



Cary Retlin, Home Fund Manager City of Olympia 601 4th Avenue East Olympia, WA 98507

Dear Cary Retlin,

The Family Support Center of the South Sound (FSCSS) is excited to submit this funding application for our permanent housing with supportive services project on Olympia's westside. FSCSS anticipates that this project will be a landmark step forward for residents, neighbors and affordable housing advocates. The FSCSS project is the first phase of a multiple-phase development, located on 7th Avenue Southwest across the street from FSCSS's main campus.

The FSCSS Family Housing Phase I project will create new affordable homes for sixty-two (62) families with children and individuals, the majority of whom are unsheltered or have experienced domestic violence. Half of the units will serve households at or below 30% of Area Median Income (AMI) and the other half will serve households at or below 50% AMI. This application presents our estimate of construction costs, private investment resources, and the remaining gap that we are requesting from public sources including the City of Olympia and the State of Washington Housing Trust Fund. We have already received a \$400,000 CDBG funding award from the City of Olympia to purchase the property; a \$372,585 commitment from Thurston County; \$530,000 in bridge financing from the Washington State Housing Finance Commission (WSHFC); \$85,000 in bridge financing from Impact Capital, and most recently a \$1,000,000 award from the Federal Home Loan Bank (FHLB). The City of Olympia's funding commitment in this funding round is essential to our project's success. FSCSS is requesting that the City of Olympia support our project with a commitment of \$1,000,000 towards the development of 62 new homes for the needlest families in Olympia.

Since our funding request last year, we have gained cost efficiencies by revising the building configuration and planned phasing of the overall project. We have reduced common area square footage and increased the unit count, adjusted the unit mix to continue to meet our main goal of serving families with children while increasing building efficiencies. We have also incorporated additional two- and three-bedroom units into the design. The current layout develops approximately 55% of the lot area, reducing initial site costs and allows for future development phases of the site. The budgets assume Davis Bacon residential wage rates and anticipated procurement requirements for selection of the general contractor. It is important to remember that family units are more expensive on a per unit basis because of the additional square footage necessary to house a family. But this investment in families is essential to building a safe and healthy community for all of our residents.

Thank you for your consideration of this ambitious endeavor. We look forward to discussing this project in more detail over the coming months. Please address questions to Kasey Liedtke, Housing Developer at Bellwether Housing, at 206-588-4803 or kliedtke@bellwetherhousing.org or you can contact me at (360)754-9297 x206 or TrishG@fscss.org

Sincerely,

Trish Gregory

Executive Director

Trish Gregory

Family Support Center of the South Sound

1. Submitting organization name:

Family Support Center of South Sound (FSCSS)

Name of primary contact for this application:

Trish Gregory, Executive Director

3. Telephone number, email, and mailing address for submitting organization:

Trish Gregory, Executive Director Family Support Center of the South Sound P.O. Box 784 Olympia, WA 98507 (360)754-9297 trishg@fscss.org

4. Project Name:

FSCSS Family Housing

5. Brief description of proposed project:

Homeless families with children, while the least visible, make up a significant portion of the Thurston County unsheltered homeless population. A 2018 report compiled by Thurston County Health and Social Services, indicated that 15% of the County's households experiencing homelessness were families with children. While this percentage may not sound high, each household is comprised of multiple family members; thus, 41% of the total people experiencing homelessness in that report were children and their parents; sleeping in cars, outdoors, or in places not meant for human habitation.

Current data demonstrates that family homelessness is still a significant issue in our community. As of February 2020, there are 219 unshletered households on FSCSS master-list, equivalent to 282 parents and 342 children, waiting for a safe, stable, and permanent housing solution. Twenty percent (20%) of these households meet the chronic homeless definition, 40% are actively fleeing domestic violence, 12% are pregnant, and 7% of the heads of households identify as LGBTQ+.

Currently, 79 of the above described households have housing vouchers. Despite sufficient financial support and intensive housing searches on the part of staff and the families, identifying available units has proven extremely difficult. There are simply not enough affordable housing options to meet the demand for housing, even for those with a housing voucher. In the month of January 2020, 47 households held active housing vouchers, but only 3 households successfully identified and moved into housing. The average length of time from issuance of a voucher to moving into a housing unit is currently 75 days.

