PHONE: 707-234-6650 FAX: 707-463-5709 FB PHONE: 707-964-5379 FB FAX: 707-961-2427 pbs@mendocinocounty.org www.mendocinocounty.org/pbs

JULIA KROG, DIRECTOR

June 27, 2022

PUBLIC HEARING NOTICE OF PENDING ACTION STANDARD COASTAL DEVELOPMENT PERMIT

The Mendocino County Coastal Permit Administrator, at a regular meeting to be held on Thursday, July 14, 2022, at 11:00 a.m. or as soon thereafter as the item may be heard, will conduct a public hearing on the below described project that is located in the Coastal Zone. This meeting will be conducted virtually and not available for in person public participation in an effort to slow the spread of COVID-19 and pursuant to the recommendation of the Mendocino County Health Officer and the California Department of Industrial Relations. In order to minimize the risk of exposure during this time of emergency, the public may participate digitally in meetings by sending comments to pbscommissions@mendocinocounty.org or telecomment. The telecomment form mav be found via https://www.mendocinocounty.org/government/planning-building-services/meeting-agendas. The meeting available for viewing on the Mendocino County YouTube https://www.youtube.com/MendocinoCountyVideo

CASE#: CDP_2021-0049 **DATE FILED:** 10/29/2021

OWNER/APPLICANT: KENNETH & MARIAN BROWN TRUST

REQUEST: Standard Coastal Development Permit to reroof an existing single-family residence,

replace electrical panel, and install roof-mounted solar array on garage roof.

ENVIRONMENTAL DETERMINATION: Categorically Exempt

LOCATION: In the Coastal Zone, in the Town of Gualala, on the west side of Hwy 1 (SR 1), 500± feet from the terminus of Coral Court (CR 531); located at 38570 Coral Court, Gualala;

APN: 145-161-31.

SUPERVISORIAL DISTRICT: 5 (Williams) **STAFF PLANNER:** STEVEN SWITZER

The staff report, and notice, will be available 10 days before the hearing on the Department of Planning and Building Services website at: https://www.mendocinocounty.org/government/planning-building-services/meeting-agendas/coastal-permit-administrator

As you are an adjacent property owner and/or interested party, you are invited to submit comments, at or prior to the hearing; all correspondence should contain reference to the above noted case number. Written comments should be submitted by mail to the Department of Planning and Building Services Commission Staff, at 860 North Bush Street, Ukiah or 120 W Fir Street, Fort Bragg, California, or by email to pbscommissions@mendocinocounty.org no later than July 13, 2022. Individuals wishing to address the Coastal Permit Administrator during the public hearing under Public Expression are welcome to do so via e-mail at pbscommissions@mendocinocounty.org, or telecomment, in lieu of personal attendance.

All public comment will be made available to the Coastal Permit Administrator, staff, and the general public as they are received and processed by the Clerk, and can be viewed as attachments under its respective case number listed at: https://www.mendocinocounty.org/government/planning-building-services/meeting-agendas/coastal-permit-administrator

The decision of the Coastal Permit Administrator shall be final unless a written appeal is submitted to the Board of Supervisors with a filing fee within 10 calendar days thereafter. If appealed, the decision of the Board of Supervisors to approve the project shall be final unless appealed to the Coastal Commission in writing within 10 working days following Coastal Commission receipt of a Notice of Final Action on this project. If you challenge the above case in court, you may be limited to raising only those issues described in this notice or that you or someone else raised at the public hearing, or in written correspondence delivered to the Coastal Permit Administrator at or prior to, the public hearing.

AMERICANS WITH DISABILITIES ACT (ADA) COMPLIANCE. Mendocino County complies with ADA requirements and upon request, will attempt to reasonably accommodate individuals with disabilities by making meeting material available in appropriate alternate formats (pursuant to Government Code Section 54953.2). Anyone requiring reasonable accommodation to participate in the meeting should contact the Department of Planning and Building Services by calling (707) 234-6650 at least five days prior to the meeting.

Additional information regarding the above noted item may be obtained by calling the Department of Planning and Building Services at 707-234-6650, Monday through Friday, 8:00 a.m. through 5:00 p.m. Should you desire notification of the Planning Commission's decision you may do so by requesting notification in writing and providing a self-addressed stamped envelope to the Department of Planning and Building Services.

JULIA KROG, Director of Planning and Building Services

JULY 14, 2022 CDP_2021-0049

SUMMARY

OWNER/ APPLICANT: KENNETH & MARIAN BROWN TRUST

916 HARRISON AVE CLAREMONT, CA 91711

REQUEST: Standard Coastal Development Permit to reroof an

existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof.

LOCATION: In the Coastal Zone, in the Town of Gualala, on the west

side of State Route 1 (SR 1), 500 feet from the terminus of Coral Court (CR 531); located at 38570 Coral Court,

Gualala; APN: 145-161-31.

