

**TOWN OF SAN ANSELMO
STAFF REPORT
March 18, 2014**

For the Meeting of April 2, 2014

TO: David L. Benjamin, Independent Hearing Officer

FROM: Diane Henderson, Interim Planning Director

SUBJECT: An appeal of (a) the Town Planning Commission's decision on February 4, 2013 that denied Ford Greene's appeal of an administrative determination made by the Town Interim Planning Director on August 14, 2012, concerning Greene's real property located at 711 Sir Francis Drake Boulevard; and (b) the determinations of the Town's Building Official on March 29, 2012 and January 22, 2013, declining to classify the California Building Code occupancy of Greene's building as R-2.

RECOMMENDATION

That the Independent Hearing Officer deny the appeal and uphold the action of the Planning Commission on February 4, 2013 that denied Ford Greene's appeal of an administrative determination made by the Town Interim Planning Director on August 14, 2012, concerning Greene's real property located at 711 Sir Francis Drake Boulevard; and (b) the determinations of the Town's Building Official on March 29, 2012 and January 22, 2013, declining to classify the California Building Code occupancy of Greene's building as R-2.

BACKGROUND

On October 11, 2001, a Report of Residential Building Records (resale report) was prepared for the property at 711 Sir Francis Drake Boulevard. Pursuant to Section 10-5.01 of the San Anselmo Municipal Code, "Prior to the consummation of the sale or exchange of any residential property in the Town, the owner or his authorized agent shall obtain from the Town a report of the residential building record showing the regularly authorized and legal use, occupancy and zoning classifications of such property and all other pertinent information relating thereto". The resale report prepared in October 2001 for 711 Sir Francis Drake Boulevard identified unpermitted work including a living unit which was apparently installed in the basement without permits and which was identified as substandard and not meeting Code requirements for habitable space. The resale report indicated that the "condition must be corrected or the unit not be used for living space."

On August 19, 2005, Building Official Keith Angerman sent a letter to Ford Greene, owner of the property at 711 Sir Francis Drake Boulevard, indicating that the Town had recently received a notice from Marin Municipal Water District of a complaint that a toilet had been installed in the rear of one of the buildings at 711 Sir Francis Drake Boulevard, and that

Town records did not indicate any permit being issued for the toilet installation. In his letter, Mr. Angerman cited the October 11, 2001 resale report and indicated that since no permits had subsequently been obtained for the illegal residential unit, "it is assumed that the space is still in use and is still deficient". Mr. Angerman directed Mr. Greene to begin the process of applying for and obtaining the proper permits within 14 calendar days of the date of his letter.

Despite numerous requests by Town staff over more than 10 years since the resale report first identified the illegal residential use of the lowest floor of the building, Mr. Greene has failed to obtain the necessary permits to allow him to legally occupy the lowest floor of the structure at 711 Sir Francis Drake Boulevard as a residential unit. In September 2011, Mr. Greene contacted the Town regarding his desire to obtain a roofing permit for the structure at 711 Sir Francis Drake Boulevard. As with any property in the Town, a property is not issued a building permit if there are outstanding violations that have not been corrected on the property. On September 12, 2011, following an inspection of the property by Town staff, Public Works Director Sean Condry sent a letter to Ford Greene telling him that he would be allowed to apply for an emergency roofing permit only at such time as he submits information necessary to reactivate expired permits and to obtain permits for work done without permits. Because of anticipated inclement weather, Mr. Condry allowed Mr. Greene to obtain a roofing permit with a \$1,000 fee deposit and a commitment to submit for a conditional use permit.

On March 1, 2012, Mr. Greene submitted an application for a conditional use permit to allow a residential use in the lowest level of the building at 711 Sir Francis Drake Boulevard. Subsequent to filing the application for use permit, in May 2012, Mr. Greene raised the issue that he believed that his residential occupancy of the lowest level of the building was a legal non-conforming use and as such should be "grandfathered in", and not subject to the Town's ordinances; therefore he should not have to pursue a use permit to legalize it. Mr. Greene was told that he should submit documentation that the lowest level of the building was legally created as a residential use and has continuously been used as a residential unit since becoming non-conforming.

