



BOARD OF PUBLIC WORKS
Council Districts: 4, 5, 7, 11 &12

October 7, 2022

**HONORABLE MEMBERS OF THE
BOARD OF PUBLIC WORKS**

**PUBLIC WORKS TRUST FUND NO. 834 OAK TREE DEPOSITS (RSC 574211) -
FUNDING REALLOCATION TO PLANT 154 OAK TREES IN COUNCIL DISTRICTS 4,
5, 7, 11 & 12**

RECOMMENDATIONS:

That the Board of Public Works, subject to approval by the Los Angeles City Council (City Council) and Mayor:

1. APPROVE AND FORWARD this report to the City Council and Mayor, with the recommendation that the City Council, subject to the concurrence of the Mayor, to (a) concur with the finding and determination that a reasonable relationship (Nexus) exists for funds in the amount of \$666,926.68 within the Public Works Trust Fund (PWTF) Fund 834, Oak Tree Revenue Source Account (RSC 574211) when said funds are used for the procurement, planting, and watering of 154 Oak Trees;
2. FIND that (a) the proposed use of fund deposits in the amount of \$666,926.68 when originally collected and received were based on ordinances, policies, and/or codes pre-established by the City to have a “relationship” between the purpose and intended use, and (b) it is in the City’s best interest to implement various Public Works projects and services based on this pre-established “relationship” to serve as a public good;
3. DETERMINE that a reasonable relationship (Nexus) exists and supported for deposits between the deposit’s original purpose/location and use of said funds inasmuch as \$664,032.68 represents available deposits/fees collected post-1989 to fund public works projects and services based on the original deposit/fee intent and nexus to the specified or non-specified project type and location (boundary), and \$2,894.00 represents available deposits/fees collected pre-1989 to fund Public Works projects and services, which the latter has greater fund use flexibility (no restriction);
4. AUTHORIZE the Board of Public Works, Director of Accounting to transfer \$362,183.28 from available funds within the Public Works Trust Fund No. 834, Dept. 50, RSC 574211 Oak Tree Deposit to the General Fund 100, Dept. 86 for the procurement, planting and first year of watering of 154 Oak Trees and increase appropriation account authority, as follows:

Acct. No.	Title	Amount
001090	Salaries, Overtime	\$288,183.28
003040	Contractual Services	\$29,000.00

006020	Operating Supplies	<u>\$45,000.00</u>
	TOTAL:	\$362,183.28

5. AUTHORIZE the Board of Public Works, Director of Accounting to transfer \$304,743.40 from available funds within the Public Works Trust Fund No.834, Dept. 50, RSC 574211 Oak Tree Deposits to the Street Services Transaction Fund No. 64C, Dept.50, RSC 5188 Miscellaneous Revenue for the watering of the Oak trees over four years after they have been planted; and
6. AUTHORIZE the Executive Officer of the Board of Public Works to make technical corrections as may be necessary to carry out the purpose and intent of this report and forward request to the Controller and/or City Administrative Officer as-needed.

TRANSMITTALS:

1. Public Works Trust Fund Use Rules and Guidelines (Adopted CF 19-1609);
2. PWTF Oak Tree Deposits by Transaction Date and Council District; and
3. Proposed locations for the planting of Oak Trees.

DISCUSSION:

BACKGROUND

The Public Works Trust Fund (Fund 834/Dept. 50) is overseen within the jurisdiction of the Board of Public Works (BPW) and actively managed by a fund administrator, collector(s), and accountant. The fund primarily acts as an escrow account holding in trust developers'/permittees' deposits for various public works projects related to development projects. As of March 31, 2022, there are 43 revenue account types in the fund totaling \$147.4 million, with majority of the funds identified as deposits and some as fines and fees. These funds are typically collected from developers, contractors, and property owners yet some deposits represent monies from defaulted bonds, cash in-lieu of bond deposits, fines, and settlements.

