

Riverland Terrace Nonprofit Water Corporation  
2006 S. Eagle Road  
Meridian, Idaho 83642

September 17, 2015

Planning and Zoning Commission  
Boise City Planning Department  
150 N. Capitol Blvd.  
Boise, ID 83702

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RE: CAR15-00026—Annexation proposal for Riverland Terrace Subdivision

Dear Planning and Zoning Commission,

The Riverland Terrace Nonprofit Water Corporation (Riverland Terrace) owns and operates the water system for the 28 homes and duplexes in the Riverland Terrace Subdivision. As residents in the Area of City Impact (AOCI), we understand that annexation is inevitable. The proposed annexation, however, does not meet comprehensive plan principles calling for a predictable development pattern, does not respond to pressing environmental concerns in the east end of the Barber Valley, and imposes an unacceptable and untimely financial burden on our residents.

For these reasons, Riverland Terrace requests deferral or denial of the City's current annexation proposal, until the following steps are taken:

1. We request that the City Planning Department create an orderly and predictable plan for annexation of the remaining parcels in the Area of City Impact (AOCI). We have three central questions:
  - a. What property hasn't been annexed but will be, and what properties won't be annexed?
  - b. What is the timeframe for these future annexations?
  - c. Why did the City not afford us the courtesy of a conversation prior to presentation at the Planning and Zoning Commission?
2. We request that the City Public Works Department consult with the Idaho Department of Environmental Quality (IDEQ) to understand and create a plan for addressing current groundwater contamination up gradient of our subdivision, which could potentially spread and affect our water system and the Boise River. Following consultation, Riverland Terrace would like to see a plan for extending sewer throughout the valley to address groundwater concerns.
3. We request that this decision be postponed until after tax notices are prepared in November to avoid an immediate and unplanned cost of approximately \$400 per residence.

Annexation is inevitable, but should be done more collaboratively, with delivered benefits to residents, and in compliance with the Comprehensive Plan. The current proposal achieves none of those objectives.

#### **Unplanned, Ad-Hoc Annexation Process**

City planning staff recommends parcels for annexation based on adjacency to the City boundary. Selecting only one neighborhood in the eastern Barber Valley for annexation means that other existing,

adjacent, and eligible properties will follow in a piecemeal fashion. Residents are divided into “winners” that get left in the county, and “losers” that get annexed with a 37.5% tax increase with no tangible benefits. This has the appearance of a divide and conquer strategy that will result in multiple hearings as each street or small neighborhood is annexed individually. It will be a black hole of time and energy for City planning staff and east Valley residents. Each successive annexation will be viewed as unfair by some residents, causing neighborhood disruption and strife.

This lack of an orderly plan conflicts with the following Blueprint Boise goals:

- Goal PDP3: Plan for a coordinated and sustainable pattern of growth within the AOCI.
  - *BVNA requested an annexation plan for this area at the public information meeting on August 17, 2015, and was informed that no such plan exists; rather, this neighborhood was selected because it is bordered on two sides by property within the City. Other properties are adjacent to or on the other side of the street from properties within the city, so this action appears both arbitrary and capricious. Riverland Terrace stands with BVNA on this issue.*
  
- PDP3.2: AOCI ANNEXATION AREAS. Annex lands within AOCI when it can be demonstrated that the proposed annexation is consistent with the goals and policies of the Comprehensive Plan.
  - *As explained in the next section, this annexation proposal is inconsistent with Comprehensive Plan goals and policies for environmental stewardship.*

Riverland Terrace understands that the AOCI boundary was established in the mid-1980s and has remained relatively constant since that time, and we recognize that residents and businesses should, therefore, anticipate annexation at some point in time. The only tangible benefit to being annexed at the current time is the ability to hookup to the sewer main that now runs underneath Warm Springs avenue. While the City has a policy against extending sewer services to areas outside of City limits without annexation, all of the septic systems in our subdivision appear to be working even though they are more than 35 years old. Any resident within 300 feet of the new sewer line will likely be required to hook up to city sewer if their septic system fails. We understand that it is necessary and prudent for the City to annex properties so that sewer connections can be made as quickly as possible following septic system failure. It appears arbitrary and capricious to forcibly annex properties with functioning septic systems and ignore nearby properties within the AOCI with failed septic systems.