FSCSS's Family Housing Project will create a significant and measurable reduction in family homelessness in Olympia. This project will create 62 new homes for homeless children and their families as well as survivors of domestic violence. If this project were completed today, the

units could be immediately filled with the households currently holding housing vouchers from FSCSS. In the first year, it is expected that we will serve approximately 209 children, parents, and survivors. City of Olympia Home Fund support is critical to making this vision a reality and it is essential that we receive City support in this round so that we can go into the State HTF and WSHFC funding rounds fully funded.

The site is located on 5 acres of undeveloped land in West Olympia. FSCSS owns the property, which was purchased in November 2018 with support from the City of Olympia, as well as Impact Capital and the Washington State Housing Finance Commission (WSHFC). Permanent affordable housing will be developed on this site in two phases in order to maximize the number of units on the site balanced by currently available public financing.

FSCSS's main campus is located directly across the street from the development site. In addition to FSCSS' own extensive family support programs and services, the office complex features more than 14 additional organizations that provide direct services to families, children, and survivors of violence. FSCSS supportive services are driven by, and responsive, to the individual needs of each household. Residents will be able to choose where to access services, including home visitations, the on-site service space, or across the street at the main campus. All services, regardless of where they are offered, will be provided in close collaboration with the partner organizations located onsite at FSCSS's Main Campus location.

The proposed development emphasizes family-sized units with forty-three 2- and 3- bedroom apartments plus nineteen 1-bedroom units to accommodate single survivors, single pregnant women, or single parent households with a child under age two. Half, or 31 units, will house households at or below 30% AMI and the other half be set aside for households at or below 50% AMI.

Since the initial design that was presented in last year's application, the development team has focused on a more cost efficient site and building layout. The number of units was increased from 44 to 62, allowing us to spread fixed costs and site work more efficiently over a greater number of units. We have scaled down the size of units to 528 square feet (sf) for 1-bedrooms, 768 sf for 2-bedrooms, 1,008 sf for 3-bedroom units.

In addition, the initial project now includes a "C" shaped building that is located at the front portion of the site, reducing the amount of sitework required for Phase I and allowing for a more efficient layout of the family-sized units. The new design allows the building to encircle a courtyard and outdoor play area where the building acts as a barrier from the street, providing natural protection and security for children and their parents. The development will include space for management and service offices as well as community gathering space. This new site layout has resulted in a more efficient development cost per unit that is reflected in the attached budgets.

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6. Location of project, city, address (if known), zoning (if known):

Address: 3524 7th Avenue SW Olympia, WA 98502

Zoning:

The site is zoned "PO/RM," meaning professional office and residential multifamily.

7. Name and brief experience of developer:

Family Support Center of South Sound (FSCSS), founded in 1992, annually provides 4,000 parents, children, and survivors of domestic violence/sexual assault with coordinated supportive services to accomplish the mission, "Working Together to Strengthen All Families". Utilizing a "one-stop-shop" model, the agency works to build strong, healthy, safe, and hopeful families through collaborative programs in an effort to reduce the negative impacts of poverty, homelessness, and family violence.

In July 2013, FSCSS was the successful bidder for \$550,000 of City of Olympia federal HOME capital dollars and the ability to purchase the then vacant "Smith Building" for \$1 to develop Pear Blossom Place, a family shelter and a permanent housing project. FSCSS, with the support of Bellwether Housing who served as the development management consultant for the project, successfully managed the project from start to finish including; overseeing all aspects of the design, permitting, construction, and lease up of the project, identifying and acquiring the additional \$1,550,000 in funding necessary to complete the full renovations; and developing a partnership with Housing Authority of Thurston County to acquire project based vouchers. Pear Blossom Place: A Family Support Community successfully opened its doors in July 2014 and has been at full capacity since that time. Pear Blossom Place includes six shelter suites on the lower level, providing 36 beds for children and their parents year round and upwards of 30 more each night during the cold weather season, November 1-April 30. The second level of Pear Blossom Place is home to six permanent housing units with supportive services. A seventh, ADA accessible unit is located on the first floor adjacent to the shelter.

In 2018, FSCSS ventured into its next real estate project to help advance our mission. We successfully purchased a \$3,400,000 commercial office property along with the vacant land that will be utilized for this proposed development. As part of the commercial office space, Nature Nurtures Farm, will open and operate a childcare center for 96 children, over half of whom will have a childcare subsidy. While construction has not yet started, FSCSS has navigated this process, successfully negotiating permitting requirements as well as identifying an additional \$1,600,000 in funding to complete the necessary renovations and frontage improvements that a change of use prompted. Construction for this project is set to begin soon.