In 2018, the City Council (CF 18-0394) approved a new position (Senior Management Analyst I) dedicated to investigate funding available in the Public Works Trust Fund (PWTF). To date, the PWTF has transferred \$114.8 million to the General Fund for public works project investment or cash flow assistance for primarily public works projects and Covid-19 relief during recent economic downturn. In 2021, with the added resource of an additional position (Management Analyst), the Financial Management section within the BPW and a team from the Bureau of Street Services (BSS) consisting of both Administrative Urban Forestry Division (UFD) staff began to meet to identify funds within the PWTF to support tree planting initiatives. There are two (2) RSCs within the PWTF

related to tree planting that require investigation with a cumulative total of approximately \$2.6M as of March 31, 2022. These are the following:

Revenue Source Code	Description	Fund Balance
574210	Street Tree Deposits	\$1,884,958.19
574211	Oak Tree Deposits	\$716,926.68
	Total:	\$2,601,884.87

For the purposes of this report, the primary focus is on deposits made to Oak Tree Deposit Revenue Source Account (RSC 574211), which as of March 31, 2022, has an account balance of \$716,926.68. Of this balance, it is recommended that \$50,000 remain within this RSC as this permit associated with this funding is still active and ongoing. The BPW worked in collaboration with the UFD to conduct further research on all other deposits made within this RSC. Based on site inspection and review of records, the UFD determined that either the trees were not planted (per the original purpose of the deposit) or there was no record of this bond at UFD or the Bureau of Engineering. Therefore, the BPW and BSS is recommending to re-allocate \$666,926.68 from RSC 574211 to plant 154 oak trees in locations (primarily street medians) within Council Districts (CDs) 4, 5, 7, 11, and 12.

PWTF USE RULES AND GUIDELINES (POLICY OPTIONS)

On January 29, 2020, the City Council adopted as amended the PWTF Financial Status Report (CF 19-1609), which approved the PWTF Nexus Study Rules and Guidelines. The purpose of these rules and guidelines is to provide the Department of Public Works rules and guiding principles to administer and manage the PWTF, including the fund management of its deposits, such as development impact fees, construction in-lieu cash deposits, fees, and surcharges, etc. Most important, the PWTF Use Rules and Guidelines aid in meeting (a) reporting requirement of the 1989 State of California Mitigation Fee Act (MFA) (Assembly Bill 1600, Gov. Code 6600 et seq.), which was enacted in 1987 with an effective date of January 1, 1989, and (b) options to establish, find, and determine if a "reasonable relationship" or "Nexus" exists for use of deposit funds, such as (i) how to identify the purpose to which the fee is to be put and (ii) how to demonstrate a reasonable relationship (nexus) between the fee and the purpose for which it is charged.

Transmittal 1 provides detailed information on the proposed PWTF Fund Use Rules and Guidelines. In general, the rules and guidelines are categorized by the following:

- If a deposit is neither used for the specific purpose and project it was intended for, nor refunded to the depositor, then those deposited funds shall require determination of "reasonable relationship" or "nexus" prior to its disposition of funds.

- If the project for which the fee collected was intended is ongoing, then the deposit should be applied to the work underway for that project, or project(s) with like purpose at the original location if available, or within the Council District as the geographical nexus/boundary.
- If the project for which the fee was intended, or a like purpose project within the geographical nexus/boundary has been completed, then the deposit should be applied to reimburse the City’s cost of completing that project.
- If neither option applies (project type or location are unknown), then the deposit should be used to fund projects that have a close geographical nexus to the original intent in the permit, using the Council District as the geographical boundary.
- Pre-1989 deposits have greater flexibility and ability to establish a reasonable relationship as determined by a governing body with minimal (i.e., broad nexus to the administration and management of funds, geographical location, and general purpose type) to no restrictions.

FUND AVAILABILITY

The main guiding principle that is applied when reviewing deposits within the PWTF is that any deposit (funds) should be applied to complete the project for which it was collected, at the original project location. If that is not possible, deposit(s) should be applied to fund projects that have a close geographical nexus with the original permit location, **using the Council District as the default nexus** and same or like-kind purpose type, if applicable (Transmittal 1)

Available fund use amounts are a combination of deposits valued at (a) post-1989 with adequate documentation to justify its use, and (b) pre-1989. Due to the age and low dollar value, the risk associated with using pre-1989 deposit(s) is extremely low in as much as pre-1989 deposits are non-restrictive. Table A below delineates deposit balances between pre- and post-1989 based on two policy options [i.e., Oak Tree Deposits with a Council District (CD) and Oak Tree Deposits with no CD assignment]. In total, the \$661,926.68 represents 38 deposits and 19 permits (Transmittal 2)

TABLE A:

Policy Option Group	Pre-1989	Post-1989	Total
Deposits with CD Assignment	-	\$608,273.85	\$608,273.85
Deposits with No CD Assignment	\$2,894.00	\$55,758.83	\$58,652.83
Total:	\$2,894.00	\$664,032.68	\$666,926.68

Based on the Nexus Study and guiding principles stated above, authority is requested to transfer available funds as follows:

- **\$608,273.85 for the Planting of Oak Trees based on CD Assignment** – To fund the procurement, planting, and watering of Oak Trees within the deposit’s identified CD;
- **\$58,652.83 for the Planting of Oak Trees in CD 7** – To fund the procurement, planting, and watering of Oak Trees in CD 7 since there is no record of original CD assignment when these deposit was made. This report recommends the reallocation of these funds with no record of CD assignment to CD 7 because of its low tree canopy and high degree of not having pending development projects in its district or lower likelihood of having a defaulted/abandoned project based on observations from the PWTF within the past five years and low potential funding in the PWTF. Other CDs in similar low funding scenarios are 8, 9 & 10. Therefore, given these two conditions, staff recommends to re-allocate these funds in CD 7 understanding that the risk of a potential claim is low but will not exceed \$55,758.83.

COST AND ANTICIPATED FUND USE OPTIONS

The cost for the procurement, planting and watering over five years per Oak Tree is projected to be \$4,351.12. See breakdown in Table B below:

Table B: Cost Per Tree

Line Item	Amount
Labor Cost	\$ 1,371.32
Cost of Watering (5 Years)	\$ 2,500.00
Cost Per Tree	\$ 289.80
Equipment Cost	\$ 190.00
TOTAL:	\$ 4,351.12

Table C below provides a viewpoint of overall available funds by CD, Number of trees that can be planted based on funding availability, Cost, Available Funds, and Fund balance. Due to its low tree canopy, it is recommended that the deposits with no CD assignment be allocated to CD 7, as outlined in Transmittal 2 See below:

Table C: Final Proposed Tree Count and Cost

Council District	No. of Trees	Cost	Available Funds	Fund Balance
4	3	\$ 13,053.36	\$ 13,026.00	\$ (27.36)
5	1	\$ 4,351.12	\$ 5,100.00	\$ 748.88
11	39	\$ 169,693.68	\$ 170,956.00	\$ 1,262.32
12	96	\$ 417,707.52	\$ 419,191.85	\$ 1,484.33
7*	14	\$ 60,915.68	\$ 58,652.83	\$ (2,262.85)
7	1**	\$ 4,351.12	-	\$ (4,351.12)
TOTAL:	154	\$ 670,072.48	\$ 666,926.68	\$(3,145.80)***

*Recommendation to allocate funding with no CD assignment to CD 7.

** Plant one additional Oak Tree in CD 7 to ensure all available funds are expended

*** Cost to be Absorbed by the Bureau of Street Services

To ensure that all available funds are expended, it is recommended that the cumulative surplus of \$3,495.53 reflected those CD's with a positive fund balance (CDs 5, 11, and 12) be used to help offset the cumulative deficit of (\$6,641.33) in those CDs with a negative fund balance (CDs 4 and 7). Furthermore, the remaining balance of \$1,205.32 is recommended to be allocated to CD 7 to plant one additional tree. Since the estimated rate per tree is \$4,351.12 as outlined in Table B, the BSS will absorb the cost of \$3,145.80. The overall net gain is the planting of one additional tree bringing the total Oak trees to be planted from 153 to 154.

TYPE OF OAK TREE SPECIES AND PROPOSED LOCATIONS

The following Southern California native Oak trees have been selected for planting in median island locations within Council Districts 4, 5, 7, 11, and 12:

- 1) Coast Live Oak;
- 2) Engelmann Oak; and
- 3) Island Oak

These Evergreen Native Oak trees are well adapted to the City's changing climate with low to moderate watering requirements and will provide shade to reduce the heat island effect within the identified Council Districts in this report. Their large branch canopies absorb air pollution and other urban contaminants and help lower dependence on lowering energy needs to cool homes. They also are the keystone species in supporting the local ecosystem providing habitat and food sources for wildlife, Birds, insects, and invertebrates.

