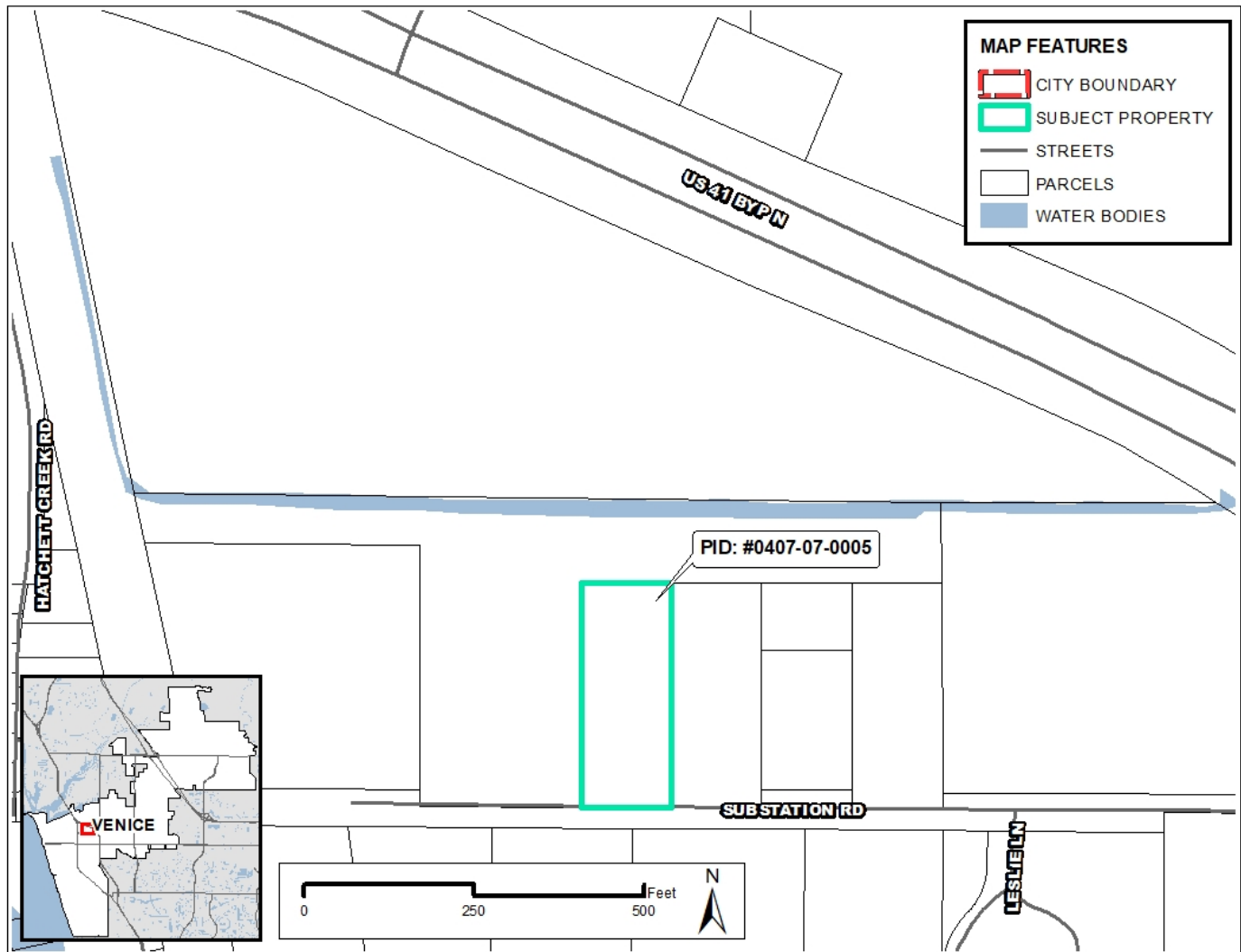




ZONING MAP AMENDMENT: 498 SUBSTATION ROAD STAFF REPORT

August 20, 2019

19-03RZ



PETITION NO.:19-03RZ 498 Substation Road

REQUEST: Zoning map amendment for the approximately 1± acre subject property. This amendment seeks to change the zoning from Sarasota County Residential, Multi-Family-2 (RMF-2) to City of Venice Residential, Multi-Family-4 (RMF-4).

GENERAL DATA

Owner & Agent: John N. Bailey III, Trustee

Address: 498 Substation Road *Property ID:* 0407070005

Property Size: 1.00 acres ± *Future Land Use:* High Density Residential

Neighborhood: Gateway Neighborhood *Existing Zoning:* Sarasota County RMF-2

Proposed Zoning: City of Venice RMF-4 *Application Date:* February 7, 2019

ASSOCIATED DOCUMENTS AND ACTIONS

- A. City Council Waiver of the Rezoning Application Fee
- B. Application Information

