

IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA
CASE NO.: 2015 CA 217

DENNIS MCDONALD and
JANET MCDONALD, his wife,
Plaintiffs,

vs.

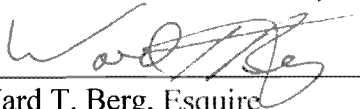
CITY OF PALM COAST,
Defendant.

NOTICE OF FILING DEPOSITION TRANSCRIPTS

COME NOW Plaintiffs, by and through their undersigned attorney, and hereby file Notice of filing the attached deposition transcripts of Toby Santangelo and Michael Marinelli in this cause of action. Plaintiff intends to rely upon portions of the testimony in these transcripts at a hearing on Defendant's Motion for Summary Judgment, scheduled for January 28, 2016, at 1:00 p.m., before the Honorable Michael Orfinger .

I HEREBY CERTIFY that on the 14th day of January, 2016, a true and correct copy of the foregoing has been electronically filed with the Court's E-Filing Portal System which will send a notice of electronic filing to: Debra S. Babb-Nutcher, Esq., Brown, Garganese, Weiss & D'Agresta, P.A., 111 N. Orange Ave., Ste. 2000, Orlando, FL 32801.

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THE SEVENTH JUDICIAL
CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA

CASE: 2015 CA 217

DENNIS MCDONALD and JANET
MCDONALD, his wife,

Plaintiffs,

v.

CITY OF PALM COAST,

Defendant.

DEPOSITION OF TOBY SANTANGELO

Taken at the instance of the Plaintiffs

DATE: Tuesday, December 8, 2015

TIME: Commenced: 11:10 a.m.
Concluded: 11:59 a.m.

PLACE: City of Palm Coast
160 Lake Avenue
Palm Coast, Florida 32164

REPORTED BY: LEANNE W. FITZGERALD, FPR
Florida Professional Reporter
Court Reporter and Notary Public

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NOTES OF REPORTER

Plaintiff's exhibits 1 - 3 are in the transcript of Michael Marinelli taken on December 8, 2015.

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1 THE COURT REPORTER: Do you declare under
2 penalty of perjury to tell the truth, the whole
3 truth, and nothing but the truth?

4 TOBY SANTANGELO: I do.

5 DIRECT EXAMINATION

6 BY MR. BERG:

7 Q My name is Ward Berg, and I represent a
8 guy named Dennis McDonald that had a fall on a piece
9 of sidewalk in Palm Coast. And I set your
10 deposition today because your name was provided to
11 me by the City as a person that might have some
12 knowledge about sidewalks in the City of Palm Coast,
13 and maybe more specifically about this area, but
14 we'll find that out in a minute.

15 Could you please state your full name for
16 me.

17 A Toby Mario Santangelo.

18 Q May I use your first name? It's so much
19 easier to pronounce than your last name.

20 A Yes, sir.

21 Q I don't mean any disrespect by using your
22 first name.

23 A Totally understood.

24 Q Thank you. I'm going to try to make my
25 questions simple and straightforward, although I'm

1 sometimes longwinded. If my question is confusing
2 to you, please let me know that it's confusing and
3 that you don't understand it, rather than trying to
4 answer a question that's confusing. Okay?

5 A Uh-huh.

6 Q And I know uh-huh means yes. And the
7 court reporter actually knows it means yes, too.

8 A I apologize. Yes.

9 Q But sometimes it gets confused. So if I
10 say was that a yes or if Debra says was that a yes,
11 we're not being cantankerous. We're just making
12 sure it's a yes or a no.

13 A I understand.

14 Q I can't imagine that you would need to
15 take a break, and I'm going to be pretty quick, but
16 if for whatever reason you want to take a break, you
17 can. I can't imagine that you would need to talk to
18 Debra about any of my questions, because they're
19 going to be simple, but if for whatever reason you
20 think you need to talk to her before you answer one
21 of my questions, that's okay with me. I don't know
22 whether it's okay with her or not, but it's okay
23 with me.

24 Can you tell me how you're currently
25 employed?

1 A I'm not currently employed.

2 Q Can you tell me how you were employed back
3 in the spring of 2013?

4 A I was employed with the City of Palm
5 Coast. I was an Equipment Operator-2.

6 Q An Equipment Operator-2. Approximately
7 when were you first employed by the City of Palm
8 Coast, just a rough idea?

9 A March of 2006 was the beginning of my
10 employment.

11 Q And when you first hired on with the City,
12 what did you do for them?

13 A I came in as a maintenance tech, I
14 believe. And it was general maintenance work within
15 and around the city. So it was varied: trash
16 pickup, landscaping. There was some concrete work
17 involved. There was some dirt work and pipe work
18 involved. It was pretty varied.

19 Q All right. And very, very generally, what
20 was your educational and work background prior to
21 taking your job with the City of Palm Coast? And I
22 don't need you to tell me every detail of every job
23 you've ever had. Just give me a very brief
24 thumbnail sketch?

25 A Sure thing. In terms of education, I have

1 a high school GED diploma from Asbury Park High
2 School in New Jersey. And prior employment was with
3 the New Jersey Highway Authority for a period of six
4 years before I came to Florida in 2006.

5 Q Very generally, what did you do for the
6 New Jersey Highway Authority folks?

7 A I was a maintenance technician.

8 Q And --

9 A And the job responsibilities included
10 mowing of grass, trash pickup and snow plowing.

11 Q All right. So you had a lot of the same
12 responsibilities, obviously no snow plowing?

13 A That was one that was removed when I moved
14 down here, yes.

15 Q Was that part of the reason for your move?

16 A (Pause.)

17 Q That's all right, just kidding.

18 A I could say, yes, at that point, sure.

19 Q Tell me -- it sounds like you moved up the
20 ladder, so to speak, from when you first started
21 here in March of '06. Could you kind of give me a
22 summary of how that went?

23 A Sure. In time, the more familiar I became
24 with the City and its operations, I seemed to show
25 more interest in it. And obviously, management felt

1 that it was necessary that they promote me or needed
2 to promote me so I could be more diverse and be more
3 productive.

4 Q Okay. And so how did that go? You
5 started out as a maintenance tech, and then what was
6 the next step for you?

7 A The next step was Equipment Operator-1.

8 Q And what does that qualify you with the
9 City to operate? What types of equipment were you
10 operating then?

11 A Basically, a truck -- which required a CDL
12 license, Class A -- with a trailer attached to it.
13 It gave me the ability to operate and drive vehicles
14 that I just mentioned. It also gave me the ability
15 to operate equipment like a front-end loader, a
16 backhoe, or a skid steer which is called heavy
17 equipment.

18 Q Had you learned how to operate heavy
19 equipment? Did you already know that from Jersey?

20 A I had prior experience on a front-end
21 loader and a backhoe from New Jersey.

22 Q All right. And did you have to have any
23 specific training other than that, or is it easy to
24 pick up the other equipment once you know how to do
25 the --

1 A I had specific training in New Jersey. I
2 did not have any specific training in terms of
3 getting certified in Florida. It was strictly just
4 experience.