On June 18, 2012 and August 1, 2012, Architect Fani Hansen (on behalf of Mr. Greene) submitted detailed information, in the form of appendices, as evidence that Mr. Greene was relying on to establish the grandfathered use. On August 14, 2012, Interim Planning Director Diane Henderson, after reviewing the submitted materials, informed Ms. Hansen that there is no proof that the lowest level of that building was legally created as a residential unit and has continuously been used as a residential unit since becoming non-conforming. Mr. Greene was advised that if he desired to occupy the lowest level of 711 Sir Francis Drake Boulevard as a residence, he must apply for and secure a conditional use permit for residential use in the C-L zoning district from the Planning Commission. Mr. Greene appealed the decision of Interim Planning Director Henderson.

Subsequent to Mr. Greene filing his appeal, staff became aware of two individuals with first hand knowledge regarding the property at 711 Sir Francis Drake Boulevard, Matthew Storms and Vicki Harrison. Matthew Storms is a real estate agent and was the listing agent for the property at 711 Sir Francis Drake Boulevard when it was listed for sale in the fall of 2001. At that time, Ford Greene was a tenant at the property and ultimately purchased the

property. According to a signed declaration from Matthew Storms, Mr. Greene, as buyer of the property at 711 Sir Francis Drake Boulevard, was given a copy of the October 11, 2001 Report of Residential Building Records for the property. As discussed in detail above, the Report of Residential Building Records for 711 Sir Francis Drake Boulevard identified the unpermitted work including the basement living unit, indicating that the "condition must be corrected or the unit not be used for living space".

Vicki Harrison owned and operated a dress shop, Harrison & Co. in the street level unit of the subject building from approximately 1979 to 1985. According to a signed declaration from Ms. Harrison, during the approximate six year period that she was a tenant in the building, the basement area was used for storage and never for residential purposes.

On November 19, 2012, the Planning Commission held a public hearing on the appeal by owner Ford Greene of the administrative decision by the Interim Planning Director regarding the existence of a residential use in the lowest level of the building at 711 Sir Francis Drake Boulevard (please refer to the staff report and attachments from the November 19, 2012 Planning Commission meeting for a complete discussion of the background, analysis and recommendation regarding the appeal). At the November 19 meeting, an issue was raised by a Commissioner regarding the possible applicability of the state's historic building codes to the subject building. Because of the Commission's uncertainty with regard to Mr. Greene's appeal at the November 19, 2012 hearing (including the potential applicability of the state historic building codes to the subject structure), the Commission voted to continue the appeal to the February 4, 2013 meeting.

Following the November 19, 2012 hearing, staff researched the potential applicability of the state historic building codes and determined that whether or not they are applicable and may or may not provide some relief to the subject structure is a matter that is relevant at the time of submittal for a building permit, and is not relevant with regard to the Commission's action on the appeal. On February 4, 2013, at a continued Planning Commission hearing of Mr. Greene's appeal, staff informed the Commission that it was appropriate for them to take action on the appeal and let the applicant deal with building codes (including state historic building codes) if and when a building permit is required.

On January 10, 2013, Mr. Greene submitted additional materials with his use permit application (the use permit application was to allow the residential use of the lowest level of the building. The use permit was granted by the Planning Commission as a separate agenda item on February 4, 2013). Staff reviewed the additional materials submitted by Mr. Greene, and reported to the Planning Commission on February 4, 2013 that there was no new evidence submitted that provides proof that the lowest level of the building at 711 Sir Francis Drake Boulevard was legally created as a legal residential unit and has continuously been used for residential purposes since becoming non-conforming.

At the February 4, 2013 hearing staff presented the Planning Commission with a declaration from Marty Marcucci, retired Battalion Chief of the Ross Valley Fire Department, who submitted a written declaration that he inspected the property in the late 1960s and there was no one living in the downstairs/basement unit at that time. Although the declaration from Marty Marcucci came after the decision set forth in the August 14, 2012 letter from Interim Planning Director Diane Henderson to Fani Hansen that there is no proof that the

lowest level of the building at 711 Sir Francis Drake Boulevard was legally created as a residential unit and has continuously been used as a residential unit since becoming non-conforming, in fact, the declaration provided further support for that determination. Additionally, Ms. Henderson informed the Planning Commission that for all the years that Mr. Greene has owned the property, he has been paying taxes based on the two commercial units and two living units, but never has there been a third unit on the property tax bill. Ultimately, staff concluded to the Planning Commission on February 4, 2013 that the analysis and recommendation stand as that set forth in the staff report and attachments submitted to the Planning Commission for the November 19, 2012 hearing, recommending denial of the appeal.

