

To Mr. Andrew Carlberg, District Manager, Upper Blue Sanitation District
From Shayli Volk and Steven M. Ravel, PE, BCEE, PMP, ENV SP
Date November 20, 2019
Project No. 507354513-002
Page Page 1 of 10
Subject Short-Term Rental Rate Impacts

I. PURPOSE

This Technical Memorandum (TM) summarizes the flow and loading impacts of short-term rental properties and provides a recommendation regarding classification of short-term rentals to provide a fair and equitable approach for various customer classification rates.

II. EXECUTIVE SUMMARY

The advertised occupancy for short-term rental properties through organizations such as Air BnB is greater than the typical residential allocation. The population, flow, and loading from short-term rental of single-family residences is similar to multiplex units. We recommend that the District consider the following actions:

- Increase the single family equivalent (SFE) allocation and associated annual service fees for short-term rental properties using the multiplex allocation based on occupancy until such time that the properties are returned to typical residential use and associated population, flow, and loading.
- Capture additional plant investment fees (PIF) for short-term rental properties using a monthly capital charge to recover the cost associated with the increased flow and loading to the system until such time that the properties are returned to typical residential use and associated population, flow, and loading.

III. BACKGROUND

The District has implemented a customer classification system based on SFE as part of its overall rate structure. The guiding principal for classifying customers is to group customers with similar use characteristics. The customer classification system allows for the fair and equitable allocation of operation, maintenance, and replacement costs to groups of customers with similar use characteristics.

The District has experienced an increase in short-term rental of single-family residences and manufactured homes. Short-term rental of these properties has been initiated directly by homeowners and through organizations such as Air BnB, VRBO, and local property management companies. Short-term rental of these properties increases the occupancy, flow, and loading to the District's collection and treatment system. The District charges a flat service fee based on the "single-family residences and manufactured homes" SFE allocation. The increased operation, maintenance, and replacement costs associated with higher occupancy of these residences/homes used for short-term rental are not recovered by the District's flat rate structure. A short-term rental SFE allocation allows for recovery



To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
Date November 20, 2019
Page Page 2 of 10

of fair and equitable service fees associated with the increased population, flow, and loading based on customer classifications.

District rate and SFE information and typical wastewater flow and loading values were obtained from the District's Rules and Regulations of July 2017; *Wastewater Flow Monitoring Program* report by Richard P. Arber Associates of October 1, 1997; *Single Family Equivalent Evaluation* report by Richard P. Arber Associates of October 30, 2003; and *Wastewater Engineering Treatment and Reuse* by Metcalf and Eddy, Fourth Edition. District information and typical wastewater values include:

- PIF Amount: \$11,584 per SFE (August 2019)
- Annual Service Fee: \$312 per SFE
- Persons per SFE: 3.5 people per SFE
- Flow: 85.7 gallons per capita per day (gpcpd)
- Flow: 300 gpd/SFE (3.5 people per SFE x 85.7 gpcpd)
- Biochemical Oxygen Demand (BOD₅): 0.18 pounds per capita per day (lbs/capita-day) or 0.63 pounds per day (based on 3.5 people)
- Total Suspended Solids (TSS): 0.18 pounds per capita per day (lbs/capita-day) or 0.63 pounds per day (based on 3.5 people)
- Ammonia as N (NH₃ as N): 0.017 pounds per capita-day
- Total Phosphorus (TP): 0.007 pounds per capita-day
- Single-Family Residences and Manufactured Homes
 - Three bedrooms or less: 1 SFE
 - Each bedroom in excess of three: 0.4 SFE
 - Each bath, or portion thereof, in excess of two: 0.2 SFE
- Apartments, Townhouses, Multiplexes, and Condominium Units:
 - Two bedrooms or less: 1 SFE
 - Each bedroom in excess of two: 0.4 SFE
 - Each bath, or portion thereof, in excess of one: 0.4 SFE

The District designs, constructs, operates, and maintains its facilities for peak daily flow and loadings to provide reliable service to its customers. As such, the District's definition of an SFE is based on the maximum (or peak) daily loading as opposed to an average weekly, monthly, or annual loading.