For the FSCSS Family Housing project, FSCSS has contracted with Bellwether Housing as the development management consultant. Bellwether Housing is an experienced developer, construction manager and property manager. Bellwether has developed and sustained high-quality affordable housing, as the largest nonprofit housing developer in the Puget Sound region, since 1980, and has aided other organizations in the development of thousands of units

state-wide. Bellwether's portfolio includes 2,100 apartments in 32 buildings, serving approximately 3,500 people annually.

8. Name and brief experience of project manager (if organization managing project is different from developer):

FSCSS will work closely with Bellwether's project management consulting team to ensure the resulting development fulfils the organization's mission. Bellwether has assigned a dedicated Development Management team to collaborate with FSCSS throughout the project. The project team is as follows:

Bellwether Housing Development Management Team:

Kasey Liedtke, Housing Developer, will serve as the lead project manager. Mr. Liedtke has 7 years of project management experience in real estate development, construction, financial management, and federal contract administration. Mr. Liedtke has worked on the project since 2018, including overseeing the acquisition of both the development site and FSCSS' administrative headquarters.

Mr. Liedtke will be supported by Heather Burns, Senior Housing Developer, and by Richard Loo, Director of Real Estate Development. Ms. Burns has over 20 years of experience working in affordable housing as a development consultant, nonprofit owner and public funder. Mr. Loo has over 30 years of experience in architecture, real estate development and affordable housing. Stephan Petryczka, Associate Housing Developer, and Emma Geyer, Construction Manager will provide additional project support.

Family Support Center of South Sound Team:

Trish Gregory, Executive Director, has 25 years of experience working in social services, 20 of which have been with FSCSS. Ms Gregory has held a leadership position at the agency for the past 14 years. Ms, Gregory is responsible for the development of many of the existing programs and services operated by FSCSS and was directly involved in the acquisition, development, and opening of Pear Blossom Place. Ms. Gregory has extensive experience in grant writing, Federal and State contract compliance, project management, financial management, and supervision of staff.

Natalie Skovran, Deputy Director of FSCSS has worked for FSCSS for over 7 years. Ms. Skovran has grant writing and program development experience, oversees all program management staff, and is working closely with Bellwether to support the development and acquisition of the newest housing project. As the Deputy Director, Ms. Skovran is responsible for the oversight of Pear Blossom Place, including ensuring the apartments are leased up with direct referrals from Coordinated Entry, as well as the shelter placement. Ms. Skovran has helped to develop Thurston County's Coordinated Entry Policies and Procedures, and is well versed in Federal, State, and Local requirements to remain in compliance with Coordinated Entry. Ms. Skovran also oversees the distribution of more than \$500,000 in rapid re-housing

funds, and ensures client portions, unit occupancy, and fair market rents are followed for all clients on the rapid re-housing programs.

9. Serve priority population (20 percent of score)

a. Target population of project:

This project will prioritize serving unsheltered homeless families with children and survivors who are fleeing domestic violence. All households served by the project will be referred by the Coordinated Entry system, for which FSCSS is the current lead agency, and will prioritize the most vulnerable as determined by the assessment process. All households served will be at or below 50% AMI, with half of the units specifically dedicated to serve households that are at or below 30% AMI. Preference will be given to households who are chronically homeless and unsheltered, or fleeing domestic violence, as per the HUD definition. As stated previously, of the current families and survivors on the master-list, 20% meet the chronic homeless definition wherein the head of households has a disabling condition, has been homeless for either 12 consecutive months, or has experienced 4 episodes of homeless in the last 3 years.

b. Proposed number of units or beds total:

FSCSS is proposing 62 units of permanent housing with supportive services. This includes twenty 3-bedroom units, twenty-three 2-bedroom units and nineteen 1-bedroom units. Based on Thurston County occupancy standards the project will be serving approximately 168-250 with an average of 209 individuals at one time.

c. Proposed number units or beds per population:

All of the units will serve households that meet one or more of the HUD definitions of homelessness:

- · Category 1: Literally homeless or living somewhere not fit for human habitation.
- · Category 2: At imminent risk of homelessness (within 14 days)
- · Category 3: Homeless under other Federal statutes
- · Category 4: Fleeing/Attempting to flee domestic violence

Priority will be given to households who meet Categories 1 and 4. It is expected that 80% of the units will be occupied by families with children. The remaining 20% of the units will be reserved for survivors of domestic violence, many of whom are eligible under both Categories 1 and 4.

d. Proposed number units or beds per income level:

Half, or 31 units, will serve households at 30% AMI or below. The other half will serve households at or below 50% AMI.

