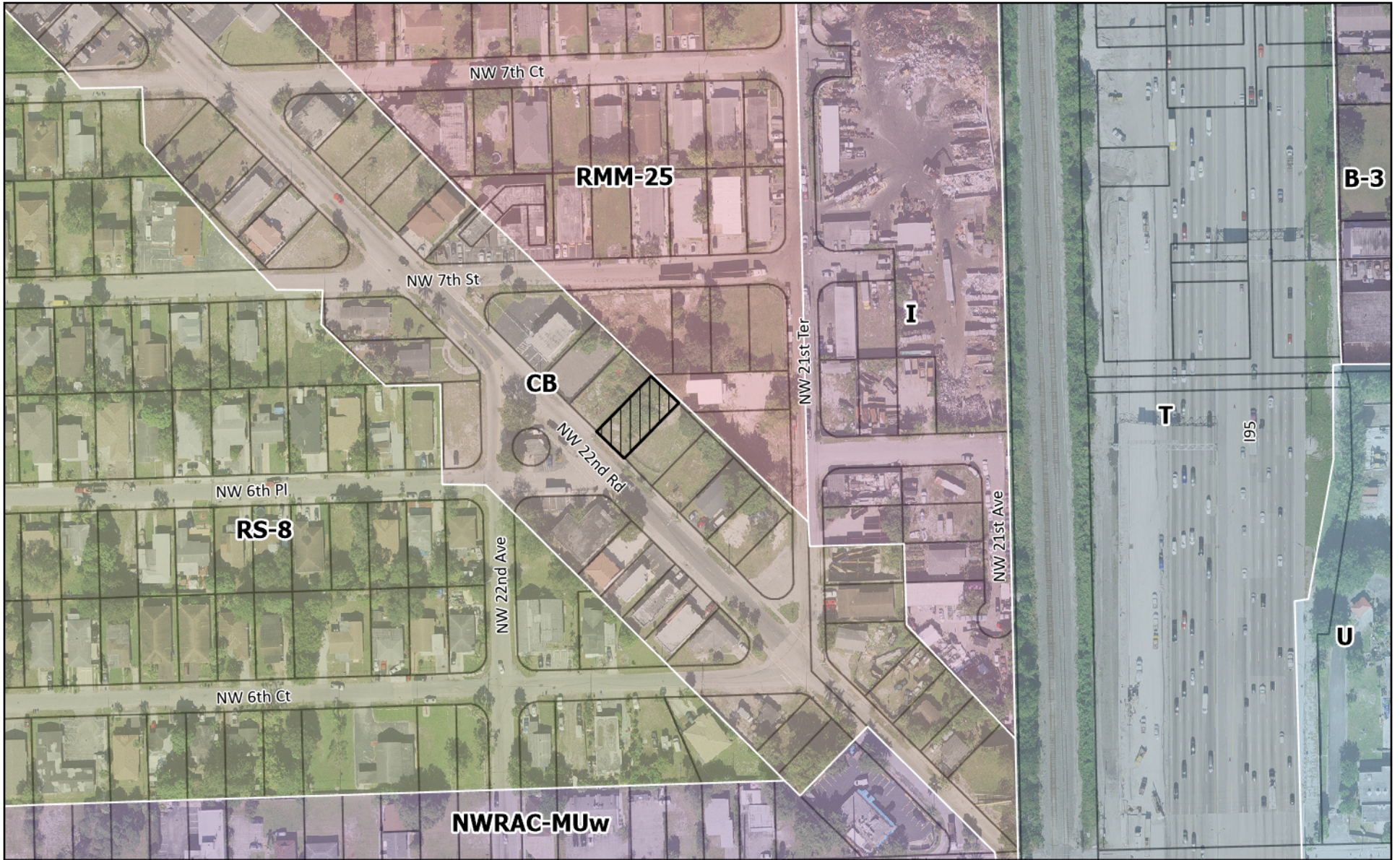
- 10) If a temporary construction is needed for this project, provide the details and location of the trailer on a separate site plan, to avoid additional review in the future. Verify details and location with the Building Representative.
- 11) Provide a preliminary construction staging plan which includes anticipated hours of operation on site, debris mitigation plan, and map indicating where crane operations and employee and/or equipment parking and storage will be placed. A revocable license application and a traffic circulation plan may be required if the sidewalk or right-of-way requires to be closed at any time, which should be filed under a separate application and coordinated through the City's Maintenance of Traffic (MOT) process.
- 12) Staff reserves the right to provide additional comments based on applicant's revised plans and responses.
- 13) An additional follow-up coordination meeting may be needed to review project changes necessitated by the DRC comments.

GENERAL COMMENTS

The following comments are for informational purposes.

Please consider the following prior to submittal for Final Development Review Committee (DRC):

1. Provide a written response to all DRC comments within 120 days.
2. Please be advised that pursuant to State Statute, Section 166.033, development permits which require a quasi-judicial or public hearing decision, must be completed within 120 days, unless an extension of time is mutually agreed upon between the City and the applicant.
3. All construction activity must comply with Code of Ordinances, Section 24-11, Construction sites. Contact Noel Zamora, Structural Plans Examiner (954-828-5536) to obtain his signature on the final DRC plans.
4. Additional comments may be forthcoming at the DRC meeting. Please provide a written response to all DRC comments.



UDP-S24022 - 654 NW 22 RD.