The District collected the following data for 350 single-family residences/manufactured homes that are listed as short-term rentals:

- Number of Bedrooms
- Number of Bathrooms
- Advertised Occupancy
- Current SFE Allocation

To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
Date November 20, 2019
Page Page 3 of 10

IV. EVALUATION

The total SFEs, PIF amount, and annual and quarterly service charges for the 350 properties were calculated using the following classifications:

- Single-Family Residences and Manufactured Homes
- Short-Term Rental Based on Advertised Occupancy
- Apartments, Townhouses, Multiplexes, and Condominium Units (“Multiplexes”)

A summary of the calculations is included in Appendix A.

Single-Family Residences and Manufactured Homes Classification

The residential occupancy allocation was determined for each of the 350 properties by applying the number of SFEs currently allocated to each based on the single-family residences and manufactured homes classification. An excerpt of Appendix A showing the total number of 2019 residential SFEs; the allocated occupancy; the associated flow and loadings; the associated total PIF amount; and the total annual and quarterly service charges is shown in Table 1.

Table 1. Single-Family Residences and Manufactured Homes Classification Summary (Excerpt of Entire Data Set)

A	B	C	D	E	F	G	H	I	J
Property Address	Rooms	Bath	2019 Residential Summary						
			SFE	Allocated Occupancy (People)	Flow (gpd)	BOD (lb/d)	TSS (lb/d)	NH ₃ as N (lb/d)	Total P (lb/d)
BARTON RD	1	1	1	3.5	300	0.63	0.63	0.060	0.025
13 CR 506	2	1	1	3.5	300	0.63	0.63	0.060	0.025
206 MORNING STAR	2	1	1	3.5	300	0.63	0.63	0.060	0.025
110 S HIGH ST	2	2	1	3.5	300	0.63	0.63	0.060	0.025
35 BOULDER RIDGE	5.5	6	2.6	9.1	780	1.64	1.64	0.155	0.064
52 ELK HORN LANE	5.5	6	2.6	9.1	780	1.64	1.64	0.155	0.064
125 KLACK RD	5	7	2.8	9.8	840	1.76	1.76	0.167	0.069
30 ESTATES DRIVE	5	7	2.8	9.8	840	1.76	1.76	0.167	0.069
1202 BROOKS HILL DR	6	4	2.6	9.1	780	1.64	1.64	0.155	0.064
68 AMBER CT	8	7	4	14	1,200	2.52	2.52	0.238	0.098
18 GRANDVIEW DR	8	8	4.2	14.7	1,260	2.65	2.65	0.250	0.103
456 PEERLESS DR	8	8	4.2	14.7	1,260	2.65	2.65	0.250	0.103
309 S FRENCH ST	9	9	4.8	16.8	1,440	3.02	3.02	0.286	0.118
98 SUNBEAM DR	13	13	7.2	25.2	2,160	4.54	4.54	0.428	0.176
Totals	1,515	1,528	703	2,460	210,870	443	443	42	17
Total PIF Amount			\$8,142,394						
Total Service Charge as Annual Amount			\$219,905						
Total Service Charge as Quarterly Amount			\$54,826						



To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
Date November 20, 2019
Page Page 4 of 10

Short-Term Rental Based on Advertised Occupancy

The SFE allocation for short-term rentals based on advertised occupancy was determined for each of the 350 properties by dividing the advertised occupancy by the residential occupancy allocation of 3.5 people per SFE. The resulting SFE was then multiplied by the flow and loading per SFE for each of the 350 properties to determine the anticipated flow and loading resulting from adjusted SFEs for short-term rental based on advertised occupancy. An excerpt of Appendix A showing the total number of short-term rental based on advertised occupancy SFEs; the associated flow and loading impacts; the associated total PIF amount; the total annual and quarterly service charges; and the increase (delta) in anticipated PIFs and services charges from the single-family/manufactured homes classification is shown in Table 2.



