



CITY OF ST. PETERSBURG, FLORIDA  
PLANNING AND DEVELOPMENT SERVICES DEPARTMENT  
URBAN PLANNING AND HISTORIC PRESERVATION DIVISION

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## STAFF REPORT

Community Planning and Preservation Commission  
Certificate of Appropriateness Request

For **Public Hearing** and **Executive Action** on July 9, 2019 beginning at 2:00 p.m. in the Auditorium, The Sunshine Center, 330 Fifth Street North, St. Petersburg, Florida

According to Planning and Development Services Department records, no commissioner resides or has a place of business within 2,000 feet of the subject property. All other possible conflicts should be declared upon the announcement of the item.



**Figure 1: Proposed Dr. ML King, Jr. Street South Bridge over Booker Creek, facing south. Image from application.**

Case No.:	19-90200029
Address:	Dr. MLK St S from 6 <sup>th</sup> Ave S to 7 <sup>th</sup> Ave S
Date of Construction:	n/a
Local Landmark:	Roser Park Local Historic District (HPC 87-01) – Replacement of Contributing Structure
Owner:	City of St. Petersburg
Request:	Request for a Certificate of Appropriateness for new construction

## Historical Context and Significance

### Designation and Previous Determinations of Significance

The Roser Park area was developed by Charles Martin Roser beginning in the early 1910s as an early planned suburb of downtown St. Petersburg. From this time, the area's development was influenced by its unique topography. Booker Creek, the body of water which the subject bridge crosses, and its surrounding parkland serve as a focal point of the neighborhood. The area was developed with, and has since retained, single-family residences of various architectural styles which represent St. Petersburg's early development, including Craftsman and Colonial Revival. Elements of the urban landscape dating to the area's early development, including rusticated concrete block retaining walls, brick streets, and park land, have also been retained and continue to define Roser Park's distinct character.

Roser Park Local Historic District (HPC 87-01) was designated to the St. Petersburg Register of Historic Places in 1987. The proposed bridge is to be located within the boundaries of the local district and will replace a contributing historic structure if the Certificate of Appropriateness (COA) application for demolition (City File No. 18-90200055) is approved. Per the City's COA Matrix, new construction requires review by the Community Planning and Preservation Commission (CPPC). As such, the plans for the replacement of the bridge are being presented to this Commission first through the afore-mentioned COA for demolition, and then as the COA for new construction contained herein. The denial of a COA for demolition will negate the possibility that the proposed new construction can be reviewed or built.

Although the bridge is outside of the boundaries of the Roser Park National Register Historic District as listed, its historic significance, and resulting eligibility for inclusion in this district, has been evaluated by independent consultants and the Florida State Historic Preservation Office as part of the replacement plan. This project is therefore in the process of a "Section 106" review, through which the impact of Federally-funded project on historic, archaeological, and cultural resources that are listed in, or eligible for, the National Register of Historic Places is considered.

## Project Description and Review

### Project Description

The application (Appendix A), submitted by the City of St. Petersburg Engineering and Capital Improvements Director on behalf of the Florida Department of Transportation (FDOT) proposes the construction of a structure which will carry Dr. ML King, Jr. Street South across Booker Creek. The proposed bridge's footprint will be contained entirely within the existing right of way, although the replacement structure is proposed to have a wider footprint, as shown in Table 1.

	<b>Existing Bridge (FDOT Bridge No. 157117)</b>	<b>Proposed Bridge (FDOT Bridge No. 157269)</b>
<b>Height</b>	At grade with Dr. ML King, Jr. Street South to north and south of bridge	Same
<b>Width</b>	45.75'	72'
<b>Open span</b>	144.45' between piers	75' between Mechanically Stabilized Earth (MSE) walls

**Table 1: Dimensions of Existing and Proposed Bridges**

Although application materials include photographs of the extant bridge, COAs for the new construction of historic landmarks are generally reviewed by CPPC members separately from demolition review. As noted above, this application is only relevant in the case that the demolition of the existing bridge is approved.

Further, it should be reiterated that the extant bridge was constructed in 1914 to accommodate a trolley line, two lanes of two-way vehicular traffic, and a pair of sidewalks. Located just outside of the southern boundary of Downtown St. Petersburg, the bridge now carries three lanes of one-way vehicular traffic as it heads south into many of the city's residential communities, as well as into a main entrance to the Roser Park Local Historic District itself. The cohesion of Roser Park was dramatically affected by the construction of the 8<sup>th</sup> Street Connector, which splits traffic from its two-way flow along Dr. ML King, Jr. Street South to one-way traffic heading northbound along 8<sup>th</sup> Street and southbound along Dr. ML King, Jr. Street through downtown. The construction of the 8<sup>th</sup> Street Connector, which opened to traffic in 1980, resulted in the demolition of 14 houses within the present-day boundaries of the Roser Park Local Historic District.<sup>1</sup>

The purpose of the added width of the proposed bridge when compared to the extant historic bridge is to bring the structure up to contemporary safety standards. Future studies may support the conversion of Dr. ML King, Jr. Street South to two-way traffic in the future, which could be accommodated by this proposed structure. The possible replacement of the subject bridge with a structure large enough to support two-way traffic along Dr. ML King, Jr. Street South could provide a future opportunity for the demolition of the 8<sup>th</sup> Street Connector and the reestablishment of this handful of parcels as residential properties.

#### General Criteria for Granting Certificates of Appropriateness and Staff Findings

1. *The effect of the proposed work on the landmark or the property upon which such work is to be done.*

The proposal would introduce a contemporary, and therefore non-contributing, structure to the northwestern corner of the Roser Park Local Historic District. From the parkland within the district to the east of the bridge, the larger scale would increase the roadway's visibility. Additionally, while the extant bridge features utilitarian piers that do not offer architectural merit, the proposed replacement bridge would obscure more of the view beneath it because of its use of MSE walls.

2. *The relationship between such work and other structures on the landmark site or other property in the historic district.*

The proposed bridge would be located entirely within the existing Right of Way, but would encroach approximately 25 feet further into the ROW and toward park land than the extant bridge does. The result will be a loss of some of the visible greenspace that characterizes Roser Park.

3. *The extent to which the historic, architectural, or archaeological significance, architectural style, design, arrangement, texture and materials of the local landmark or the property will be affected.*

The application indicates that landscape features adjacent to the bridge will be preserved.

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<sup>1</sup> Roser Park Local Historic District, City Council Report for meeting of June 11, 1987, 29.

4. *Whether the denial of a Certificate of Appropriateness would deprive the property owner of reasonable beneficial use of his or her property.*

The denial of this COA application would likely necessitate the rehabilitation of the extant bridge. As discussed in the demolition COA, this would cost an estimated \$2.85 million more than the pursuit of this proposed replacement.

5. *Whether the plans may be reasonably carried out by the applicant.*

The proposed project appears to be appropriate under this criterion. The FDOT has dedicated a considerable amount of resources to the project already through planning and stakeholder meetings (Appendix B).

6. *A COA for a noncontributing structure in a historic district shall be reviewed to determine whether the proposed work would negatively impact a contributing structure or the historic integrity of the district. Approval of a COA shall include any conditions necessary to mitigate or eliminate negative impacts.*

Approval of this COA would result in the creation of a noncontributing structure. While the impact to the district caused by increased width and bulk of the proposed bridge are of concern, staff acknowledges that these factors may one day create the opportunity for traffic along Dr. ML King, Jr. Street South to be returned to two-way. This would allow the removal of the 8<sup>th</sup> Street Connector, which cuts through the district one block to the east and resulted in the demolition of over a dozen homes which may have otherwise been listed as contributing properties when the Roser Park Local Historic District was created in 1987.

Although the current need for the bridge replacement relates only to the extant bridge's condition, there has been a history of studies recommending that two-way traffic along Dr. ML King, Jr. Street and 8<sup>th</sup> Street be restored downtown, where they currently act as a one-way pair. Although it is not currently being planned, should the City pursue this goal in the future, the proposed bridge would be able to accommodate the restored two-way traffic. In the long term, therefore, the proposed bridge's increased width could potentially facilitate the restoration of a large swath of the historic district, which was inappropriately converted to a highway-style connector, as residential parcels, thus restoring a great deal of integrity to the subject district.

#### Additional Guidelines for New Construction

In approving or denying applications for a COA for new construction (which includes additions to an existing structure), the Commission and the POD shall also use the following additional guidelines:

1. *The height and scale of the proposed new construction shall be visually compatible with contributing resources in the district.*

Although the height of the extant bridge is proposed to be replicated, the structure's overall width, the width of the space dedicated to vehicular traffic, and the visually open span from the parkland beneath are all proposed to change quite significantly and will reflect a more contemporary model of construction, as shown in the plans and in Table 1.

2. *The relationship of the width of the new construction to the height of the front elevation shall be visually compatible with contributing resources in the district.*

As noted, the proposed bridge is wider than that which exists. Other bridges in the subject district were historically wood and later replaced with concrete, although, as much smaller structures supporting far less traffic, they do not serve as a point of direct comparison.

3. *The relationship of the width of the windows to the height of the windows in the new construction shall be visually compatible with contributing resources in the district.*

This criterion is not applicable to bridge design.

4. *The relationship of solids and voids (which is the pattern or rhythm created by wall recesses, projections, and openings) in the front facade of a building shall be visually compatible with contributing resources in the district.*

Again, the extant bridge is unique within the subject district, so other contributing resources do not set a useful point of comparison. The rhythm created by the battered, or sloping, light posts of the extant bridge, however, appears to have provided a degree of inspiration for the proposal. The battered columns in the proposed bridge, which are also a common element of Craftsman-style architecture found in the subject district's buildings, are the strongest reference to the historic bridge in that being proposed. The proposed railings feature vertical cutouts and are distinct from the pipe railings found on the historic bridge. The railings of the existing and proposed bridges can be seen in Figure 2 and Figure 3.



**Figure 2: Railing of extant bridge, facing south**



**Figure 3: Rendering of proposed bridge from application, facing west**

5. *The relationship of the new construction to open space between it and adjoining buildings shall be visually compatible with contributing resources in the district.*

The proposed bridge will encroach further into existing ROW in the district and be less open to area at the other side from the parkland below.

6. *The relationship of the entrance and porch projections, and balconies to sidewalks of the new construction shall be visually compatible with contributing resources in the district.*

This criterion is not applicable to a bridge. Railings are discussed above in evaluation of criterion 4.

7. *The relationship of the materials and texture of the facade of the new construction shall be visually compatible with the predominant materials used in contributing resources in the district.*

The material of the proposed bridge will generally match that of the existing, with the exception of the elimination of pipe railings. The proposed MSE walls feature rusticated concrete block to reference contributing historic retaining walls found throughout the subject district.