TOTAL ACREAGE: 3.2± Acres

GENERAL PLAN: Rural Residential (RR-5[SR])

ZONING: Rural Residential (RR-5[SR])

SUPERVISORIAL DISTRICT: 5 (Williams)

ENVIRONMENTAL DETERMINATION: Categorically Exempt

APPEALABLE: Yes. Appeal Jurisdiction

RECOMMENDATION: APPROVE WITH CONDITIONS

STAFF PLANNER: STEVEN SWITZER

BACKGROUND

PROJECT DESCRIPTION: Standard Coastal Development Permit to reroof an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof. Considering the age of the current 22 year old roof on the single-family residence, the roof is in need of repair. Further information regarding the property's location on a blufftop, as well as County standards and practices on reviewing applications to determine threats and impacts on geologic hazards, are discussed in the Hazards Management section of this report.

<u>APPLICANT'S STATEMENT:</u> "Permit to replace the roof: the roof is 22 years old and needs replacement, color to remain grey with NO architectural changes. Permit to replace entrance electrical panel, panel is 43 years old, breaker is no longer made. Panel has the PG&E meter and one 200 amp. double pole breaker. Permit to install 3kW grid tied solar panel array on the south side of the garage roof. That area cannot be seen by neighbors or from the Gualala Park."

RELATED APPLICATIONS ON-SITE:

- BF 2021-0644 –Reroof (On Hold Pending Issuance of CDP_2021-0049)
- BF 2000-0485 Termite Repair, Propane Addition, Reroof
- BC 1997-0025 –Substandard Roof (Closed)

<u>SITE CHARACTERISTICS</u>: Situated in the town of Gualala, the parcel is located on the west side of Hwy 1 (SR 1), 500 feet from the terminus of Coral Court (CR 531). Access to the site is provided by an

¹ Location Map

easement through three parcels, two of which are owned by the applicant. The subject property is directly adjacent to the Pacific Ocean on a blufftop with vertical heights of 45 to 50 feet. Upper bluff slopes are approximately two horizontal to one vertical (2H:1V) foot, while the lower bluffs are near vertical. As sited, the residence terrace is predominately level sloping gently, approximately 10H:1V, towards the west-southwestern portions of the parcel. The 3.2± acre parcel is classified as Urban and Built-Up Land and currently developed with a Single-Family Residence and propane tank storage shed. Gualala Community Services District manages a community sewage system for the property. Groundwater resources for the site are managed by North Gualala Water Company. Coastal Ground Water Resources map the parcel as a Critical Water Area.² LCP Land Capabilities and Natural Hazards map the area as Non-Prime Agricultural Land in Zone 1 with underlying Bedrock.³ The subject parcel as well as adjacent parcels contain Western Soil Classifications 139 -Dystropepts.⁴ Both South Coast Fire Protection District and California Department of Forestry and Fire Protection (CalFire) are the responsible fire agencies.

SURROUNDING LAND USE AND ZONING:

	GENERAL PLAN	ZONING	LOT SIZES	USES
NORTH	Rural Residential (RR-5[SR])	Rural Residential (RR-5[SR])	2± Acres	Residential
EAST	Rural Residential (RR-5[SR])	Rural Residential (RR-5[SR])	.3± Acres; .3± Acres; .3± Acres; .3± Acres	Residential
SOUTH	Rural Residential (RR-5[SR])	Rural Residential (RR-5[SR])	1.2± Acres	Residential
WEST	Pacific Ocean	Pacific Ocean	Pacific Ocean	Pacific Ocean

PUBLIC SERVICES:

Access: Easement connecting to terminus of Coral Court (CR 531)

Fire District: South Coast Fire Protection District
Water District: North Gualala Water Company
Sewer District: Gualala Community Services District

School District: Arena Union Elementary

AGENCY COMMENTS: On February 18, 2022 project referrals were sent to the following responsible or trustee agencies with jurisdiction over the Project. Any comment that would trigger a project modification or denial are discussed in full as key issues in the following section.

REFERRAL AGENCIES	COMMENT	
Building Division (Fort Bragg)	No Comment	
CALFIRE (Land Use)	No Response	
California Coastal Commission	No Response	
California Dept. of Fish & Wildlife	No Response	
Cloverdale Rancheria	No Response	
County Assessor	No Response	
Environmental Health (EH)	No Response	
Gualala MAC	Comment	
Planning Division (Fort Bragg)	Comment	
Redwood Valley Rancheria	No Comment	
Sherwood Valley Band of Pomo Indians	No Response	
South Coast Fire Protection District	No Response	

² Critical Water Areas Map

³ LCP Land Capabilities & Natural Hazards Map

⁴ Western Soil Classifications Map

KEY ISSUES

LOCAL COASTAL PROGRAM CONSISTENCY:

The proposed project is consistent with the goals and policies of the Local Coastal Program, General Plan, and Zoning Codes as detailed below:

LAND USE: The proposed development to reroof an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof is located on a parcel within the boundaries of the Local Coastal Program (LCP).⁵ The parcel is designated under Mendocino County General Plan Chapter 7: Coastal Element, Chapter 2: The Land Use Plan, Section 2.2 –Rural Residential (RR-5 [SR])⁶. The Rural Residential classification intends:

...to encourage local small scale food production (farming) in areas which are not well suited for large scale commercial agriculture, defined by present or potential use, location, mini-climate, slope, exposure, etc. The Rural Residential classification is not intended to be a growth area and residences should be located as to create minimal impact on agricultural viability. (MCGP, Ch. 7 Coastal Element, Ch. 2.2 –Rural Residential)

Though the parcel is designated as RR-5 (5 acre minimum) the parcel's lot size variable is governed by the Suburban Residential (SR) land use classification. The intent and minimum parcel size for the SR classification is as follows:

Intent: The Suburban Residential classification is intended to be applied on lands adjacent to existing developed communities on the urban side of the Urban/Rural boundary, or to lands which are appropriate to accommodate future residential growth. Land within the Suburban Residential classification should have moderate to light constraints for residential development, should be served by the publicly-maintained road network, and should be located within utility service areas or the logical extensions thereof. Portions of lands within the Suburban Residential classification will be appropriate for development of residential subdivisions. Such areas should be developed as major subdivisions, not minor subdivisions.

Minimum Parcel Size:

Within water and sewer service areas:

Map Code SR: 4,000 square feet for mobile home subdivisions and manufactured home subdivision - 5 acre minimum site required. 6,000 square feet.

The proposed development to reroof an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof is consistent with the intent and principally permitted uses of the RR and SR classifications.

ZONING: The parcel is located within a Rural Residential (RR-5 [SR]) and a Floodplain Combining District (FP).⁷ The intent of the RR district is as follows:

... to encourage and preserve local small scale farming in the Coastal Zone on lands which are not well-suited for large scale commercial agriculture. Residential uses should be located as to create minimal impact on the agricultural viability. (MCC, Title 20, Division II, Ch. 20.376)

⁵ LCP Land Use Map 31: Gualala

⁶ General Plan Classifications Map

⁷ Zoning Display Map

COASTAL PERMIT ADMINISTRATOR STAFF REPORT FOR STANDARD COASTAL DEVELOPMENT PERMIT

The proposed development to reroof an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof is consistent with the principally permitted uses under the RR Zoning District.

The maximum building height allowed in the RR District is 28 feet above natural grade for Non-Highly Scenic Areas. Considering the maximum height of the structure, 13± feet tall as supplied on the application, the project would comply with the maximum building height requirement and not encroach the 28 feet limit with the addition of the roof mounted solar panels.

Further discussion of the FP Combining District is covered in the Hazards Management section of this report.

HABITATS AND NATURAL RESOURCES: Environmentally Sensitive Habitat Areas (ESHA) are addressed in both the Mendocino County General Plan's Coastal Element and Division II –Mendocino County Coastal Zoning Code. Chapter 20.496 of Mendocino County Coastal Zoning Code prescribes that any project having a potential impact to an ESHA shall be subject to a biological survey, prepared by a qualified biologist, to determine the extent of the sensitive resource, to document potential negative impacts, and to recommend appropriate mitigation measures. Mapping designates the parcel as barren and does not indicate that the proposed development will impact any immediate or adjacent sensitive coastal resources.⁸ No biological survey was requested. On January 18, 2022, the project was referred to California Department of Fish & Wildlife (CDFW) where no response was received. The project does not propose any expansion of the existing footprint of the single-family residence on the parcel. Considering the aforementioned items, the proposed development is consent with the regulations for ESHA outlined in Chapter 20.496.

HAZARDS MANAGEMENT: The parcel is mapped as moderate fire hazard.⁹ The responsible fire agencies are South Coast Fire Protection District and California Department of Forestry and Land Use (CalFire). No comment was received from either agency regarding the proposed development. A standard condition requires that the applicant secure all necessary permits for the proposed development from County, State and Federal agencies having jurisdiction to ensure fire abatement and protection policies will be addressed.

The Local Coastal Program maps natural hazards of the project site in Zone 1 with underlying bedrock. ¹⁰ The project site's location on a blufftop parcel requires a preliminary investigation to determine threats and impacts from geologic hazards. Section 20.500.015 provides County practices and standards for the determination of Hazard Areas stating the following:

(2) Geologic Investigation and Report. In areas of known or potential geologic hazards such as shoreline and blufftop lots and areas delineated on the hazard maps, a geologic investigation and report prior to development approval, shall be required. The report shall be prepared by a licensed engineering geologist or registered civil engineer pursuant to the site investigation requirements in Chapter 20.532. (MCC, Title 20, Division II, Ch. 20.500)

In accordance with Section 20.500.015, the applicant provided a Geologic Report prepared by a licensed engineering geologist at Brunsing Associates, Inc. dated October 27, 2021. A summary of the conclusions contained in the report are detailed below:

...the existing residence is in relatively good condition and appears to be un-distressed by foundation settlement. The bluff near the house is presently stable and is not currently undergoing any sever erosion or landsliding. The lower bluff is composed of hard bedrock that is generally resistant to wave erosion, except for erosion along weaker fracture zones and faults. The residence should remain unaffected by bluff retreat

⁸ LCP Habitats & Resources Map

⁹ Fire Hazard Zones Map

¹⁰ LCP Land Capabilities and Natural Hazards Map

for the next 47 years (the remainder of the 75 years lifespan from the 1993 Glomb report) and possibly the next 75 years or more.