To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
 Date November 20, 2019
 Page Page 5 of 10

Table 2. Short-Term Rental Based on Advertised Occupancy Summary (Excerpt of Entire Data Set)

A	B	C	K	L	M	N	O	P	Q	R	S	T	U	V	W	X
Property Address	Rooms	Bath	Short Term Rental Summary (Based on Occupancy - People)							Increase from 2019 Allocation to Short Term Rental Use						
			Advertised Occupancy (People)	SFE (Column K / 3.5 People/SFE)	Flow (gpd)	BOD (lb/d)	TSS (lb/d)	NH ₃ as N (lb/d)	Total P (lb/d)	Δ Occupancy (People)	Δ PIF (Column L - Column D)	Δ Flow (gpd)	Δ BOD (lb/d)	Δ TSS (lb/d)	Δ NH ₃ as N (lb/d)	Δ Total P (lb/d)
BARTON RD	1	1	6	1.7	514	1.08	1.08	0.102	0.042	2.5	0.7	214	0.45	0.5	0.048	0.018
13 CR 506	2	1	6	1.7	514	1.08	1.08	0.102	0.042	2.5	0.7	214	0.45	0.5	0.043	0.018
206 MORNING STAR	2	1	4	1.1	848	0.72	0.72	0.068	0.028	0.5	0.1	48	0.09	0.1	0.009	0.004
110 S HIGH ST	2	2	6	1.7	514	1.08	1.08	0.102	0.042	2.5	0.7	214	0.45	0.5	0.043	0.018
35 BOULDER RIDGE	5.5	6	20	5.7	1,714	3.60	3.60	0.340	0.140	10.9	3.1	934	1.96	2.0	0.185	0.076
52 ELK HORN LANE	5.5	6	16	4.6	1,371	2.88	2.88	0.272	0.112	6.9	2.0	591	1.24	1.2	0.117	0.048
125 KLACK RD	5	7	18	5.1	1,548	3.24	3.24	0.306	0.126	8.2	2.3	703	1.48	1.5	0.139	0.057
30 ESTATES DRIVE	5	7	16	4.6	1,371	2.88	2.88	0.272	0.112	6.2	1.8	531	1.12	1.1	0.105	0.043
1202 BROOKS HILL DR	6	4	14	4.0	1,200	2.52	2.52	0.238	0.098	4.9	1.4	420	0.88	0.9	0.083	0.034
68 AMBER CT	8	7	19	5.4	1,629	3.42	3.42	0.323	0.133	5.0	1.4	429	0.90	0.9	0.085	0.035
18 GRANDVIEW DR	8	8	22	6.3	1,886	3.96	3.96	0.374	0.154	7.3	2.1	626	1.31	1.3	0.124	0.051
456 PEERLESS DR	8	8	20	5.7	1,714	3.60	3.60	0.340	0.140	5.3	1.5	454	0.95	1.0	0.090	0.037
309 S FRENCH ST	9	9	28	8.0	2,400	5.04	5.04	0.476	0.196	11.2	3.2	960	2.02	2.0	0.190	0.078
98 SUNBEAM DR	13	13	31	8.9	2,657	5.58	5.58	0.527	0.217	5.8	1.7	497	1.04	1.0	0.099	0.041
Totals	1,515	1,528	4,458	1,276	382,800	804	804	76	31	2,006	573	171,930	361	361	34	14
Total PIF Amount				\$14,781,184							\$6,638,790					
Total Service Charge as Annual Amount				\$398,112							\$178,807					
Total Service Charge as Quarterly Amount				\$99,528							\$44,702					



To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
Date November 20, 2019
Page Page 6 of 10

Short-Term Rental Based on Multiplex Classification

The short-term rental based on the multiplex designation SFE allocation was determined for each of the 350 properties by converting these properties to SFEs using the District's Multiplex classification and the advertised number of bedrooms and bathrooms for each of the properties. The resulting SFE was then multiplied by the flow and loading per SFE for each of the 350 properties to determine the anticipated flow and loading resulting from short-term rental based the multiplex designation. An excerpt of Appendix A showing the total number of SFEs using the Multiplex classification; the associated flow and loading impacts; the associated total PIF amount; the total annual and quarterly service charges; and the increase (delta) in anticipated PIFs and services charges from the single family residences/manufactured homes designation is shown in Table 3.