At the February 4, 2013 continued hearing, Mr. Greene also asked the Planning Commission to make a finding in place of the Building Official and "designate the property as R-2 in terms of its occupancy classification". Staff explained that the occupancy classification is a determination made by the Building Official at such time as a building permit application is submitted. Since there was not yet a determination from the Building Official regarding a change in occupancy, staff indicated to the Planning Commission that this was not a proper issue for determination at the February 4, 2013 hearing, and the Commission declined Mr. Greene's invitation to direct the Building Official to make a finding as to which occupancy group the building qualified for. The Commission voted unanimously to uphold the action of the Interim Planning Director and denied Mr. Greene's appeal.

On February 14, 2013, Mr. Greene filed an appeal of (a) the Town Planning Commission's decision of February 4, 2013 that denied his appeal of an administrative determination made by the Town Interim Planning Director on August 14, 2012, concerning his real property located at 711 Sir Francis Drake Boulevard; and (b) the determinations of the Town's Building Official on March 29, 2012 and January 22, 2013, declining to classify the California Building Code occupancy of Greene's building as R-2.

DISCUSSION

Section 10-3.302 of the San Anselmo Municipal Code (SAMC), the Land Use Regulations Table, referred to as Table 3A, lists uses of the land on properties in the Town of San Anselmo, and indicates whether or not each use is permitted (P), conditionally permitted (C), or not permitted (-) in each zoning district. Uses not specifically listed in the Land Use Regulations Table are specifically prohibited unless a Use Determination by the Planning Director is made which finds "the use not specifically listed is similar to another use permitted or conditionally permitted within the District."

The property at 711 Sir Francis Drake Boulevard is zoned C-L, Limited Commercial. As detailed in Land Use Regulations Table 3A, Multi-Family Residential, Single Family Attached Residential and Single Family Detached Residential are conditionally permitted uses in the C-L zoning district. Second units are not permitted in the C-L zoning district.

In 1976, the San Anselmo Town Council adopted Ordinance No. 706, amending the San Anselmo Municipal Code to provide for the establishment and regulation of residential second units. This ordinance allowed property owners to register second living units if they

were established in conformity with laws in effect at the time. A handout prepared by the Planning Department at that time, *Questions and Answers Most Often Asked About 2nd Living Units*, identified the type of evidence that the Town would accept to show that a second unit was legal or existing rather than new. In order to be considered a legal unit, the second unit had to have been continuously used since becoming non-conforming and evidence had to be submitted to establish the date the unit was created. As detailed in *Questions and Answers Most Often Asked About 2nd Living Units*, the date of establishment could be verified by: old rental receipts, written testimony (signature to be notarized of other persons who had the knowledge of the unit's existence), assessor's records or the type and age of materials used in construction.

While second units are not allowed in the C-L zoning district, it is appropriate that the same type of evidence used to establish the legality of a second unit in a residential zone would also establish the legality of a residential unit in a commercial zone. Applying this rationale, the Interim Planning Director reviewed the evidence submitted by Ms. Hansen on behalf of Mr. Greene and came to the conclusion that there is nothing in the materials submitted that establishes the legality of the residential use of the lowest level of the building at 711 Sir Francis Drake Boulevard. The Planning Commission, on February 4, 2013, concurred with this determination and denied Mr. Greene's appeal.

Ms. Hansen (on behalf of Ford Greene) submitted *Chronology of Occupancy of 711-721¹ Sir Francis Drake, and Outline of Occupancy Set Forth in Narrative Form*, detailing Mr. Greene's argument for the historic occupancy of the property, including copies of excerpts from pages of Sanborn Insurance Maps, the 1920 Fourteenth Census of the United States, Marin County Directories, A to Z Directories, Polk Directories and Haines Directories showing the names of various individuals assigned to 711 Sir Francis Drake Boulevard, and declarations from Ford Greene, Shelly Winn, Peter Penhallow, and Gerry Armstrong indicating their residencies at 711 Sir Francis Drake Boulevard. While there are names listed in the census and the various directories, and the declarations indicate that people lived in the structure at 711 Sir Francis Drake Boulevard, there is nothing in the submitted materials that confirms that anyone lived in the lowest level of the building until Mr. Greene took up occupancy there sometime during or after 1990. It should be noted that there are two legal residential units on the third level of the mixed-use building at 711 Sir Francis Drake; staff has never questioned the legality of the two upper level units for residential use; it is understood that these units have existed for residential purposes since the building was constructed. It is the conversion and use of the lowest level, originally a bakery, and now being occupied as a residential use, that is under question. Therefore, although Ms. Hansen (on behalf of Mr. Greene) submitted statements from numerous individuals, declaring residential uses at 711 Sir Francis Drake Boulevard, none of them provides written testimony that the lowest level was a legal residential use that has continued to exist as such since it was established. Statements that bakers slept in the bakery do not establish the lowest level as a residential use.