5 Q But you learned how to do that?

6 A That's correct.

7 Q And when Mr. Marinelli was giving his
8 deposition a little while ago, I thought I
9 understood him to say that you also would from time
10 to time operate the Gator gas cart and do sidewalk
11 inspections?

12 A That's correct. As time went on and I got
13 a promotion above the Equipment Operator-1 -- which
14 was eventually Equipment Operator-2 -- my job
15 responsibilities seemed to have spread out. As the
16 City grew, within this department, I grew with them.
17 So I became more diverse in terms of divisions. I
18 wore several hats once I reached the level of
19 Equipment Operator-2. And I used to do -- operate
20 Gator carts and do inspection; that's correct.

21 Q This incident with Mr. McDonald happened
22 March 24th, of 2013. So let me ask you: During --
23 let's just stick to 2013. Between January and March
24 of 2013, did your responsibilities include sidewalk
25 inspections during that period of time?

1 A It might have. Our schedule was so busy
2 and random at the time, that I can't actually
3 isolate that time period.

4 Q Okay.

5 A Because at times, I would be pulled off of
6 one job and put on another.

7 Q Sure.

8 A And I would be in charge of that job or I
9 would be involved in that job for a lengthy period
10 of time. So it's hard to say whether I was actually
11 inspecting at that time. But I can safely say that
12 prior and up to the time that I left the City, there
13 were periods where I was inspecting sidewalk.

14 Q All right. Can you give me just a rough
15 idea of about what percentage of your time during,
16 let's say, 2012 and 2013 would have been devoted to
17 sidewalk inspection?

18 A The two years combined?

19 Q Yeah. Or however you want to break it
20 down. If you know full well during 2012 you did
21 almost no sidewalk inspection, but you know full
22 well during 2013 you did a lot of sidewalk
23 inspection, let me know that.

24 A I certainly did more sidewalk inspection
25 in 2012 than I did in 2013. That much I can say.

1 Percentagewise, that would hard to gauge.

2 Q Just rough idea in 2012.

3 A Rough, probably 50 to 60 percent. And
4 then in 2013, probably closer to 10 or 20.

5 Q All right. Did you do sidewalk
6 inspections in 2011 also, if you can remember?

7 A As far as I can remember, I did. I just
8 don't remember how long, at what point it started.

9 Q Okay.

10 A But yes.

11 Q Tell me what your routine would be when
12 you were doing sidewalk inspections. What did you
13 do? How did you go about --

14 A Physically or --

15 Q Yeah.

16 A -- in terms of documentation?

17 Q Both.

18 A Okay. I had a spreadsheet set up.

19 Q This thing?

20 A Yes, sir.

21 Q Okay.

22 A And I configured it in such a manner that
23 I could divide up the entire city in segments and
24 then inspect each segment or sector individually, so
25 I could cover the entire city within a reasonable

1 amount of time.

2 Q Did you design that?

3 A Actually, I did. But it was with
4 coordination of the manager, my supervisor at the
5 time. Which I believe was Thomas Wormuth. And
6 there was a transitional period where Thomas
7 eventually left the City and then Mike came in. So
8 all three of us had a role in the structure of this
9 spreadsheet.

10 Q But you got the spreadsheet set up so that
11 it was systematic for you to be able to inspect all
12 the sidewalks within the city?

13 A That's correct.

14 Q And tell me then, nuts and boltswise, once
15 you had the spreadsheet set up, how would you
16 actually go about doing what you would do? Did you
17 load the cart -- I mean, load the Gator onto a
18 trailer on the truck and take it somewhere and then
19 begin, or how did that work?

20 A Yeah, it would depend. That would be
21 dependent on the actual section that I was
22 inspecting at the time. We have some sidewalks that
23 weren't accessible with a Gator cart. They were
24 only accessible by foot. So, yes, there were routes
25 where I would actually have to load the Gator cart

1 onto a trailer, take it out to the sector, and sort
2 of negotiate where I was going to go with the Gator
3 cart versus where I was not going to go with the
4 Gator cart. So it varied. Most of the time, I
5 could drive the Gator cart directly from our
6 facility into the city limits and approach the
7 sectors that way.

8 Q All right. And this incident happened
9 along Clubhouse Drive near one of the bridges.
10 We've got a couple of pictures that were marked
11 earlier. These are kind of -- let me show you one
12 we didn't mark.

13 MR. BERG: We'll mark this one as
14 Plaintiff's 4.

15 (Plaintiff's Exhibit 4 was marked for
16 identification.)

17 BY MR. BERG:

18 Q Do you recognize that as a bridge over one
19 of the canals there on Clubhouse Drive?

20 A Yes, I do. I'm just not sure which
21 direction it's pointing.

22 Q Neither am I. That's why I didn't ask you
23 that one. But you do know that --

24 A I'm assuming that this would be the --
25 since we only had one sidewalk on Clubhouse, I'm

1 assuming this would be -- I'm going to say
2 eastbound.

3 Q I think that's what Mike said, the east
4 side of Clubhouse Drive?

5 A Right. Or the eastern portion. Because I
6 don't remember a sidewalk being on the southern or
7 opposite direction of Clubhouse.

8 Q Okay. All right. This section that we've
9 identified here, that's an area where you would be
10 able to drive the Gator; right?

11 A I believe so. It was -- there was an area
12 that was a little narrow. But, yes, I believe I was
13 able to drive the Gator cart all the way to the next
14 intersection which would be, I believe, Palm Harber,
15 Palm Harber Drive, if I'm not mistaken.

16 Q Yeah, you're right -- at least according
17 to your spreadsheet. It says Clubhouse Drive, Palm
18 Coast Parkway, eastbound to Palm Harbor Parkway.

19 A Correct, yeah.

20 Q All right. When you're in the Gator and
21 you're cruising around doing your sidewalk
22 inspections -- this might sound like a dumb lawyer
23 question, but tell me what you do.

24 A Well, I would go slow enough to where I
25 could actually get a good visual on the concrete and

1 its structure and whether or not there are areas
2 that are failing. So I would crawl. It was hard
3 for me to gauge what speed I was going, because the
4 speedometer would say "zero," I was going so slow.
5 So as I would move along in the Gator cart, I would
6 visually inspect the sidewalk. And again, there
7 were areas that I would literally park the Gator
8 cart and get off and walk due to pedestrian traffic
9 at the time or motor vehicle traffic at the time
10 where I deemed that it not safe enough to navigate a
11 cart around. I would get off and walk --

12 Q Right.

13 A -- and then walk back to the cart and
14 continue on, just to be safe.

15 Q Okay.

16 A So walking and mobile inspection.

17 Q And what criteria did you have to trigger
18 whether you needed to make a notation of anything
19 about the condition of the sidewalk?

20 A My main criteria were what we call "trip
21 hazards."

22 Q Okay.

23 A And those specifications were maintained
24 by the ACA (sic) and the Florida Department of
25 Transportation in terms of size and depth.