To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
Date November 20, 2019
Page Page 8 of 10

V. PIF DETERMINATION CASELAW

The District's method for developing SFE determinations and assessing PIFs was supported by the Supreme Court of Colorado, Case No. 99SC491 of February 26, 2001 (*Krupp v. the Breckenridge Sanitation District*). The Court concluded that the District's rate design and differential charges implementing the rates, was rational based on documentation supporting that:

- multiplex units (such as apartment buildings and condominiums) are much more likely to be used as temporary rental units than are single family units.
- multiplex units have, on average, higher per unit peak day flows than single family units.
- the variation in selected conversion units used for residential users is therefore reasonable.
- the record is sufficient to establish a rational basis for the distinction between long-term and short-term residences in the District's SFE conversion schedule.
- the expected short-term, high-occupancy use of triplex units is typical of the multiplex unit conversion category, the District had a rational basis for assessing triplexes in the higher, multiplex category.
- the PIF rationally differentiates between different classes of buildings based upon anticipated peak wastewater flow per unit.

VI. SHORT-TERM RENTAL SFE ALLOCATION

The District should consider capturing additional PIF for short-term rental properties to fund the increased flow and loading to the system. Collecting additional PIF from existing residences converted to short-term rentals is difficult as short-term rentals may return to a traditional residential classification at a future date. An approach to collect PIF for the increased flow and loading for short-term rental properties, without a permanent re-designation of the PIF allocation, is to allocate a monthly capital charge during the time period that residential properties are operated as short-term rentals. A monthly capital charge allows for the fair and equitable recovery of a portion of the additional capital cost over a pre-determined period of time, such as 25-years (300 months).

A multi-year phased cost recovery period will alleviate the initial impact of the additional PIF for owners of short-term rental properties by increasing the monthly capital charge in increments over a period of time. The monthly capital charge may be calculated by multiplying the SFE delta (short-term rental SFE allocation - residential SFE purchased) x a percentage allocation of the total PIF charge x the cost recovery period (25 years = 1 month / 300 months) x the PIF (at the time of allocation). An example 5-year phase-in monthly capital charge calculation that provides for recovery of the increase of 1 SFE amount over 25-years (300 months) is shown in Table 4.

To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
Date November 20, 2019
Page Page 9 of 10

Table 4. Example Phase-In Monthly Capital Charge Calculations per SFE

A	B	C	D	E
Year	% of Total PIF Charge	25-Year Cost Recovery Period	PIF⁽¹⁾	Monthly Capital Charge per 1 SFE (Column B x C x D)
1	20%	1 month / 300 months	\$11,584	\$7.72
2	40%	1 month / 300 months	\$11,584	\$15.45
3	60%	1 month / 300 months	\$11,584	\$23.17
4	80%	1 month / 300 months	\$11,584	\$30.89
5	100%	1 month / 300 months	\$11,584	\$38.61
> 5	100%	1 month / 300 months	\$11,584	\$38.61

Notes:

1. PIF based on a \$11,584 per SFE.

VII. SUMMARY

The advertised occupancy for short-term rental properties through organizations such as Air BnB is greater than the typical residential allocation. The population, flow, and loading from short-term rental of single-family residences/manufactured homes is similar to multiplexes. To evaluate the impact of short-term rentals to population, flow, and loading; the known short-term rental properties were characterized by:

- the increased occupancy using the number of persons allowed to stay in the property (as advertised by the owner and/or property manager);
- or*
- the bedroom and bath count (as advertised by the owner and/or property manager) for determination of SFEs using the multiplex classification.

The difference in designation results in an increased PIF allocation and increased service charges. Using the advertised occupancy of the rental and the increased contribution of flow and loading yields an 82% increase in PIF and service fees from the 2019 single-family/manufactured home residential summary and allocation. The increased contribution to flow and loading using the multiplex classification yields a 63% increase in PIF and service fees.

A summary of the flow and loading SFE, PIF, and service charge impacts of single-family residence/manufactured home properties operated as short-term rentals is shown in Table 5.