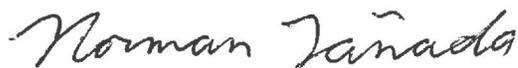
PROPOSED LOCATIONS

The BSS, UFD has recommended that the Oak Trees be planted on large medians within CDs 4,5, 7, 11, and 12, which will provide a higher probability for the Oak Tree to thrive and will allow the BSS UFD to water these Oak Trees in bunches (group planting). Transmittal 3 lists the proposed median locations to plant 154 Oak Trees. The BPW and BSS will continue to work closely with the respective CDs to ensure the proper tree is planted at the desired location.

FISCAL IMPACT STATEMENT

Funding in the amount of \$666,926.68 is available within the PWTF (Fund 834/Dept. 50) Oak Tree Deposits Revenue Source Account (RSC 574211) for immediate use upon finding and determining that a reasonable relationship (nexus) exist for deposits between the deposit's original purpose/location and use of said funds. If approved and adopted, \$666,926.68 will be transferred to the BSS (Dept. 86) various appropriation accounts listed in this report to plant 154 Oak Trees within CDs 4, 5, 7 11, and 12. There is no anticipated impact to the General Fund, except for \$3,145.80 to be absorbed by the BSS.

Respectfully submitted,



Norman Tanada
PWTF Fund Manager, Board of Public Works

Approved,



Dr. Fernando Campos
Executive Officer, Board of Public Works

For Questions, please contact:
Norman Tanada at Norman.Tanada@lacity.org

TRANSMITTAL 1**PUBLIC WORKS TRUST FUND (NO. 834)
FUND USE RULES AND GUIDELINES**

The purpose of this Fund Use Rules and Guidelines document is to provide the Department of Public Works rules and guiding principles to administer and manage the Public Works Trust Fund No. 834, including the fund management of its deposits, such as development impact fees, construction in-lieu cash deposits, fees, and surcharges, etc. Most important, the Fund Use Rules and Guidelines will aid in meeting (a) reporting requirement of the 1989 State of California Mitigation Fee Act (MFA) (Assembly Bill 1600, Gov. Code 6600 et seq.), which was enacted in 1987 with an effective date of January 1, 1989, and (b) options to establish, find, and determine if a “reasonable relationship” or “Nexus” exists for use of deposit funds, such as (i) how to identify the purpose to which the fee is to be put and (ii) how to demonstrate a reasonable relationship (nexus) between the fee and the purpose for which it is charged.

In general, deposits in the Public Works Trust Fund may be broadly categorized as:

- Permit fee collected as a refundable deposit
 - Deposit for work required to a public area in proximity of a project (i.e. street improvement, general improvement, sidewalk, street lighting, curb and gutter, tree, etc.). The deposit is refundable to the extent of the deposit excess over actual cost incurred. If the actual cost exceeds the deposit, the customer is billed for the difference between actual cost and the deposit.
- Permit fee collected as non-refundable in-lieu of construction deposit
 - Fee deposit for work required to be done to a public area in proximity of a project (street improvement, sewer work, etc.); or,
- Deposits from the settlement of a defaulted bond
 - Either proceeds from bond payment or cash in-lieu of a bond deposit that was deposited to guarantee work (e.g. from one of two categories above).

Review and Analysis of Deposit

- Each deposit shall require a review of the documentation (i.e. permit application, deposit voucher, etc.) to determine specific project purpose and location.
- Each deposit made within the last five years from the adoption of this Fund Use Rules and Guidelines document (i.e. from July 1, 2013 to June 30, 2018) shall be reviewed and reported in a five-year reporting plan in compliance with the 1989 State of CA Mitigation Fee Act.
- If documentation for a deposit is sufficient, then a recommendation shall be made to the Director of Accounting and ultimately, the Executive Officer of the Board of Public Works for how the deposit could be used.

- If the documentation for a deposit is insufficient (not adequate or lacks support), then further investigation shall be completed as follows based on three possible outcomes:
 1. If it is determined that the project has not been completed, use the funds to complete the project for which it was collected (generally in-lieu of construction fees). In cases, where the funds remaining in the PWTF is not sufficient to pay for the entire project, then the portion of funds available will be used to the extent possible, transferred to another holding fund, or retained in the PWTF until sufficient funds are identified to fully implement the project.
 2. If it is determined that the project has not been completed because it became unnecessary, then the deposit shall be refunded the remaining deposit to the current property owner, if known. In some cases, the project address may be a street, an intersection, or part of a neighborhood, in which case a “current owner” will not be relevant. In these situations, use the funds for a similar project within the same neighborhood/Council District. Note: If the current owner is not known, gather additional information on the project to find the best nexus for use of remaining funds.
 3. The same nexus evaluation applies to refundable and non-refundable deposits collected after January 1, 1989.

