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**COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING AND BUILDING
STAFF REPORT**

Tentative Notice of Action

MEETING DATE April 8, 2016	CONTACT/PHONE Airlin M. Singewald, Senior Planner (805) 781-5198	APPLICANT 1736PAC, LLC.	FILE NO. DRC2015-00073
LOCAL EFFECTIVE DATE April 22, 2016	asingewald@co.slo.ca.us		
APPROX FINAL EFFECTIVE DATE May 13, 2016			
SUBJECT A request by 1736PAC, LLC for a Minor Use Permit / Coastal Development Permit to allow an existing 2,478 square-foot, 4-bedroom single family residence to be used as a residential vacation rental. The Minor Use Permit is requesting to modify the location standard for vacation rentals per Coastal Zone Land Use Ordinance Section 23.08.165(C)(2). The requested waiver would allow the proposed vacation rental to be located within 40 feet of an existing vacation rental, which is closer than the distance requirement allows for. The proposed project will result in no site disturbance on a 5,432 square-foot parcel. The proposed project is within the Residential Single Family land use category and is located at 1736 Pacific Avenue, approximately 75 feet north of the 18 th Street and Pacific Avenue intersection, within the community of Cayucos. The site is in the Estero planning area.			
RECOMMENDED ACTION Deny Minor Use Permit / Coastal Development Permit DRC2015-00073 based on the findings listed in Exhibit A.			
ENVIRONMENTAL DETERMINATION This project is found to be statutorily exempt from the California Environmental Quality Act under the provisions of Public Resources Code section 21080(b)(5), which provides that CEQA does not apply to projects which a public agency rejects or disapproves.			
LAND USE CATEGORY: Residential Single Family	COMBINING DESIGNATION Archeologically Sensitive Area, Coastal Appealable Zone, Flood Hazard, Geologic Study Area, Local Coastal Plan, Small Scale Neighborhood	ASSESSOR PARCEL NUMBER 064-236-007	SUPERVISOR DISTRICT 2
PLANNING AREA STANDARDS: None applicable <i>Does the project meet applicable Planning Area Standards?: N/A</i>			
LAND USE ORDINANCE STANDARDS: Section 23.08.165 – Residential Vacation Rentals <i>Does the project conform to the Land Use Ordinance Standards?: No – see discussion</i>			
FINAL ACTION This tentative decision will become the final action on the project, unless the tentative decision is changed as a result of information obtained at the administrative hearing or is appealed to the County Board of Supervisors pursuant Section 23.01.042 of the Coastal Zone Land Use Ordinance; effective on the 10th working day after the receipt of the final action by the California Coastal Commission. The tentative decision will be transferred to the Coastal Commission following the required 14-calendar day local appeal period after the administrative hearing. The applicant is encouraged to call the Central Coast District Office of the Coastal Commission in Santa Cruz at (831) 427-4863 to verify the date of final action. The County will not issue any construction permits prior to the end of the Coastal Commission process.			
ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING THE DEPARTMENT OF PLANNING & BUILDING AT: COUNTY GOVERNMENT CENTER γ SAN LUIS OBISPO γ CALIFORNIA 93408 γ (805) 781-5600 γ FAX: (805) 781-1242			

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EXISTING USES: Single family residence	
SURROUNDING LAND USE CATEGORIES AND USES: <i>North:</i> Residential Single Family / residences <i>East:</i> Residential Single Family / residences <i>South:</i> Residential Single Family / residences <i>West:</i> Residential Single Family / residences	
OTHER AGENCY / ADVISORY GROUP INVOLVEMENT: The project was referred to: Public Works, Cayucos Sanitary District, Paso Robles Beach Water Association, Cal Fire, Cayucos Citizens Advisory Council, and California Coastal Commission	
TOPOGRAPHY: Nearly level	VEGETATION: Ornamental landscaping
PROPOSED SERVICES: Water supply: Paso Robles Beach Water Association Sewage Disposal: Cayucos Sanitary District Fire Protection: Cal Fire	ACCEPTANCE DATE: January 25, 2016