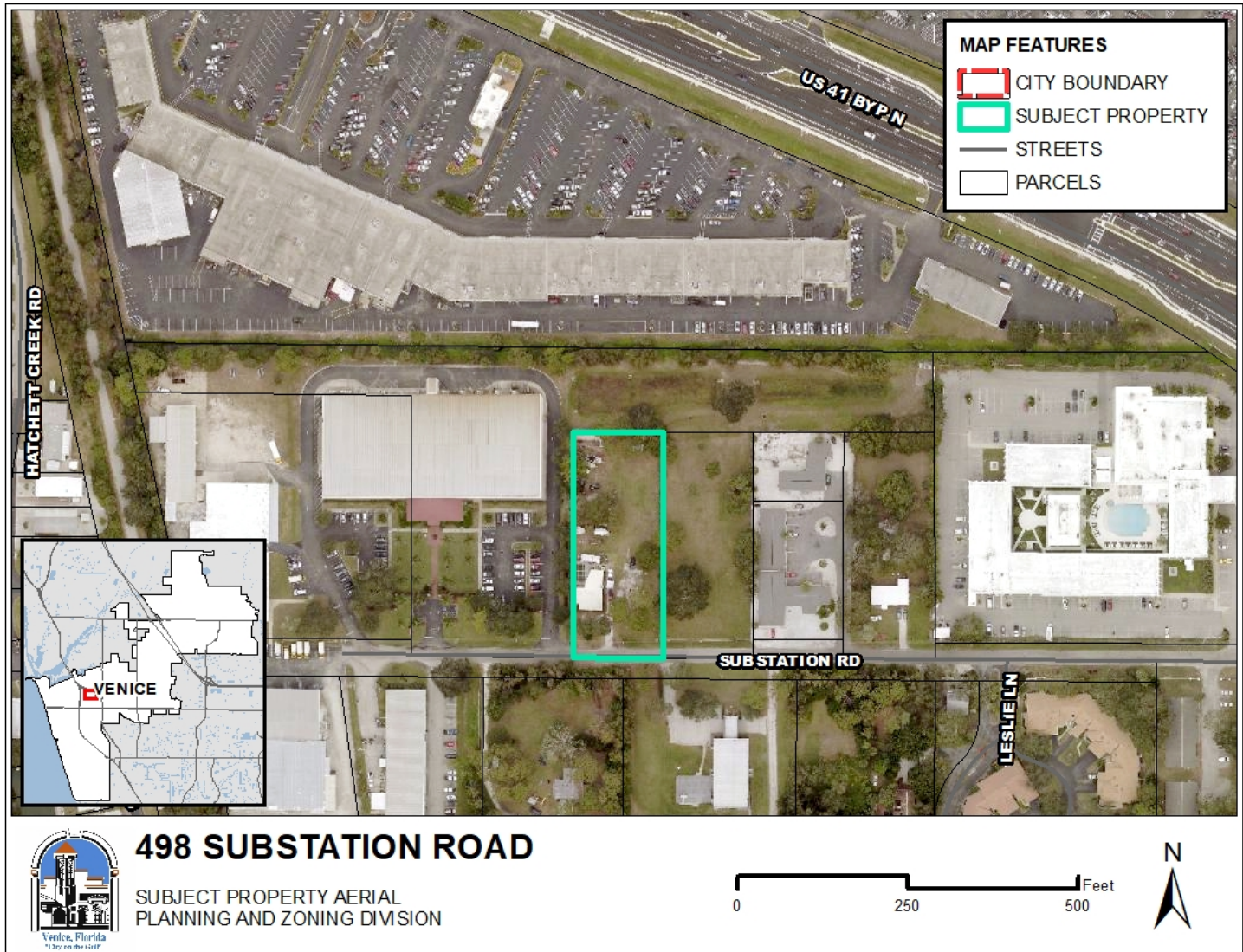
I. EXECUTIVE SUMMARY

The subject 1.0 ± acre property is proposed to be rezoned from Sarasota County Residential, Multi-Family-2 (RMF-2) to City of Venice Residential, Multi-Family-4 (RMF-4). The property was annexed into the City in 2002 through an interlocal agreement with Sarasota County that approved annexation of all improved properties identified as enclaves (surrounded by County property). However, the property was never rezoned to a City designation. This rezoning is required to occur before any development can take place on the property. Further, the City's Comprehensive Plan Future Land Use designation of High Density Residential necessitates an implementing zoning district of RMF-4, and in fact, this is the only implementing district for the identified land use.

Based on the submitted application materials, staff analysis, and conclusions of this staff report, staff provides the following summary findings on the subject petition:

- **Conclusions / Findings of Fact (Consistency with the Comprehensive Plan):**
Analysis has been provided to determine consistency with the Land Use Element strategies applicable to the High Density Residential future land use designation, Policy 8.2 regarding compatibility, strategies found in the Gateway Neighborhood and other plan elements. This analysis should be taken into consideration upon determining Comprehensive Plan consistency.
- **Conclusions / Findings of Fact (Compliance with the Land Development Code):**
The subject petition complies with all applicable Land Development Code standards and there is sufficient information to reach a finding for each of the rezoning considerations contained in Section 86-47(f) of the Land Development Code.
- **Conclusion / Findings of Fact (Concurrency):**
Based on preliminary concurrency analysis, no issues have been identified regarding adequate public facilities capacity to accommodate the development of the project per Chapter 94 of the Land Development Regulations.
- **Conclusion / Findings of Fact (Mobility):**
Based on preliminary analysis and consideration of potential uses in the RMF-4 district, no issues have been identified that would negatively impact the transportation system in this area.