Changes in the condition of the site can occur over time, whether by natural causes or by human activities on this or adjacent sites. Accordingly, the prepared geological report and future development on the site may be subject to further review and revision as changed conditions are identified. Staff concurs with the findings contained in the report from Brunsing Associates, Inc. and believes that the potential geologic hazard of the blufftop does not pose any immediate threats to the proposed development.

With regards to the parcel's location within with a FP Combining District, it is important to note the elevation of the project site. Hazards such as severe storms or tsunamis pose real risks for similar parcels adjacent to the Pacific Ocean within the Mendocino Coastal Zone. Since the property bluffs, where the single-family residence is sited, are approximately 45 to 50 feet in vertical height, the likelihood of future impact or inundation from a severe storm or tsunami are considered low.

As currently proposed, the reroof of an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof is consistent with the standards of the FP Combining District and those prescribed in Chapter 20.500 for Hazard Areas within the county.

ARCHAEOLOGICAL/CULTURAL RESOURCES: The project does not propose any ground disturbance and will remain within the current footprint of the existing development on the parcel. Subsequently the project was not referred to Mendocino County Archaeological Commission (ARCH) or Northwest Information Center at Sonoma State University (SSU) for review on the basis of no proposed ground disturbance. The applicant is advised of the Discovery Clause, evoking Section 22.12.090 and its procedures subsequent to the discovery of any cultural resources during construction activities associated with the project.

The project was referred to three local tribes for review, and comment, including Cloverdale Rancheria, Redwood Valley Rancheria, and Sherwood Valley Rancheria. No response was received from the tribes.

With the added condition, the proposed development is consistent with Mendocino County policies for protection of paleontological and archaeological resources.

GROUNDWATER RESOURCES: The project site is mapped as Critical Water Resources. ¹¹ Groundwater resources for the site are managed by North Gualala Water Company. The proposed project was referred to North Gualala Water Company (NGWC) and Environmental Health (DEH) to review impacts to water and septic. No response was received from either agency regarding the project. The proposed development to reroof an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof shall not affect groundwater resources or septic on the site. The proposed project is consistent with the Local Coastal Program policies related to groundwater resources and DEH regulations.

TRANSPORTATION, UTILITES AND PUBLIC SERVICES: Staff finds the project to not significantly contribute to new sources of traffic on local and regional roadways. The project will not impact transportation or circulation and subsequently will be provided adequate access by means of an easement connecting to terminus of Coral Court (CR 531). The proposed project is consistent with regulations outlined in Chapter 20.516.

The parcel's Land Use classification (RR-5[SR]) has a five acre lot size minimum, variable to 6,000 square feet. 12 Coastal Element Policy 3.8-10 outlines variable residential density policies:

In order to be developed to the smaller parcel size, areas indicated on the map as having a variable density zoning classification shall be required to be served by a public water system which utilizes surface waters, and which does not impact upon the ground water resource, or by completion of a hydrological study which supports those greater densities. (MCGP, Ch. 7, Ch. 3.8)

12 MCGP, Ch. 7, Ch. 2.2 -Suburban Residential

¹¹ Ground Water Resources Map

A private water district services the water needs of the parcel. The proposed project does not intend to expand current water usage on the site. The proposed project will not impact the Critical Water resources of the surrounding area and is consistent with Coastal Element Policy 3.8-10 and transportation, utilities and public services regulations as outlined in Chapter 20.516.

ENVIRONMENTAL PROTECTION

Pursuant to Title 14, Division 6, Chapter 3, Article 19, Section 15302(c) of California Environmental Quality Act (CEQA) Guidelines, a categorical exemption is offered for replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. The proposed project to reroof an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof is categorically exempt given the development's negligible and/or no expansion of capacity on the site.

PROJECT FINDINGS AND CONDITIONS

Pursuant to the provisions of Chapter 20.532 and Chapter 20.536 of the Mendocino County Coastal Zoning Code, the Coastal Permit Administrator approves CDP_2021-0049 for the proposed project to reroof an existing single-family residence, replace electrical panel, and install roof-mounted solar array on garage roof, and adopts the following findings and conditions.