1 Q What is the ACA? Did you say ACA?

2 A I'm sorry. ADA, Americans with
3 Disabilities Agency (sic).

4 Q Okay. And so what are the kind of things
5 you're looking for? I mean, obviously, you said
6 trip hazard. I'll get back to that. But aside from
7 the trip hazard, are there any other conditions of
8 the sidewalk that you're looking for?

9 A Yes. Structural failure, which would
10 involve any cracks; hairline cracks or fractures.

11 Q What is the difference between a hairline
12 crack and a fracture?

13 A A hairline crack would be a very fine
14 crack with an extremely tight gap in it, just barely
15 enough to be visible but would still present an
16 issue in the long term. A fracture would
17 probably be -- what I would consider something that
18 would have an actual separation of the material --

19 Q Okay.

20 A -- that would be visible.

21 Q Okay. And let me get you to look at what
22 we marked earlier as Plaintiff's Exhibit 2 to
23 Michael's deposition and the -- I'm going to call it
24 a crack, going down the middle of that. What would
25 that be characterized as? Would that be a crack?

1 A That would be a crack.

2 Q That would be a crack?

3 A Yes, sir.

4 Q Okay. So why do you make a note of it if
5 there's a crack? Oh, excuse me. Do you make a note
6 of it, at that time, did you make a note of it if
7 there was a crack as opposed to a hairline?

8 A Could you repeat that?

9 Q Yeah.

10 A Because I'm not sure if you're being
11 specific --

12 Q That was a terrible que- --

13 A -- to the particular --

14 Q No, I'm not. We'll talk about this
15 particular section in a minute.

16 A Right.

17 Q If I'm talking about this particular spot,
18 I'll let you know that for sure.

19 A Right.

20 Q But right now, I'm just talking about, in
21 general, when you're doing your inspections?

22 A Right.

23 Q Why would you note a crack if it wasn't a
24 trip-and-fall hazard?

25 A Because I considered it exceeding our

1 standards, which was any damage or any -- anything
2 that I would consider a trip hazard. And we always
3 liked to be proactive. In other words, if I saw a
4 crack and I made a note of it, then I wanted to
5 document it for future purposes that it could
6 present a problem in the long term.

7 Q Because it could get worse?

8 A Correct.

9 Q And the crack that we see in the sidewalk
10 that's been marked as Plaintiff's Exhibit 1, that's
11 definitely a crack that, if you had noticed it, you
12 would have noted?

13 A Absolutely.

14 Q All right.

15 A What's given in the picture, yes, because
16 there's not only a crack; there seems to be a lip
17 right here.

18 Q Right. A little lip or misleveling there.

19 A Right.

20 Q What's the degree of misleveling that you
21 used to determine whether you needed to make a note
22 of it or not?

23 A In terms of --

24 Q Just --

25 A -- the height of it or are we talking

1 crack here?

2 Q No. I mean, I'm saying a crack is
3 probably not going to be misleveled; right?

4 A Correct. In most cases, yes.

5 Q And so most of the time, cracks are
6 cracks, not misleveling?

7 A Correct.

8 Q Unless it's really, really bad?

9 A Unless it's severe and there's an actual
10 gap, yes.

11 Q So you look for cracks, you look for
12 hairline cracks, and you would also look for
13 misleveling?

14 A Correct.

15 Q Anything else you would be looking for on
16 the sidewalk?

17 A I would look for areas of what we would
18 call subgrade that would be deteriorated.

19 Q What do you mean --

20 A Along the edges of the sidewalk, if there
21 are areas that could have gotten washed out and it's
22 missing material --

23 Q Under the edge?

24 A -- and there's an actual void under the
25 slab, then I would notate that as well. Because

1 that would mean that the strength -- the structure
2 underneath the slab would be compromised. So now,
3 anything that would bear weight would have run the
4 chance of misleveling that slab.

5 Q Even a mower, you think?

6 A It's possible.

7 Q Does that cover the conditions that you
8 would be, pretty much, on the lookout for on the
9 sidewalks?

10 A Yes.

11 Q Okay.

12 A Yeah.

13 Q Going back to the misleveling, not in this
14 particular place, but just in general, the
15 misleveling: You mentioned that there were some
16 guidelines or standards -- I forget which word that
17 you used, but I'm going to say guidelines -- that
18 you used to determine whether a crack was bad
19 enough, I'll say, or high enough or -- misleveling,
20 I'm sorry, not a crack -- to require you to make a
21 note of it; right?

22 A That's correct.

23 Q And what were you referring to? You
24 mentioned the ADA and you mentioned something else.
25 I didn't catch that.

1 A The Florida Department of Transportation
2 had a set height of, I believe, it was a quarter
3 inch at the time. I'm not sure if that's changed or
4 if it's been modified since then. But at the time,
5 I was using a quarter inch as a guide in terms of
6 specifications that were mandated by the State of
7 Florida.

8 Q Okay. So what did that mean to you?
9 You're using that as a guide. You're using that as
10 a guide for what?

11 A As a guide for what the State would
12 consider a trip hazard.

13 Q Okay.

14 A And if I noted one that was more or less
15 than a quarter of an inch on both ends of the
16 spectrum, I would document it.

17 Q So I think I'm understanding you to say at
18 the time you were doing sidewalk inspections, you
19 were aware that there was the DOT standard. And
20 your understanding of that DOT standard at the time
21 you were doing your inspections is that it was a
22 quarter of an inch?

23 A Yes.

24 Q Was it a quarter of an inch the whole time
25 you were doing your inspections, as best as you can

1 remember?

2 A The actual rule?

3 Q Yeah.

4 A As far as I know, it didn't change, no.

5 Q Okay. That's what I'm getting at. You
6 don't remember like --

7 A I don't remember an update or getting a
8 notification of an update for it going from a
9 quarter of an inch to an eighth of an inch or a
10 quarter of an inch to half a inch, any increment.

11 Q Okay. So best recollection is it was a
12 quarter of an inch?

13 A Correct.

14 Q And did -- as far as you knew, did the
15 City of Palm Coast expect you to follow that DOT
16 standard?

17 A Yes.

18 Q Was that made clear to you?

19 A Yes.

20 Q Was that made clear to you by Michael
21 Marinelli?

22 A Yes.

23 Q Again, I know this sounds awful simple,
24 but I'm going to ask again: What did he tell you
25 about that DOT standard? What did he say to you

1 about it, about the quarter-of-an-inch standard?
2 Did he say, "Report all of them," or did he say,
3 "It's just a guideline. If it looks worse, do it.
4 If it doesn't, it's okay to let it go"? Did he say
5 anything to you?

6 A Well, the discussion that I remember was
7 that we already used that as our baseline and that
8 we should actually exceed that and note anything
9 that might be, perhaps, a little less, like an
10 eighth of an inch or anything that might present a
11 gap or a misleveling. So there were times that we
12 did discuss, "Look, let's go out and notate
13 everything."