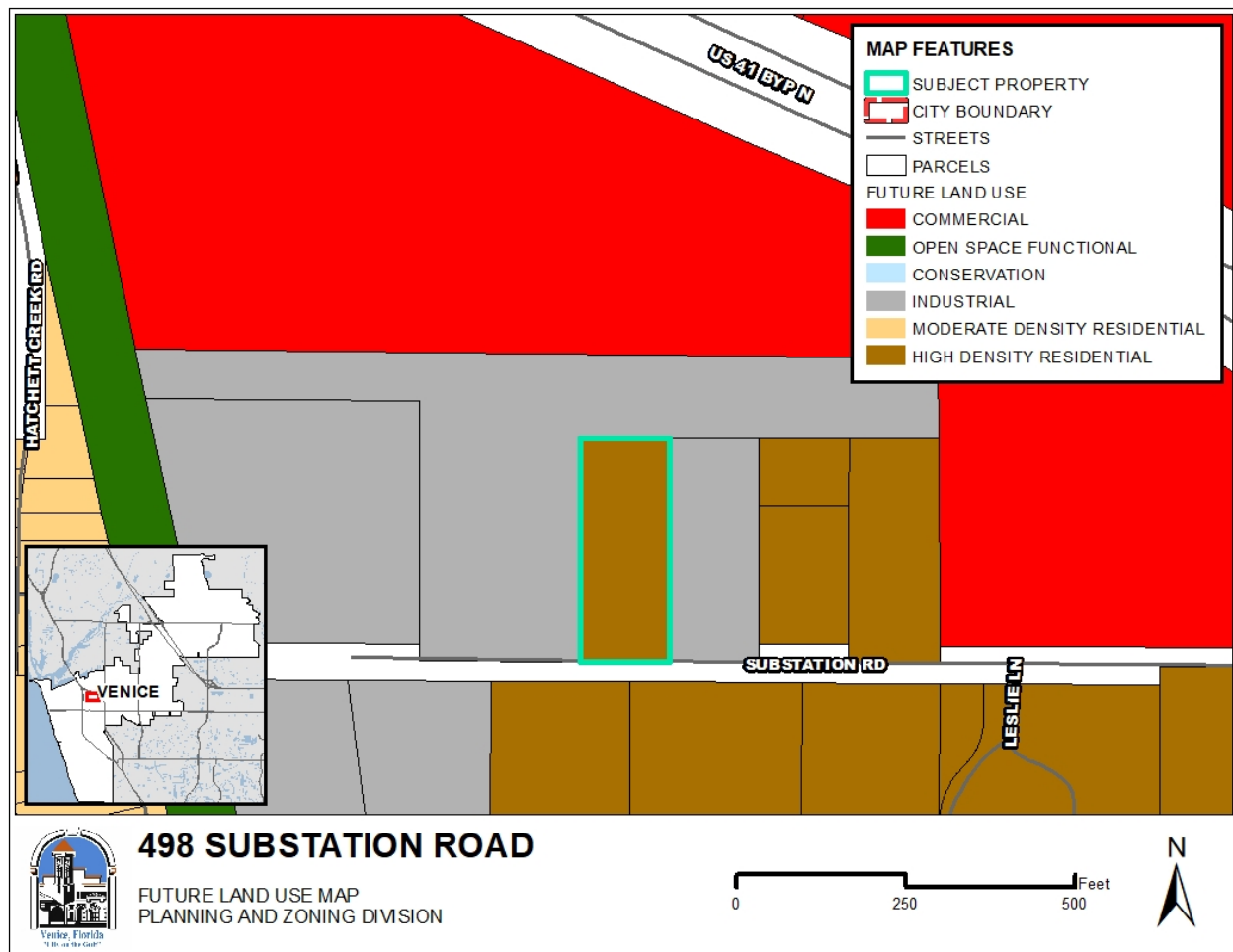
EXISTING CONDITIONS



The aerial photograph below shows that the subject property is located on the north side of Substation Road. The subject property consists of one parcel totaling 1.0± acres. The parcel is bordered to the east and north by vacant land and to the south by a single family home and the Knights of Columbus building on the south side of Substation Road. Currently, the subject property contains a single family home with associated accessory buildings.

Future Land Use

The subject property has a Future Land Use of High Density Residential. The Industrial land use designation abuts the property to the east, north and south. Property to the south across Substation Road has a designation of High Density Residential consistent with the subject property.



Below are photos taken of the subject property from Substation Road.