FINDINGS:

- 1. Pursuant with MCC Section 20.532.095(A)(1), the proposed development is in conformity with the certified Local Coastal Program. The proposed reroof, roof-mounted solar array, and utility upgrade for the single-family residence are principally permitted uses within the RR land use classification and is consistent with the intent of the RR Classification. The proposed development on a blufftop parcel is allowed with an approved Coastal Development Permit; and
- 2. Pursuant with MCC Section 20.532.095(A)(2), the proposed development would be provided with adequate utilities, access roads, drainage, and other necessary facilities. The site has been served for many years, and would continue to be served, by a private water district and public sewer district; and
- 3. Pursuant with MCC Section 20.532.095(A)(3), the proposed development is consistent with the purpose and intent of the Rural Residential Zoning District. The proposed development preserves the integrity of the Rural Residential Zoning District; and
- 4. Pursuant with MCC Section 20.532.095(A)(4), the proposed reroof, roof-mounted solar array, and utility upgrade, if constructed in compliance with the conditions of approval, would not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act and is determined to be Categorically Exempt from further environmental review; and
- 5. Pursuant with MCC Section 20.532.095(A)(5), the proposed development would not have any adverse impact on any known archaeological or paleontological resources, as there are no known resources within the vicinity of the site and no proposed ground disturbance. Standard Condition 8 is in place when archaeological sites or artifacts are discovered; and
- 6. Pursuant with MCC Section 20.532.095(A)(6), other public services, including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve the proposed development. The site is currently developed with an existing single-family residence and proposes a re-roof, roof-mounted solar array, and utility upgrade; and
- 7. Pursuant with MCC Section 20.532.095(B), the proposed development would not diminish public access to Mendocino County coastal areas and conforms to the goals and policies of the Coastal Element of the General Plan. The project site is located between the first public road and the sea; and is not designated as a potential public access point.

CONDITIONS OF APPROVAL:

- 1. This action shall become final on the 11th day following the decision unless an appeal is filed pursuant to Section 20.544.015 of the Mendocino County Code. The permit shall become effective after the ten (10) working day appeal period to the Coastal Commission has expired and no appeal has been filed with the Coastal Commission. The permit shall expire and become null and void at the expiration of two years after the effective date except where construction and use of the property in reliance on such permit has been initiated prior to its expiration.
- To remain valid, progress towards completion of the project must be continuous. The Applicants have sole responsibility for renewing this application before the expiration date. The County will not provide a notice prior to the expiration date.
- 3. The application, along with supplemental exhibits and related material, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.
- 4. This permit shall be subject to the securing of all necessary permits for the proposed development from County, State and Federal agencies having jurisdiction.
- 5. The Applicants shall secure all required building permits for the proposed project as required by the Building Inspection Division of the Department of Planning and Building Services.
- 6. This permit shall be subject to revocation or modification upon a finding of any one or more of the following:
 - a. The permit was obtained or extended by fraud.
 - b. One or more of the conditions upon which the permit was granted have been violated.
 - c. The use for which the permit was granted is conducted so as to be detrimental to the public health, welfare or safety, or to be a nuisance.
 - d. A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective, or has enjoined or otherwise prohibited the enforcement or operation of one or more such conditions.
- 7. This permit is issued without a legal determination having been made upon the number, size or shape of parcels encompassed within the permit described boundaries. Should, at any time, a legal determination be made that the number, size or shape of parcels within the permit described boundaries are different than that which is legally required by this permit, this permit shall become null and void.
- 8. If any archaeological sites or artifacts are discovered during site excavation or construction activities, the property owner shall cease and desist from all further excavation and disturbances within 100-feet of the discovery, and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resources in accordance with Section 22.12.090 of the Mendocino County Code.
- 9. To comply with MCC Section 20.376.045, the building height limit shall not exceed twenty-eight (28) feet above natural grade.
- 10. Conditions approving CDP_2021-0049 shall be attached to any building permit application and shall be a part of on-site construction drawings.

5.31.2022

DATE

Appeal Period: 10 Days Appeal Fee: \$2620.00

ATTACHMENTS:

- A. Location Map
- B. Aerial Map
- C. Zoning MapD. General Plan Map
- E. LCP –Land Use Map 15: GualalaF. LCP –Land Capabilities & Natural Hazards
- G. LCP -Land Habitats & Resources
- H. Post LCP Certification & Appeal Jurisdiction
- I. Adjacent Parcels Map
 J. Fire Hazards Map
- K. Fire Responsibility Area Map
- L. Coastal Ground Water Resource Area Map
- M. Critical Water Areas Map
- N. Western Soil Classes Map
- O. Water Districts Map