8. *The roof shape of the new construction shall be visually compatible with contributing resources in the district.*

This criterion is not applicable to a bridge.

9. *Appurtenances of the new construction such as walls, gates and fences, vegetation and landscape features, shall, if necessary, form cohesive walls of enclosures along a street, to ensure visual compatibility of the new construction with contributing resources in the district.*

The proposed bridge will not affect the existing streetscape or setbacks beyond its boundaries.

10. *The mass of the new construction in relation to open spaces, the windows, door openings, porches and balconies shall be visually compatible with contributing resources in the district.*

This criterion is not applicable to a bridge.

11. *The new construction shall be visually compatible with contributing resources in the district in its orientation, flow, and directional character, whether this is the vertical, horizontal, or static character.*

The proposed bridge will replicate the directional character of the extant bridge.

12. *New construction shall not destroy historic materials that characterize the local landmark or contributing property to a local landmark district. The new construction shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the local landmark and its environment, or the local landmark district.*

Adjacent landscape features would be preserved, and the proposed bridge's scale and ornamentation will differentiate it from historic elements of the subject district.

13. *New construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the local landmark and its environment would be unimpaired.*

Aside from the demolition of the extant bridge, the proposed new construction will not more broadly affect the subject district's landscape.

#### Staff Recommendation

The continuing presence of a bridge carrying Dr. ML King, Jr. Street South across Booker Creek is undeniably required to allow transportation to and from downtown St. Petersburg; it is also a character-defining feature of the Roser Park Local Historic district. Although replacing the existing historic bridge with a new structure in the same location will diminish the district's historic integrity somewhat, the Commission may consider the fact that the extant bridge's substandard safety features are inseparably tied to its historic character. An update to contemporary standards, therefore, necessitates a new design which will fail to meet many criteria, almost by definition.

The subject bridge's replacement is being motivated by the extant structure's deterioration the desire to meet improved safety standards, and the goal of incorporating more comfortable sidewalks and bicycle lanes in accordance with the City's Complete Streets Initiative. However, the width of the proposed bridge will also create the possibility of a project to restore a more historic two-way traffic pattern to Dr. ML King, Jr. Street South in the future, allowing the City and community residents to decide at that time if the

8<sup>th</sup> Street Connector that currently cuts through much of the subject district's historic fabric should be retained, or if that land should be returned to its historic residential use.

Despite the challenges of a widened footprint that accompany this, and so many road improvement projects, and based on a determination of general consistency with Chapter 16, City Code of Ordinances, staff recommends that the Community Planning and Preservation Commission **approve** the Certificate of Appropriateness request for the construction of a new Dr. ML King, Jr. Street South Bridge over Booker Creek with the following conditions:

1. The exterior fabric of the bridge's MSE walls will be textured to replicate the appearance of the rusticated concrete block retaining walls found along Roser Park Drive South within the subject district;
2. Battered columns be employed along the bridge's railing system to reference the extant historic bridge, as shown; and
3. Surrounding elements of the built landscape to be preserved as stated in application narratives.

# Appendix A:

Application No. 19-90200029



# CERTIFICATE OF APPROPRIATENESS

## APPLICATION

All applications are to be filled out completely and correctly. The application shall be submitted to the City of St. Petersburg's Planning and Development Services Department, located on the 8th floor of the Municipal Services Building, One Fourth Street North, St. Petersburg, Florida. Laura Duvekot, Historic Preservationist II, (727) 892-5451 or Laura.Duvekot@stpete.org

### GENERAL INFORMATION

Dr MLK St S From 6th Ave S to 7th Ave S	N/A
Property Address	Parcel Identification No.
Roser Park	N/A
Historic District / Landmark Name	Corresponding Permit Nos.
The City of St Petersburg	727-892-5383
Owner's Name	Property Owner's Daytime Phone No.
One Fourth St N, St Petersburg, FL, 33701	brejesh.prayman@stpete.org
Owner's Address, City, State, Zip Code	Owner's Email
Brejesh Prayman, Engineering & Capital Improvements Director	727-892-5383
Authorized Representative (Name & Title), if applicable	Representative's Daytime Phone No.
One Fourth St N, St Petersburg, FL, 33701	brejesh.prayman@stpete.org
Owner's Address, City, State, Zip Code	Representative's Email

APPLICATION TYPE (Check applicable)	
<input type="checkbox"/>	Addition
<input checked="" type="checkbox"/>	New Construction
<input type="checkbox"/>	Demolition
<input type="checkbox"/>	Relocation
<input type="checkbox"/>	Other:
<input type="checkbox"/>	Window Replacement
<input type="checkbox"/>	Door Replacement
<input type="checkbox"/>	Roof Replacement
<input type="checkbox"/>	Mechanical (e.g. solar)

TYPE OF WORK (Check applicable)	
<input type="checkbox"/>	Repair Only
<input type="checkbox"/>	In-Kind Replacement
<input type="checkbox"/>	New Installation
<input type="checkbox"/>	Other:

### AUTHORIZATION

By signing this application, the applicant affirms that all information contained within this application packet has been read and that the information on this application represents an accurate description of the proposed work. The applicant certifies that the project described in this application, as detailed by the plans and specifications enclosed, will be constructed in exact accordance with aforesaid plans and specifications. Further, the applicant agrees to conform to all conditions of approval. It is understood that approval of this application by the Community Planning and Preservation Commission in no way constitutes approval of a building permit or other required City permit approvals. Filing an application does not guarantee approval.

- NOTES:**
- 1) It is incumbent upon the applicant to submit correct information. Any misleading, deceptive, incomplete or incorrect information may invalidate your approval.
  - 2) To accept an agent's signature, a notarized letter of authorization from the property owner must accompany the application.

Signature of Owner: Brejesh Prayman Date: 5/24/19

Signature of Representative: \_\_\_\_\_ Date: \_\_\_\_\_



# CERTIFICATE OF APPROPRIATENESS

## CHECKLIST, NEW CONSTRUCTION

**Completed COA application**

Pending  **Application fee - \$300.00**

**Site plan or survey of the subject property:**

- To scale, no larger than 11" x 17" paper or digitally submitted
- North arrow
- Setbacks of structures to the property lines
- Dimensions, locations of all property lines, structures, parking spaces

**Floor Plans and Elevations:**

- To scale, no larger than 11" x 17" paper or digitally submitted
- Depicts all sides of existing & proposed structure(s)

**Photographs of the subject property**

**Written description explaining how the proposed work complies with the following evaluation criteria:**

1. The height and scale of the proposed new construction shall be visually compatible with contributing resources in the district.
2. The relationship of the width of the new construction to the height of the front elevation shall be visually compatible with contributing resources in the district.
3. The relationship of the width of the windows to the height of the windows in the new construction shall be visually compatible with contributing resources in the district.
4. The relationship of solids and voids (which is the pattern or rhythm created by wall recesses, projections, and openings) in the front facade of a building shall be visually compatible with contributing resources in the district.
5. The relationship of the new construction to open space between it and adjoining buildings shall be visually compatible with contributing resources in the district.
6. The relationship of the entrance and porch projections, and balconies to sidewalks of the new construction shall be visually compatible with contributing resources in the district.
7. The relationship of the materials and texture of the facade of the new construction shall be visually compatible with the predominant materials used in contributing resources in the district.
8. The roof shape of the new construction shall be visually compatible with contributing resources in the district.
9. Appurtenances of the new construction such as walls, gates and fences, vegetation and landscape features, shall, if necessary, form cohesive walls of enclosures along a street, to ensure visual compatibility of the new construction with contributing resources in the district.

(continued next page)



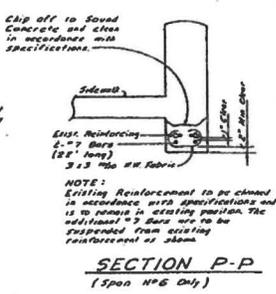
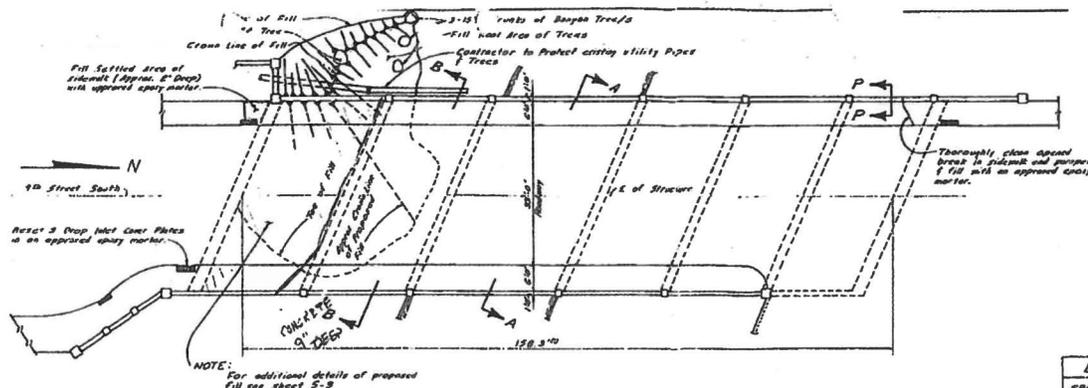
# CERTIFICATE OF APPROPRIATENESS

## CHECKLIST, NEW CONSTRUCTION

8. The mass of the new construction in relation to open spaces, the windows, door openings, porches and balconies shall be visually compatible with contributing resources in the district.
9. The new construction shall be visually compatible with contributing resources in the district in its orientation, flow, and directional character, whether this is the vertical, horizontal, or static character.
10. New construction shall not destroy historic materials that characterize the local landmark or contributing property to a local landmark district. The new construction shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the local landmark and its environment, or the local landmark district.
11. New construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the local landmark and its environment would be unimpaired.