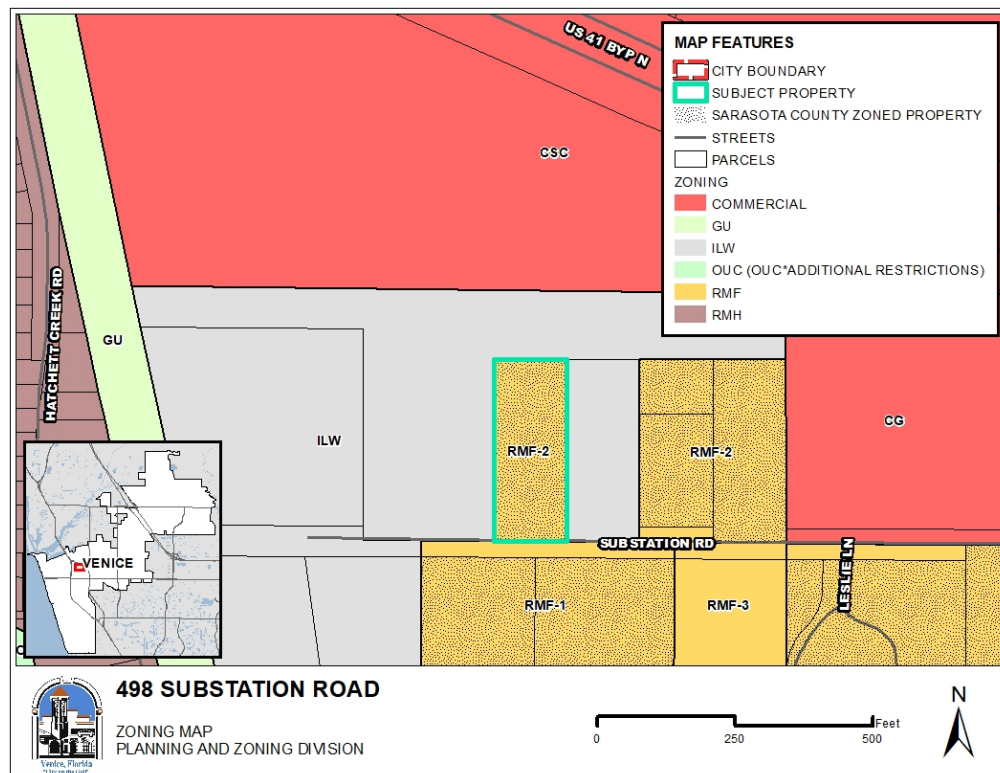


The table on the following page summarizes the existing uses and current zoning and future land use designations on properties adjacent to the subject property.

Direction	Existing Use(s)	Current Zoning	Future Land Use Designation
North	Vacant Southern Spring & Stamping	ILW	Industrial
East	Vacant Southern Spring & Stamping	ILW	Industrial
South	Residential & Charitable (SF Home and Knights of Columbus)	Sarasota County RMF-1	High Density Residential
West	Industrial Southern Spring & Stamping	ILW	Industrial

Zoning and Land Use is City of Venice unless otherwise noted.

Zoning Designation



The map below indicates the zoning designations of the subject property and the surrounding properties. The subject property is zoned County RMF-2. The adjacent properties to the east, north and west are zoned Industrial, Light and Warehousing (ILW). The property to the south across Substation Road is zoned County RMF-1.

Flood Zone Information

The FEMA Flood Insurance Rate Map (FIRM) shows the subject property with Zone AE designation. AE zones have a 1-percent annual chance flood and are also referred to as the base flood or 100-year flood. Development of the property will be subject to compliance with applicable FEMA requirements.

II. PLANNING ANALYSIS

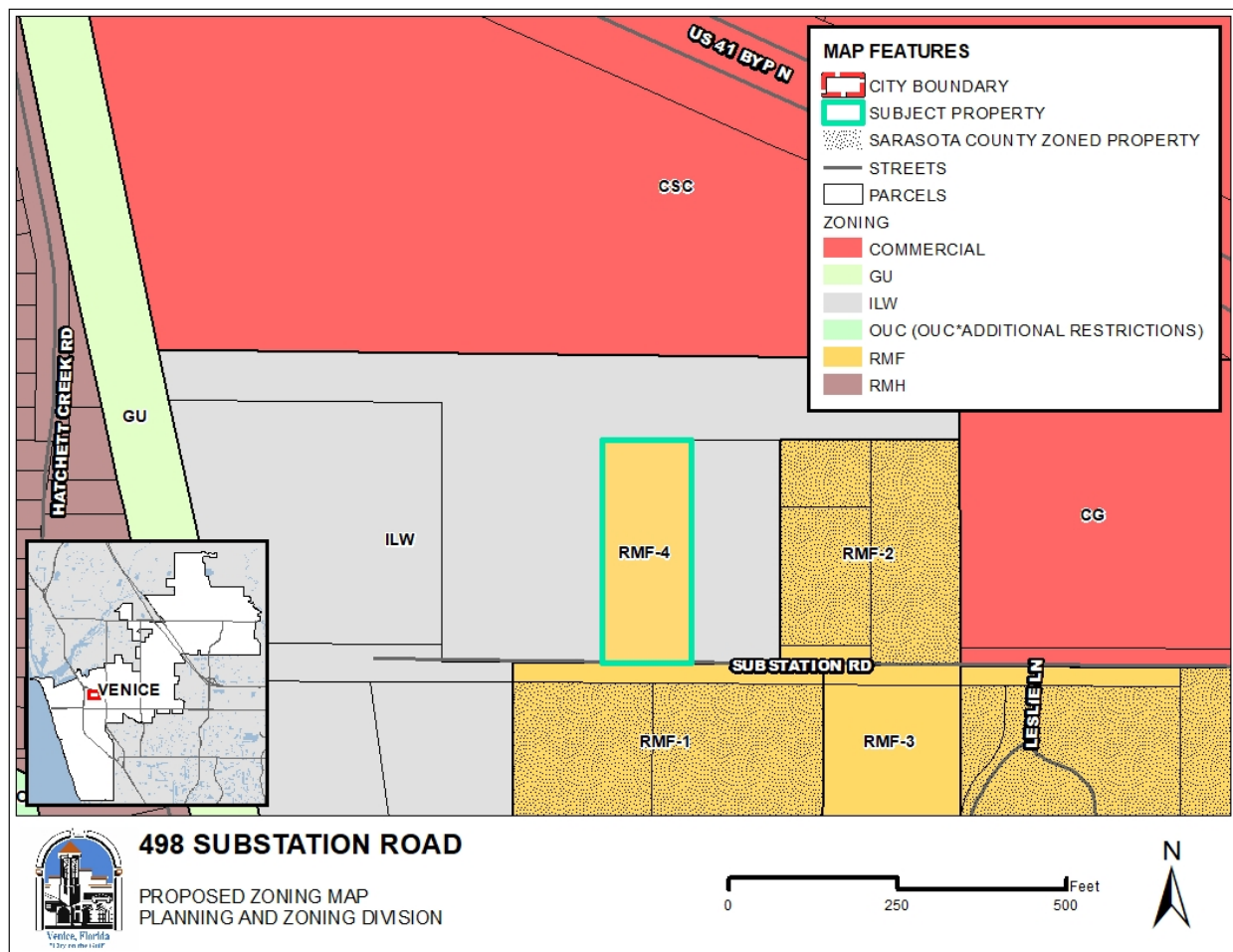
In this section of the report, analysis of the subject rezone petition evaluates 1) how the existing zoning designation compares to the proposed zoning designation with regard to uses and development standards, 2) consistency with the comprehensive plan, and 3) compliance with the city's concurrency/mobility regulations and the project's expected impacts on public facilities.