¹ 721 Sir Francis Drake Boulevard refers to a structure separate from the current building, which burned down in the early 1960s and was not reconstructed.

Based on the discussion above, on August 14, 2012, Interim Planning Director Diane Henderson sent a letter to Mr. Greene's architect, Fani Hansen, AIA, indicating that "While I concur that there is evidence that the building at 711 Sir Francis Drake Boulevard has historically had residential and commercial uses, I find no proof in the materials that you submitted that establishes that the lowest level of that building was legally created as a residential unit and has continuously been used as a residential unit since becoming non-conforming". Ms. Hansen was further informed that "if Mr. Greene wishes to occupy the lowest level of 711 Sir Francis Drake Boulevard as a residence, it is necessary for him to apply for and receive a conditional use permit for residential use in the C-L zoning district from the Planning Commission". Pursuant to Chapter 4 of the San Anselmo Municipal Code, Ms. Hansen was also informed that if Mr. Greene desired to appeal the administrative decision of the Interim Planning Director, he could file an appeal to have the matter considered by the Planning Commission. On August 24, 2012, Mr. Greene filed an appeal.


As discussed in detail above, after receiving testimony at public hearings on November 19, 2012 and February 4, 2013, the Planning Commission voted unanimously to deny Mr. Greene's appeal and uphold the action of the Interim Planning Director, as set forth in the August 14, 2012 letter from Interim Planning Director Diane Henderson to Fani Hansen that there is no proof that the lowest level of the building at 711 Sir Francis Drake Boulevard was legally created as a residential unit and has continuously been used as a residential unit since becoming non-conforming. On February 14, 2013, Mr. Greene filed an appeal of the Planning Commission's action.

CONCLUSION

On February 4, 2013, the Planning Commission unanimously denied Mr. Greene's appeal and upheld the action of the Interim Planning Director, finding no proof in the materials that were submitted by the property owner that establishes that the lowest level of the building at 711 Sir Francis Drake Boulevard was legally created as a residential unit and has continuously been used as a residential unit since becoming non-conforming. The Planning Commission respectfully declined to address the new issue raised by Mr. Greene at the continued hearing and declined his invitation to direct the Building Official to make a finding as to which occupancy group the building qualified for.

At the same meeting, the Planning Commission did grant Mr. Greene's request for an after-the-fact conditional use permit for a residential use in the Limited Commercial (C-L) zoning district, which would allow Mr. Greene to take the necessary steps to legalize the lowest level of the building at 711 Sir Francis Drake Boulevard.

Respectfully submitted,



Diane M. Henderson
Interim Director of Planning

Attachments:

(Please note, all attachments can be found in the Town of San Anselmo's Hearing Exhibits, the Index for which is attached hereto as Attachment 1. In an effort to avoid duplication, Attachments 2-6 are not actually attached to this document, but rather, the location of each Attachment, including its page number in the San Anselmo Hearing Exhibits is called out for easy reference.)

1. Index of Town of San Anselmo's Hearing Exhibits
2. Staff Report to the Planning Commission with attachments, November 19, 2012 (Town of San Anselmo Hearing Exhibit Nos. 30 through 42; Bates pages SA00610 through SA 01172)
3. Excerpt from Planning Commission Minutes, November 19, 2012 (Town of San Anselmo Hearing Exhibit No. 43; Bates pages SA 01173 through SA01181)
4. Staff Report to the Planning Commission with attachments, February 4, 2013 (Town of San Anselmo Hearing Exhibit Nos. 52 through 56; Bates pages SA01241 through SA01298)
5. Excerpt from Planning Commission Minutes, February 4, 2013 (Town of San Anselmo Hearing Exhibit No. 57; Bates pages SA01299 through SA01308)
6. Appeal application, February 14, 2013 (Town of San Anselmo Hearing Exhibit No. 66; Bates pages SA01417 through SA01468)