Figure 1: General Location Map of the Proposed Project

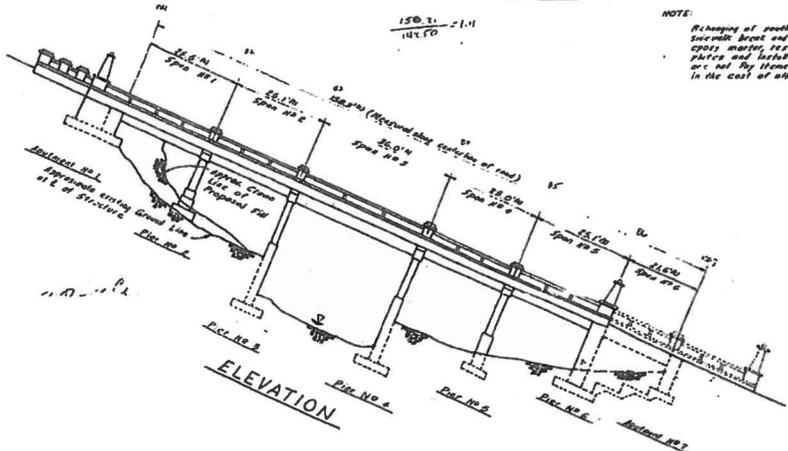


**ESTIMATED REPAIR QUANTITIES**

SPALL REPAIR:	
<b>SUPERSTRUCTURE:</b>	
SPAN #1	--- 48 C.F.
SPAN #2	--- 76
SPAN #3	--- 108
SPAN #4	--- 65
SPAN #5	--- 55
SPAN #6	--- 27
<b>SUBSTRUCTURE:</b>	
ABUT #1	--- 7 C.F.
PIER #2	--- 8
PIER #3	--- 34
PIER #4	--- 32
PIER #5	--- 8
PIER #6	--- 8
ABUT #7	---
<b>TOTAL SPALL REPAIR</b>	<b>--- 466 C.F.</b>
<b>CAST IN PLACE CONCRETE:</b>	
PIER #2	--- 5 C.Y.
<b>EMBANKMENT:</b>	
3 M. CORNER	--- 200 C.Y.

**PLAN**

NOTE: Relocating of south pipe support, removing sidewalk break and settled areas with epoxy mortar, resetting utility curves, plates and installing reinforcing steel are not to be done, but shall be included in the cost of other bid items.



**ELEVATION**

NOTE: Refer this sheet with sheet 2 of 2.

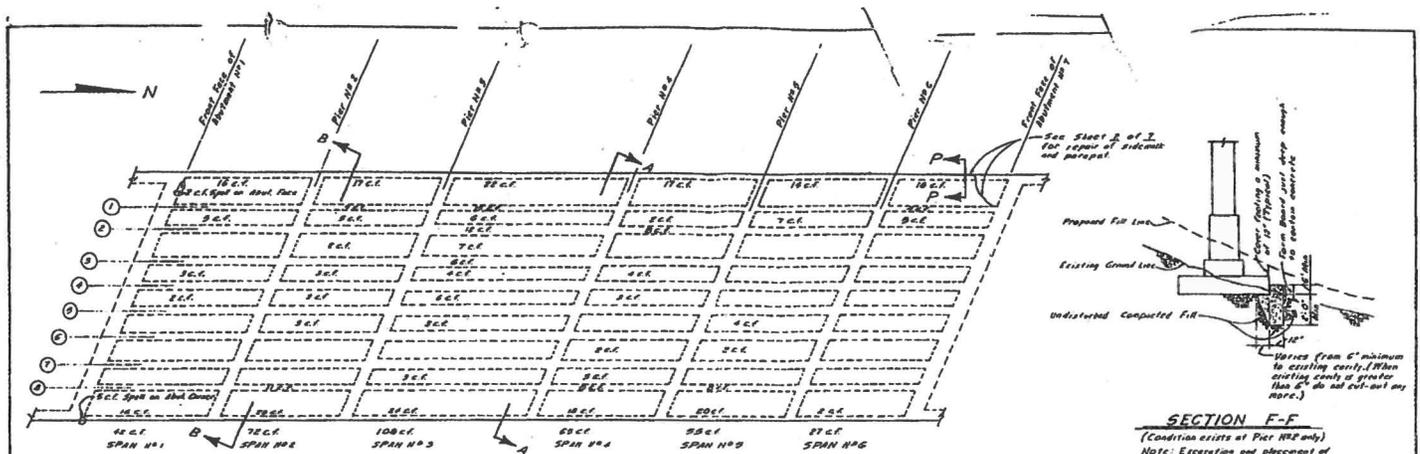
DWG. NO. 9095-2

Number	Description	By	Date
1	PREPARED	JAN. 21, 1977	
2	REVISED	JAN. 21, 1977	
3	REVISED	JAN. 21, 1977	
4	REVISED	JAN. 21, 1977	
5	REVISED	JAN. 21, 1977	
6	REVISED	JAN. 21, 1977	
7	REVISED	JAN. 21, 1977	
8	REVISED	JAN. 21, 1977	
9	REVISED	JAN. 21, 1977	
10	REVISED	JAN. 21, 1977	

**dlouhy & associates, inc.**  
CONSULTING ENGINEERS

PROJECT NO. 110000

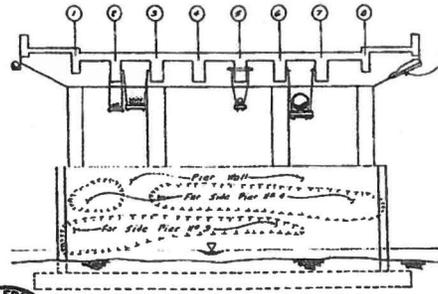
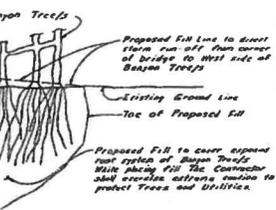




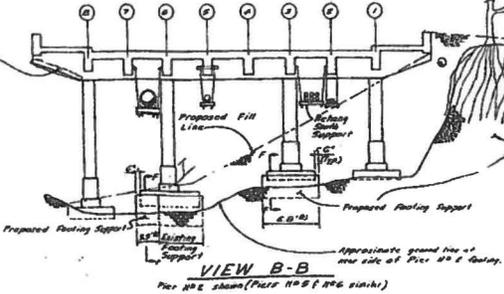
**DECK FRAMING PLAN**

Showing Estimated Quantities required to repair spalled areas underneath Bridge Deck

**SECTION F-F**  
(Condition exists at Pier #1P only)  
Note: Excavation and placement of new concrete shall occur on the same day.



**VIEW A-A**  
Pier #4 A shown (Pier #4B similar)



**VIEW B-B**  
Pier #4 C shown (Pier #4B & 4D similar)

NOTE: Work this sheet with sheet 2 of 2.



NO.	DESCRIPTION	DATE	BY
1	PREPARED	11/23/08	ML
2	REVISION	11/23/08	ML

DWG. NO. 0373-3

NINTH STREET SOUTH  
OVER BOOKER CREEK  
CITY OF ST. PETERSBURG, FLORIDA  
FDOT BRIDGE NO. 157U7

PROJECT NO. E30600

dlouhy & associates, inc.  
CONSULTING ENGINEERS

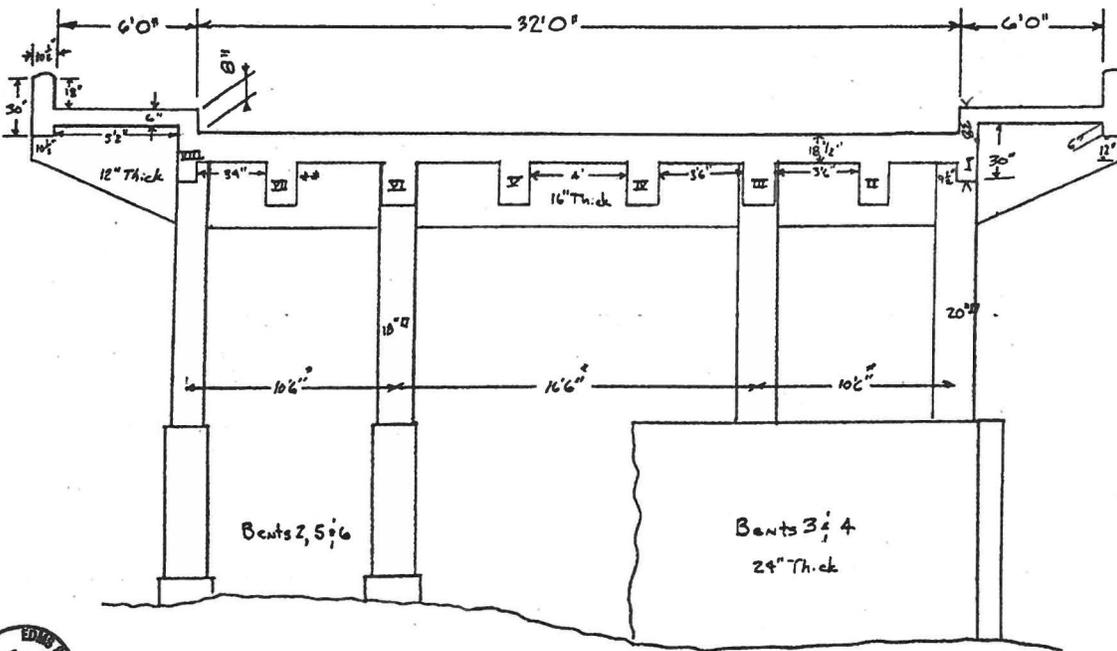
S-3

**KISINGER CAMPO & ASSOCIATES**  
**ENGINEERS & LAND SURVEYORS**  
**TAMPA, FLORIDA**

Bridge No. 157117

City of St. Petersburg

Date: 5/17/85



\* Diagonal Dimension  
 \*\* Depth of Beams Vary see table below

Beam No.	I	II	III	IV	V	VI	VII	VIII		I	II	III	IV	V	VI	VII	VIII
Span 1	14 1/2"	16"	16"	16"	24"	21"	21"	27"	Span 3	14"	24"	24"	27"	34"	34"	33"	10 1/2"
Span 2	14 1/2"	16"	16"	16"	18"	21"	21"	11"	Span 5	14"	16"	16"	16"	24"	21"	21"	9"







Existing Bridge Looking West



Existing Bridge Looking North



Existing Bridge Looking South



Existing Bridge Looking Southwest



Proposed Bridge Looking West



Proposed Bridge Looking North



Proposed Bridge Looking South



Proposed Bridge Looking Southwest

Written description explaining how the proposed work complies with the following evaluation criteria:

1. The height and scale of the proposed new construction shall be visually compatible with contributing resources in the district.  
**The reconstructed roadway will be the same elevation as the existing roadway**
2. The relationship of the width of the new construction to the height of the front elevation shall be visually compatible with contributing resources in the district.  
**The existing structure is 45.75' the new structure will be 72' wide however the structures will be the same elevation. The new structure will follow the City of St. Petersburg's complete street policy and can facilitate roadway configuration changes.**
3. The relationship of the width of the windows to the height of the windows in the new construction shall be visually compatible with contributing resources in the district.  
**Not applicable since the structure is a bridge.**
4. The relationship of solids and voids (which is the pattern or rhythm created by wall recesses, projections, and openings) in the front facade of a building shall be visually compatible with contributing resources in the district.  
**Not applicable since the structure is a bridge.**
5. The relationship of the new construction to open space between it and adjoining buildings shall be visually compatible with contributing resources in the district.  
**The existing structure has approximately 144.45' of open space between the piers. The new structure has approximately 75' of clear space between the Mechanically Stabilized Earth (MSE) wall.**
6. The relationship of the entrance and porch projections, and balconies to sidewalks of the new construction shall be visually compatible with contributing resources in the district.  
**Not applicable since the structure is a bridge.**
7. The relationship of the materials and texture of the facade of the new construction shall be visually compatible with the predominant materials used in contributing resources in the district.  
**The new structure walls will have rusticated blocks panel texture to match the existing upland Roser Park retaining walls along the street and Campbell Park aesthetics**
8. The roof shape of the new construction shall be visually compatible with contributing resources in the district.  
**Not applicable since the structure is a bridge.**

9. Appurtenances of the new construction such as walls, gates and fences, vegetation and landscape features, shall, if necessary, form cohesive walls of enclosures along a street, to ensure visual compatibility of the new construction with contributing resources in the district.  
**The City of St. Petersburg style railing, rusticated block wall, pilaster/pedestals, and decorative lighting will complement the adjacent neighborhood's streetscaping.**
  
10. The mass of the new construction in relation to open spaces, the windows, door openings, porches and balconies shall be visually compatible with contributing resources in the district.  
**Not applicable since the structure is a bridge.**
  
11. The new construction shall be visually compatible with contributing resources in the district in its orientation, flow, and directional character, whether this is the vertical, horizontal, or static character.  
**The City of St. Petersburg style railing, pilaster/pedestals, and decorative lighting will complement the existing neighborhoods.**
  
12. New construction shall not destroy historic materials that characterize the local landmark or contributing property to a local landmark district. The new construction shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the local landmark and its environment, or the local landmark district.  
**Historical features like the short wall west of the project's sidewalk shall be preserved.**
  
13. New construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the local landmark and its environment would be unimpaired.  
**Not applicable since the structure is a bridge.**

#### PROJECT INTRODUCTION AND BACKGROUND INFORMATION

The FDOT is evaluating the rehabilitation or replacement of the existing bridge over Booker Creek (FDOT Bridge No. 157117) with a new bridge (FDOT Bridge No. 157269) since the bridge is structurally deficient. The existing bridge is a 163-foot long, six-span, concrete tee beam bridge that was constructed in 1914. The roadway is off-system and the project is within the urban area boundary for Pinellas County. Although this is an off-system bridge, federal funding will be applied to this project. The project included the evaluation of the existing structurally deficient bridge to retrofit the existing or construct a new bridge. Rehabilitation would restore the existing deteriorated condition and scour critical foundations while maintaining the existing lane configuration. Construction of a new bridge would provide three lanes, two bike lanes, two shoulders, and two sidewalks; and construction of

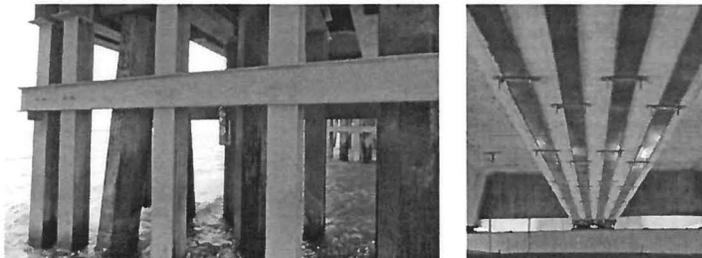
**new retaining walls. All improvements will be within existing right of way (ROW) and will support the City of St. Petersburg's future lane configuration modifications.**

**The previously recorded Dr. Martin Luther King Jr. St. (9<sup>th</sup> Street)/Booker Creek Bridge/FDOT Bridge No. 157117 (8PI8746) was not included as a contributing resource to the National Register-listed Roser Park Historic District (8PI6915) at the time of designation in 1998 (Bureau of Historic Preservation 1998). However, the MLK St. (9th Street)/Booker Creek Bridge (8PI8746) was considered as a contributing resource within the local Roser Park Historic District. The local Roser Park Historic District was listed by the City of St. Petersburg Planning Department as a local landmark site on February 17, 1987. The MLK St. (9th Street)/Booker Creek Bridge (8PI8746) is considered National Register-eligible as a contributing resource to the National Register-listed Roser Park Historic District (8PI6915) under Criterion A in the areas of Transportation and Community Planning and Development as it is an unaltered historic bridge built in the same era as the neighborhood and continues to maintain its historic physical integrity.**

#### **NEW CONSTRUCTION JUSTIFICATION**

**For the Dr. Martin Luther King Jr. St. Bridge #157117 the design options include 1) rehabilitation or 2) replacement. While rehabilitation is possible, it would reduce the aesthetics qualities of the structure and the neighboring Roser Park Historic District and Campbell Park. The rehabilitation option reduces the bridge's aesthetics due to the structurally required crutch bents (left image) and Carbon Fiber Reinforced Plastic (CFRP) fiber patching (right Image).**

**The rehabilitation option would have a service life of up to only 20-years which requires a full bridge**



**replacement in less than 20 years. The rehabilitation option would only delay the inevitable bridge replacement which will expose the Roser Park and Campbell Park neighborhoods to two bridge construction projects in less than 20 years. In comparison, a modern bridge replacement would have a service life of 100-years. Additionally, because of the shorter service life, the cost of rehabilitation (\$1.7M) would be in addition to the cost of a future bridge replacement (\$2.5M) in under 20 years, making the rehabilitation option \$2.85 million (rehab cost + inflation of the replacement costs at 3% inflation over 20 years) more expensive than the bridge replacement option. From these details, we believe the bridge replacement would preserve the historic aesthetic quality as it has been designed to replicate elements of the existing structure (Refer to images of proposed structure), reduce community construction impacts, and reduce the overall cost to local, state, and federal governments.**

# Appendix B:

March 28, 2019 Inwood Consulting Engineers Stakeholder  
Meeting Summary

## Stakeholder Meeting Summary

LOCATION: Poynter Institute  
801 3<sup>rd</sup> Street South  
St. Petersburg, Florida 33701  
March 28, 2019  
6:00 pm – 8:00 pm

The meeting was held at The Poynter Institute located at the address listed above. Upon entry, attendees were asked to sign in and provided with a comment form (see attached sign-in sheet). The meeting started with introductions and the presentation began at 6:15 PM (see attached for presentation and display boards). The presentation was followed by an informal Question and Answer (Q&A) session, which has been summarized below.

Q: Kai: Why isn't the home at 901 7<sup>th</sup> Street eligible?

A: The resource doesn't meet the criteria for the National Register of Historic Places (NRHP) or have the context of integrity intact.

A: Ken and SHPO mentioned the standing structure would be reevaluated and the results shared with the group.

A: Alyssa (SHPO) mentioned there can be an owner objection to not have the property included in the historic district.

A: Alyssa mentioned changes in the façade and additions to the building likely occurred.

Q: Terry Smith asked about the commercial property 701 MLK Street.

A: it was reiterated that this structure was ineligible.

\*It was noted the bridge was initially in local historic district but not national, this has since changed.

\*It was noted that Roser Park is contributing to the NRHP historic district boundaries.

Laura: Legal descriptions of local boundaries in 1988, created the new map and match the definition of the boundary as discussed in the ordinance and that the local historic district includes the bridge.

\*It was noted that the Roser Park Future Neighborhood Plan is consistent with the project.

\*It was mentioned that an archaeological survey was conducted for the impact/construction limits and the Area of Potential Affect (APE) for historic resources covered a larger area.

Q: Kai asked what archaeological tests were done to determine "no findings".

A: Ken explained that dig tests were performed within the right of way by professional archaeologists.

\*Maintenance of Traffic (MOT) was discussed; it was mentioned the bridge would not be completely shut down due to and during construction activities.

Q: Is there potential to fast track the bridge replacement due to safety concerns?

A: Craig explained that construction will take longer due to the city's request for the bridge to remain partially open during construction. The replacement would take place in two phases (essentially one side and then the other) and has an approximate two-year construction schedule.

A: Juan explained that the bridge just became eligible for replacement and that the 1988 retrofit stabilized the structure and that it is not an immediate threat to safety.

1980

1988

Q: Alyssa: Can trucks be re-routed away from the bridge in the meantime before construction to lessen the wear and tear?

A: This is likely not possible; no other viable options.

A: The bridge is posted for weight restrictions.

Q: The current railings don't seem safe. A child could fall over or fall through the gap in the railings.

A: The railings are substandard; the city would need to address any temporary safety measures on the existing bridge.

Q: Ken: Is there opposition to replacement?

A: No one objected

- General response- the replacement must have an appropriate design and historic look.
- Ken noted that the Memorandum of Agreement (MOA) would cover the design elements and mitigation measures to be employed.
- Alyssa (SHPO) mentioned mitigation measures should be meaningful to the community. Drone videos, makers, photos etc. as a way to remember and document the bridge.

Q: For Alyssa: Because the bridge qualifies for historic preservation, are there specific policies regarding reconstruction?

A: The SHPO doesn't have a say once it's determined the bridge will be replaced.

\*The City of St. Petersburg explained the Certificate of Appropriateness (COA) process, and the public hearings required. It was noted that 2 COA's are needed; one for demolition of the bridge and one for the new construction of the bridge.

Q: If the bridge is replaced and considered a two way, does the 8<sup>th</sup> Street Bridge could be removed?

A: Laura (City): The bridge is the "entrance" to the historic district. The COA will evaluate existing conditions, if repair is possible, and the new construction that is being proposed.

A: Craig: the bridge will be replaced with the same existing typical section (3-lane). There will be additional shoulders (8 ft wide), sidewalks (10ft wide) with 11 ft travel lanes. The city will have the option to expand to 4-lanes if desired, but that is not currently what FDOT has planned. It was also noted that this project was only eligible for an in-kind experiment.

Q: Explain the notification process for this meeting.

A: The FDOT notified all parties that attended the June 2018 meeting; notices on social media; notices to the Roser Park and Campbell Park neighborhood associations.

Q: How much bigger will the proposed bridge be compared to the existing bridge?

A: Craig: The proposed bridge will be approximately 36 additional feet in width.

\*It was noted that the survey results showed more ROW than expected.