Comparison of Existing County RMF-2 Zoning and Proposed City RMF-4 Zoning

The subject property is currently zoned Sarasota County RMF-2. As indicated previously, the subject property was annexed into the City in 2002 as part of the annexation of all improved enclaves through an interlocal agreement with Sarasota County. The property must be rezoned to a City designation prior to any proposed development of the site and the RMF-4 district is the only option to maintain consistency with the Comprehensive Plan. The table on the next page indicates some of the standards of the existing and proposed zoning designation along with the land use designation provided in the City's Comprehensive Plan.

	County RMF-2	City RMF-4	Comp Plan (No Change)
Density	9 du/acre	18 du/acre	18 du/acre
Dwelling Units	9	18	18
Setbacks	20' abutting RE, RSF and OUE	20' front, 15' side, 15' rear	NA
Height	35' + 24' of parking (2 levels)	45' + 10' of parking	42'
Permitted Uses	SF dwellings, two-family dwellings, townhouses, MF dwellings, day care, adult day care, parks, community recreation facility*	SF dwellings, MF dwellings, patio houses, two-family dwellings, townhouses, house of worship, bed & breakfast, , schools, parks, playgrounds*	No change
Special Exception Uses	Community service, schools, cemeteries', house of worship, neighborhood resource center, golf course, commercial parking, restaurant, bed & breakfast*	Private clubs, marina, nursing homes, cemeteries', infant care centers, golf course, yacht club, tennis club, rooming houses, monasteries, housing for the aged*	No change

*Not an exhaustive list of permitted and special exception uses.



The following map depicts the proposed RMF-4 zoning on the City's zoning map.

A. Consistency With the Comprehensive Plan

The Comprehensive Plan identifies the subject property as being within the 436 acre Gateway Neighborhood. The subject property has a future land use designation of High Density Residential. The following analysis includes review of significant strategies found in the Land Use Element of the comprehensive plan.

Land Use Strategy LU 1.2.3 identifies the proposed RMF-4 district as the only implementing zoning district for the High Density Residential designation. As such, the proposed zoning map amendment is consistent with this land use strategy.

Strategy LU 4.1.1 in the Comprehensive Plan, includes Policy 8.2, Land Use Compatibility Review Procedures.

At the point of rezoning of property, evaluation of compatibility is required to ensure compatibility with adjacent uses. Compatibility review requires evaluation of the following as listed in Policy 8.2:

A. Land use density and intensity.

Applicant Response: This petition for rezoning is consistent with current density and intensity. The property is located in the Gateway, which borders the Island. As the Island and surrounding community's

population grows, there will be a continuously increasing need for local close proximity work-force affordable housing to service the steadily increasing retirement population requirements especially on the Island. Rezoning certain properties to be able to accommodate the highest and best use to this end is a first step in achieving this future potential for the housing needs of the growing service workforce. Building heights and setbacks.

Applicant Response: N/A. This petition does not include a site plan. The building heights and setbacks will, however, be properly addressed at some future time as a site plan is developed.

B. Character or type of use proposed.

Applicant Response: The type of use proposed is compatible with the existing neighborhood and current City of Venice Comprehensive Plan 2017-2027

C. Site and architectural mitigation design techniques.

Applicant Response: N/A. This will be addressed at the future proper time when a site plan is proposed.

The subject petition does not include a development plan and, without such plan, the above evaluation of development characteristics (Policy 8.2 A through D) is limited. Further evaluation of the development characteristics will be included in the review of any future development of the subject property.

Policy 8.2 E through H lists considerations for determining compatibility. Staff provided evaluative commentary on each consideration.

D. Protection of single-family neighborhoods from the intrusion of incompatible uses.

Applicant Response: This rezoning petition is consistent with approved City of Venice Comprehensive Plan 2017-2027 as High Density Residential in the Gateway. There are a few nearby parcels that are already zoned accordingly as high density to allow for possibilities of future affordable housing to accommodate the growing workforce serving the growing population needs within walking distance in the surrounding area including the Island, Gateway itself, and Pinebrook.

Staff Comment: *There are no single-family neighborhoods in close proximity to the subject property. Any nearby residential use is multi-family except for a portion of the Villa La Grande community which contains single family villas. Otherwise the property is surrounded by institutional, commercial or industrial uses.*

E. Prevention of the location of commercial or industrial uses in areas where such uses are incompatible with existing uses.