### **Environmental and Groundwater Contamination Issues**

Residents of Riverland Terrace do not currently have failed septic systems nor groundwater issues. We know this because our community well system continues to deliver water within the water quality standards for Public Drinking Water Systems. Unfortunately, this is not the case as one travels further southeast toward Highway 21. IDEQ required residents served by a former Public Drinking Water System southeast of Riverland Terrace to connect to United Water’s service due to that neighborhood’s system failing to meet water quality standards. Failed septic systems are the likely cause in this area. Because of the City’s policy to not extend sewer services outside of the City boundaries, the groundwater contamination itself has likely not been addressed, which could present a risk to Riverland Terrace and other down gradient ground water users. It could also affect the Boise River immediately to the southwest. These risks should be assessed by City professionals and IDEQ so a response plan can be created in conformance to the Idaho Ground Water Quality Rule (IDAPA 58.01.11). Section 400 of this administrative rule addresses contamination of ground water and the appropriate responses.

According to Blueprint Boise, a collaborative, interagency response to groundwater contamination should take place, even if that is within the AOCI and outside of City boundaries. Further, residents down gradient of the

contamination (including Riverland Terrace), should receive support in this effort from the City under the wellhead protection goal.

The following goals speak directly to this issue:

- Goal ES3: Protect groundwater quality and quantity.
- Goal ES4: Identify areas of groundwater contamination and support remediation where feasible.
  - ES4.1: CONTAMINATION STATUS AND RESPONSE. Assess areas of potential groundwater contamination and assist all appropriate agencies in prompt, adequate, and efficient response to incidents of contamination.
  - ES4.2: REMEDIATION AGREEMENTS. Review all development applications for evidence of groundwater contamination sources. If contamination is found, require the developer to work with the state to prepare a remediation agreement.
  - ES4.3: WELLHEAD PROTECTION. Coordinate with the Idaho Department of Water Resources (IDWR) and IDEQ in the identification of wellhead protection areas and apply principles for wellhead protection through the subdivision plat review process.
  - ES4.4: INTERAGENCY RESPONSE. Facilitate interagency responses to groundwater issues within the AOCI.

#### **Financial Impact Is Immediate and Unforeseen**

The city did survey our residents last year regarding the desire to hook up to city sewer, and the overwhelming response was no. Cost was a major factor for this response due to hookup fees of \$10,000 to \$15,000, related costs of another \$10,000 to \$15,000 in order to re-plumb sewer drainage and install pipes through front yards, and ongoing monthly costs of around \$35. Many retirees on fixed incomes live in our neighborhood, and they do not have the ability to pay these kind of out of pocket costs. Lastly, annexation would add 37.5% to our property taxes effective this November, which equates to an increase of around \$400. Our residents on fixed incomes do not even have time to budget for this tax increase, let alone a \$20,000 to \$30,000 bill for sewer hookups.

Riverland Terrace thanks the Planning and Zoning Commission for carefully considering our comments and acting to preserve neighborhood cohesion, promote orderly development, and protect the environment. We leave it to the Commission to determine whether denial or deferral is the most appropriate course of action. Regardless, the current proposal appears to lack the due diligence and comprehensive plan conformance expected from the City of Boise.

Thank you,



Eric Wilson  
President, Riverland Terrace Nonprofit Water Corporation

6706 Glacier Drive  
Boise, ID 83716  
September 16, 2015

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Boise City Planning & Zoning Commission  
Planning & Development Services  
150 N. Capitol Blvd.  
Boise, ID 83701-0500

Re: CAR15-00026, Annexation

Commissioners:

The City's proposal to annex Riverland Terrace subdivision flies in the face of common sense and the City's own guidelines for annexation. While all areas in the Area of Impact may ultimately be annexed, there should be advantages to both the City and to those being annexed. It should not be a one way deal where the City wins all and the citizens lose.