\*The County did a bridge survey in 2018. It was mentioned this is the oldest remaining bridge in Pinellas County.

Q: The current bridge has “character defining” lighting, is it possible to save them and use them on the new bridge, or to try to replace them with similar lighting options?

A: FDOT: we will look into more aesthetic lighting options.

A: Craig explained that federal funding only allows FDOT to replace at existing conditions.

\*It was noted the brick streets will not be impacted

Q: Will city fund aesthetic enhancements?

A: Local funds can be used for this.

A: City funds have already been added to widen the bridge so that the city has room to widen to 4-lanes, if desired.

- The plan view and typical section were reviewed in greater detail. Craig Fox mentioned he would send these graphics, the display boards and the presentation, to all attendees.

Q: Has there been any feedback on the substructure? The MSE walls don't seem to fit the character of the neighborhood

A: The cost of converting the MSE walls to piles would be a substantial cost and the city would have to fund this.

- Action: Craig noted a ballpark estimate could be provided.
- Residents noted that there was illegal activity occurring under the bridge and this design may help with these issues.
- It was noted there is no existing view from the Campbell Park side.
- It was noted that a façade may be used on the substructure.

Q: How high are the sidewalks?

A: 6 Inches high and separated by an 8' wide shoulder.

\*Craig noted trees would not be removed-some may be trimmed (referring to the lack of trees displayed in the meeting graphic).

Q: Has funding been decided?

A: Federal funding has been decided. Any additional funding would have to come from the city (of St. Petersburg).

Q: Can the timeline for replacement be accelerated?

A: The schedule is currently being accelerated; the anticipated end of design is currently June

2022

—2020



# Meeting Summary

3000 Dovera Drive, Suite 200, Oviedo, FL 32765 | P: 407-971-8850 | F: 407-971-8955 | [www.inwoodinc.com](http://www.inwoodinc.com)

Q: What is the timeline for the COA?

A: Could take upwards of two months and the COAs can be combined. The COA decision can be appealed to the city council

\*It was decided a presentation to the council may be appropriate.

The meeting concluded shortly after 8 PM.

## **Attachments**

Presentation

Display Boards

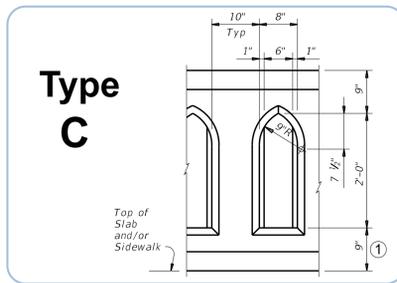
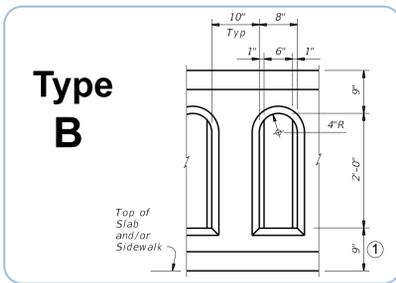
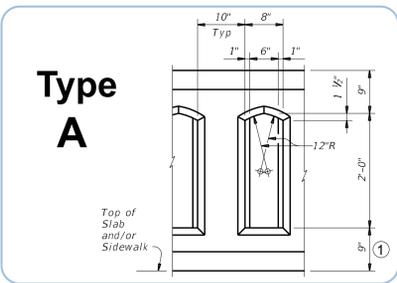
Sign-in sheets



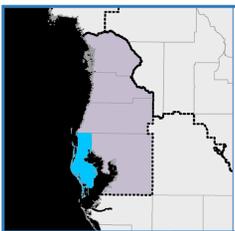
**Existing Bridge**

**Proposed Bridge  
Alternative Railing  
Window Types**

① Increase 2" for structures with overlay.

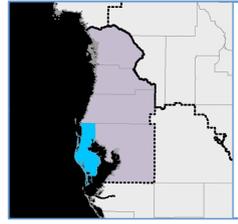
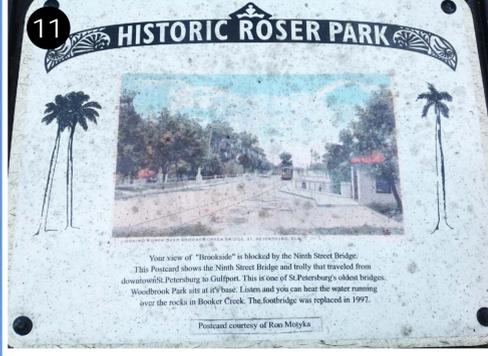
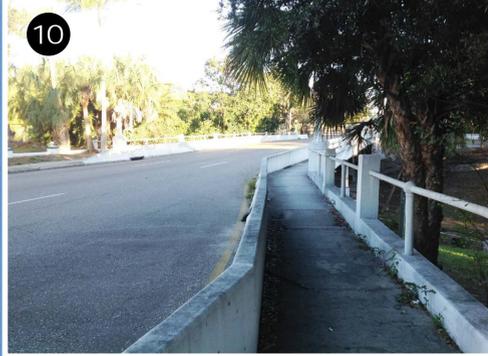


**Proposed Bridge**



**Bridge Replacement Design Project  
(Bridge No. 157117)**  
9th St. S. (MLK Jr. St. S.) From 6th Ave. S. To 7th Ave. S.  
Pinellas County, Florida  
Financial Project ID: 430501-1-32-01  
Federal Project No: D717-027-B

**Proposed Bridge  
Rendering and Details**



**Bridge Replacement Design Project  
(Bridge No. 157117)**  
 9th St. S. (MLK Jr. St. S.) From 6th Ave. S. To 7th Ave. S.  
 Pinellas County, Florida  
 Financial Project ID: 430501-1-32-01  
 Federal Project No: D717-027-B



0 50 100  
 Feet  
 1 in = 50 ft

**Legend**

- PARK BOUNDARY
- NATIONAL REGISTER HISTORIC DISTRICT
- ROSER PARK HISTORIC DISTRICT
- FLOWLINE



# **9th Street South (Dr. Martin Luther King Jr. Street South) Bridge Replacement (Bridge No. 157117) Design Project**



**Pinellas County, Florida**

**FPID: 430501-1-32-01**

**FAP No.: D717-027-B**



## **Cultural Resource Committee Meeting #2**

**March 28, 2019**

# Project Details



## AGENDA

- Project Details – Craig Fox and Jesse Blouin
- Project Need – Juan Valenzuela
- Overall Project Approach – Craig Fox
- Community Involvement and Input – Jesse Blouin
- Bridge Alternatives – Juan Valenzuela
- Section 106 Process and CRAS – Ken Hardin
- Historic and Archeological Resources – Ken Hardin
- Roser Park Neighborhood – Ken Hardin
- Project Schedule – Craig Fox

# Project Details



- Project limits
  - From 6th Avenue South to 7th Avenue South
  - One-way facility
- City of St. Petersburg
- Pinellas County
  - Within County urban area boundary
- Urban general minor arterial
- Off system
- Booker Creek Watershed
- Roser Park Historic District National Register of Historic Places (NRHP) - listed and locally designated



# Project Need

- Structural issues
  - Posted weight restrictions
  - Foundation susceptible to settlement
  - Scour susceptible
  - Superstructure is structurally deficient – Poor Superstructure Rating
  - No shoulders – functionally obsolete



# Project Need - Existing Bridge



- Original construction – 1914
- Bridge determined by State Historic Preservation Officer (SHPO) to be eligible for the NRHP as a contributing resource to the Roser Park Historic District
- Sufficiency rating – 49.5
- Superstructure rating – 4 (poor)
- Load Rating – 0.29
- Scour - critical
- Vertical clearance – meets min. 2-ft drift clearance
- Horizontal clearance – 33'-10" min.



# Overall Project Approach



 Denotes Activity in Progress

# Community Involvement



- Community Concerns

- Preservation of the City of St. Petersburg's historic resources
- Aesthetics
- Bicycle and pedestrian safety
- Maintenance of traffic during construction
- Noise and vibrations during construction



# Community Input



- Coordinate with local government
  - Ongoing throughout project duration
- Meet with stakeholder groups
  - Last meeting held on June 26, 2018



# Bridge Alternatives - No Build



## A “No Build” Alternative Poses Multiple Safety Concerns

- Low load rating = 0.29 where a passing load rating is 1.0
- Listed as unstable and scour critical in latest Bridge Inspection Report due to spread footing foundations
- Functional obsolescence due to not having shoulders adjacent to travel lanes with a barrier separating the sidewalk and without bike lanes
- Age is over 100 years
- Sufficiency Rating = 0.49 where anything below 0.50 becomes eligible for replacement

## A Rehabilitation Alternative is Temporary and Cost Prohibitive

- Strengthening measures are required to improve the load rating and stabilize the foundation
- The superstructure can be strengthened via Carbon Fiber Reinforced Polymer (Requires intermediate pile bent supports in each span)
- The foundations can be stabilized with micro-piles/deep foundations (Requires driving piles through all existing spread footings)
- This is all low head room work that will require special equipment and has a limited life span which will ultimately require replacement within 20 years
- Cost = \$4.25 Million (Bridge Only - excludes roadway/drainage/lighting, etc.)

# Bridge Alternatives – Reconstruction



Replacement of existing bridge addresses many concerns

- Improves roadway approach to match bridge
- Maintains access to all side streets
- Provides bicycle and pedestrian accommodations
- Provides a new structure with a 100 year service life
- Provides Aesthetic Railing and Lighting
- Cost = \$1.4 Million (Bridge Only - excludes roadway/drainage/lighting, etc.)