14 Q Be really proactive with making sure --

15 A Be really proactive.

16 Q -- mislevelings were addressed?

17 A Yes, sir.

18 Q All right. And your normal procedure, if
19 you found a section of sidewalk that was misleveled
20 or had a crack that met your criteria, you would
21 make a note on your -- you call it spreadsheets?
22 Inspection reports?

23 A Yes. It would be entered finally into
24 this spreadsheet, but I take a notepad out to the
25 field that I could scribble on and make actual

1 location marks and jot down locations. And then
2 when I got back to the office, I would translate
3 that into the spreadsheet, based on the data that I
4 came back with.

5 Q Okay. Who would make the decision as to
6 whether an area that you reported needed any
7 attention or not? Is that something you did, or is
8 that something Mike or somebody else did?

9 A Either Mike or Tom at the time. Like I
10 said, there was a transition period where I was
11 working for Tom Wormuth and then we transitioned
12 into Mike Marinelli being the supervisor. But it
13 held equally as -- they were both equally as
14 responsible for making that decision.

15 Q That's not something that you had to worry
16 about deciding; you just gave them the data?

17 A I gave them the data. Did I worry about
18 making that decision? No. Because basically my job
19 was to give them the data that they could base their
20 decision on.

21 There were times where I would stress,
22 "Look, this one is really bad. Let's see if we can
23 get some guys out there, like now."

24 Q Got you.

25 A You know. And we would all converge on

1 the same decision. But, no. Basically, that was
2 their responsibility was to make the decision.

3 Q All right. And if they decided a
4 particular area that you brought to their attention
5 needed attention of some kind, what would happen?

6 A They would dispatch a repair crew, and it
7 would be addressed.

8 Q Was there any kind of typical time frame
9 that it took to get a particular area repaired, if
10 it was something like is depicted in Plaintiff's 2?
11 In other words, if it's about that type condition.

12 A A specific time frame?

13 Q Yeah, just a rough idea.

14 A That's hard to say. Because a lot of it
15 was, you know, had to be negotiated, so it would be
16 hard to say. It could be anywhere from a day up to
17 a week or possibly even two weeks.

18 Q What do you mean, "had to be negotiated"?
19 I'm not following that.

20 A Well, we had to actually assemble a crew
21 and dispatch that crew. And if we, you know, if we
22 did not have that crew available, then, obviously,
23 we would have to wait until the next day until we
24 could actually pull ourselves off of one job and
25 negotiate another job. But we would always make it

1 a priority to address a sidewalk.

2 Q All right. And you guys had a grinder
3 yourselves; right? The City had a grinder?

4 A Not at the time I was working.

5 Q No?

6 A No. We had possession of one, but I don't
7 remember us grinding any...

8 Q Did you ever operate the grinder, or did
9 somebody else do that?

10 A I never operated the grinder, no.

11 Q Were you ever involved with going out to a
12 particular site of the sidewalk that was going to be
13 ground -- or was being ground down, where somebody
14 else was operating a grinder? Did you go with them?

15 A No. But I can tell you this: At one
16 point, we had an outside contractor come in with a
17 grinder, and we were examining the options of hiring
18 a third party to come in and do grinding. And that
19 was the only affiliation I ever had. I don't even
20 remember whether the decision was made to do that.

21 Q Okay. Let's go specifically to this area
22 where Mr. McDonald tripped. And let me ask you --
23 first of all, let's look at the spreadsheet. This
24 was attached to Mr. Marinelli's affidavit. If
25 you'll look at this spreadsheet, you'll see the area

1 where we're talking about at Clubhouse Drive; right?

2 A Right.

3 Q And there's some notation over here, where
4 it says (as read) current damage, slash, linear
5 feet.

6 A Right.

7 Q What is that? What does that say?

8 A That would be the amount of linear footage
9 that would be damaged that I documented.

10 Q Okay. And there's a notation over to the
11 side. What does that say?

12 A I can't read it. I only have one eye. So
13 you'll have to let me see it. (As read) Palm Club,
14 Cardinal Court. That would be probably the cross
15 streets.

16 Q Okay. So that would have been on
17 Clubhouse Drive. And you were identifying a
18 particular area by the cross streets to Clubhouse
19 Drive?

20 A That's what I would assume in this case,
21 yes. Cardinal Court being a cross street. Palm
22 Club, I'm not sure how I would refer to that, but I
23 would assume that it would be between -- on
24 Clubhouse or around Palm Harbor --

25 Q Okay.

1 A -- in that general vicinity.

2 Q Would that have been a different location
3 than the area where Dennis fell, that we've
4 identified here in --

5 A It's very well possible. I really don't
6 recall, to be honest, but it's possible, yeah.

7 Q Okay. So what I'm trying to figure out --
8 I'm not trying to be tricky. I'm just trying to
9 figure out: Do you know whether the area where
10 Dennis tripped was noted on your spreadsheet on the
11 January 2013 inspection?

12 A No, I do not. I do not know that.

13 Q All right. Can you identify from your
14 spreadsheet whether this area was noted, this area
15 where he fell was noted?

16 A No, I cannot. I cannot, because it's just
17 too vague.

18 Q Sure. I understand. That's what I'm
19 getting at. So is it fair to say that based upon
20 your spreadsheet that we have here, attached to
21 Mr. Marinelli's affidavit, based upon that, we can't
22 tell whether this area where Dennis fell was noted
23 as an area that needed attention at your January
24 2013 inspection?

25 A Only unless there was a crew sent out

1 there to repair the damage in that area.

2 Q Okay. If there was a crew sent out there
3 to repair it, then we would assume that you had
4 noted it?

5 A Correct.

6 Q Okay.

7 A Or sometimes I didn't note it. If there
8 was a crew sent out, we had a separate sheet for how
9 much concrete we poured. It might have got entered
10 there.

11 Q Okay. But this misleveling here, this
12 crack and misleveling that's identified in
13 Plaintiff's Exhibit 1, in that photograph, that
14 wouldn't require concrete pouring, would it?

15 A It wouldn't require concrete pouring?

16 Q Yeah. I'm saying wouldn't that be
17 something you just grind, or would that be
18 something...

19 A That would have been something I normally
20 would have markated (sic) for repair, if I would
21 have seen it.

22 Q Okay.

23 MS. BABB-NUTCHER: I think he was asking
24 you whether you would have just ground it down
25 or whether...

1 A Ground it down?

2 BY MR. BERG:

3 Q I know that was not your call.

4 A That was not really my call. Like I said,
5 this would have normally been something, if I would
6 have visualized this, I would have markated it for
7 repair and scheduled it for repair.

8 Q Okay. When you say markated it, again,
9 dumb lawyer question, I'm assuming that means you
10 marked it in some way?

11 A Spray-painted it.

12 Q Got you. Thank you. So as a part of your
13 equipment on your Gator, when you're doing your
14 inspections, you would have some spray paint?