Disposition of Deposited Funds

- If a deposit is neither used for the specific purpose and project it was intended for, nor refunded to the depositor, then those deposited funds shall require determination of “reasonable relationship” or “nexus” prior to its disposition of funds.
- If the project for which the fee collected was intended is ongoing, then the deposit should be applied to the work underway for that project, or project(s) with like purpose at the original location if available, or within the Council District as the geographical nexus/boundary.
- If the project for which the fee was intended, or a like purpose project within the geographical nexus/boundary has been completed, then the deposit should be applied to reimburse the City’s cost of completing that project.
- If neither option applies (project type or location are unknown), then the deposit should be used to fund projects that have a close geographical nexus to the original intent in the permit, using the Council District as the geographical boundary.
- Pre-1989 deposits have greater flexibility and ability to establish a reasonable relationship as determined by a governing body with minimal (i.e. broad nexus to the administration and management of funds, geographical location, and general purpose type) to no restrictions.

Guidance to Determine Disposition and Fund use Deposits

- If a deposit is determined to be used “At-Will”, then the use of said funds can be for any public works project in any location, or for administrative expenses tied to the management of the PWTF. The following criteria should be identified to find and determine a reasonable relationship, if applicable:

Pre-1989 deposits

- No project type specified, and
- No project location specified, and
- No Council District specified, and
- Non-refundable

Post-1989 deposits under \$10,000

- No project type specified, and
- No Council District specified

- If a deposit is determined to be used “On Any Project”, then the use of said funds can be for any public works project, in locations to be determined by factors associated with the specific deposit, based on the variables listed below. The following criteria should be identified to find and determine a reasonable relationship, if applicable:

Within Council District Specified – Pre-1989 Deposits

- No project type specified, and
- Non-refundable

Within Nexus Specified – Post 1989 Deposits

- No project type specified, and
- Nexus:
 - 1) project location; or if not available, then
 - 2) Council District, and
- Non-refundable

Within Nexus Specified – Post 1989 Deposits

- No project type specified, and
- Nexus:
 - 1) project location; if not available,
 - 2) Council District, and
- Refundable, but if stated project location is not a specific address, there is no current owner to receive refund per MFA

- If a deposit is determined to be used “In Any Council District”, then the use of said funds can be for any location for public works project related to that documented with the specific deposit. The following criteria should be identified to find and determine a reasonable

relationship, if applicable:

Project Type Specified – Post-1989 Deposits

- No project location, nor CD specified, and
 - Non-refundable, or refundable (can only refund if project address is available, as refunds need to be made to current owner of project location per MFA)
- If a deposit is determined to be used “On a Specified Project Type and Specified Nexus”, then the use of said funds can be for public works projects, based on the variables listed below, for the specified Nexus of location and project type documented with the specific deposit. The following criteria should be identified to find and determine a reasonable relationship, if applicable:

Pre-1989 Deposits under \$10,000

- Project status is unknown

Post-1989 Deposits

- Project known to be completed per notes in documentation, and
- Can be non-refundable, or refundable. If refundable, project location is an area/street, rather than specific address, and therefore, not possible to refund to “current owner” per MFA

Reporting of Deposited Funds

- In compliance with the MFA, on an annual basis, the Department of Public Works shall prepare and release an annual report with summary information on all its deposits in compliance with the MFA and upon request by the Los Angeles City Council or Board of Public Works.
- Every five years, the Department of Public Works shall prepare and release a five-year reporting plan, no later than June 30 of the succeeding fiscal year, in compliance with the 1989 State of CA Mitigation Fee Act. The Department of Public Works shall prepare and release its first report for the five years covering July 1, 2013 to June 30, 2018 on or before June 30, 2019. Thereafter, every subsequent five years, the same process shall be completed and a new report shall be released.