DISCUSSION

PROPOSED PROJECT

The proposed project is a request to use an existing residence at 1736 Pacific Avenue in Cayucos as a residential vacation rental. The subject parcel is located within 100 feet of two existing vacation rentals, which are located 40 and 80 feet to the north. The applicant is requesting minor use permit approval to modify the ordinance requirement that no residential vacation rental shall be located within: 1) 100 feet of an existing residential vacation rental on the same or opposite side of the street; or 2) within a 50-foot radius around the proposed vacation rental.

LAND USE ORDINANCE STANDARDS

Section 23.08.165 – Residential Vacation Rentals

The proposed project is a request to use an existing residence as a residential vacation rental. Section 23.08.165 allows for residential vacation rentals in Cayucos, Cambria, and Avila Beach subject to a set of rules to ensure compatibility with surrounding residences. These rules include operational standards to address issues such as noise, traffic, and overflow parking, as well as a location standard, which requires a minimum separation distance between vacation rentals. The purpose for the location standard is to avoid concentrations of vacation rentals and associated neighborhood impacts in the same area. The ordinance allows for vacation rentals with zoning clearance (“over the counter”) approval provided that they comply with the location standard and all other ordinance provisions. The location standard can be modified through Minor Use Permit approval.

Location Standard

In Cayucos, no residential vacation rental shall be located within: 1) 100 feet of an existing residential vacation rental on the same or opposite side of the street; or 2) within a 50-foot radius around the proposed vacation rental. The proposed vacation rental does not comply with this standard because it would be located within 100 feet of two existing vacation rentals on the same side of the street. Specifically, it would be located within 40 feet of an existing vacation rental at 1702 Pacific Avenue and within 80 feet of one at 1698 Pacific Avenue. See figure 1, below.

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As shown in Figure 1, the concentration of vacation rentals in this neighborhood already exceeds the limit set by the ordinance, with a number of existing vacation rentals located closer than 100 feet from each other. This is because, when the vacation rental ordinance was adopted in 2003, it exempted existing legally established vacation rentals from the location standard. Community members have expressed concerns that the existing concentration of vacation rentals is already impacting the residential character of Cayucos's neighborhoods, and that any waivers or modifications made to the ordinance would further diminish the quality of life enjoyed by permanent residents living in Cayucos.



Figure 1: Proximity to Existing Vacation Rentals

This minor use permit is a request to modify the location standard, which would allow for the existing residence at 1736 Pacific Avenue in Cayucos to be used a residential vacation rental.

The purpose of the location standard is to protect residential neighborhoods by limiting the concentration of vacation rentals. This is clear from the purpose statement of the ordinance which states "...vacation rentals have the potential to be incompatible with surrounding residential uses, especially when several are concentrated in the same area..." However, the ordinance does not specify what criteria should be considered in reviewing a minor use permit to modify the location standard. In the absence of specific criteria, staff evaluated the project based on the standard minor use permit findings in Section 23.02.034, placing particular emphasis on the following findings:

1. The establishment and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the

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health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use; and

2. The proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development.

Staff has determined that these findings cannot be made because the proposed project would result in a higher concentration of vacation rentals than the ordinance allows for, and because there are no unique circumstances that set the project site apart from any other oceanfront property in Cayucos or that render the minimum separation requirement unnecessary.

The applicant has submitted findings in support of the requested modification (see Attachment 4). Specifically, the applicant points out that the site has adequate on-site parking and access from Pacific Avenue, is adjacent to and oriented towards the beach, which means noise from outdoor activities would have less of an impact on neighbors, and that the surrounding residential neighborhood is not overly dense. The applicant also points out that the house has unique historical and architectural interest since it was designed by a well-known local architect.

