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FLORIDA'S LAW FIRM FOR BUSINESS

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TOWN OF PALM BEACH
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Our Client No. 46274.00002
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November 20, 2019

VIA E-MAIL AND REGULAR MAIL

Mr. Wayne Bergman
Assistant Director, Planning, Zoning and Building
Town of Palm Beach
360 South County Road
Palm Beach, FL 33480

**Re: Extension of Construction Work Hours at 280 Sunset Avenue
Bradley Park Hotel
Code Section 42-199**

Dear Mr. Bergman:

The purpose of this letter is to request a waiver of Section 42-199 of the Town Code to allow an extension of normal construction hours for the ongoing work at 280 Sunset Avenue (Bradley Park Hotel). Work is already under way at this site and is being done by Fine Line Construction. The contractor expects to complete the project by January 31, 2020 assuming that this construction hour extension is granted by the Town.

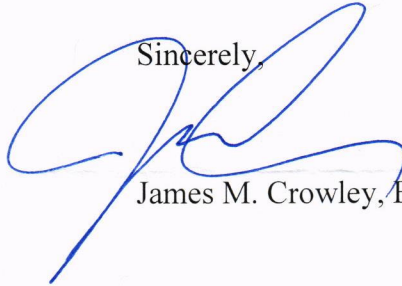
Our specific request is for work hours of 7 a.m. to 10 p.m., seven days a week excluding legal holidays. The contractor will limit Saturday and Sunday work to the interior of the building. In addition, work on the weekdays after 5 p.m. will be limited to interior work. We request that these extended hours be granted immediately and extend through January 31.

Please consider that this part of Town is mostly commercial in nature so Town residents should not be disturbed by these extended work hours, especially since the work during extended hours will occur inside of the building.

Mr. Wayne Bergman
November 20, 2019
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Please place this matter on the December 11th Town Council Development Review agenda. Feel free to contact us with any questions regarding this request. We will of course appear at the Town Council meeting where this matter is heard in order to further explain the request. We will also notify all abutting property owners and all property owners along Sunset Avenue of this request.

Sincerely,

A handwritten signature in blue ink, appearing to be 'JC' with a large loop and a long horizontal stroke extending to the right.

James M. Crowley, Esq.

JMC/op

cc: Joshua Martin, Director of Palm Beach & Zoning (*via email*)
Paul Castro, Zoning Manager (*via email*)
Damien Barr (*via email*)
Ned Grace (*via email*)

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ORLANDO
PALM BEACH
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TAMPA
VERO BEACH
WEST PALM BEACH

November 22, 2019

Re: Extension of Construction Hours at 280 Sunset Avenue
Bradley Park Hotel

To Whom It May Concern:

Gunster Law Firm represents New England Development, which is currently engaged in renovations to the Bradley Park Hotel. In order to complete the renovations as quickly as possible, the owner has requested an extension of the Town of Palm Beach's normal construction hours to 7:00 am to 10:00 pm, seven days a week (excluding legal holidays). In order to minimize the impact of these extended hours on the neighborhood, the contractor will limit the work to the interior of the building after 5:00 pm on weekdays and on Saturdays and Sundays.

This request will be heard by the Town Council at their regularly scheduled meeting on December 11, 2019. If granted, this request will allow the contractor to complete the project by January 31, 2020.

Please feel free to call us with any questions. Thank you for your time.

Sincerely,

James M. Crowley, Esq.

JMC/op

cc: Joshua Martin, Director of Palm Beach & Zoning (*via email*)
Wayne Bergman, Assistant Director of Planning & Zoning (*via email*)
Paul Castro, Zoning Manager (*via email*)
Damien Barr (*via email*)
Ned Grace (*via email*)