10. Demonstrate readiness (20 percent of score)

a. What is your estimated timeline for completion? When will the project reach full occupancy?

FSCSS has already secured permanent financing from the City of Olympia (CDBG), Thurston County (Home), and the Federal Home Loan Bank (FHLB). We will submit funding applications to the State of Washington Housing Trust Fund in September 2020 and a 9% Tax Credit application in January 2021. We anticipate completing design, permitting and financing in the Fall of 2021 and completing construction by the end of 2022. The project will be fully leased in the first quarter of 2023.

Milestone	Date of Completion
City of Olympia CDBG Award/ WSHFC LAP Financing	11/30/2018
Thurston County HOME Award	5/16/2019
FHLB Award	1/23/2020
Begin Construction	10/1/2021
Certificate of Occupancy Issued	12/31/2022
100% Lease-Up	4/1/2023

b. Has a site been purchased for this purpose or are there properties available for this rehabilitation?

Yes, FSCSS purchased the property in November 2018.

11. Reduce homelessness for most vulnerable (10 percent of score)

a. Will this project serve homeless households?

Yes, this project will serve families with children and survivors of domestic violence who meet the federal HUD definition as indicated in questions 9c. Preference will be given to households that are chronically homeless, unsheltered, and those who meet Category 1 (literally homeless) and Category 4 (fleeing domestic violence).

b. How will this project ensure it is serving the most vulnerable households in Coordinated Entry during lease up?

FSCSS is the lead Coordinated Entry Provider for Thurston County, and is the designated entry point for homeless families with children and survivors of domestic violence. As the Coordinated Entry provider for these populations, FSCSS is committed to ensuring households have quick and easy access to all available homeless services programming and resources, including placement into permanent units with supportive services. When a household experiencing homelessness seeks Coordinated Entry services from FSCSS, a comprehensive assessment is completed to better understand that household's present situation. Currently, households who are unsheltered are assessed utilizing the Vulnerability Index Family Service Decision Assistance Tool (VI-F-SPDAT), which evaluates their history of homelessness, mental health, medical conditions, and other key elements that are proven to be risk factors linked to increased death on the street. For survivors who are fleeing domestic violence, they are assessed utilizing the Jackie Campbell Danger Assessment, an evidence-based tool that assesses the risk of lethality by their perpetrator. Once the applicable assessment is completed, households are given a score, which then puts them on the County-wide master list which is maintained by FSCSS. As resources become available, the next household on the master list, that is interested and eligible, is offered the resource. Households with the highest score rise to the top of the list, meaning the households with the greatest need, biggest barriers to housing, chronic homelessness, greatest safety needs, AND the least amount of familial and/or community support, are offered services first. Households are offered resources which may include rapid re-housing, shelter, case management, Foundations Community Support services, and referrals into housing programs as they become available. During lease-up and as units become available once FSCSS Family Housing is operational families at the top of the waiting list will be contacted and begin the tenant application process.

Because FSCSS has worked with families experiencing homelessness for more than 28 years, families and survivors regularly hear about the available services by word of mouth, social media, other social service providers, law enforcement, 211, Crisis Clinic, and the Coordinated Entry hotline. FSCSS answers the family extension of the Coordinated Entry hotline 24 hours a day, 7 days a week, providing information about shelter and housing, as well as how to access the Coordinated Entry system. The organization's main office campus is located directly across the street from the development site, a fact that is well known and routinely publicized at community meetings throughout Olympia. Because FSCSS operates Pear Blossom Place, the County's ONLY shelter for homeless families, there is a natural flow of families experiencing homelessness to the organization. Additionally, FSCSS' offices are integrated with a multitude of social service, community service, housing service and coordinated entry providers ensuring that the organization is well-situated within the community to help households who are in need of services and that they will be directed to FSCSS when needed.

c. How many units or beds will be dedicated to the most vulnerable?