While these unique characteristics could help mitigate some noise and land use compatibility impacts on nearby homes, they don't sufficiently set the subject property apart from almost every other oceanfront home on Pacific Avenue. Most homes on Pacific Avenue and other bluff-top parcels in Cayucos and Cambria could claim similar findings in support of a modification to the location standard. In recent years, the county has seen a surge in vacation rental requests and this trend is expected to continue as websites like AirBNB and VRBO continue to grow in popularity. Approving this modification request and others like it would cumulatively transform the character of oceanfront neighborhoods from residential areas to visitor-serving commercial areas, undermining the intent of the vacation rental ordinance to limit the density of vacation rentals.

At the February 3, 2016 Cayucos Citizens Advisory Council meeting, Cayucos residents described some of the deleterious effects that vacation rentals have on neighborhoods. Concerns included noise, parking overflow, and regular turnover of visitors who are not familiar with the residential neighborhoods where they are lodging. The advisory council also felt that this property wasn't different than any other oceanfront home on Pacific Avenue and was concerned about setting a precedent of waiving the distance standard for any other oceanfront property in Cayucos.

Residential Vacation Rental Operational Standards

In addition to the location standard, the vacation rental ordinance establishes a number of operational standards that are intended to minimize the impacts of vacation rentals on nearby homes and to ensure that they are operated in a manner that is generally consistent with the expectations for a residential neighborhood. These standards include: 1) a requirement to designate a local property manager with contact information given to neighbors within 200 feet, 2) a limitation on the number of occupants allowed (2 people per bedroom plus another 2 people), 3) on-site parking required, 4) noise limitations, 5) tenancy limited to four times per month, 6) traffic shall be consistent with the number of trips generated by a typical home, 7) the exterior appearance shall not be modified and no advertising onsite, 8) payment of transient occupancy tax required, and 9) code enforcement and permit revocation procedures for non-compliant vacation rentals.

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If the hearing officer decides to approve the proposed project, staff recommends that these standards be added as conditions of approval.

COMMUNITY ADVISORY GROUP COMMENTS:

The proposed project was reviewed by Cayucos Citizens Advisory Council on February 3, 2016. The advisory council voted 8 to 3 to recommend denial of the requested modification. As described above, the advisory council was concerned about the impacts of vacation rentals on residential neighborhoods and the precedent of waiving the location standards for any oceanfront property in Cayucos. The advisory council also stated that the ordinance should be strictly upheld and enforced (without granting modifications) since it is the product of a long process that included extensive public and stakeholder involvement.

AGENCY REVIEW:

Public Works – No comment, per referral response dated July 17, 2015.

Cayucos Sanitary District – No comments received.

Paso Robles Beach Water Association – No comments received.

California Coastal Commission – No comments received.

LEGAL LOT STATUS:

The lot legally created by a recorded map at a time when that was a legal method of creating lots.

Staff report prepared by Airlin M. Singewald and reviewed by Karen Nall.

**EXHIBIT A – FINDINGS
DRC2015-00073 / 1736PAC, LLC**

CEQA Exemption

- A. This project is found to be statutorily exempt from the California Environmental Quality Act under the provisions of Public Resources Code section 21080(b)(5), which provides that CEQA does not apply to projects which a public agency rejects or disapproves.