To Mr. Andy Carlberg, Manager, Upper Blue Sanitation District
Date November 20, 2019
Page Page 10 of 10

Table 5. Short-Term Rental Based Impacts to SFEs, PIFs, and Service Charges

Description	2019 Residential Summary	Short Term Rental Based on Occupancy	Increase from 2019	Short Term Rental Based on Rooms and Multiplex Designation	Increase from 2019
SFEs	703	1,276	82%	1,147	63%
Total PIF	\$8,142,394	\$14,781,184	82%	\$13,291,482	63%
Total Annual Service Charge	\$219,305	\$398,112	82%	\$357,989	63%

Notes:

1. PIF based on a \$11,584 per SFE.
2. Annual Service Charge based on \$312 per SFE.

The District should consider increasing the SFE allocation and associated service charge for short-term rental use of single-family residences and manufactured homes until such time that the properties are returned to typical residential use with associated population, flow, and loading. The District should also consider implementing a monthly capital charge to allow for the fair and equitable recovery of the PIF associated with the increased flow and loading to the system, over a specific period of time, until such time that the properties are returned to typical residential use with associated population, flow, and loading. Use of the existing multiplex classification provides an allocation approach that allows short-term rental properties to pay the District a fair and equitable amount for their use of the District's system.

SKV:SMR/mta

Appendix A

Short Term Rental Summary Calculations

Property Address	Acres	Beds	Single Family SFR	Multi-Family SFR	2019 Residential Summary															Short Term Rental Summary (Based on Occupancy - People)															Increase from 2018 Allocations to Short Term Rental Use															Short Term Rental Summary (Based on Revenue and Multiple Occupancies)															Increase from 2018 Allocation to Multiple														
					Occupancy (People)					Revenue (\$)					Revenue Per Occupant (\$)					Occupancy (People)					Revenue (\$)					Revenue Per Occupant (\$)					Occupancy (People)					Revenue (\$)					Revenue Per Occupant (\$)																																		
					Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta	Actual	Target	Ratio	Delta																																			
BAYVIEW	1	1	1	1	1	300	300	1.00	0.00	300	300	1.00	0.00	1000	1000	1.00	0.00	1000	1000	1.00	0.00	1000	1000	1.00	0.00	1000	1000	1.00	0.00	1000	1000	1.00	0.00	1000	1000	1.00	0.00	1000	1000	1.00	0.00																																						