First, the proposed annexation of Riverland Terrace looks like extreme gerrymandering, taking in a far out community and ignoring areas much closer to the central core of the City. Note that all the areas to the southwest side of Warm Springs Avenue have been left in Ada County. These properties include: the Shakespeare Theater, Idaho Department of Parks and Recreation, Barber Pool Conservation Area, Gregorson's, and Ben's Crow Inn. Why have they been excluded?

The annexation of our property is unfair and disrespectful to our residents. The City is treating our little self contained community like a "Cash Cow" for tax revenue, and providing no improvement in services or amenities. We are not a third world country to be exploited for our resources.

As the Staff report indicates, we are adequately served now, and do not need anything from the City.

- ▲ Our water is from our own wells
- ▲ Our septic system functions well and we do not need to hook up to city sewer
- ▲ We have excellent fire protection and law enforcement security
- ▲ Our children are in Boise School District schools

We would get negligible benefits from being in the City!

On the other hand, if annexed, we would be faced with a large property tax increase of more than 37%, amounting to \$400 to \$500 per year. That is a big hit for most of our retired senior citizens (about 25% of our residents). While this is not exactly "taxation without representation", since we would be able to vote in City elections, it is certainly "taxation without benefits".

And so I plead with you to stop the gerrymandering and expand the City boundaries in a logical and rational way. Take in those areas on the southwest side of Warm Springs Avenue first. When the City Limits comes down our way we will accept it and be proud citizens. Until that time, I and many of my neighbors will continue to oppose the annexation.

Pritchard H White

CITY OF BOISE

MY NAME IS DIRK MARCUM. I OWN PARCEL #SO929336300 THE ADDRESS IS 4340 E BOISE RIVER LANE. THIS IS A PRIVATE LANE. THE ROAD WAS BUILT AND MAINTAINED BY THE HOME OWNERS.THERE IS A TOTAL OF EIGHT HOMES ON E BOISE RIVER LANE THAT HAS ACCESS THRU MY PROPERTY.

I PURCHASED THE PROPERTY WITH THE INTENT OF BUILDING A HOME AND SHOP FOR MY RETIREMENT.

MY PROPERTY HAS A UNIQUE CONFIGERATION. MY PROPERTY LINE EXTENDS TO THE MIDDLE OF THE NEW YORK CANAL, IT ALSO HAS EXTRA THIRTY FOOT RIGHT AWAY ROAD FOR THE NEW YORK CANAL ACCESS. E BOISE RIVER LANE RUNS THROUGH IT. ALSO THE RIVER SETBACK REQUIREMENTS.

WITH ALL OF THESE OBSTACLES WE ARE LEFT WITH A SMALL BUILDABLE AREA.

ACROSS THE RIVER IS THE BARBER POOL WILDLIFE REFUGE,EXTENDING OUT TO HAMMER FLAT FISH AND GAME PROPERTY, WHICH WILL NEVER BE IN BOISE CITY.

JUST TO TAKE IN THREE PROPERTIES ONLY ON E BOISE RIVER LANE WOULD NOT MAKE SENSE.IT WOULD BE VERY CONFUSING TO THE DIFFERENT GOVERMENT JURISDICTIONS,EMERGENCY SERVICES,UTILITIES,AND OTHER GENERAL DELIVERY AND SERVICES.

I ALREADY HAVE A LOT OF TIME AND MONEY INVESTED. ENGINEERING OF SITE DESIGN,ROAD REDESIGN ENGINEERING,UTILITY DESIGN AND CONSTUCTION,PURCHASE OF PROPERTY.

MY PROPERTY QUALIFIES FOR BUILDING PERMITS IN ADA COUNTY.

IF I WOULD BE ANNEXED NOW IT WOULD CHANGE ALL OF THE RULES ,REGULATIONS AND PROPERTY RIGHTS I HAVE NOW.

AT THIS TIME IT WOULDN'T BE POSSIBLE FINACALLY TO MOVE FORWARD WITH MY PLANS. I WILL NEED SPECIAL VARIANCES,RULES AND REGULATIONS IF THE ANNEXATION WERE TO TAKE PLACE.