TOWN OF SAN ANSELMO'S HEARING EXHIBITS

Record Exhibit No.	Bates - Begin	Bates - End	Pages	Date	Document Description
1	SA00001	SA00004	4	Thu 10/04/2001	011004 Resale Report
2	SA00005	SA00005	1	Wed 08/24/2005	050824 Letter From F. Greene to K. Angerman
3	SA00006	SA00006	1	Mon 08/29/2005	050829 Building Permit
4	SA00007	SA00007	1	Mon 09/19/2005	050919 Letter from K. Angerman to F. Greene
5	SA00008	SA00009	2	Thu 11/17/2005	051117 Building Permit 47529
6	SA00010	SA00010	1	Thu 12/01/2005	051201 Fax
7	SA00011	SA00011	1	Tue 12/06/2005	051206 Notes from L. Wight
8	SA00012	SA00012	1	Thu 12/15/2005	051215 Fax
9	SA00013	SA00013	1	Thu 07/31/2008	080731 Letter From L. Wight to F. Greene
10	SA00014	SA00014	1	Wed 09/03/2008	080903 Email from L. Wight to F. Greene
11	SA00015	SA00017	3	Thu 09/04/2008	080904 Email from L. Wight to F. Greene
12	SA00018	SA00021	4	Tue 12/29/2009	091229 Municipal Code Violations
13	SA00022	SA00022	1	Tue 06/28/2011	110628 Unpermitted Work
14	SA00023	SA00024	2	Fri 07/08/2011	110708 Letter from K. Angerman to F. Greene
15	SA00025	SA00032	8	Mon 09/12/2011	110912 Letter From S. Condry to f. Greene
16	SA00033	SA00033	1	Fri 10/28/2011	111028 Letter From J. Kroot To Town Council
17	SA00034	SA00034	1	Sun 01/08/2012	120108 Email From t.McInerney to F. Greene
18	SA00035	SA00037	3	Tue 01/31/2012	120131 email From d. Stutsman To T. McInerney
19	SA00038	SA00039	2	Tue 02/07/2012	120207 Email From D. Stutsman To T. McInerney
20	SA00040	SA00049	10	Thu 03/01/2012	120301 Drawings
21	SA00050	SA00055	6	Fri 03/30/2012	120330 Letter from Boyle to Hansen

Record Exhibit No.	Bates - Begin	Bates - End	Pages	Date	Document Description
22	SA00056	SA00066	11	Mon 06/18/2012	120618 Drawings
23	SA00067	SA00178	112	Tue 06/19/2012	120619 Application for Conditional Use Permit (color)
24	SA00179	SA00290	112	Wed 08/01/2012	120801 Additional Materials Submitted by Applicant
25	SA00291	SA00296	6	Wed 08/01/2012	120801 Drawings
26	SA00297	SA00302	6	Thu 08/02/2012	120802 Drawings
27	SA00303	SA00307	5	Tue 08/14/2012	120814 Letter from D. Henderson to F. Hansen
28	SA00308	SA00607	300	Fri 08/24/2012	120824 Appeal of Administrative Action
29	SA00608	SA00609	2	Mon 11/19/2012	121119 1. PC Agenda
30	SA00610	SA00614	5	Mon 11/19/2012	121119 2. Staff Report Grandfathering Appeal of Admin Decision
31	SA00615	SA00914	300	Mon 11/19/2012	121119 3. Att 1 Grandfathering Appeal of Admin Decision
32	SA00915	SA00918	4	Mon 11/19/2012	121119 4. Att 2 Grandfathering Report of Residential Building Records
33	SA00919	SA00919	1	Mon 11/19/2012	121119 5. Att 3 Grandfathering Letter from K. Angerman to F. Greene
34	SA00920	SA00924	5	Mon 11/19/2012	121119 6. Att 4 Grandfathering Letter from S. Condry to F. Greene
35	SA00925	SA00977	53	Mon 11/19/2012	121119 7. Att 5a Grandfathering Applicant's Submittal (Part 1) 12Jun19
36	SA00978	SA01036	59	Mon 11/19/2012	121119 8. Att 5b Grandfathering Applicant's Submittal (Part 2) 12Jun19
37	SA01037	SA01148	112	Mon 11/19/2012	121119 9. Att 6 Grandfathering Applicant's Submittal 12Aug01
38	SA01149	SA01153	5	Mon 11/19/2012	121119 10. Att 7 Grandfathering Letter from D. Henderson to F. Hansen
39	SA01154	SA01155	2	Mon 11/19/2012	121119 11. Att 8 Grandfathering Declaration of M. Storms
40	SA01156	SA01157	2	Mon 11/19/2012	121119 12. Att 9 Grandfathering Declaration of V. Harrison
41	SA01158	SA01171	14	Mon 11/19/2012	121119 13. Att 10 Grandfathering Letter from Perty Owner's Legal Counsel
42	SA01172	SA01172	1	Mon 11/19/2012	121119 14. Att 11 Granfathering Chronology of Occupancy and Zoning Development
43	SA01173	SA01181	9	Mon 11/19/2012	121119 15. Minutes Grandfathering Excerpt
44	SA01182	SA01187	12	Mon 11/19/2012	121119 2. Staff Report Conditional Use Permit (CUP) and Fence Variance