Property Address	Rooms	Bath	Single Family SFR	Multi Family MF	2018 Residential Summary														Short Term Rental Summary (Based on Occupancy - People)														Increase from 2018 Absorption to Short Term Rental Use														Short Term Rental Summary (Based on Rooms and Multiple Designation)														Increase from 2018 Absorption to Multiple													
					SFR		MF		A/R		B/R		SFR		MF		A/R		B/R		A		B		C		D		A		B		C		D		A		B		C		D																															
					Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People	Occupancy	People																																
1031 N YORK ST	1	1	1	1	24	11	43	433	0.81	0.81	0.81	0.81	15	23	817	1.82	1.80	0.70	0.70	1.1	1.1	437	0.31	0.31	0.89	0.89	1	1	795	1.84	1.84	0.10	0.10	0.24	1.2	132	0.21	0.21	0.07	0.07																																		
1032 N YORK ST	1	1	1	1	24	11	43	430	0.80	0.80	0.80	0.80	15	23	816	1.81	1.79	0.69	0.69	1.1	1.1	436	0.32	0.32	0.90	0.90	1	1	796	1.85	1.85	0.10	0.10	0.25	1.2	133	0.22	0.22	0.08	0.08																																		
1033 N YORK ST	1	1	1	1	24	11	43	429	0.79	0.79	0.79	0.79	15	23	815	1.80	1.78	0.68	0.68	1.1	1.1	438	0.33	0.33	0.91	0.91	1	1	797	1.86	1.86	0.10	0.10	0.26	1.2	134	0.23	0.23	0.09	0.09																																		
1034 N YORK ST	1	1	1	1	24	11	43	428	0.78	0.78	0.78	0.78	15	23	814	1.79	1.77	0.67	0.67	1.1	1.1	440	0.34	0.34	0.92	0.92	1	1	798	1.87	1.87	0.10	0.10	0.27	1.2	135	0.24	0.24	0.10	0.10																																		
1035 N YORK ST	1	1	1	1	24	11	43	427	0.77	0.77	0.77	0.77	15	23	813	1.78	1.76	0.66	0.66	1.1	1.1	442	0.35	0.35	0.93	0.93	1	1	799	1.88	1.88	0.10	0.10	0.28	1.2	136	0.25	0.25	0.11	0.11																																		
1036 N YORK ST	1	1	1	1	24	11	43	426	0.76	0.76	0.76	0.76	15	23	812	1.77	1.75	0.65	0.65	1.1	1.1	444	0.36	0.36	0.94	0.94	1	1	800	1.89	1.89	0.10	0.10	0.29	1.2	137	0.26	0.26	0.12	0.12																																		
1037 N YORK ST	1	1	1	1	24	11	43	425	0.75	0.75	0.75	0.75	15	23	811	1.76	1.74	0.64	0.64	1.1	1.1	446	0.37	0.37	0.95	0.95	1	1	801	1.90	1.90	0.10	0.10	0.30	1.2	138	0.27	0.27	0.13	0.13																																		
1038 N YORK ST	1	1	1	1	24	11	43	424	0.74	0.74	0.74	0.74	15	23	810	1.75	1.73	0.63	0.63	1.1	1.1	448	0.38	0.38	0.96	0.96	1	1	802	1.91	1.91	0.10	0.10	0.31	1.2	139	0.28	0.28	0.14	0.14																																		
1039 N YORK ST	1	1	1	1	24	11	43	423	0.73	0.73	0.73	0.73	15	23	809	1.74	1.72	0.62	0.62	1.1	1.1	450	0.39	0.39	0.97	0.97	1	1	803	1.92	1.92	0.10	0.10	0.32	1.2	140	0.29	0.29	0.15	0.15																																		
1040 N YORK ST	1	1	1	1	24	11	43	422	0.72	0.72	0.72	0.72	15	23	808	1.73	1.71	0.61	0.61	1.1	1.1	452	0.40	0.40	0.98	0.98	1	1	804	1.93	1.93	0.10	0.10	0.33	1.2	141	0.30	0.30	0.16	0.16																																		
1041 N YORK ST	1	1	1	1	24	11	43	421	0.71	0.71	0.71	0.71	15	23	807	1.72	1.70	0.60	0.60	1.1	1.1	454	0.41	0.41	0.99	0.99	1	1	805	1.94	1.94	0.10	0.10	0.34	1.2	142	0.31	0.31	0.17	0.17																																		
1042 N YORK ST	1	1	1	1	24	11	43	420	0.70	0.70	0.70	0.70	15	23	806	1.71	1.69	0.59	0.59	1.1	1.1	456	0.42	0.42	1.00	1.00	1	1	806	1.95	1.95	0.10	0.10	0.35	1.2	143	0.32	0.32	0.18	0.18																																		

APPENDIX A

Property Address	Rooms	Beds	Single Family SFE	Multi-Family SFE	2018 Residential Summary												Short Term Rental Summary (Based on Occupancy - People)								Increase from 2018 Adherence to Short Term Rental Use								Short Term Rental Summary (Based on Rooms and Multiple Occupancies)												Increase from 2018 Adherence to Multiple			
					# of	Admitted Occupancy (People)	Peak (People)	BOB (People)	TOR (People)	NO, in (People)	TOT (People)	Admitted (People)	Peak (People)	BOB (People)	TOR (People)	NO, in (People)	TOT (People)	# of Occupancy (People)	Admitted (People)	Peak (People)	BOB (People)	TOR (People)	NO, in (People)	TOT (People)	Admitted (People)	Peak (People)	BOB (People)	TOR (People)	NO, in (People)	TOT (People)	Admitted (Rooms)	Peak (Rooms)	BOB (Rooms)	TOR (Rooms)	NO, in (Rooms)	TOT (Rooms)	# of	Admitted (People)	Peak (People)	BOB (People)	TOR (People)							
CORWYWAY	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
CLIFTON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
MADISON LANE	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
ROXBURY PLACE	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
535 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							
455 WILSON ST	4	4	1	3	7	11	83	160	133	133	0307	0341	10	23	837	130	130	0370	0200	37	13	337	817	07	0863	0019	4	4	4	10	100	130	133	0371	0011	12	342	675	65	0211	0323							