15 A Yes.

16 Q Any particular color?

17 A Yes. Two colors actually, depending on
18 which color I grabbed first, pink or chartreuse.

19 Q Okay. Any rhyme or reason --

20 A It's a florescent green.

21 Q Any rhyme or reason to whether you would
22 use pink or chartreuse? Not that it matters, but --

23 A Well, actually we eventually narrowed that
24 down, because we didn't want to have any confusion
25 as to what was markated as a sidewalk repair or what

1 was markated as a utility. So I believe at one
2 point, we narrowed it down to strictly pink, I
3 believe it was, marking pink. So we had a uniform
4 code. And every time a sidewalk got marked, we
5 new -- basically you could tell from your location
6 that it was marked for repair, but we also focused
7 on color as well, just so there was no confusion.

8 Q All right. So if I'm understanding you
9 correctly, at the time you would have done your
10 sidewalk inspection in January of 2013, based upon
11 your spreadsheet, we know that you would have
12 traversed the area where Mr. McDonald fell. Is that
13 fair to --

14 A It's possible. Like I said, I'm too vague
15 on whether I was there at the time or not. But if I
16 would have traversed that area and noted any cracks,
17 they would have gotten documented.

18 Q Okay. That's a very good answer to what
19 may be a bad question, because I said traversed.
20 And to me, traversed implies walking, not riding.

21 A To me, traversed implies traveling whether
22 it be mobile or by foot.

23 Q That's what I meant. I didn't want to be
24 that specific, but --

25 A That's okay.

1 Q I just want to make sure, because when we
2 do our lawyer thing and we go back over this and we
3 start arguing about whether we get to go to step B
4 or not, I need to be specific.

5 A Sure.

6 Q Okay. So I'm not jerking you around by
7 playing with the word "traversed." I'm going to go
8 back and ask the question a different way.

9 A Okay.

10 Q Based upon your spreadsheet that has a
11 date of January 1, 2013, I assume that would mean
12 during the week of January 1, 2013, not the
13 particular day?

14 A That actually could mean during the week
15 of or during the month of.

16 Q Got you. Okay. We know it, at least,
17 means during January at some time of 2013?

18 A At some time.

19 Q So based upon this spreadsheet and this
20 notation of Clubhouse Drive from Palm Coast Parkway
21 eastbound to Palm Harbor Parkway, we know that
22 during January of 2013, you would have covered,
23 either on foot or in the Gator, the area of sidewalk
24 where Mr. McDonald fell?

25 A If I was the one inspecting at the time,

1 that is correct.

2 Q Got you. And if you had not been the one
3 inspecting at that time, who would have been the
4 other person inspecting?

5 A It's hard to give a name, because at the
6 time, if we were busy and another person or
7 individual would have been dispatched to fill my
8 shoes or take -- do the inspection, a lot of times I
9 was not aware of who it was.

10 Q All right. Can you give me the names of
11 any of the other folks that it might have been?

12 A Sure. I can give at least two.

13 Q Okay.

14 A Dave Randall.

15 Q All right.

16 A And Paul Chew-Nee-Ard (phonetic) or
17 something like that. Chouinard, I believe it is.
18 Yeah.

19 Q So one of those two guys could have been
20 who actually traversed this particular area if you
21 didn't?

22 A It's highly likely.

23 Q Okay. If you had been the one to traverse
24 this area sometime during January of 2013, and you
25 had seen this area where Dennis fell, would you have

1 marked it with your spray paint?

2 A Yes, sir.

3 Q And you know you would have marked it with
4 your spray paint, because that's your normal
5 routine?

6 A Well, yeah.

7 Q That's what you're supposed to do?

8 A I mean, that was my job.

9 Q That's what I'm getting at?

10 A So, obviously, to neglect something like
11 that, I would be at fault.

12 Q Right. Were Dave Randall and Paul given
13 the same guidelines you were given?

14 A Yes, they were. Because at one point,
15 like I said, I didn't know a lot of times which one
16 was going to go --

17 Q Right.

18 A -- but there were times where we met to
19 agree that all the inspections were to be based on
20 the same criteria, not each individual's --

21 Q Subjective?

22 A -- determination. Subjective; correct.

23 Q All right. And was there always spray
24 paint kept on the cart, the Gator, whatever you call
25 it?

1 A If there was not, we would obtain some. A
2 lot of times guys would steal it. So I mean, you
3 know.

4 Q Okay. The norm would be, though, to have
5 some spray paint on there so you could mark it?

6 A Normally, that was one of our staple
7 items, yes.

8 Q On the Gator?

9 A On the Gator or present if we happen to be
10 in the truck or walking.

11 Q All right. Were any of the inspections
12 ever done by truck, or were they done either by
13 walking on in the Gator?

14 A There might have been some inspections
15 done by truck. But, obviously, we would have to
16 park the truck and get out and walk. Because we
17 wouldn't -- obviously we wouldn't drive vehicles in
18 the right-of-way or anywhere near pedestrian
19 traffic.

20 Q All right. Well, that's what I'm getting
21 at. If you took a vehicle to an area and then got
22 out and walked, then your inspection would be done
23 on foot?

24 A Yeah.

25 Q Were there ever inspections, that you were

1 aware of, that were done by truck where you would
2 just go really slow, obviously not driving on the
3 sidewalk --

4 A Right.

5 Q -- but really slow on the road right next
6 to the sidewalk, if you could see the sidewalk from
7 the road easy enough?

8 A No, not in my -- not in my protocol, there
9 was not. Because you would not be able to get a
10 good enough visual in a traffic lane. You would be
11 going too fast.

12 Q Okay. Give me just a minute.

13 You don't have any way of knowing whether
14 this particular cracked and misleveled section of
15 sidewalk existed in this condition in January of
16 2013, do you?

17 A No, I do not. Like I said, my schedule at
18 the time was so varied -- and from what I can
19 remember, because it's been quite some time, that
20 period, I don't remember inspecting a lot of
21 sidewalk. Previously, in the previous year, I would
22 say more favorable that I was inspecting sidewalk.
23 Bur for that period, I don't believe I was -- I'm
24 pretty sure I was tied up on a lot of other projects
25 at the time.

1 Q All right.

2 A But I'm not denying the fact that I could
3 have possibly done that.

4 Q No, no. I understand. You've made it
5 really clear. I understand. Thank you.

6 Look at this photograph again, that's been
7 marked Plaintiff's Exhibit 1. Based upon your
8 experience of inspecting sidewalks for the City of
9 Palm Coast and looking at the condition of the
10 sidewalk in whatever these photographs best depict
11 it, do you have any opinion as to what would cause
12 that cracked area and/or that misleveled area?

13 A I mean, I have varied opinions.

14 Q You're the sidewalk guy. Share it with
15 me. What do you think?

16 A It could be a number of things. It could
17 really be a number of things. Weight bearing would
18 be one issue, a vehicle --

19 Q Okay.

20 A -- of generous size.

21 Q A pickup truck generous enough?

22 A I would say a pickup truck or some type of
23 vehicle.

24 Q Okay.

25 A In terms of a Gator cart or something like

1 that, in my experience, I've rarely seen a Gator
2 cart in that weight spectrum take out a piece of
3 sidewalk like that in this manner.