Minor Use Permit

- B. The proposed project or use is inconsistent with the San Luis Obispo County General Plan because the requested modification would result in a greater concentration of vacation rentals on the 1600/1700 block of Pacific Avenue in Cayucos than the ordinance allows for, and as a result would be incompatible with the purpose and character of the Residential Single Family land use category. Allowing a vacation rental on the project site and other similar properties in the area would cumulatively increase noise to levels in excess of the limits established in the Noise Element and could result in roadway safety concerns that are inconsistent with the Circulation Element.
- C. The proposed project or use does not satisfy all applicable provisions of Title 23 of the County Code because it would allow a vacation rental to be established closer to an existing vacation rental than what is allowed by Section 23.08.165(C)(2). According to this section, no residential vacation rental in Cayucos shall be located within: 1) 100 feet of an existing residential vacation rental on the same or opposite side of the street; or 2) within a 50-foot radius around the proposed vacation rental. The proposed vacation rental does not comply with this standard because it would be located within 100 feet of two existing vacation rentals on the same side of the street. Specifically, it would be located within 40 feet of an existing vacation rental at 1702 Pacific Avenue and within 80 feet of one at 1698 Pacific Avenue.
- D. The establishment and subsequent operation or conduct of the use will be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use because the requested modification would result in a greater concentration of vacation rentals on the 1600/1700 block of Pacific Avenue in Cayucos than the ordinance allows for, and as a result would be incompatible with the purpose and character of the Residential Single Family land use category. Allowing a vacation rental on the project site and other similar properties in the area would cumulatively increase commercial lodging and associated impacts, including noise, overflow parking, and non-residential traffic, in residential neighborhoods. This would degrade the quality of life enjoyed by neighboring residents.
- E. The proposed project or use will be inconsistent with the character of the immediate neighborhood or contrary to its orderly development because the requested modification would result in a greater concentration of vacation rentals on the 1600/1700 block of Pacific Avenue in Cayucos than the ordinance allows for, and as a result would be incompatible with the purpose and character of the Residential Single Family land use category. Allowing a vacation rental on the project site and other similar properties in the area would cumulatively increase commercial lodging and associated impacts, including noise, overflow parking, and non-residential traffic, in residential neighborhoods. This would degrade the quality of life enjoyed by neighboring residents.
- F. The proposed project or use will generate a volume of traffic beyond the safe capacity of all roads providing access to the project, either existing or to be improved with the

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project, because allowing a vacation rental on the project site would exceed the concentration of vacation rentals allowed by the ordinance and because granting this modification and others for similar projects in the area would cumulatively increase non-residential traffic and street parking on Pacific Avenue in a residential neighborhood.

Coastal Access

- G. The proposed use is not in conformity with the public access and recreation policies of Chapter 3 of the California Coastal Act, because the project is adjacent to the coast and could inhibit access to the coastal waters and recreation areas. Granting this modification and others for similar properties could transform the character of oceanfront properties along Pacific Avenue from residential to commercial. This could hinder public access to the beach by reducing the supply of street parking on Pacific Avenue.

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



PROJECT
Minor Use Permit / Coastal Development Permit
1736PAC, LLC DRC2015-00073



EXHIBIT
Vicinity Map

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



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EXHIBIT
Land Use Category Map