I WOULD NEED A MINIMUM OF A FIVE YEAR TIME FRAME EXTENTION BEFORE ANNEXATION. IF I WOULD BE ANNEXED BEFORE I'M ABLE TO MOVE FORWARD WITH MY PLANS, THE PROPERTY WOULD NOT MEET ANY OF THE CITY OF BOISE BUILDING REQUIREMENTS. AT THAT TIME THE PROPERTY WOULD HAVE ZERO VALUE.

DIRK & LESLIE MARCUM

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## Colleen Carroll

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**From:** Lex Heyer <lexheyer@gmail.com>  
**Sent:** Friday, September 11, 2015 7:36 AM  
**To:** Colleen Carroll  
**Subject:** Annexation Proposal File No. CAR15-00026

We are property owners in southeast Boise currently being considered for annexation. Please let the record show that we are opposed to this action. We recently retired and purchased this property as an acreage in Ada county with an understanding of the county rules and regulations governing development. We haven't had a chance to fully utilize this property as the retirement home we planned. Annexation into the city will have a negative impact on the intended use of our property and cause us financial hardship. We understand that annexation is inevitable at some point in time, we were just hoping it could be delayed a little longer to allow us the opportunity to continue establishing our retirement home as planned under Ada county rules.

Lex & Velda Heyer  
4008 E Boise Ave  
Boise, ID 83716

William J. and Alyson J. Heyer  
4114 E. Boise Ave.  
Boise, ID 83716  
208-340-6282

RE: CAR15-00026

September 11, 2015

Dear City of Boise Planning and Zoning;

I appreciate the opportunity to submit feedback regarding annexation of my property. I have met with a City of Boise planner and my concerns were confirmed regarding the effect the annexation will have in the use of my property. **My primary concern is that City Code restricting construction 200 feet from the back of my property makes any future development of my property impossible.**

I purchased this property only 18 months ago and completed a home on my 1.6 acre parcel for my wife and I and our elementary age twin sons. **We intended to build a shop at that time, but the building process left us "spread thin" and we had to hold off on the shop.**

Part of the role of the Planning and Zoning commission is to determine when a special consideration is necessary and appropriate. The timing of this annexation creates undue hardship on my family, as we have not had the opportunity to develop the property to our planned intentions with the building of a shop.

**I would like to make a request to not be annexed into the City of Boise so as to give my family an opportunity to build a shop in the next few years. This will allow me to develop my property under the same Ada County regulation that was in place when I purchased the property only 18 months ago. It seems very reasonable to request a period of time before a sweeping change of regulation affects my property.**

I hope you recognize the unique circumstance and undue hardship this creates as a result of city regulations.

Sincerely,

William and Alyson Heyer

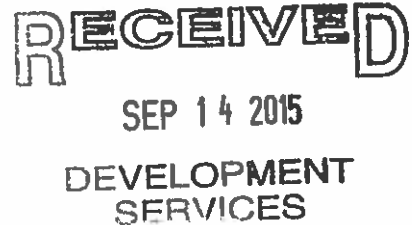
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Protest regarding Annexation, file CAR15-00026

Public Hearing Date 9-21-2015

Subject Property: 4700 East Boise River Lane

Parcel # S0929346803



TO: Boise City Planning and Zoning Commission

Dear Commissioners,

I will be traveling on September 21<sup>st</sup> and will be unable to attend the annexation hearing. Please accept this protest letter as my testimony.

By including my parcel in the 2015 Annexation plan the Cities GAP planners have gone beyond the intent of state statutes that grant municipal corporations the right to annex. It appears my property was included because it abuts parcels that have recently connected to city sewer services. I do not have city services and have not been given the option to connect to them. In 2003 the city annexed an Idaho Power Intertie right of way on the East side of my property, and by that action my property is now surrounded by the city. None of my six neighbors to the East will ever be annexed because of the Barber Pool Nature Preserve. It is unreasonable that my property should be annexed just because the city annexed a unbuildable industrial right of way to the East of me. I strongly disagree with the city's finding that my property should be included.