4 Q Okay.

5 A That's a pretty big area. So to me, this
6 represents either a large vehicle or something that
7 compromised the subgrade of the sidewalk itself.

8 Q Okay.

9 A And based on my experience, I can tell you
10 that I've seen areas where actual fire ant nests
11 have gotten under the sidewalk and weakened the
12 substructure --

13 Q Wow, really?

14 A -- to a point where this could actually
15 crack with very little weight.

16 Q Okay.

17 A That's based on my experience.

18 Q That's why I asked.

19 A Anything outside of that, this to me,
20 would not seem like something that would occur
21 naturally --

22 Q Right.

23 A -- just out of random. There would have
24 to be a cause and effect.

25 Q Okay. So based on all your experience

1 with sidewalks, this looks to you like -- if I'm
2 understanding you correctly. And I'm asking you to
3 correct me if I'm wrong -- but it looks to you like
4 either the -- what did you call it? Substrate?

5 A Substructure or subgrade.

6 Q -- substructure or subgrade under it had
7 some type of compromise or something heavier than a
8 Gator cart would cause that crack?

9 A Yes.

10 Q All right. Because you drove Gator carts
11 all over the sidewalks, and you never cracked them
12 with a Gator cart, did you?

13 A Never, not in my recollection, no.

14 Q All right. Do you get any hints or --
15 well, I use the word hints. Do you get any hints or
16 inklings of a problem with the substrate or subpart
17 of the sidewalk from what you see here? Is there
18 anything about the condition of that and the way
19 that's broken that would cause you to conclude that
20 it was more likely caused by a substrate issue as
21 opposed to just simply a weight issue, or can you
22 tell?

23 A In this particular picture, no, I do not.
24 Because what I would look for are indications of any
25 erosion --

1 Q Along the edge?

2 A -- which I do not see.

3 Q And that looks really good on the edge;
4 right?

5 A It looks like a nice, fairly packed edge
6 with a very intact slope and grade to it. So from
7 what I can see, no, it doesn't seem to be
8 compromised by anything, the subgrade. Because it
9 would usually present an indication of a dirt pile,
10 a mound, or missing material. There would be voids
11 created here (gesturing) that you would be able to
12 point out and highlight and document.

13 Q Caused by water or something?

14 A Caused by water, caused by drainage.

15 Q And there's no tree roots in this area, so
16 it's not trees?

17 A Yeah, there's -- it's obvious the trees
18 are way over here (indicating).

19 Q What is down the hill from where
20 Mrs. McDonald is standing? What's that way, down
21 the hill, away from the sidewalk?

22 A Oh, gosh. I wish I could tell you. It's
23 been so long. From the best of my memory, I believe
24 it was a grassy area, maybe a wooded lot. I don't
25 remember anything being there in terms of structure.

1 Q All right. This area of grass would have
2 been maintained by the City; is that right?

3 A I'm assuming it would be, yeah.

4 Q You didn't ever run the mowers, did you?

5 A I certainly have.

6 Q You did run the mowers?

7 A Yes, sir.

8 Q How would you get the mower to an area
9 like this?

10 A Get the mower to an area?

11 Q Yeah.

12 A We would have -- I can only speak for
13 myself.

14 Q Okay.

15 A I would have access points, which I knew
16 were safe to traverse the sidewalk. Be it a mile
17 away and if I had to navigate that right-of-way to
18 get to it, that's how I would get to it. Normally
19 along Clubhouse, we had some areas where there were
20 asphalt pavement into -- let me give you an example.
21 Off the road, there would be an old asphalt pavement
22 structure that would lead to a previous structure
23 that was not really there anymore. I believe it --
24 I could actually name it, but I just can't
25 remember -- off of Clubhouse. And we could access

1 areas like that though that which would not
2 compromise the structure of the sidewalk from any
3 type of vehicle at all.

4 Q Okay. The mowers would be put in a
5 trailer and pulled with a pickup truck I'm assuming
6 to get to the general area where the mowing would be
7 done?

8 A Generally, yes.

9 Q And the truck that was pulling the trailer
10 would be typically what type of truck? Was it
11 typically one type or another, or not?

12 A Typically, it's hard to say. I mean, it
13 varied. We had pickup trucks, standard pickup
14 trucks, that would pull trailers with mowers. And
15 we had twin-cab or dual-cab pickup trucks which were
16 heavier versions of pickup trucks to pull trailers
17 with mowers.

18 Q Okay.

19 A So it would vary.

20 Q Do we have any way to know whether a truck
21 would have driven in this area or not to deliver a
22 mower? Is there any way to know that?

23 A Other than common sense. I would say
24 that's highly unlikely, because of the fact there's
25 a guardrail here. You would not be able to traverse

1 the sidewalk and that's not one spot where one would
2 drive a vehicle hooked up to a trailer across a
3 sidewalk just to drop off a mower, no.

4 Q Right.

5 A Like I mentioned before, we had
6 established access points along our sidewalks where
7 mowers -- it was standard for a mower or any
8 equipment to access. So we could access the
9 sidewalk from the back side without creating any
10 damage to the sidewalk (indicating).

11 Q So if I'm understanding you correctly, it
12 sounds to me like you're saying that your opinion
13 would be that this particular crack in this
14 misleveled section was caused by something at least
15 as heavy as a pickup truck?

16 A Yeah, you did; you did. I mean, I know
17 what you're trying to get at here. And in my
18 experience -- based on my experience, that certainly
19 well could be from a vehicle.

20 MR. BERG: Okay. All right. I think I'm
21 done.

22 MS. BABB-NUTCHER: I have a couple of
23 follow-up. Did you mark this spreadsheet?

24 MR. BERG: I didn't. We can do that
25 though.

1 MS. BABB-NUTCHER: Let's go ahead and make
2 this Defendant's 1, the three-page spreadsheet
3 attached to Mike Marinelli's deposition (sic).
4 (Defendant's Exhibit 1 was marked for
5 identification.)

6 CROSS-EXAMINATION

7 BY MS. BABB-NUTCHER:

8 Q Do you feel, based on the protocol
9 established by the City of Palm Coast, that if Dave
10 Randall or Paul Chouinard had done the inspections
11 in January of 2013 that they would have done what
12 you testified that you would have done and marked
13 this location with spray paint?

14 MR. BERG: Objection. Speculative.

15 A Oh, absolutely, absolutely. Again, I'll
16 reiterate on what I said in terms of how we all
17 agreed as to what our protocol and what our
18 standards were.