Applicant Response: The rezoning petition is consistent with approved City of Venice Comprehensive Plan 2017-2027. There is currently a single-family home on the property. There are already mixed use properties nearby including commercial, industrial, single family, multi-family, hotels, opi.

Staff Comment: *Non-residential uses are not permitted, based on the Comprehensive Plan, in residential zoning districts.*

F. The degree to which the development phases out nonconforming uses in order to resolve incompatibilities resulting from development inconsistent with the current Comprehensive Plan.

G. **Applicant Response:** This rezoning petition is consistent with approved City of Venice Comprehensive Plan 2017-2027. There is no site plan considered yet, however, a high density RMF-4 rezoning approval will be fully consistent with the newly adopted Comprehensive Plan allowing for the potential development of more affordable housing much needed in our community. This is consistent with Policy 8.2 G which phases out existing non-conforming uses in order to resolve incompatibilities resulting from development inconsistent with current Comprehensive Plan.

Staff Comment: Staff is not aware of any non-conforming uses on the property.

H. Densities and intensities of proposed uses as compared to the densities and intensities of existing uses.

Applicant Response: This zoning district is consistent with surrounding uses and is consistent with designation in the currently adopted Comprehensive Plan.

Staff Comment: Although the proposed RMF-4 zoning district provides for a higher maximum density than the surrounding residential zoning, the potential density is consistent with the City's adopted future land use of High Density Residential. In fact, the RMF-4 district is the only implementing zoning district for this land use designation. In addition, the property is located close to multiple employment opportunities and higher density residential uses are more appropriate in such areas.

Based on the above evaluation there is adequate information to make a determination regarding compatibility with the surrounding properties and to make a finding on considerations E. thru H.

Future development of the subject property will require a preliminary plat or site and development plan approval by the Planning Commission. It is during this process that full review of the project will occur, including the project's compatibility with adjacent properties. If during that review potential incompatibilities are identified, the following mitigation techniques provided in Policy 8.2 I through N may be considered. Doing so would ensure the application of appropriate mitigation measures in response to specific development characteristics of an actual development proposal.

- I. Providing open space, perimeter buffers, landscaping and berms.
- J. Screening of sources of light, noise, mechanical equipment, refuse areas, delivery and storage areas.
- K. Locating road access to minimize adverse impacts.
- L. Adjusting building setbacks to transition between different uses.
- M. Applying step-down or tiered building heights to transition between different uses.
- N. Lowering density or intensity of land uses to transition between different uses.

Applicant Response (I thru N): N/A. To be determined under Site Plan review process.

Conclusions / Findings of Fact (Consistency with the Comprehensive Plan):

Analysis has been provided to determine consistency with the Land Use Element strategies applicable to the High Density Residential future land use designation, Policy 8.2 regarding compatibility, strategies found in the Gateway Neighborhood and other plan elements. This analysis should be taken into consideration upon determining Comprehensive Plan consistency.

Consistency with the Land Development Code

The subject petition has been processed with the procedural requirements contained in Section 86-47 of the Land Development Code (LDC). In addition, the petition has been reviewed by the Technical Review Committee and no issues regarding compliance with the Land Development Code were identified. Future development of the subject property will require confirmation of continued compliance with all applicable LDC standards.

Section 86-47(f) of the Land Development Code states that, when pertaining to the rezoning of land, the report and recommendations of the Planning Commission to the City Council shall show that the Planning Commission has studied and considered the proposed change in relation to the considerations listed below. The Planning Commission materials include the applicant's response to each of the considerations and they are also indicated below.

(a) Whether the proposed change is in conformity to the comprehensive plan.

Applicant's Response: The subject property is located within the City of Venice, in "Gateway Neighborhood", according to the newest FLUM High Density Residential designation and the proposed change is consistent with the high density RMF Planning Intent of Comprehensive plan 2017 – 2027, to foster an integrated sector including housing opportunities. Although industrial uses are currently located within this Gateway Neighborhood, the majority of these types of uses are envisioned to be replaced or integrated with increased residential development including High Density residential uses. The Development Standards are specific to Gateway Neighborhood showing density range up to 18 units per acre.

High Density residential usage references Smart Growth and Sustainable Development Practices which provides for implementation into the City's livable community planning framework and development standards consistent with the City's current Strategic Plan.

RMF-4 provides for a balance of land use and infrastructure capacity through a focus on infill.

RMF-4 fosters compact forms of development within designated infill, and redevelopment areas.

Therefore, the proposed change to RMF-4 is fully consistent with current, ongoing discussions by the City Planning Commission, City Staff, and City Council regarding the need for localized affordable workforce housing.

Staff's Comment: *Also see Consistency with the Comprehensive Plan in Section III (B) of this report.*

(b) The existing land use pattern.

Applicant's Response: The subject property is surrounded by a mix of uses including residential, commercial/ industrial. Then in a broader "near proximity range", along Substation Rd., there are restaurants, a hotel, opi, multi-family, etc. The proposed rezoning will allow for residential use at a density which is consistent with surrounding development and the intent of High Density Residential. The RMF-4 zoning will have potential density capability to promote affordable workforce housing which has been desperately needed in the City for decades.

Staff's Comment: *Although the subject property is surrounded by industrial zoned property, the majority of the residentially zoned property in the immediate vicinity is zoned for RMF zoning. As indicated above, the RMF-4 district is consistent with the High Density Residential land use designationl.*

(c) Possible creation of an isolated district unrelated to adjacent and nearby districts.