**City services:**

My property is not connected to city sewer. The nearest manhole is 1300 feet West with an elevation gain of 20 feet. I have been told by your GAP planner that the city will only connect sewer within 1000 feet of a parcel. Connection to city sewer would require a pressure pumping system, electrical service, and trenching into the New York Canal impact zone. In many public hearings for development of the parcels to the west of my property, the Boise project board of control repeatedly stated their opposition to disturbance of the narrow canal bank west of my parcel. My land has no connection to municipal water service, no natural gas service, no cable television service etc. Would the city intend on charging franchise fees for services that I have no access to?



**Taxes:**

Based on the calculations provided in the informational hand out, the added tax assessment for my parcel would increase by \$3062.10 per year. For those taxes, I would receive no street lights, no city sewer, and no other fee or tax services that I don't already pay for.

**Legislative intent:**

By no means does the inclusion of my parcel ( S0929346803) in the CAR15-00026 plan meet the legislative intent granted to Idaho cities for annexations. First I currently pay for tax supported county services. Second I have no need for, and the city has provided no option for fee supported municipal services. Annexation of my parcel is not reasonably necessary to assure the orderly development of the city and its services.

**Rural and agricultural setting at risk:**

Whether it is the cities intent at this time or not, by attempting to annex my property into the City of Boise, I will be at risk of new ordinances forever. At some point in the future the city may decide I cannot pasture animals, they may decide that our private road is unacceptable and has to be rebuilt. The list of repercussions to annexation is endless. Boise River Lane is a unique area in all of Ada County. It is bounded by the Boise River on the North side, and the New York Canal on the South. The East side is the Barber Pool Nature Preserve, and we have an Idaho Power intertie right of way through the middle. Currently on Boise River Lane there are horse pastures, barns, cattle pastures, and hay fields. Attachment 1 shows the rural and isolated nature of the Boise River Lane area.

**Boise River System Overlay District:**

Annexation of my parcel would bring it under the Boise River Overlay District. My parcel is unique in that it is not low in the flood plain as are the subdivisions down river or across at Harris Ranch. The land is on a bluff above the river twenty five to thirty feet above the high water mark. Currently the Ada County set back is one hundred feet from the river. If that setback is changed to two hundred feet it will make that parcel unbuildable. The septic set back from the river is 200' and the well must be a set distance from the septic. (See attachment 2)

My plan for this parcel has always been to sell my current home and build a retirement home on that pasture. A two hundred foot setback would amount to rendering that area undevelopable, and I would consider it a taking by the city of Boise.