19 You have to understand, at the time, there
20 was a period of several years where we were very
21 proactive with sidewalk cracking and bridge --
22 pedestrian bridges as well. So our standards were
23 baselined off of what was mandated, but we also
24 exceeded that. So we made it obvious and we made it
25 apparent and well-known that anyone who was out

1 inspecting sidewalks were to hold the same
2 standards. So it would be uniform code amongst our
3 department. And a lot of times -- I would say
4 99 percent of the time, we exceeded those standards.

5 Q The photos that you have been shown do not
6 indicate any spray paint; is that correct? There is
7 no spray paint in any of these photos?

8 A No, I don't see any, no.

9 Q Okay. And given the fact that there is no
10 notation on the spreadsheet that we've marked as
11 Defense Exhibit 1 for this location -- well, let me
12 back up. Is there any indication that the
13 spreadsheet noted any defect in the sidewalk?

14 A No, there is not. Because it's not
15 itemized as per location. Like I said, these are
16 waypoints which would represent a stretch of linear
17 footage.

18 Q Okay. So --

19 A So this could have -- you know, there
20 could have been cracks all along this entire
21 section, the cross street.

22 Q The Palm Club/Cardinal Court?

23 A Correct.

24 Q But there is nothing that indicates that
25 anybody noted a defect that is indicated on these

1 photographs?

2 A No.

3 MS. BABB-NUTCHER: Okay. I don't have
4 anything further.

5 REDIRECT EXAMINATION

6 BY MR. BERG:

7 Q You mentioned sometimes guys would, quote,
8 steal, unquote, the spray paint?

9 MS. BABB-NUTCHER: Scope.

10 BY MR. BERG:

11 Q What did you mean by that? Like
12 somebody --

13 A I guess I used a harsh word.

14 Q Well, I know. We're using that word very
15 loosely. I'm not suggesting they took it home.

16 A You know, given how some of the Gator
17 carts were parked overnight and the fact that a lot
18 of our tools and small hand tools and so forth might
19 have been left in the Gator cart overnight, it was
20 per- -- there perhaps could have been an incident
21 where, say, somebody in Parks might have needed a
22 can of pink spray paint for an impromptu call and
23 didn't have time, and they spied one of our cans and
24 actually took it out of the Gator cart and took it
25 with them.

1 Q Because it was easy, and why not, it's
2 right there.

3 A Well, sometimes yes. But a lot of times,
4 we had to make sure who took anything out and
5 whether or not that person is responsible for it.
6 And most of the time, those people were responsible
7 for removing tools and items from other vehicles.

8 Q Sure.

9 A And that's what I was referring to. But
10 not all of the time.

11 Q Right, right, right.

12 A And we always made sure we had it when we
13 went out.

14 MR. BERG: Sounds good. Thank you.

15 MS. BABB-NUTCHER: I don't have anything
16 further.

17 You have the right to read through your
18 deposition -- and why don't we go ahead and say
19 he'll read.

20 (The deposition concluded at 11:59 a.m.)

21

22

23

24

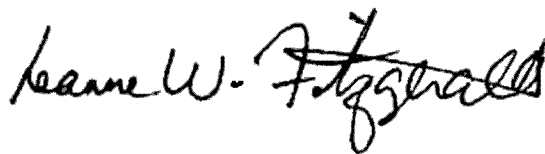
25

CERTIFICATE OF OATH

STATE OF FLORIDA)
)
COUNTY OF FLAGLER)

I, the undersigned authority, certify that TOBY SANTANGELO personally appeared before me on December 8, 2015, and was duly sworn.

WITNESS my hand and official seal this 21st day of December, 2015.



Leanne W. Fitzgerald
Notary Public - State of Florida
My Commission No. FF060921
Expires: February 8, 2018

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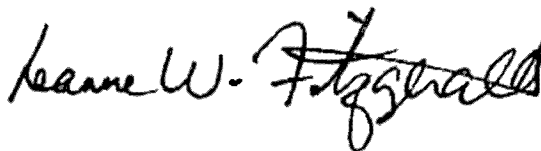
CERTIFICATE OF REPORTER

STATE OF FLORIDA)
)
COUNTY OF VOLUSIA)

I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of TOBY SANTANGELO; and that the foregoing transcript is a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 21st day of December, 2015.



Leanne W. Fitzgerald, FPR
Florida Professional Reporter

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IN THE CIRCUIT COURT OF
THE SEVENTH JUDICIAL
CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA

CASE: 2015 CA 217

DENNIS MCDONALD and JANET
MCDONALD, his wife,

Plaintiffs,

v.

CITY OF PALM COAST,

Defendant.

IN RE: Deposition of TOBY SANTANGELO

TAKEN: 12/08/2015

E-MAILED on 12/21/2015 to: TSANTANGELO1@CFL.RR.COM

The above-referenced transcript has been completed and awaits reading and signing.

Please review the transcript and note any corrections on the attached errata sheet within 30 days or before the date of trial. Once completed, please forward the errata sheet to Southern Reporting Company, 747 South Ridgewood Avenue, Suite 107, Daytona Beach, Florida, 32114.

Your errata sheet, once received, will be forwarded to all ordering parties.

Thank you.

cc: WARD T. BERG, Esquire
DEBRA S. BABB-NUTCHER, Esquire

ERRATA SHEET
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES

IN RE: DENNIS MCDONALD and JANET MCDONALD, his
wife vs. CITY OF PALM COAST
CASE NO: 2015 CA 217
DATE TAKEN: 12/08/2015
DEPONENT: TOBY SANTANGELO

PAGE LINE CHANGE

Table with 3 columns: PAGE, LINE, CHANGE. The table contains 18 empty rows for recording corrections.

Under penalties of perjury, I declare that I have
read the foregoing document and that the facts
stated in it are true.

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TOBY SANTANGELO

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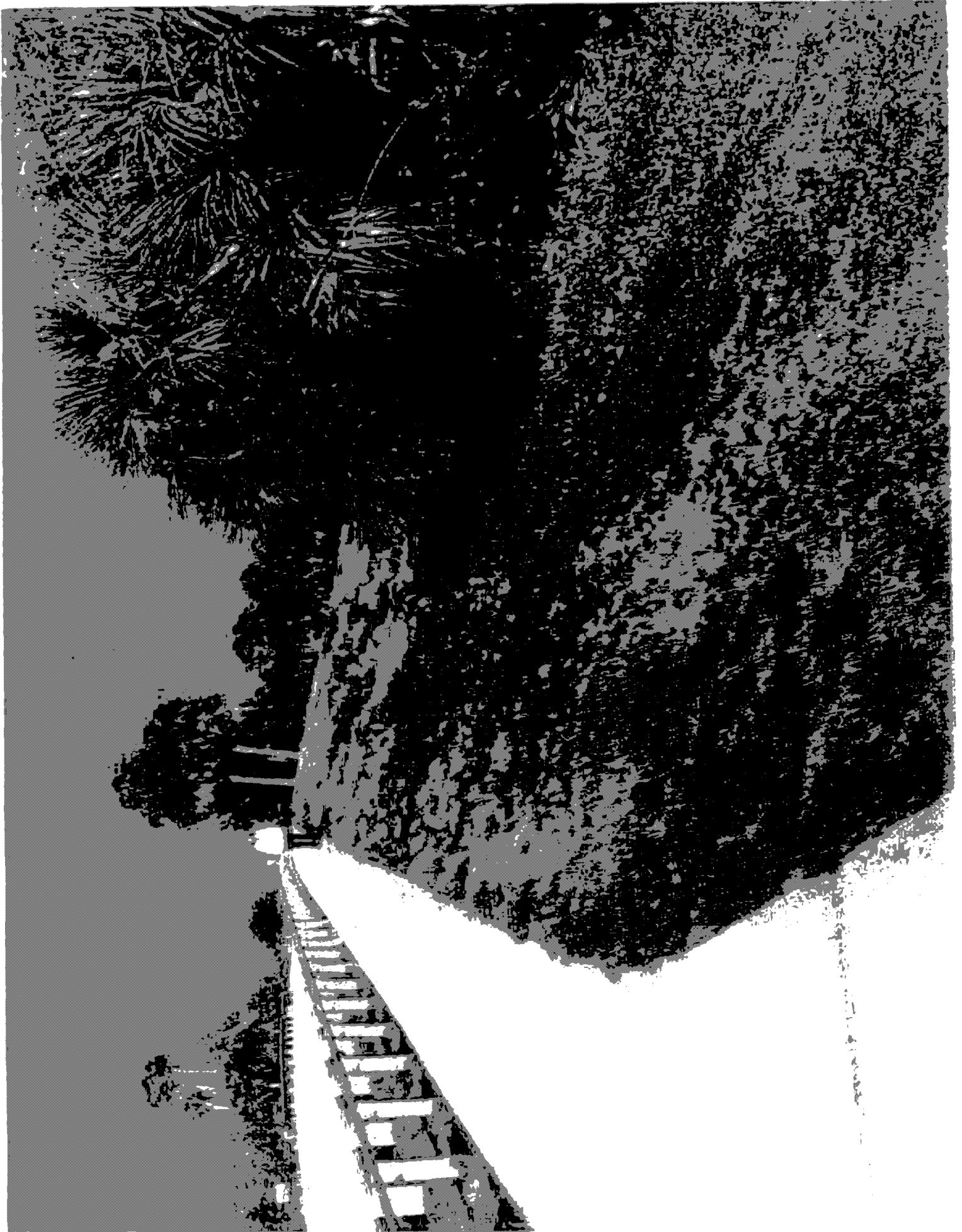
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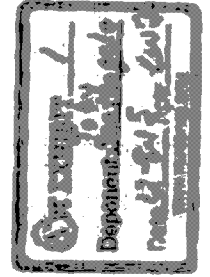
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Asst. Director 4
Department of Health
Date: 1-15-53
WATERBURY, CT 06703

LOCATION	LENGTH	LAST INSP DATE	DATE LAST REPAIR	IF LAST REPAIR	CURRENT DAMAGE	NOTES
CLARVILLE DR BLAIRSVILLE DR. TO PCP EASTBOUND	325	1/1/2013				
PALM HARBOR FROM FRONTIER TO PCP EASTBOUND	14249	1/1/2013				
CLARFIELD DRIVE FROM PALM HARBOR TO CHRISTOPHER CT.	6588	1/1/2013				
CLARHOUSE PCP E-BOUND TO PALM HARBOR PWY	8816	1/1/2013				34
COLBERT LANE FROM BLARE DRIVE TO PCP WESTBOUND	2141	1/1/2013				
GREENWAY COURT FROM COLBERT LANE TO LINEAR PARK ENTRANCE	702	1/1/2013				
FOREST GROVE FROM FIELDSTONE LANE TO OLD KINGS NORTH	2120	1/1/2013				
FLORIDA PARK DRIVE FROM PALM HARBOR TO PCP WESTBOUND	1521	1/1/2013				
OLD KINGS ROAD PALM HARBOR VILLAGE WAY TO PCP WESTBOUND	5843	1/1/2013				
LINE OAKS FROM PCP W-BOUND TO GOLF COURSE DWY.	1009	1/1/2013				
BURROUGHS DRIVE FROM BURBANK TO BELLE TERRE PWY N-BOUND	2159	1/1/2013	2/1/2013			
BERD OF PARADISE FROM BELLE TERRE TO BURNING BUSH AREA	3683	1/1/2013	1/1/2013			185
AVENUE DR FROM BELLE TERRE S-BOUND TO SCHOOL ENT.	15049	1/1/2013				
PARKVIEW DR FROM BELLE TERRE PARK ENT. TO PERSIMMON DR.	2300	1/1/2013				

palm club, cardinal ct



PINE LAKES PKWY (NORTH SECTION) FROM BELLE TERRE NORTH-PARKVIEW CONDOS SECTION 437	1932 437	1/1/2013		
PALM COAST PKWY EASTBOUND FROM BELLE TERRE TO CYPRESS POINT ALSO (MEDIAN STRIPS)	2817	1/1/2013	Feb-13	\$10
PALM COAST PKWY WESTBOUND FROM TOLL BRIDGE TO US 1	22143	2/26/2013	19-Feb	300
LEANING WAY ? FROM BELLE TERRE NORTHBOUND TO PCP W. BOUND	512	2/26/2013		
PINE CONE DR (IN BETWEEN PCP PWYS)	274	2/26/2013		
CYPRESS POINT PKWY FROM BELLE TERRE TO PCP EASTBOUND (BOTH SIDES)	1748	2/26/2013		
CYPRESS EDGE DR. NORTH & SOUTH BOTH SIDES	5000	2/26/2013		
BOLDER ROCK DR. ? FROM PCP WESTBOUND (BOTH SIDES)	1800	2/26/2013		
BELLE TERRE NORTHBOUND FROM PINE GROVE DR. TO PCP EASTBOUND	13547	2/26/2013	19-Feb	40
BELLE TERRE NORTHBOUND FROM PCP EASTBOUND TO MANANZAS WDS PKWY	18270	2/26/2013	NEW	
BELLE TERRE SOUTHBOUND FROM MANANZAS WDS PKWY TO PCP WESTBOUND	18940	2/26/2013		
BELLE TERRE SOUTHBOUND FROM PCP WESTBOUND TO BR 190	28137	2/26/2013	19-Feb	400
SEMINOLE WOODS PARK ALONG SESAME TO SEWARD LANE SIDEWALK WITHIN PARK	1484 614	2/26/2013		
SEMINOLE PKWY SOUTHBOUND GRAND LANGUAGES	1000	2/26/2013		
BELLE TERRE SOUTH BENTON VILLAGE	335	2/26/2013		

IN ROW

ALL PARKS	20386							
TOTAL U	223905							
CURRENT TOTAL MILES	42.4							1438

city additions
 British trails
 public market
 station 25
 US - total pop

1/9/2018
 1/9/2018
 1/11/2018
 1/11/2018