Record Exhibit No.	Bates - Begin	Bates - End	Pages	Date	Document Description
45	SA01188	SA01196	9	Mon 11/19/2012	121119 3. Att 1 CUP Applications and Supplemental Questionnaires
46	SA01197	SA01200	4	Mon 11/19/2012	121119 4. Att 2 CUP Letters of Support
47	SA01201	SA01214	14	Mon 11/19/2012	121119 5. Att 3 CUP Letter from Property Owner's Legal Counsel
48	SA01215	SA01220	6	Mon 11/19/2012	121119 6. Att 4 CUP Plans
49	SA01221	SA01224	4	Mon 11/19/2012	121119 7. Minutes CUP Excerpt
50	SA01225	SA01238	14	Thu 01/10/2013	130110 Drawings
51	SA01239	SA01240	2	Mon 02/04/2013	130204 1. PC Agenda
52	SA01241	SA01243	3	Mon 02/04/2013	130204 2. Staff Report Grandfathering Appeal of Admin Decision
53	SA01244	SA01282	39	Mon 02/04/2013	130204 3. Att 1 PC Report from 12Nov19
54	SA01283	SA01290	8	Mon 02/04/2013	130204 4. Att 2 Grandfathering Excerpt from Planning Commission Minutes 12Nov19
55	SA01291	SA01291	1	Mon 02/04/2013	130204 5. Att 3 Grandfathering Letter from Applicant
56	SA01298	SA01298	1	Mon 02/04/2013	130204 6. Att 4 Grandfathering Declaration of Marty Marcucci
57	SA01299	SA01308	10	Mon 02/04/2013	130204 7. Minutes Grandfathering Excerpt
58	SA01309	SA01316	8	Mon 02/04/2013	130204 2. Staff Report Conditional Use Permit (CUP) and Shed Wall
59	SA01317	SA01318	2	Mon 02/04/2013	130204 3. Att1 CUP Letter of Support
60	SA01319	SA01330	12	Mon 02/04/2013	130204 4. Att 2 CUP Application
61	SA01331	SA01344	14	Mon 02/04/2013	130204 5. Att 3 CUP Plans
62	SA01345	SA01348	4	Mon 02/04/2013	130204 6. Minutes CUP Excerpt
63	SA01349	SA01350	2	Fri 02/08/2013	130208 Letter from Boyle to Greene
64	SA01351	SA01415	65	Fri 02/08/2013	130208 Letter from Rifkind to Freeman
65	SA01416	SA01416	1	Mon 02/11/2013	130211 Letter from Hansen to Condry Angerman
66	SA01417	SA01468	52	Thu 02/14/2013	130214 Appeal of PC Action
67	SA01469	SA01469	1	Tue 06/11/2013	130611 Property Tax Assessment Roll 2013-2014

Record Exhibit No.	Bates - Begin	Bates - End	Pages	Date	Document Description
68	SA01470	SA01470	1	8/19/2005	Letter from K. Angerman to F. Greene
69	SA01471	SA01472	2	8/18/2008	Green to Wight email
70	SA01473	SA01475	3	6/29/2012	Boyle to Hansen Letter
71	SA01565	SA01569	5	6/11/2013	Stipulation for Hearing by OAH and attendant Resolution 1088 thereon
	SA01478	SA01564			Town Ordinances
	SA01570	SA01574	5		California Building Code Excerpt