# Bridge Alternatives – Reconstruction

- Existing View from Roser Park



# Bridge Alternatives – Reconstruction



- Proposed Rendered view from Roser Park (Existing trees – preserved)



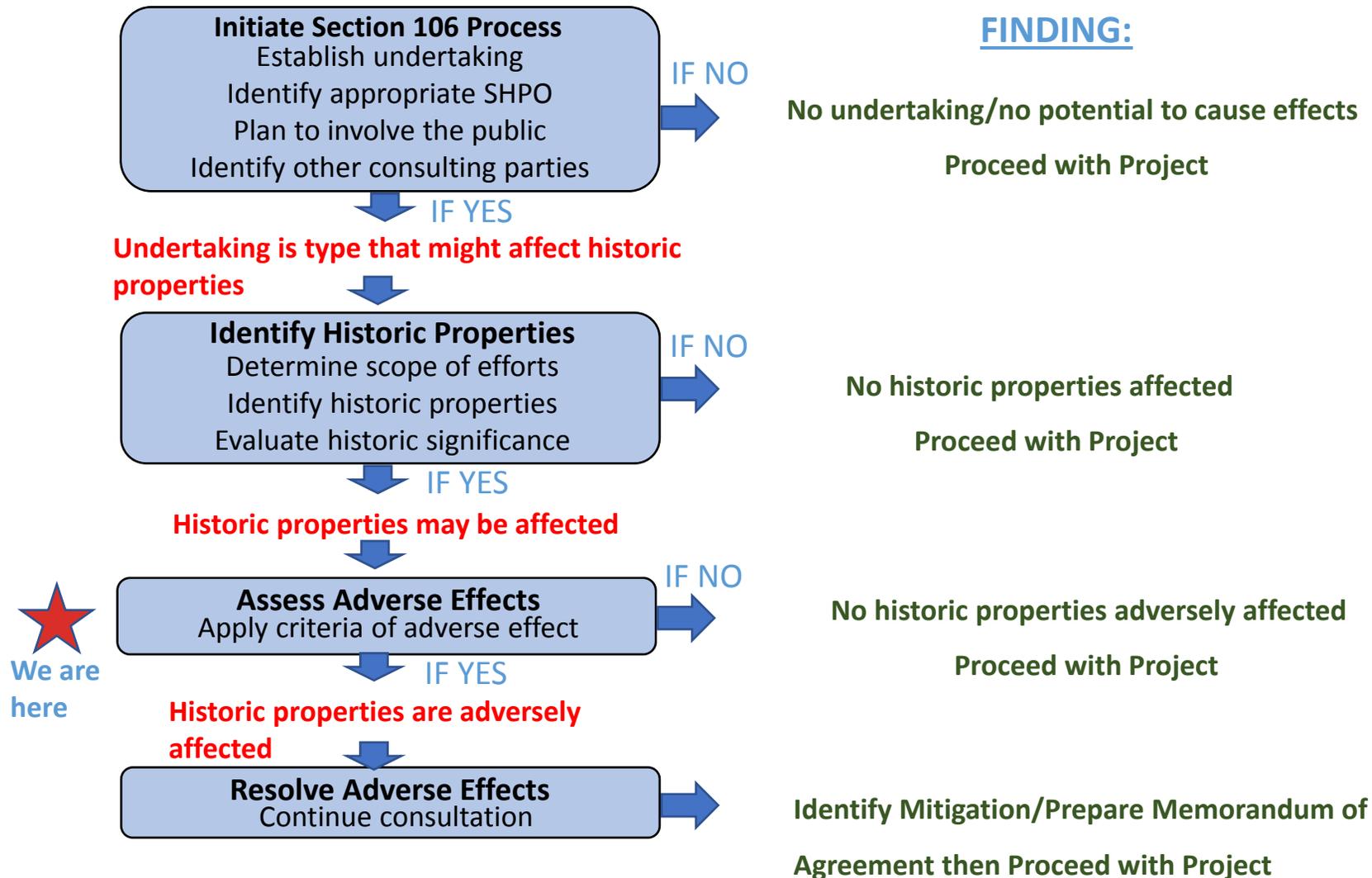
# Bridge Alternatives – Reconstruction



- Close up and samples



# Section 106 Process



# Section 106 Related Documentation



- Cultural Resources Assessment Survey (CRAS) - **completed**
- Determination of Eligibility for Significant Properties - **completed**
- Section 106 Determination of Effects documentation - **in process**
- Continued consultation - **in process**
- Development of mitigation measures - **as applicable**
- Preparation of Memorandum of Agreement - **as applicable**

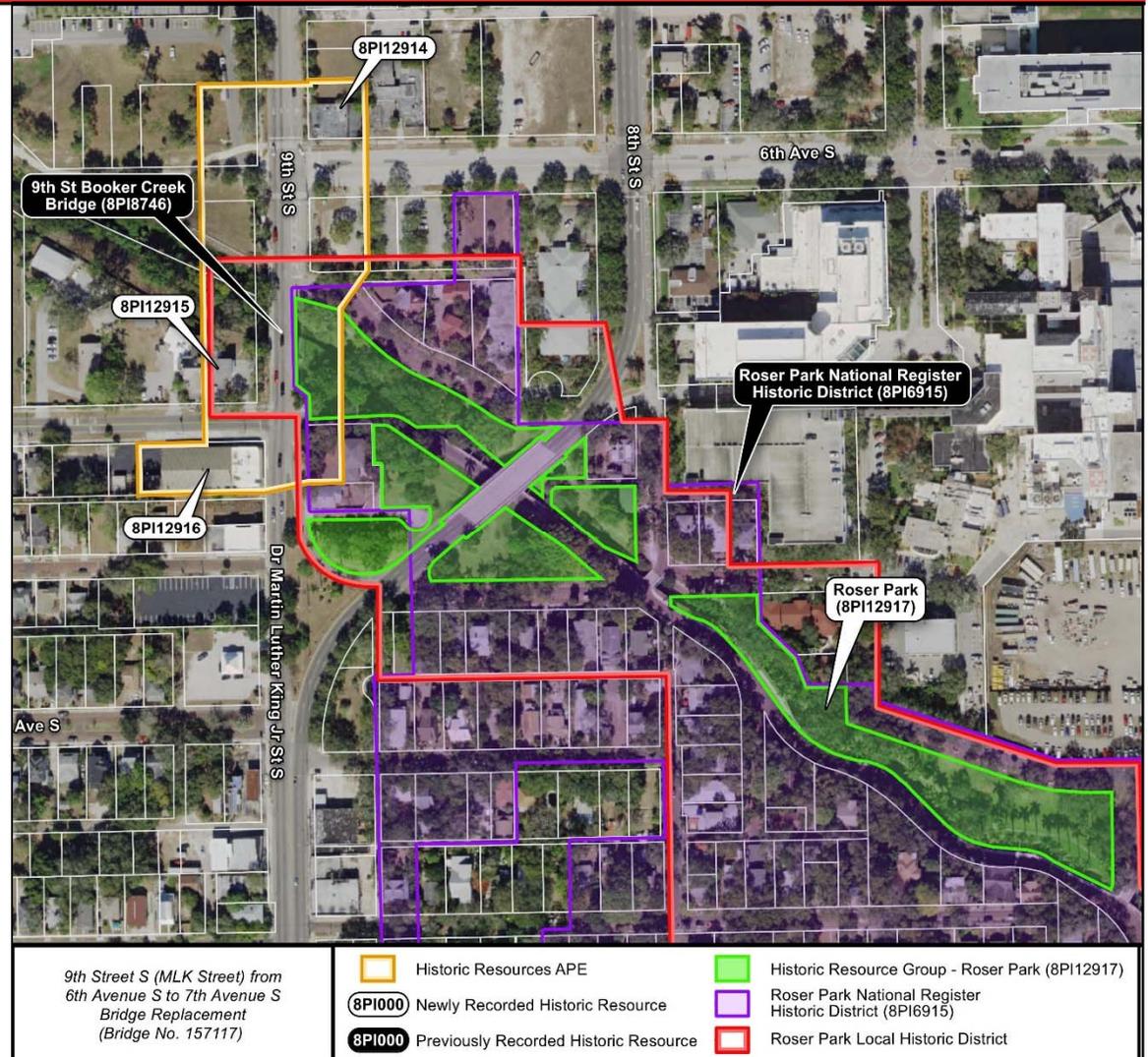
# Cultural Resources Assessment Survey

Fieldwork completed March 2018

Results include six historic resources within project area:

- Two previously recorded
- Four newly recorded

SHPO concurred with Cultural Resources Assessment Survey (CRAS) findings in February 2019



# Previously Recorded Historic Resources



- 8PI08746 - 9th Street Booker Creek Bridge
  - Built 1914
  - 1989 original survey-FDOT Bridge No. 157117
  - 1987 contributing to Local Historic District
  - 1998 bridge was not included in National Register of Historic Places (NRHP) district boundaries as a contributing resource
  - 2019 bridge determined contributing to NRHP historic district boundaries



- 8PI06915 - Roser Park Historic District
  - 1987 Local Historic District
  - 1998 NRHP Listed

# Newly Recorded Historic Resources

8PI12914



- 8PI12914 - 556 MLK Street South
  - Constructed circa 1955
  - Determined Ineligible for the NRHP

8PI12915



- 8PI12915 - 901 7th Avenue South
  - Constructed circa 1906
  - Determined Ineligible for the NRHP