Applicant's Response: The property is currently designated RMF-2 (Sarasota County). The proposed RMF-4 zoning is consistent with the planning intent for the neighborhood and is a complementary use to the mix of uses which currently exist, and again offers a better potential for development of affordable workforce housing which is desperately needed in the City. My good neighbors on Hauser Lane, Mr. Ronald Siegrist, and Mr. and Mrs. George Ronald, received this RMF-4 designation in 2016 by the City; as did Mr. Don O'Connell receive a higher density rezoning the year prior for similar reasoning.

Staff's Comment: *As provided above, the majority of the residentially zoned property in the immediate vicinity is zoned RMF and therefore the proposed district is not isolated.*

- (d) The population density pattern and possible increase or overtaxing of the load on public facilities such as schools, utilities, streets, etc.

Applicant's Response: The proposed change to rezone the property from RMF-2 (Sarasota County) to City of Venice RMF-4 will not overtax the load on public facilities.

Staff's Comment: *Upon review of the proposed zoning map amendment by the City's TRC, no issues have been raised regarding maintenance of levels of service regarding concurrency and mobility.*

- (e) Whether existing district boundaries are illogically drawn in relation to existing conditions on the property proposed for change.

Applicant's Response: Not applicable. The involuntary annexation of the property by the City necessitates the proposed application to the City and the approval of such rezoning so as to comply with the highest and best usage as it applies within the City zoning designation and intent of Gateway Neighborhood High Density RMF-4 designation.

- (f) Whether changed or changing conditions make the passage of the proposed amendment necessary.

Applicant's Response: The involuntary annexation of the property by the City necessitates the proposed amendment to apply a City zoning designation to the property as the action by the City 17 years ago was never completed, thus creating many such similar properties that are currently non-conforming. This non-conforming status places unnecessary and egregious restrictions on these properties and the owners as they currently exist. This property is currently unable to be developed without any City zoning designation thus making a City zoning designation necessary, and the zoning to RMF-4 is in full compliance with the City FLUM and proper as it relates to current City intent to provide for possible workforce housing which is consistent with the financial constraints and abilities of the workforce.

Staff's Comment: *The property is required to be rezoned to a City designation and the RMF-4 district is the only option for the FLUM designation of High Density Residential.*

- (g) Whether the proposed change will adversely influence living conditions in the neighborhood.

Applicant's Response: The proposed change will not adversely influence living conditions in the neighborhood. Substation Road is a private road that currently consists of mixed usage consistent with FLUM. This request is fully consistent with existing uses and zoning.

Staff's Comment: *The proposed zoning map amendment is consistent with the High Density Residential Future Land Use designation of the property.*

- (h) Whether the proposed change will create or excessively increase traffic congestion or otherwise affect public safety.

Applicant's Response: The proposed change will create additional traffic, however, it will not excessively increase traffic congestion or otherwise affect public safety. The highway department upgraded highway 41 intersecting Substation Road to accommodate such future growth. The addition of high density RMF is minimal compared to the area traffic flow from the existing motels, hotels, restaurants, and other CI establishments currently servicing the community for decades.

Staff's Comment: *Upon review of the proposed zoning map amendment by the City's TRC, no issues have been raised regarding maintenance of levels of service regarding concurrency and mobility.*

- (i) Whether the proposed change will create a drainage problem.

Applicant's Response: The proposed change will not create a drainage problem. There is a considerable "natural drainage slope" to the land. Any and all appropriate permits required by the City or with "SWFWMD" will be applicable in the future planning and development stage. There currently is available City Utilities including existing potable water and sewer lines available to service this property.

Staff's Comment: *The project has been reviewed by the City's Engineering Dept. and no issues have been identified.*

- (j) Whether the proposed change will seriously reduce light and air to adjacent areas.

Applicant's Response: The proposed change will not reduce light and air to adjacent areas.

Staff's Comment: *This neighborhood is restricted by the Comprehensive Plan to a maximum height of 42 feet.*

- (k) Whether the proposed change will adversely affect property values in the adjacent area.

Applicant's Response: The proposed change will not adversely affect property values in adjacent areas. Conversely, the RMF-4 designation may possibly increase the property values as a direct result of the infill development producing additional revenue to the City.

- (l) Whether the proposed change will be a deterrent to the improvement or development of adjacent property in accord with existing regulations.

Applicant's Response: The proposed change will not be a deterrent to the improvement or development of adjacent property and the designation of a City zoning amendment is necessitated by the City's involuntary annexation of the property. All adjacent properties surrounding the remaining properties in the City in the Gateway along highway 41 and Substation Road have been or hopefully will eventually be developed to the highest and best use. Other similar nearby enclaves have recently been given high density multi-family City zoning. The final portions yet retaining County zoning designation are scattered throughout the City and warrant review and updating with City zoning consistent FLUM

- (m) Whether the proposed change will constitute a grant of special privilege to an individual owner as contrasted with the public welfare.

Applicant's Response: The proposed change is necessitated by the City's involuntary annexation of the property and will not constitute a grant of special privilege to an individual owner as contrasted with the public welfare. The zoning designation to RMF-4 is fully consistent with the FLUM and the need for more localized affordable workforce housing.

Staff's Comment: The proposed zoning map amendment is consistent with the High Density Residential Future Land Use designation of the property.

- (n) Whether there are substantial reasons why the property cannot be used in accord with existing zoning.