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING

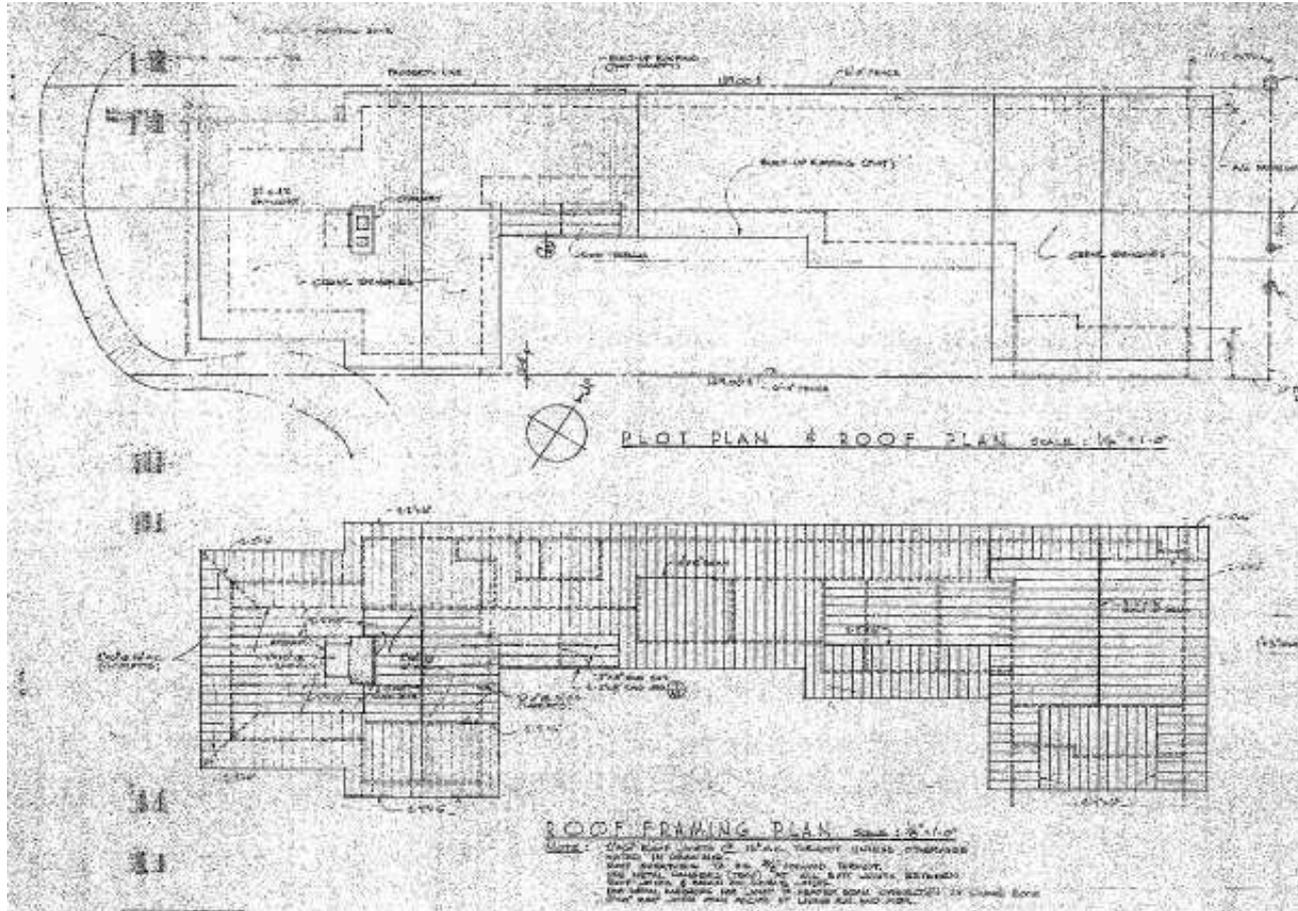


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EXHIBIT
Aerial Photograph

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING

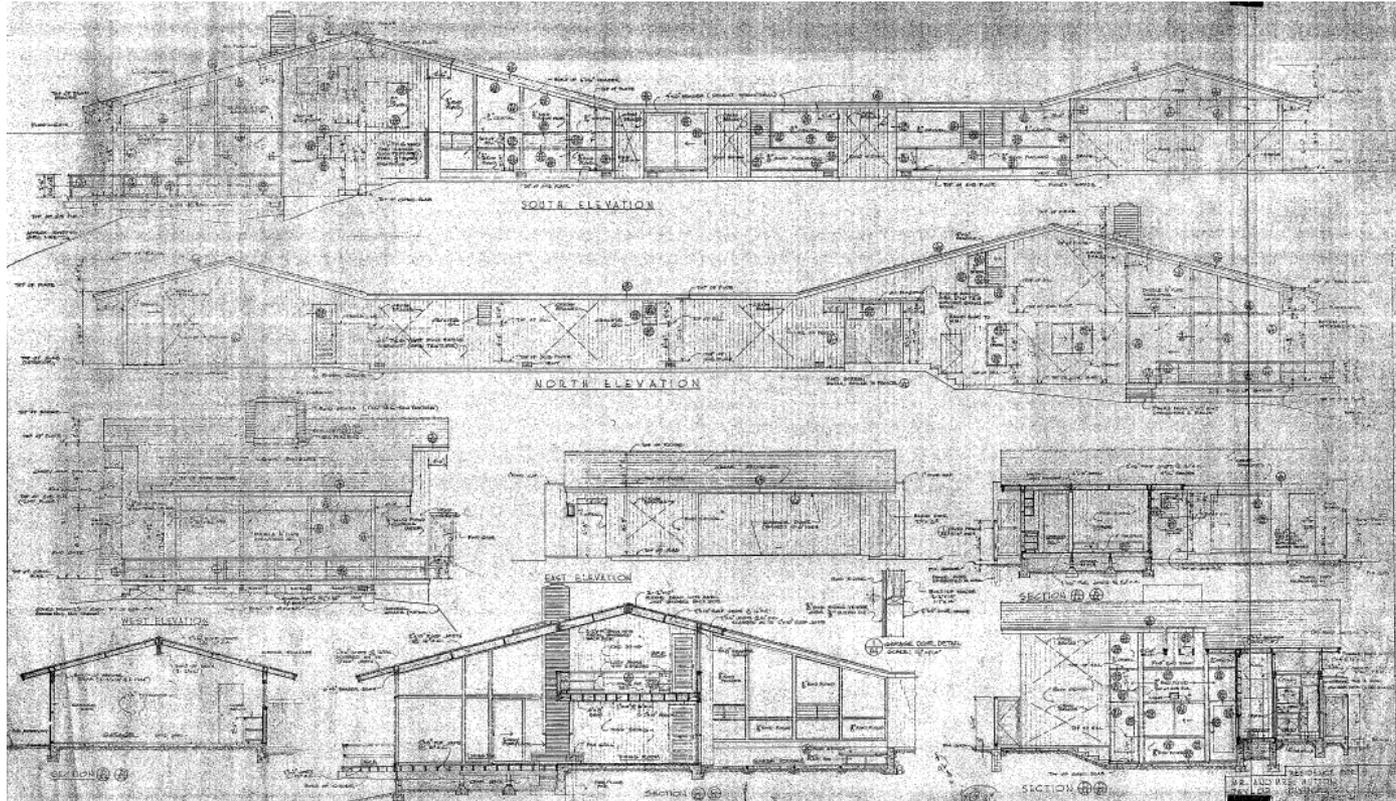


PROJECT
Minor Use Permit / Coastal Development Permit
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EXHIBIT
Site Plan and Roof Plan

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



PROJECT
Minor Use Permit / Coastal Development Permit
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EXHIBIT
Elevations

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Attachment 3 - Referral Responses

Cayucos Citizens Advisory Council February 3, 2016

Mark Hutchinson: There are four other principals who are eligible to purchase Nacimiento water. CSA 10A's portion is 15 acre feet. A set of policies has been worked out as to how that additional water can and can not be used. The existing amount CSA 10A currently has rights to is 75 acre feet. I would like to hear responses to the policies that were passed out at the last meeting.

Dave Dabritz: With our water use going down, I just wonder what's happening here. I'm confused. As far as I'm concerned, it's a done deal.

John Carsel: What was of concern to everyone on the council was that this water not be used outside the Urban Service Line. It is not going to increase our rates. These policies are designed to state that this water will not be used as a back door to development.

Mark Hutchinson: Where we are at is if the Board were to decide to buy the water, what would the policies be.

Cheryl Conway: Science tells us that we are going to have more and more droughts. I look at this favorably. If we are going to sell the water, it should be on a temporary basis.

Dave Dabritz: We have also been hearing that our waste water will be sellable.

Cheryl Conway: There are no standards yet for sewer water to be used for drinking water. That is apples to oranges.

Stephen Geil: I would like to make a motion to approve the staff report.

Larry Fishman: I second the motion.

Roll call vote:

10 Yes.

1 No.

The motion carries.