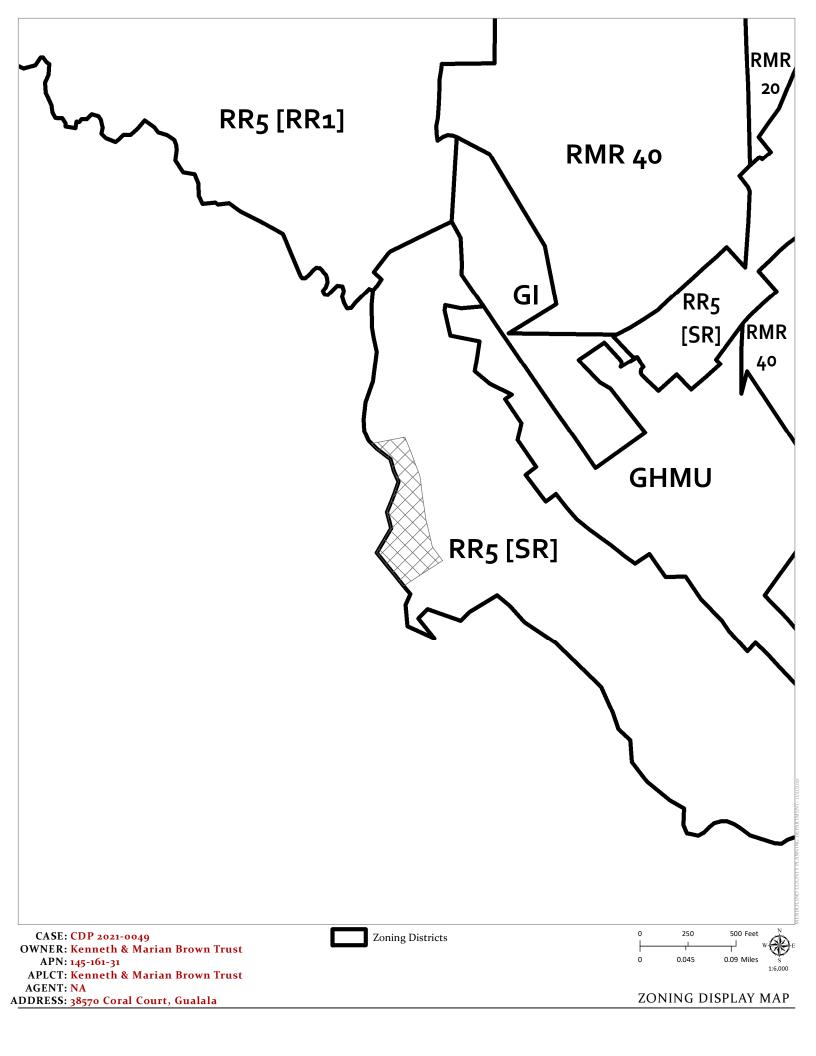


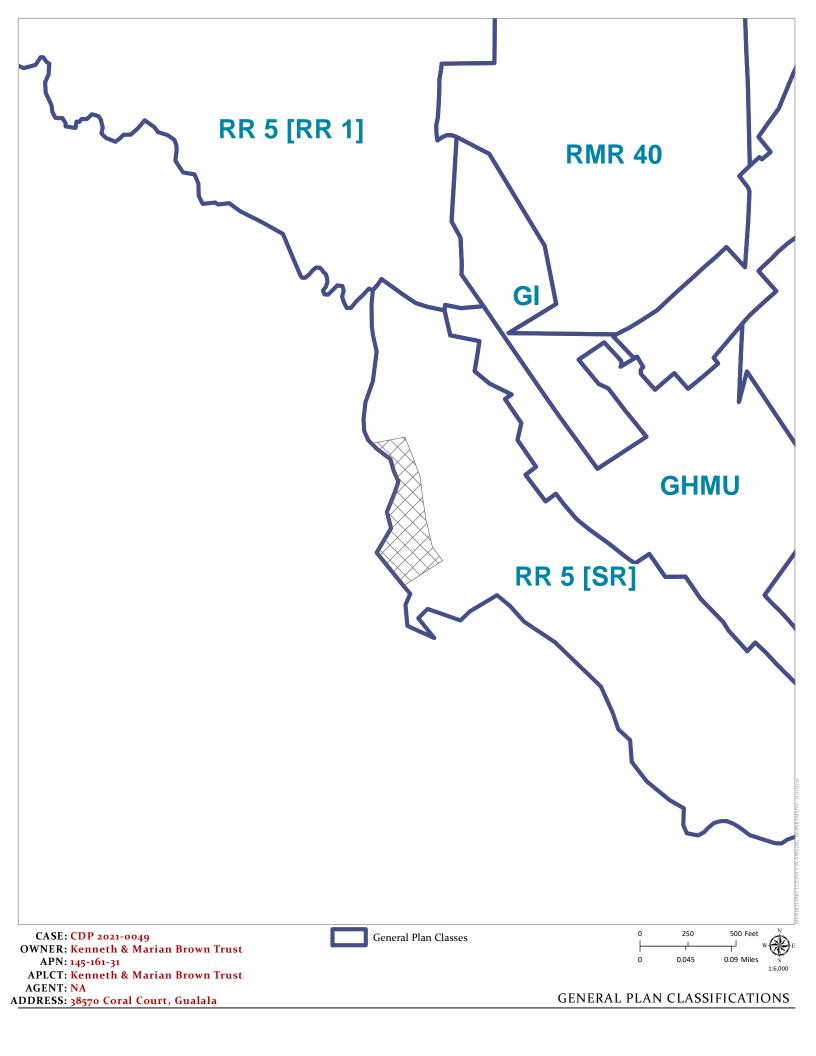


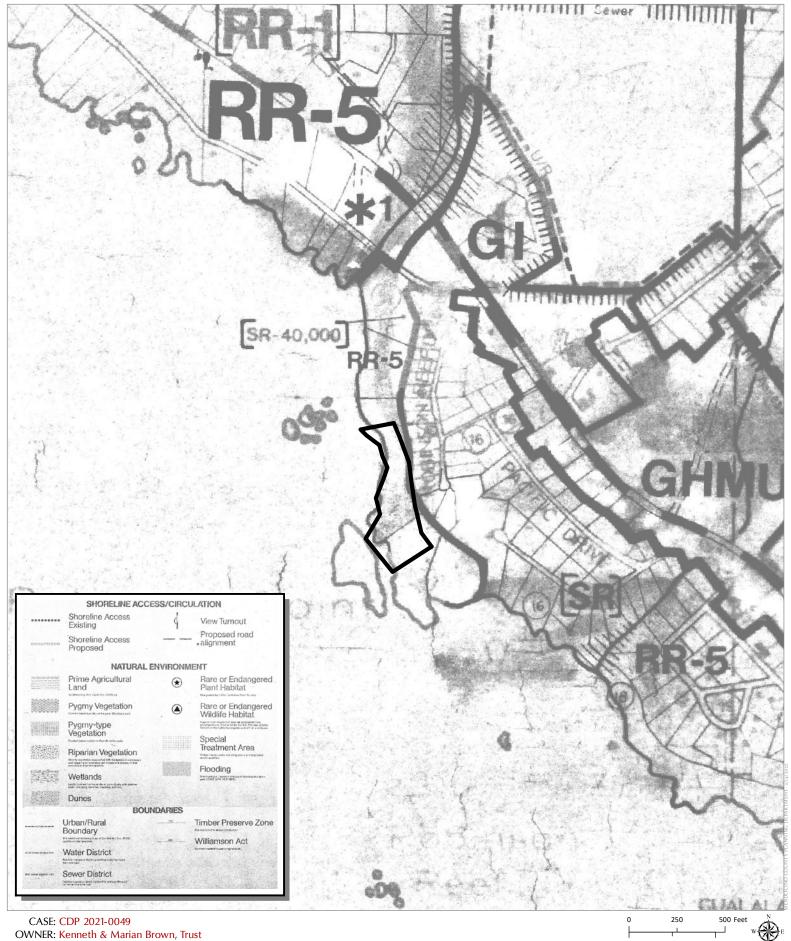
APLCT: Kenneth & Marian Brown Trust AGENT: NA ADDRESS: 38570 Coral Court, Gualala