Applicant's Response: The involuntary annexation of the property by the City necessitates the proposed application and amendment to apply a City zoning designation to the property to be compliant and to be consistent with Gateway Neighborhood High Density RMF-4 designation. The property cannot be developed without a City zoning designation. The probability of resale of the property is greatly diminished and/or any future development of the property to current standards is completely restricted as well without a proper City zoning. A simultaneous change to RMF-4 will bring the property into better alignment with City Gateway Neighborhood High Density designation and current City intent of Planning Commission, and City Council, supporting the probability of more affordable workforce housing. Affordable workforce housing in close proximity to "the Island", Seaboard Area, the Bird Bay and Gateway Neighborhood is greatly needed and has been an ongoing important main topic with City Council, City Officials and Staff.

Staff's Comment: The property is required to be rezoned to a City designation and the RMF-4 district is the only option for the FLUM designation of High Density Residential.

- (o) Whether the change suggested is out of scale with the needs of the neighborhood or the city.

Applicant's Response: The proposed change is not out of scale with the needs of the neighborhood or the City. In fact, the proposed change to RMF-4 is highly consistent with the current needs of the neighborhood and intent of the City to provide for more localized affordable workforce housing. The owner fully understands the need for this. The owner is active in the area as a Venice businessman, born and raised in the City. The owner has insight in the very real and ongoing needs for additional affordable workforce housing in close proximity to "the island" the Seaboard District, the Bird Bay area businesses and Gateway Neighborhood. This can be better achieved with the proposed RMF-4 zoning designation, consistent with FLUM. Furthermore, the owner of the property has a keen understanding of the need for affordable workforce housing in the community as he has been a resident of Venice his entire life.

Staff's Comment: The proposed zoning map amendment is consistent with the High Density Residential Future Land Use designation of the property.

- (p) Whether it is impossible to find other adequate sites in the city for the proposed use in districts already permitting such use.

Applicant's Response: Not applicable, the involuntary annexation of the property by the City necessitates the proposed application to the City for a proper zoning designation to the property, and the amended RMF-4 designation according to current City standards and Gateway Neighborhood FLUM. However, there are

few other sites in the City that are in such close proximity to “the island”, the Seaboard District and the Bird Bay area, located within Gateway Neighborhood which are currently available to provide for additional affordable workforce housing such as this property might provide, and which are within and most appropriately compliant with the current FLUM high density designation and zoned RMF-4.

***Staff’s Comment:** The proposed zoning map amendment is consistent with the High Density Residential Future Land Use designation of the property.*

Conclusions / Findings of Fact (Compliance with the Land Development Code):

The subject petition complies with all applicable Land Development Code standards and there is sufficient information to reach a finding for each of the rezoning considerations contained in Section 86-47(f) of the Land Development Code.

B. Concurrency/Mobility

Concurrency

At the rezone stage for a project that is not for a proposed planned development district, concurrency is evaluated on a “preliminary” basis, with a formal concurrency determination and issuance of a concurrency certificate at the point of development. As provided earlier, rezoning the property to RMF-4 is consistent with the future land use designation.

City departments responsible for concurrency reviewed the petition for impacts to sanitary sewer, potable water, solid waste, parks, and drainage facilities and it was preliminarily determined there currently are adequate public facilities available to accommodate the expected development of the subject property.

Mobility

Through an interlocal agreement with Sarasota County, the City collects mobility fees with each Certificate of Occupancy issued. These fees are required to be paid by the developer and can be used to fund identified transportation improvements. Although these fees will be applicable to any potential development of the subject property, staff has still provided preliminary analysis of any potential impact of the requested zoning.

The maximum potential residential units for this site under the proposed zoning is 18. Based on Sarasota County 2017 Generalized Level of Service (LOS) Analysis, the roadway segment of US 41 Bypass from the TJ Maxx entrance to Albee Farm Road is operating a LOS “C”. Current conditions indicate 3,223 Design Hourly Volume (DHV) with a Service Volume (SV) of a maximum of 5,660 vehicle trips to maintain LOS. The maximum of 18 residential units would create approximately 18 PM Peak Hour trips and therefore would not cause a negative impact to the existing LOS as it would not cause the SV to be exceeded. Further evaluation will be performed with subsequent applications for development. Addressing potential development, without a specific development plan is difficult. However, the allowed uses would typically be of low intensity in a residential district.

Finally, with the adoption of the Comprehensive Plan, level of service (LOS) standards have been established for pedestrian facilities, bicycle facilities, transit service and hurricane shelter space. To date, these adopted standards have not been implemented in the Land Development Code. However, the Comprehensive Plan indicates the current LOS for bicycle, pedestrian, and transit are all operating below the required LOS. Mobility fees will be collected with any Certificate of Occupancy issued for any proposed development of the property and could be

used to address this issue. Shelter LOS is only required if the property is located within the Coastal High Hazard Area and the subject property is not.

Conclusion / Findings of Fact (Concurrency):

Based on preliminary concurrency analysis, no issues have been identified regarding adequate public facilities capacity to accommodate the development of the project per Chapter 94 of the Land Development Regulations.

Conclusion / Findings of Fact (Mobility):

Based on preliminary analysis and consideration of potential uses in the RMF-4 district, no issues have been identified that would negatively impact the transportation system in this area.

V. CONCLUSION

Upon review of the petition and associated documents, Comprehensive Plan, Land Development Code, Staff Report and analysis, and testimony provided during the public hearing, there is sufficient information on the record for the Planning Commission to take action on Zoning Amendment Petition No. 19-03RZ.