# Newly Recorded Historic Resources



- 8PI12916 - Tropicana Automotive at 701 MLK Street South

- Constructed circa 1949
- Determined Ineligible for the NRHP



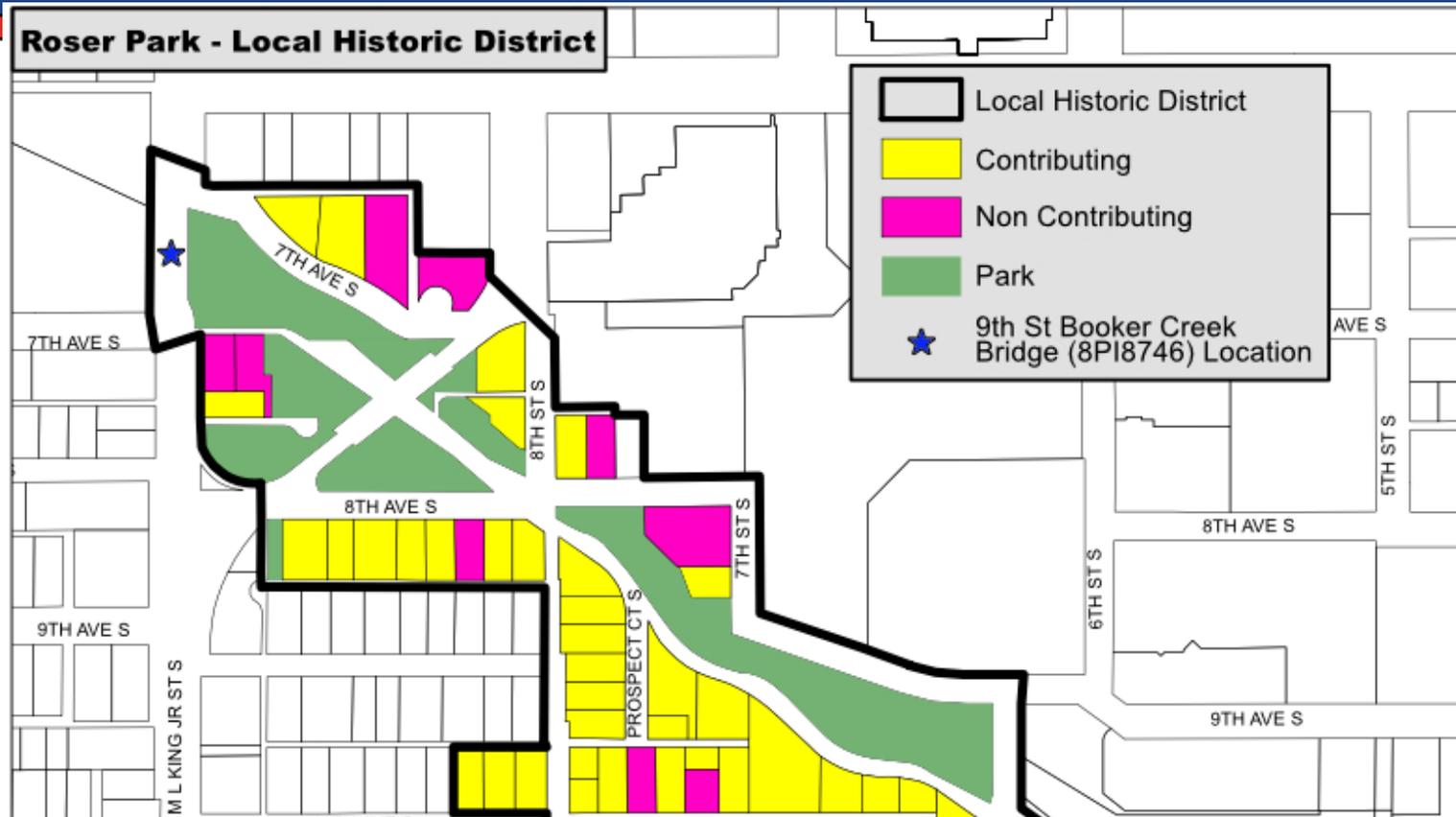
- 8PI12917- Roser Park

- Constructed circa 1914
- 1987 contributing to Local Historic District
- 1998 Park was not included in NRHP listed historic district as a contributing resource
- 2019 SHPO determined Park contributing to NRHP historic district boundaries

# Archaeological Resources

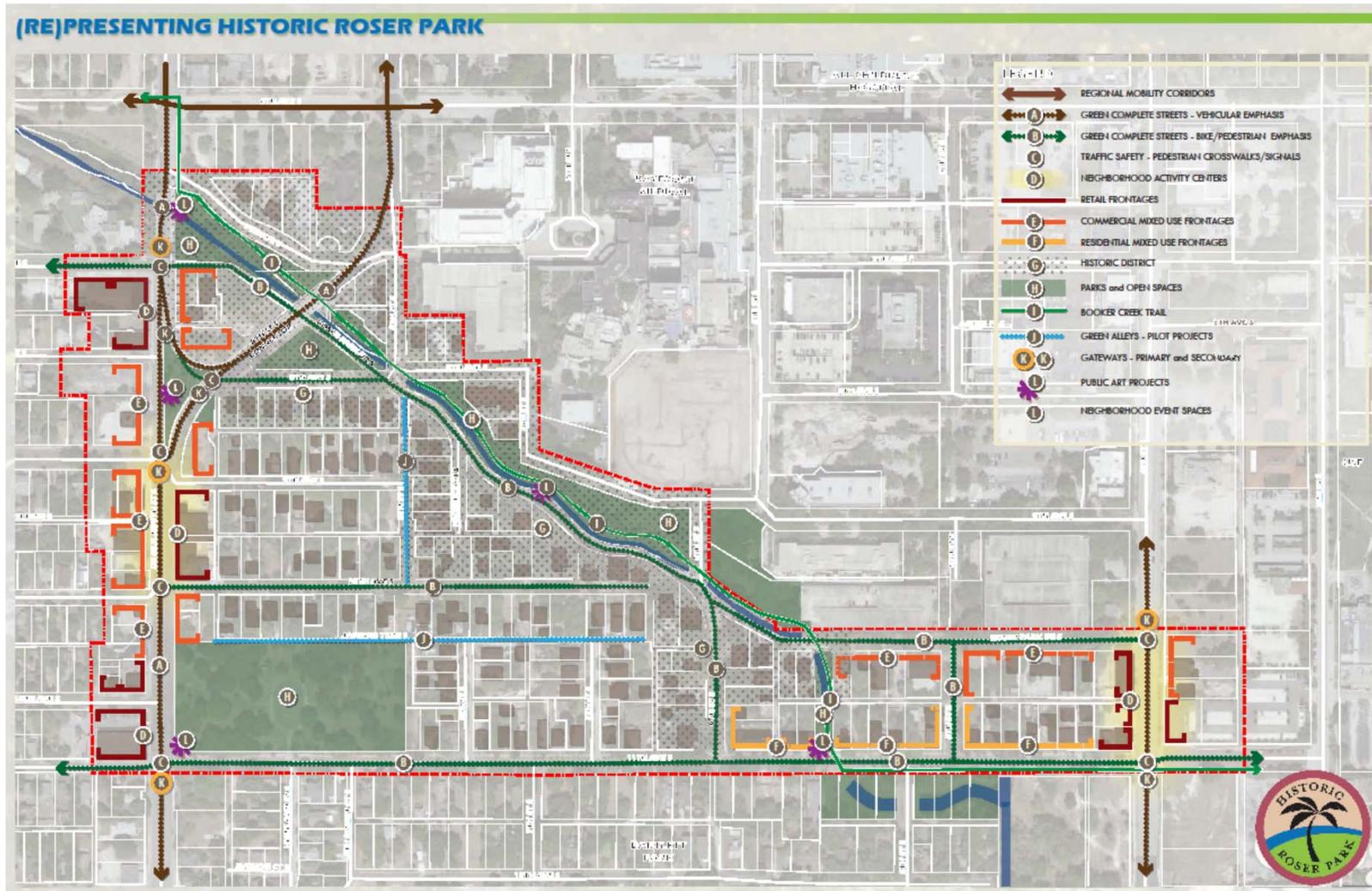
- Archaeological testing successfully conducted, no evidence of previously recorded sites found
- One archaeological occurrence identified consisting of historic artifacts mixed with construction materials, which does not constitute an archaeological site

# Locally Designated Roser Park Historic District City of St. Petersburg Boundary

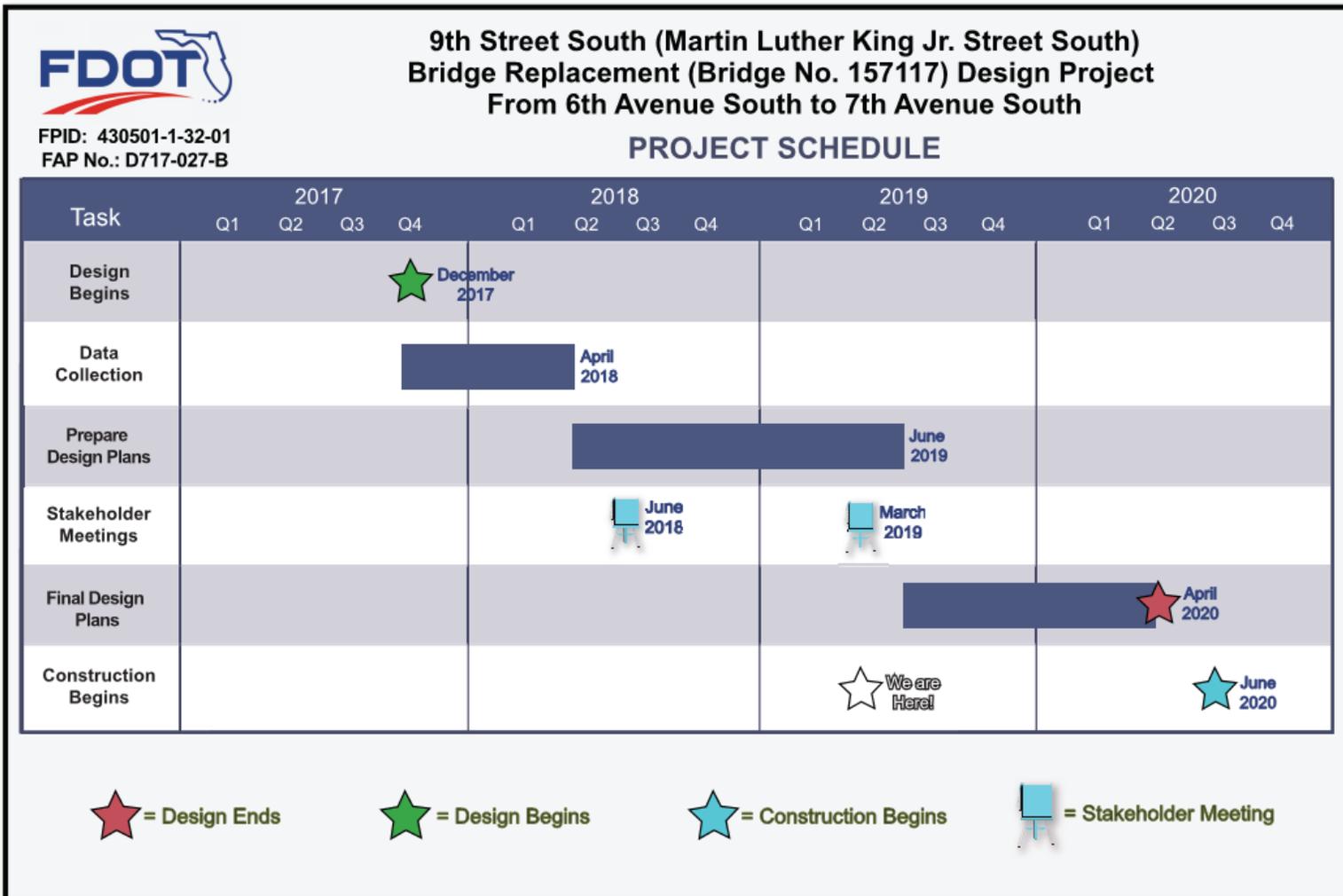


# Roser Park Future Neighborhood Plan

## (Last Update - 2013)



# Project Schedule



# Contact Information



## **Craig Fox, P.E.**

FDOT Project Manager  
11201 N. Malcolm McKinley Drive  
Tampa, Florida 33612-6403  
813-975-6082  
[craig.fox@dot.state.fl.us](mailto:craig.fox@dot.state.fl.us)

## **Juan Valenzuela, P.E.**

Consultant Project Manager  
Florida Bridge and  
Transportation, Inc.  
633 Dartmouth Street  
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**9th Street South  
(Dr. Martin Luther King Jr. Street South)  
Bridge Replacement (Bridge No. 157117) Design Project**