All 62 apartment units developed in this project will be dedicated to serving the most vulnerable homeless families with children and survivors of violence in our community. As both the lead contracted Coordinated Entry provider, and the point of entry for all homeless families with children and survivors of domestic violence, FSCSS is well-versed and experienced in utilizing a master list to distribute resources based on prioritization. As previously stated, FSCSS uses the VI-F-SPDAT and the Jackie Campbell Danger Assessment to determine placement on the master list for available resources. As resources become available, FSCSS refers to the master list to identify the next interested and eligible household for the resource. FSCSS initiated this

development as a means to fill a critical gap and improve outcomes for the most vulnerable families with children and survivors of violence. FSCSS is dedicated to ending unsheltered family homelessness. A key strategy to accomplish this is to increase the number of available units in our community.

12. Provide Supportive housing (20 percent of score)

a. Will this project provide supportive housing?

This project will provide supportive services for all 62 housing units. Services will be tailored to the individual needs of each household, and will include case management and goal plans to support households in identifying and achieving their goals for greater family stability.

b. What are the targeted supportive needs of the households served?

Once families have entered FSCSS's housing units, each household's needs will vary. Case managers will work with each family to meet identified needs, including mental health and substance abuse treatment enrollment and participation; assistance with enrolling in mainstream benefits (such as SSDI or SSI), and securing gainful employment; increasing the overall health and stability of their children through early childhood programs, securing IEP or other school-based supports, enrolling in medical care and finding a doctor; bolstering financial stability which can include budgeting, paying off past debts, enrolling in technical or education programs (such as GED courses or college); increasing overall safety through confidential domestic violence advocacy, accessing a protection order or other civil legal route such as parenting plans and dissolutions of marriage. Supportive services offered are trauma-informed and operate from a strengths-based perspective. Programs also operate following best practice standards such as harm reduction, low barriers to entry, and other evidence-based service delivery models.

c. How have supportive services been integrated into the design of the proposed project?

From the early planning stages, prior to even purchasing the property, FSCSS envisioned a campus style facility which would include housing, childcare, multiple other basic need services, and opportunities for family engagement and enrichment. FSCSS recognizes that by serving the most vulnerable households at the proposed housing development it is then incumbent upon the agency to also to provide a comprehensive array of support services to engage families and support their long term stability, including but not limited to those services described in subsection 'b' of this question. The FSCSS Main Campus, located across the street from the housing development, houses the majority of FSCSS's case managers and services including coordinated entry, rapid rehousing, and family resource services, as well as the shelter intake and placement for Pear Blossom Place.

FSCSS believes that services need to be easily accessible and will leverage existing FSCSS programs and services as well as partnerships with other direct service organizations in order to provide services to the new housing development tenants within their own community. The FSCSS Campus houses multiple partner agencies who are committed to helping us in our

mission of strengthening families. Such partners include: Thurston County Volunteer Legal Services who provide free civil legal assistance, Catholic Community Services' volunteer and Veteran programs, Enriching Therapy and Beautiful Instant Psychotherapy who provide mental health care, the Thurston County Prosecutor's and County Clerk's Office as well detectives from across the county who are housed onsite to provide assistance to victims fleeing domestic violence. Parenting and prenatal support are provided through partnerships with Nurse Family Partnership, Parents as Teachers, and ChildCare Action Councils who hosts a Kaliedescope Play and Learn group and accepts referrals to their Homeless Childcare program. FSCSS staff and onsite partners have the flexibility to meet with families at whichever location is the most comfortable and convenient for the family, including the client's home. Each household will be assigned a designated case manager and will have access to FSCSS staff 24 hours a day to assist in mitigating any challenges or crises that arise.

d. How will services, like case management or behavioral health, be funded?