Google earth

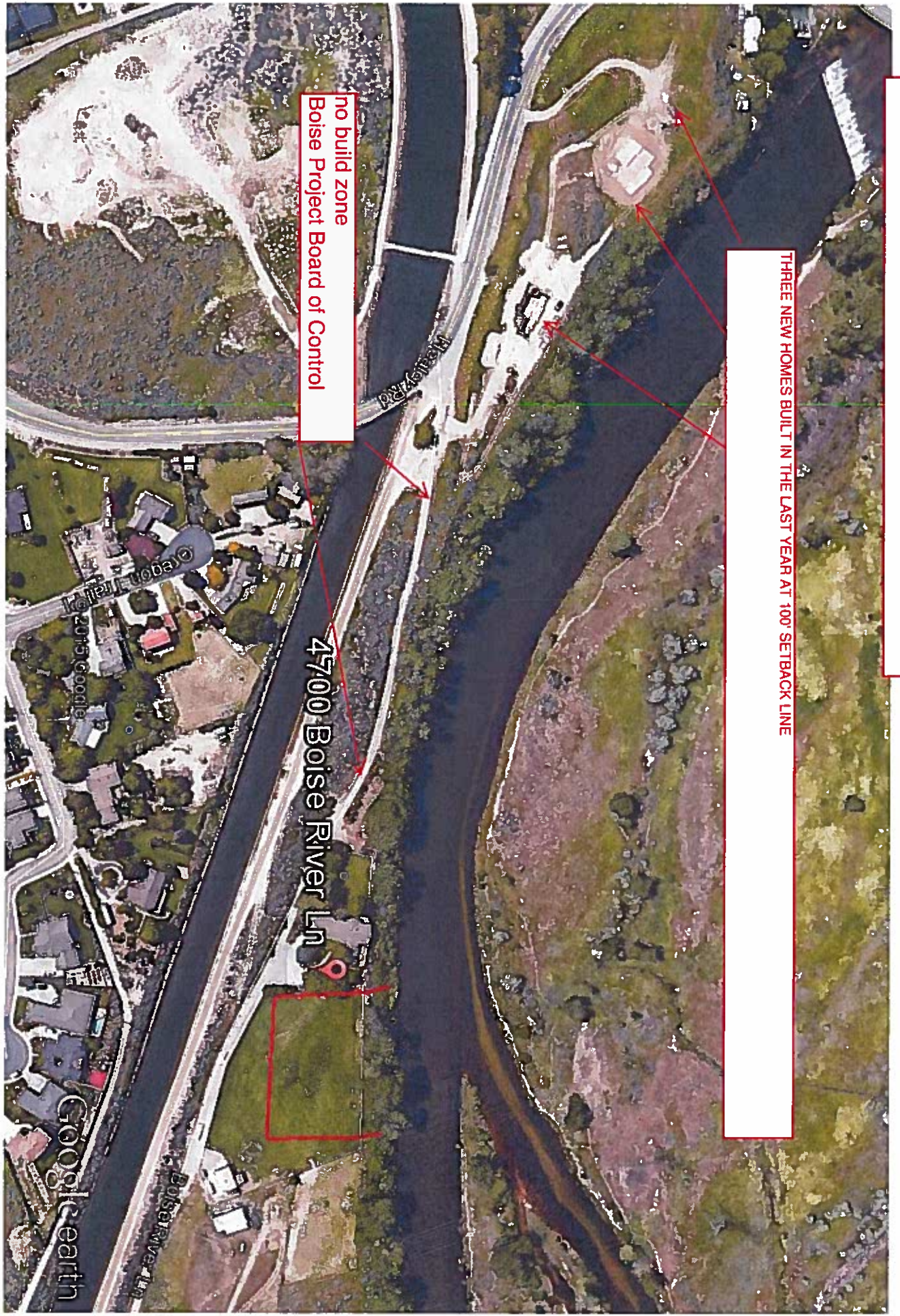
feet  
meters



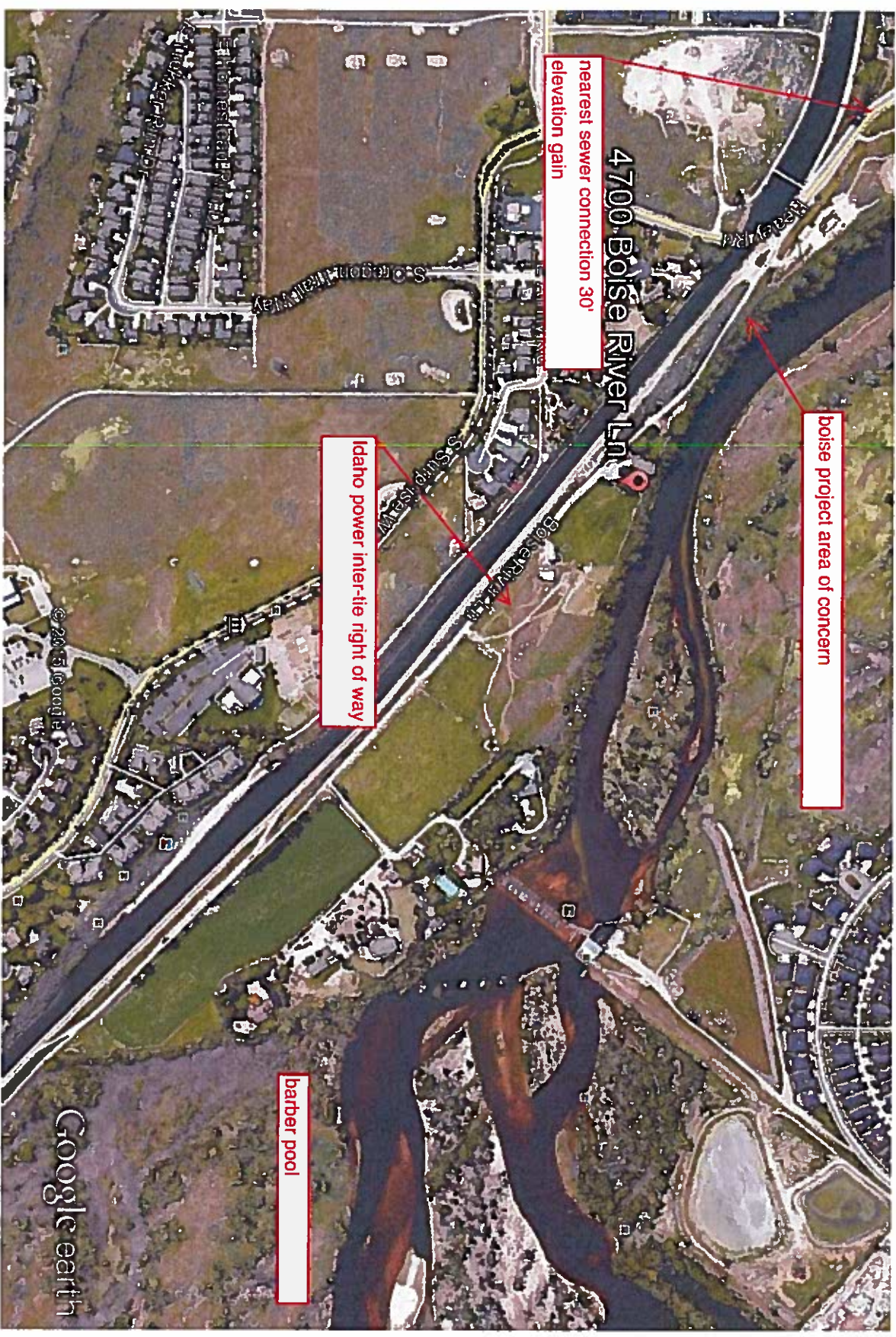
THREE NEW HOMES BUILT IN THE LAST YEAR AT 100' SETBACK LINE

no build zone  
Boise Project Board of Control

47,000 Boise River Ln



Attachment 1



Google earth

feet  
meters



Google earth

**Recent Construction:**

Within the last twelve months three homes have been built within the 100' set back just to the east of my parcel. (See Attachment 3)

**Summary:**

While I understand the City's goals in urban planning and support of services, I think your GAP planner reached too far by tying my parcel to this annexation. As summarized above there is no beneficial outcome for inclusion in the city of this land, with the exception of adding funds to city coffers. In its annexation plan the planners have not reached the threshold set by the state of Idaho for annexation. There is no provision now or in the future for the services state statutes intend for annexation.

I respectfully request that parcel numb S0929346803 be removed from CAR15-00026

Thank you,



Paul Warner

4700 E. Boise River Lane

Boise, ID 83716

Phone: 484-4230



September 16, 2015

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Planning and Zoning Commission  
Boise City Planning Department  
150 N. Capitol Blvd.  
Boise, ID 83702

RE: CAR15-00026—Annexation proposal for Riverland Terrace Subdivision

Dear Planning and Zoning Commission,

The Barber Valley Neighborhood Association (BVNA) is a proponent of collaborative, orderly, and predictable planning that enhances the quality of life and environment of our neighborhood. We find that the proposal to annex the Riverland Terrace subdivision, consisting of two small streets and little else, does not meet comprehensive plan principles calling for a predictable development pattern and does not respond to pressing environmental concerns in the east end of the Barber Valley.

For these reasons, BVNA requests deferral or denial of the City's current annexation proposal, until the following steps are taken:

1. We request that the City Planning Department create an orderly and predictable plan for annexation of the remaining parcels in the Area of City Impact (AOCI). We have two central questions:
  - a. What property hasn't been annexed but will be, and properties won't be annexed?
  - b. What is the timeframe for these future annexations?
2. We request that the City Public Works Department consult with the Idaho Department of Environmental Quality (DEQ) to understand and create a plan for addressing current groundwater contamination, which could potentially spread and affect the Boise River. Following consultation, BVNA would like to see a plan for extending sewer throughout the valley to address environmental concerns.