New Business:

A.MUP to waive 100 ft. separation so 1736 Pacific Avenue can be used as a vacation rental.

http://www.slocount.ca.gov/Assets/PL/referrals/coastal/DRC2015-00073_1736PAC_LL_C_MUP_Referral_Pkg.pdf

Marie Jaqua: We are discussing whether to grant a waiver of the 100' separation to allow the residence at 1736 Pacific to be a vacation rental. The Land Use Committee voted unanimously to deny this proposal.

Jeff Edwards: I'm representing the owners at 1736 Pacific Ave. We are requesting a MUP to allow this home to be a vacation rental. The home is accessed from Pacific Avenue. The single family residence neighborhood is not overly dense. The property has four onsite parking spaces. The orientation and design of the beach front property is particularly conducive for use as a vacation rental. The residence was designed by George Nagano, a well known local architect.

Dave Dabritz: How close are the other vacation rentals.

Toni LeGras: The one nearby on Pacific Avenue is only used as a vacation rental three months out of the year.

Cameron Taylor Brown: I am one of the three owners of the home at 1736 Pacific Avenue. I lived at this address until I went to college. My family has a long history in Cayucos. We would like to rent it part time to help pay for maintenance. We would like to hire a local vacation rental agency to oversee the rental.

Mark Walton: I am speaking in favor of supporting the vacation rental proposal. I am in favor of the legal vacation rental route.

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Attachment 3 - Referral Responses

Cayucos Citizens Advisory Council February 3, 2016

Andy Hinsdale, 148 Birch: I have lived here since 1975. I'm a musician here in town, I've been around a long time. Cameron Taylor Brown is my cousin. I am here to validate what Cameron has said.

Stuart Selkirk, Santa Rita Rd.: The only person who has been here longer than me is Greg Bettencourt. Vacation rentals have been disappearing for some time because people will get the vacation rental permits and then sit on them. I think the 100' ordinance should be revised. The County is losing bed tax because of the illegal vacation rentals.

Cheryl Conway: I'm not a relative and I don't live on Pacific Avenue. The ordinance was put into place to protect full time residents and to preserve the neighborhood community. Giving a waiver here would set a bad precedence.

Toni LeGras: I passed out an update on vacation rental statistics.

Mr. Prange: I applaud this family for pursuing the legal route. There are over 60 illegal vacation rentals in town.

Jeff Edwards: These should be considered case by case. The number of complaints could be counted on one hand. The MUP process has a high bar. For all of the reasons presented here, I recommend that you recommend approval of this home as a vacation rental.

Steve Beightler: Is it typical for vacation rentals to allow parking in the garage?

Toni LeGras: It depends on the property.

Mr. Prange: Some garages are available and some aren't.

Gil Igleheart: It seems like the worst thing is that the County is not enforcing the existing policies.

Toni LeGras: If the current trend continues, legal vacation rentals won't exist.

Larry Fishman: I wanted to commend the owner for pursuing the legal route. We need to make a connection between what we do here and the outcome. The ordinance was established through a long arduous process. It sets up a bad situation.

Terry Wahler: What I am hearing is that there are reasons for taking another look at the vacation rental ordinance. We've had this in Avila Beach where there is more acceptance of a higher concentration of vacation rentals downtown and less in the residential area.

Marie Jaqua: We recommend that when a home sells, the vacation rental permit does not go with it but it does.

Terry Whaler: We hear about parking issues and noise issues but it depends on the management.

Marie Jaqua: We suggested that if the vacation rental permit was not used that it should lapse and that the permit should not go with the sale of a house but those suggestions were ignored. We have been fighting this for a long time but it keeps coming up like parking does. There are already illegal vacation rentals. The density keeps going up one way or another.

Terry Wahler: I like the idea of rotating vacation rental permits so that everyone gets a chance.

Steve Beightler: What about the resident who lives in that house near those three vacation rentals who would prefer not to have the constant turmoil; people looking for addresses, going in and out, slamming doors, all of the stuff that goes along with vacation rentals.