TRANSMITTAL 2

Permit Data by Transaction Date:

Permit No.	Transaction Date	Council District	Amount
19583	02/13/86	None	\$ 10,000.00
19583	09/02/87	None	\$ (7,106.00)
19583	07/12/90	None	\$ 500.00
24431	03/05/93	None	\$ 20,000.00
24953	08/22/95	None	\$ 1,400.00
24985	11/06/95	None	\$ 1,267.35
24985	11/06/95	None	\$ 369.00
24985	02/01/96	None	\$ 32.47
19583	02/27/96	None	\$ 20,000.00
24985	03/11/96	None	\$ 25.00
24985	03/18/96	None	\$ 27.00
24985	03/26/96	None	\$ 25.00
24985	03/26/96	None	\$ 25.00
24985	04/04/96	None	\$ 20.00
24985	04/08/96	None	\$ 24.00
24985	04/15/96	None	\$ 130.00
24985	04/26/96	None	\$ 18.00
24985	05/02/96	None	\$ 23.65
24985	06/20/96	None	\$ 10.00
24985	07/24/96	None	\$ 604.91
24985	07/25/96	None	\$ 10.00
24985	08/09/96	None	\$ 15.00
24985	12/03/96	None	\$ 78.45
25222	03/12/97	None	\$ 7,500.00
25298	06/19/97	None	\$ 250.00
25309	08/07/97	11	\$ 7,224.00
25280	11/20/97	None	\$ 2,300.00
24985	10/12/00	None	\$ 20.00
26018	02/22/01	None	\$ 1,084.00
26825	04/06/04	12	\$ 62,377.90
26860	05/05/04	12	\$ 203,792.00
26900	06/28/04	12	\$ 59,764.00
26954	08/31/04	12	\$ 16,297.00
27102	03/01/05	11	\$ 42,600.00
27175	05/06/05	12	\$ 76,960.95
27205	06/15/05	5	\$ 5,100.00
27232	07/13/05	11	\$ 93,470.00
27880	06/08/07	4	\$ 13,026.00
28052	10/17/07	11	\$ 27,662.00
TOTAL:			\$ 666,926.68

Permit Data by Council District:

Council District	Permit No.	Amount
4	27880	\$ 13,026.00
Subtotal:		\$ 13,026.00
5	27205	\$ 5,100.00
Subtotal:		\$ 5,100.00
11	25309	\$ 7,224.00
	27102	\$ 42,600.00
	27232	\$ 93,470.00
	28052	\$ 27,662.00
Subtotal:		\$ 170,956.00
12	26825	\$ 62,377.90
	26860	\$ 203,792.00
	26900	\$ 59,764.00
	26954	\$ 16,297.00
	27175	\$ 76,960.95
Subtotal:		\$ 419,191.85
No Council District Assignment	19583	\$ 23,394.00
	24431	\$ 20,000.00
	24953	\$ 1,400.00
	24985	\$ 2,724.83
	25222	\$ 7,500.00
	25280	\$ 2,300.00
	25298	\$ 250.00
26018	\$ 1,084.00	
Subtotal:		\$ 58,652.83
TOTAL:		\$ 666,926.68

TRANSMITTAL 3**Proposed Locations for the Planting of Oak Trees**

Quantity	Locations*
Council District 4	
3	White Oak between Bessemer St and Delano St
3	CD 4 Subtotal
Council District 5	
1	Venice Bl median between Sepulveda Bl and Tilden Ave
1	CD 5 Subtotal
Council District 7	
15	Brand Bl center median between Memory Park Ln and San Fernando City limits
15	CD 7 Subtotal
Council District 11	
20	Manchester Bl center median btwn Falmouth and Lincoln Bl
10	Slauson Ave median between Braddock Dr and Culver Bl
5	Venice Bl between Walgrove Ave and Centinela Ave
4	Beethoven St and Stewart Ave
39	CD 11 Subtotal
Council District 12	
33	Lassen Ave and Yolanda Ave and adjacent Circles and medians
31	Valley Circle Blvd between Hartland St. and Roscoe Blvd.
16	Reseda Blvd and Parthenia St on the hillside areas
2	Nordoff St (19400 blk) west of Tampa
14	Tampa Ave median between 118 Fwy and Devobnshire Bl
96	CD 12 Subtotal
154	Total Oak trees to be planted

*If a location is determined not to be feasible for Oak Tree planting post the adoption of this report, other locations/addresses will be selected in coordination with the Council Office and the Bureau of Street Services (BSS) Urban Forestry Division (UFD) and new sites not listed above may be identified after further consideration and coordination between the Council Office and BSS UFD is completed.