The BVNA board understands that the AOCI boundary was established in the mid-1980s and has remained relatively constant since that time, and we recognize that residents and businesses should, therefore, anticipate annexation at some point in time. We agree that residents in the east end of the Barber Valley will benefit from the City's development of Marianne Williams Park, as they currently enjoy Ada County's Barber Park. Similarly, the Greenbelt is a patchwork of County- and City-maintained sections, and residents benefit from parks and other such amenities throughout the City.

We also acknowledge that the City has a policy against extending sewer services to areas outside of City limits without annexation. Now that sewer lines have been laid on Warm Springs Avenue to service new developments in the east end of the Valley, DEQ is unlikely to approve rebuilding septic systems or

drainfields that fail and would require residents to connect to the system. Recognizing that most septic systems in the area are more than 35 years old and at risk of failure, we understand that it is necessary and prudent for the City to annex properties so that sewer connections can be made as quickly as possible following failure to prevent groundwater contamination, protecting the water supply.

Annexation is inevitable, but should deliver benefits to residents and comply with the Comprehensive Plan. The current proposal achieves neither of those objectives.

### **Unplanned, Ad-Hoc Annexation Process**

City planning staff recommends parcels for annexation based on proximity to the expanding City boundary. Selecting only one neighborhood for annexation means that other streets will follow in a piecemeal fashion. BVNA's Board will need to write letters and attend multiple hearings as each street or small neighborhood is annexed individually. Not only does this represent a waste of time and energy for City planning staff and BVNA volunteers, it assures that any annexation action will be viewed as unfair by the residents, causing neighborhood disruption and strife. The lack of an orderly plan conflicts with the following Blueprint Boise goals:

- Goal PDP3: Plan for a coordinated and sustainable pattern of growth within the AOCI.
  - *BVNA requested an annexation plan for this area at the public information meeting on August 17, 2015, and was informed that no such plan exists; rather, this neighborhood was selected because it is bordered on two sides by property within the City. Other properties are adjacent to or on the other side of the street from properties within the city, so this action appears both arbitrary and capricious.*
- PDP3.2: AOCI ANNEXATION AREAS. Annex lands within AOCI when it can be demonstrated that the proposed annexation is consistent with the goals and policies of the Comprehensive Plan.
  - *As explained in the next section, this annexation proposal is inconsistent with Comprehensive Plan goals and policies for environmental stewardship.*

### **Environmental and Groundwater Contamination Issues**

Residents of Riverland Terrace do not currently have failed septic systems nor groundwater issues; we know this because the community well system continues to deliver water that is free of nitrates and *E. coli*. Unfortunately, this is not the case as one travels further east. DEQ has found groundwater contamination and required properties to connect to a clean water system provided by United Water. Because of the City's policy to not extend sewer services outside of the City boundaries, the groundwater contamination itself may not have been addressed, which could present a risk to the Boise River. This risk should be assessed by City professionals and a response plan created.

According to Blueprint Boise, a collaborative, interagency response to groundwater contamination should take place, even if that is within the AOCI and outside of City boundaries. Further, residents downgradient of the contamination (such as Riverland Terrace), should receive support in this effort from the City under the wellhead protection goal.

The following goals speak directly to this issue:

- Goal ES3: Protect groundwater quality and quantity.

- Goal ES4: Identify areas of groundwater contamination and support remediation where feasible.
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BVNA thanks the Planning and Zoning commission for carefully considering our comments and acting to preserve neighborhood cohesion, promote orderly development, and protect the environment. We leave it to the Commission to determine whether denial or deferral is the most appropriate course of action. Regardless, the current proposal because lacks the due diligence and comprehensive plan conformance necessary to gain BVNA's endorsement.

Thank you,



Michael Reineck, President



Jeremy Maxand, Vice President

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