FSCSS is a dynamic agency that has a proven track record of securing funding for case management and supportive services for families experiencing homelessness and for survivors of domestic violence through a combination of government grants and contracts, foundation and community grants, corporate, community, and individual contributions, as well fundraising events, faith-based support, and in-kind donations. While not all resources for this development project have been specifically identified, FSCSS has an established contract with Foundational Community Supports (FCS) through Amerigroup and the Health Care Authority for supportive housing services as well as supportive employment services. Proposed services to be offered on-site align with allowable services under FCS. We expect that approximately half of the tenants will be eligible for the FCS Supportive Housing Program. FSCSS currently has County and HUD funded rapid re-housing programs in excess of \$500,000 this fiscal year, which may be utilized to subsidize households at the development, as well as ongoing case management services. FSCSS has successfully secured and managed Washington Balance of State HUD funding, and is actively tracking NOFA's that may provide supportive services for the permanent housing project. FSCSS feels confident in their ability to secure and maintain funding for the supportive services aspect of the project, and will continue to seek out funding and leverage existing awards to support this project.

FSCSS is currently operating a program for Pear Blossom Place shelter guest and apartment tenants funded by Thurston County Treatment Sales Tax that is focused on supporting participation in behavioral and mental health programs. Intensive case management support is offered, and the Adult Needs and Strengths Assessment is completed with adults to assess their behavioral and mental health functioning and needs. It is expected that the services currently offered and being developed for Pear Blossom Place clients can be replicated for those in this affordable housing project.

e. Has the operator of this housing been trained or evaluated in Substance Abuse and Mental Health Services Administration (SAMHSA) Supportive Housing Fidelity? If yes, estimate the most recent date and include the evaluating organization.

FSCSS has enrolled and begun participating in SAMHSA Supportive Housing Fidelity training and will have fidelity evaluation completed prior to the onset of services at the new facility.

13. Cost (30 percent of score)

a. What is the average cost per unit based on the total project cost? Please include your calculation.

We have made a series of design changes to increase the cost efficiency of the building. It is important to remember that per unit costs of constructing family housing are significantly higher than the cost of developing Single Room Occupancy (SRO) units for homeless individuals. Almost one-third of our proposed units are 3-bedroom units and more than one-third are 2-bedroom units. The typical SRO unit can be 400 sf or smaller. Our 1-bedrooms are designed to serve small families and are 30-50% larger than a typical SRO unit. The 2-bedroom units are at least twice the size and the 3-bedroom units are 2.5 times the size of a typical SRO. In addition to the design changes already made, the development team intends to work diligently and collaboratively with the project architect and an as yet to be selected general contractor to identify additional changes to further increase the cost efficiency of the project.

<u>a1. Per unit hard construction costs</u>, including contractor overhead and profit and estimated off-site costs, are \$219,399 per unit or \$229 per square foot. Per bedroom the hard costs are \$108,822. **This is a reduction in hard costs of over (\$22,086) per unit from our previous application.** These numbers include a 3% escalation contingency from today to the expected start of construction and assume federal Residential Davis-Bacon wage rates.

\$13,602,768 / 62 = **\$219,399/unit**; / 59,264 sf = **\$229/sf**1BR x 19 + 2BR x 23 + 3BR x 20 = 125 bedrooms;

\$13,602,768 / 125 = **\$108,822/bedroom**

a2. <u>Total project costs excluding land costs are \$324,308/unit</u>. This is a reduction of over (\$41,257)/per unit from our 2019 application. Including land costs, the total project costs per unit are \$331,675.

\$20,564,625 - \$457,500 = \$20,107,125 / 62 = **\$324,308/unit** \$20,564,625 / 62 = \$331,688

b. Average cost per Home Fund dollar requested? Please include your calculation.

City of Olympia Home Fund Request: \$1,000,000 / 62 Units = \$16,129 / Unit. Divided by the expected occupancy of the project the per bed the Home Fund Request is \$1,000,000 / 252 persons = \$3,968 / person or by bedroom \$/125 = \$8,000/bedroom.

This is a reduction from our 2019 request of over (\$20,234)/unit. This reduction is due to the increase in the number of units in the project and other design changes that we have made.

14. A BUDGET SPREADSHEET MUST BE ATTACHED TO YOUR APPLICATION. The budget must be completed in the Washington State Combined Funders Application Spreadsheet and should include estimated income and expenses for:

- o All estimated fund sources including Olympia Home Fund
- o Design and Inspection
- o Project management
- o Relocation
- o Title insurance
- o Environmental review
- o Permits and fees
- o Land/property acquisition
- o Site development
- o Construction/rehabilitation
- o Utilities
- o Other expenses

Please reference FSCSS's Excel budget document included in our application.

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SITE PLAN

SCALE 1" = 30'