Pinellas County, Florida

FPID: 430501-1-32-01 FAP No.: D717-027-B

**Questions?**



**9<sup>th</sup> Street South (MLK Jr. Street South)**  
**Bridge Replacement Design Project**  
**from 6<sup>th</sup> Avenue South to 7<sup>th</sup> Avenue South**

Stakeholder Meeting

March 28, 2019

FPID: 430501-1-32-01

Name	Organization	E-Mail	In Attendance
Lauren Seaman <sup>Waldrop</sup>	Janus Research	lauren_seaman@janus-research.com	LW
Jessica Ballock	Inwood	jballock@inwoodinc.com	
Jesse Blouin	Inwood	jblouin@inwoodinc.com	
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Rebecca Spain-Schwarz	Atkins	rebecca.spain-schwarz@atkinsglobal.com	RSS
Tom Scofield	Pinellas County	tscofield@pinellascountys.org	TS
Tracey Smith	City of St. Pete / The Greenhouse	tracey.smith@stpete.org	TA
Danielle White	Janus	danielle.white@janus-research.com	DW
Evan Birk	Co SP	evan.birk@stpete.org	
Jennifer Carothers	HRPNA	jennecarothers1@gmail.com	JC
Crystal Griger	FDOT	crystal.griger@dot.state.fl.us	CG



FPID: 430501-1-32-01

**9<sup>th</sup> Street South (MLK Jr. Street South)**  
**Bridge Replacement Design Project**  
**from 6<sup>th</sup> Avenue South to 7<sup>th</sup> Avenue South**

**Stakeholder Meeting**

**March 28, 2019**

Name	Organization	E-Mail	In Attendance
Derek Kilborn	City of St. Petersburg	derek.kilborn@stpete.org	DK
Elizabeth Abernethy	City of St. Petersburg	Elizabeth.abernethy@stpete.org	
Robert Gerdes	City of St. Petersburg	Robert.gerdes@stpete.org	RB
Susan Ajoc	City of St. Petersburg	susan.ajoc@stpete.org	SJA
Claude Tankersley	City of St. Petersburg	claudetankersley@stpete.org	
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Laura Duvekot	City of St. Petersburg	laura.duvekot@stpete.org	LD



FPID: 430501-1-32-01

**9<sup>th</sup> Street South (MLK Jr. Street South)**  
**Bridge Replacement Design Project**  
**from 6<sup>th</sup> Avenue South to 7<sup>th</sup> Avenue South**

Stakeholder Meeting

March 28, 2019

Name	Organization	E-Mail	In Attendance
Timothy Parsons	DOS	timothy.parsons@dos.myflorida.com	
Alyssa McManus	DOS	alyssa.mcmanus@dos.myflorida.com	AMM
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Sarah Liko	DOS	sarah.liko@dos.myflorida.com	
Jason Aldridge	DOS	Jason.aldrige@dos.myflorida.com	
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Rahim Harji	Pinellas County	rharji@pinellascounty.org	
Renea Vincent	Pinellas County	rvincent@pinellascounty.org	
Wayne Atherholt	City of St. Petersburg	wayne.atherholt@stpete.org	
Kevin King	City of St. Petersburg	kevin.king@stpete.org	
Nikki Gaskin-Capehart	City of St. Petersburg	nikki.capehart@stpete.org	

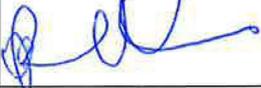


FPID: 430501-1-32-01

**9<sup>th</sup> Street South (MLK Jr. Street South)**  
**Bridge Replacement Design Project**  
**from 6<sup>th</sup> Avenue South to 7<sup>th</sup> Avenue South**

**Stakeholder Meeting**

**March 28, 2019**

Name	Organization	E-Mail	In Attendance
Matt Nigro	HRPNA	mattngr@aol.com	
Deb Camfferman	HRPNA	camffdeb@gmail.com	
Paul Caruthers	HRPNA	Paul.caruthers@gmail.com	
Alex Nicolas	Campbell Park Neighborhood Association	Alexandernicolas310@gmail.com	
Robin Rhinesmith	FDOT- Office of Environmental Management	Robin.rhinesmith@dot.state.fl.us	
Roy Jackson	FDOT- Office of Environmental Management	Roy.jackson@dot.state.fl.us	
Matthew Marino	FDOT- Office of Environmental Management	Matthew.marino@dot.state.fl.us	
Craig Fox	FDOT	Craig.fox@dot.state.fl.us	
Juan Valenzuela 	Florida Bridge and Transportation	jvalenzuela@flbridge.com	JAV
Amy Streelman	Janus Research	amy_streelman@janus-research.com	
Ken Hardin	Janus Research	ken_hardin@janus-research.com	

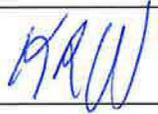


FPID: 430501-1-32-01

**9<sup>th</sup> Street South (MLK Jr. Street South)**  
**Bridge Replacement Design Project**  
**from 6<sup>th</sup> Avenue South to 7<sup>th</sup> Avenue South**

**Stakeholder Meeting**

**March 28, 2019**

Name	Organization	E-Mail	In Attendance
Jeff McCarthy	City of St. Petersburg	jeffrey.mccarthy@stpete.org	
Ivan Fountain	City of St. Petersburg	ivan.fountain@stpete.org	
Whit Blanton	Forward Pinellas MPO	wblanton@forwardpinellas.org	
Sean Sullivan	Tampa Bay Regional Planning Council	sean@tbrpc.org	
Matthew Weidner	St. Petersburg Downtown Neighborhood Association	president@stpetedna.org	
Rui Farias	St. Petersburg Museum of History	rui@spmoh.org	
Allison Stribling	Preserve the 'Burg	director@stpetepreservation.org	
Elena Paredes	Bayfront Health St. Petersburg	elena.paredes@bayfronthhealth.com	
Adam Gyson	Resident	gyson1aw@hotmail.com	
Alexander Grant	Historic Roser Park Neighborhood Association	alexandercgrant@roserpark.com	
Kai Warren	HRPNA	kaistpete@gmail.com	



# Appendix C:

## Maps of Subject Property



7TH AVE S

6TH AVE S

7TH AVE S

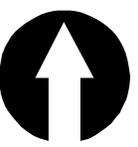
8TH AVE S

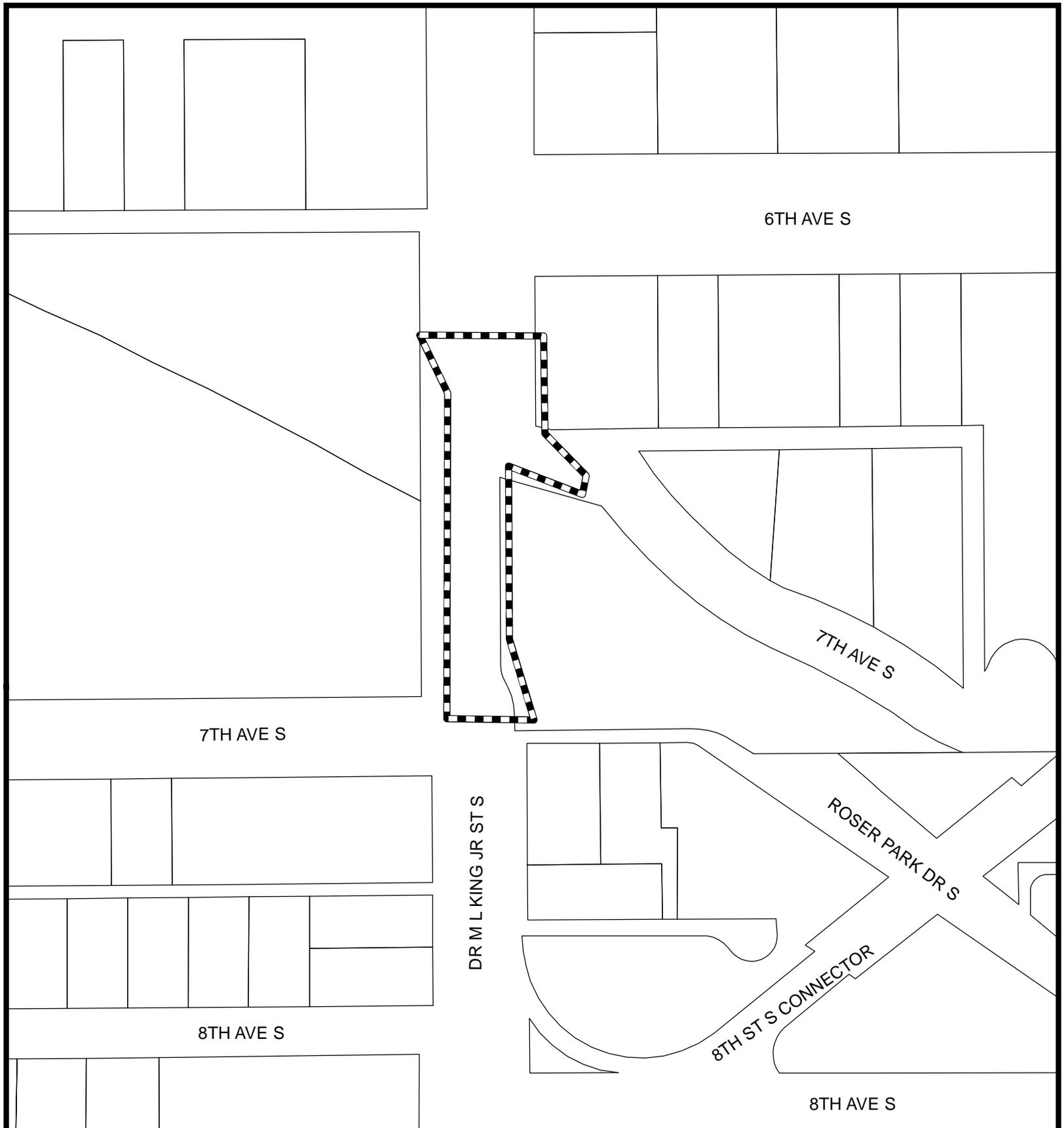
DR M L KING JR ST S

ROSE PARK DR S

8TH ST S CONNECTOR

8TH AVE S





Community Planning and Preservation Commission

Roser Park Bridge

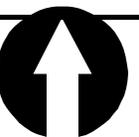
AREA TO BE APPROVED,

SHOWN IN



CASE NUMBER

19-90200029



N

SCALE:  
1" = 117'