John Carsel: There was a question about were the neighbors notified of this application?

Jeff Edwards: The noticing is in excess of thirty days for residents within three hundred feet.

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Attachment 3 - Referral Responses

Cayucos Citizens Advisory Council February 3, 2016

John Carsel: Were they noticed that we would be talking about this here tonight?

Dave Dabritz: Some of the vacation rental properties have been bought and sold and the vacation rental permits were not used. The ordinance says with a MUP you can do it. They have the parking, they have all of the requirements. This is a way to do it legally.

Stephen Geil: If we allow this, under what circumstances can we turn someone down? One of the reasons listed here is that this is a beach front property. Does that mean that all beach front properties should be vacation rentals? Another reason is that the house was designed by George Nagano. What about the other homes designed by George Nagano? I have personal experience with the vacation rental ordinance being enforced. If we are going to consider this, we should first address the code. I see nothing listed here that would support a reason to go around the existing ordinance/code.

Roland Hutchinson: I make a motion to deny approval of this MUP for a vacation rental.

Francie Farinet: I second it.

Terry Wahler: The issue of code enforcement has come up so many times, I would like to say there are six code enforcement guys. They don't work weekends or nights. We are understaffed.

Jeff Edwards: The ordinance requires the managers to notify the neighbors.

Marie Jaqua: Call for the Question.

Roll call vote:

8 Yes.

3 No.

The motion carries.

Good of the Order:

Next meeting of the CCAC will be March 2, 2016

Set up and refreshments will be precincts 3 & 4.

The next Land Use Committee meeting will be February 24, 2016.

John Carsel: Meeting Adjourned.

Respectfully Submitted: Carol Baptiste February 28, 2016

Attachment 3

J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN
Specializing in Water Neutral Development

February 2, 2016

1736 Pacific Avenue, Cayucos, DRC2015-00073

Findings to Support Approval of Distance or Separation Modification for Authorization of a Residential Vacation Rental at 1736 Pacific Ave.

- 1) The home is accessed from Pacific Avenue. Pacific Avenue is an 80 ft. right-of-way and is a collector street. The topography is flat and visibility for vehicular and pedestrian traffic is excellent. There are ample travel lanes with a large paved road section to accommodate pedestrian and bicycle traffic. Pacific Avenue and the side streets provide good circulation patterns and there are no dead end streets limiting access and circulation for the neighborhood. Access to HWY 1 is easy.
- 2) The single-family residential neighborhood is not overly dense and the lot patterns and sizes are typical for the community of Cayucos. The subject property exhibits the same characteristics as the neighborhood.
- 3) The traffic anticipated from the use of the residence as a vacation rental is the same level of traffic as an owner or tenant occupied home.
- 4) There are four (4) onsite parking spaces available at the subject residence. The available parking should be adequate for purposes of accommodating vacation rental guests. Given the width of Pacific Avenue there is additional on-street parking that is available for guests and other beach goers.
- 5) The orientation and design of the beachfront subject property is particularly conducive for use of the home as a vacation rental. The majority of windows are oriented towards the ocean and not the neighbors on either side. There is a private interior courtyard that is a well located outdoor use area for bar-b-ques, etc. There is well established vegetative screening; activities in the courtyard should not affect the neighbors.
- 6) Given the subject property is ocean front; many guests will be recreating on the beach and will generate less activity and noise at the residence itself.
- 7) The subject residence has historical and architectural interest in that it was designed and built by George Nagano, a well-known local architect. Other Nagano designs include a law office on Santa Rosa Street in San Luis Obispo and a Buddhist Temple near Avila Beach.

**P.O. Box 6070, Los Osos, CA 93412 (805)235-0873 jhedwardscompany@gmail.com
ACQUISITION MARKETING LAND USE REDEVELOPMENT**

Attachment 3



Attachment 3