AERIAL IMAGERY



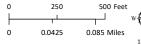


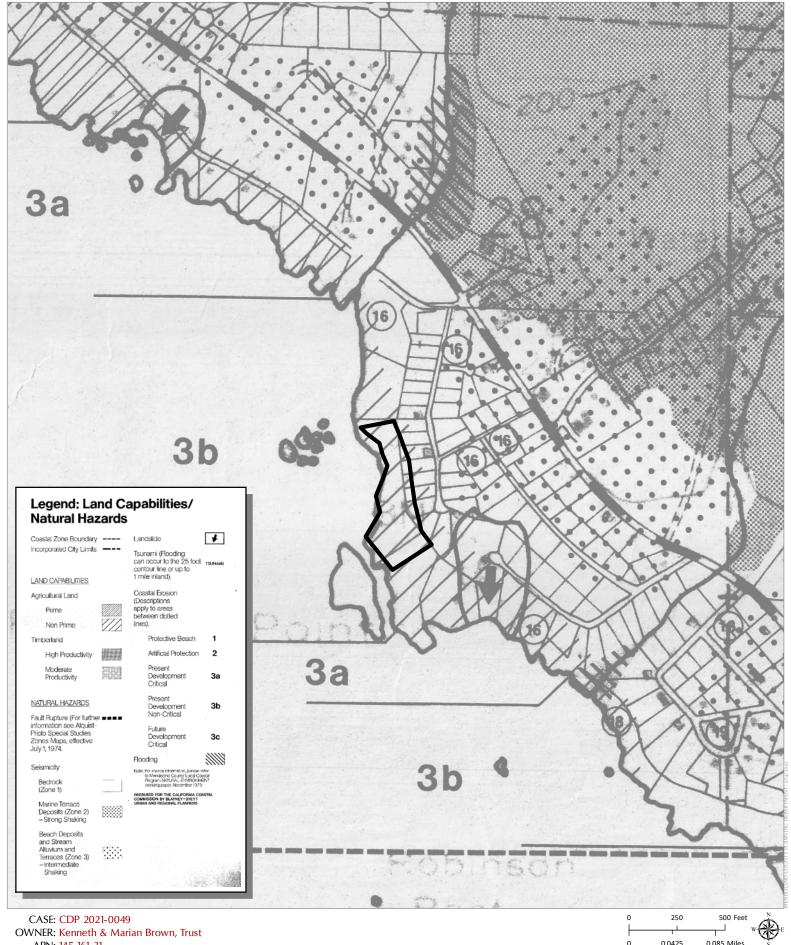


APN: 145-161-31

APLCT: Kenneth & Marian Brown, Trust

AGENT:

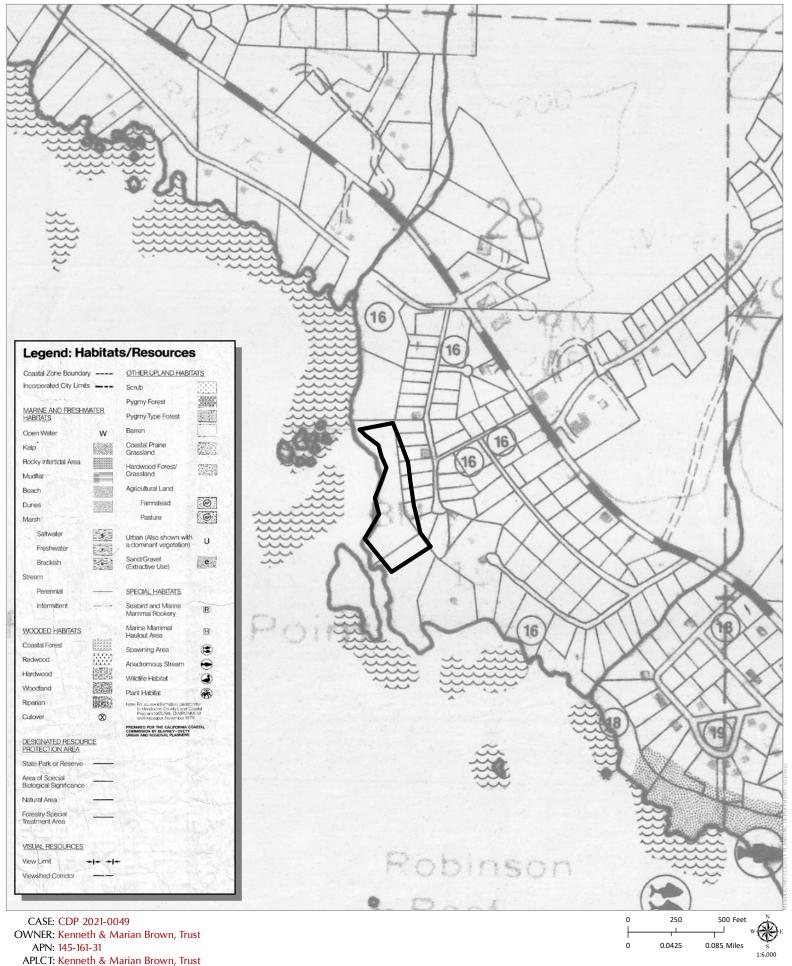




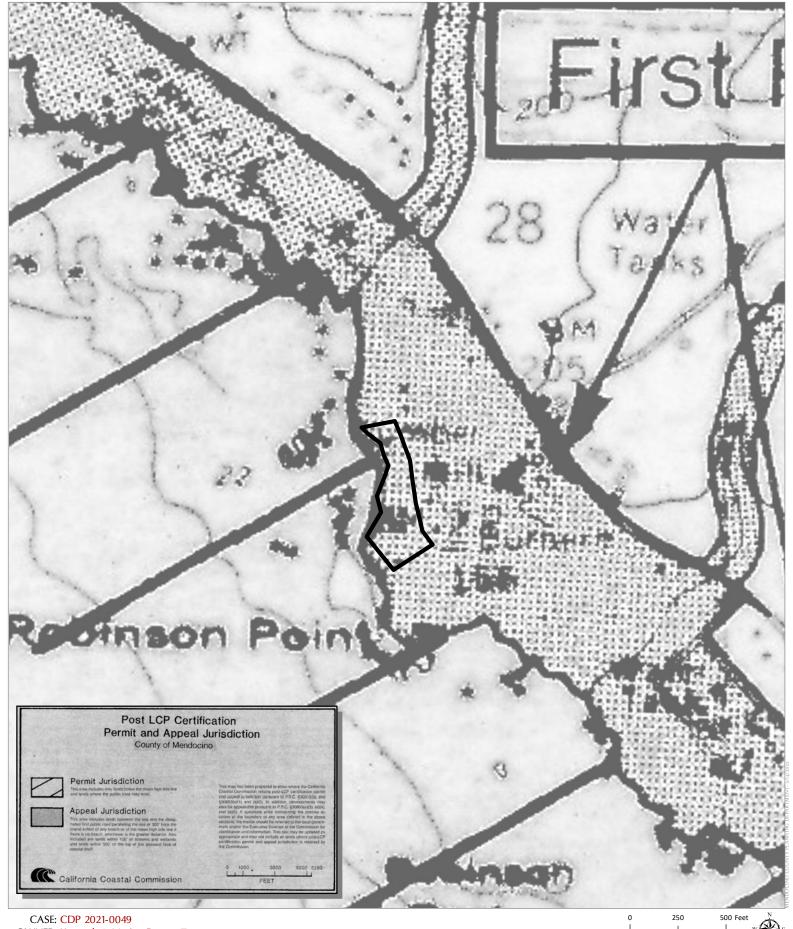
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AGENT:



OWNER: Kenneth & Marian Brown, Trust

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APLCT: Kenneth & Marian Brown, Trust

AGENT:

