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BEFORE THE HEARING EXAMINER
CITY OF REDMOND

In the Matter of the Appeal of
Eugene Zakhareyev
Of the June 12, 2018 approval
Site Plan Entitlement LAND-2013-
00171 Decision for the Anjuman-E-
Burhani Mosque at 15252 NE 51st
Street, Redmond

Appeal No. LAND-2018-00701 of
LAND-2013-00171

**RESPONSE TO MOTIONS TO
DISMISS FROM CITY AND AEB**

1. INTRODUCTION.

The City of Redmond and the Anjuman-e-Burhani Mosque (“AEB”) have filed motions to dismiss portions of the appeal filed by Eugene Zakhareyev. For the reasons stated below, both motions should be denied and this matter should proceed to hearing on September 10, 2018.

2. STANDARD FOR REVIEW.

The motions of the City and AEB request that the Hearing Examiner dismiss certain issues in Appellant Zakhareyev’s appeal based on issues of law. The only authority cited for the City and AEB motions is from the Hearing Examiner Rules of Procedure, VI.A.2.f and .g. Subsection (g) allows the Hearing Examiner “To consider

1 and rule upon all procedural and other motions appropriate to the proceeding;. . .”

2 However, no authority is cited that allows pre-hearing dispositive motions in these
3 rules or in Chapter 4.28 of the Redmond Municipal Code (RMC).
4

5 If indeed the Examiner has authority to issue dispositive rulings, the usual rules
6 for such motions from the Superior Court should apply. The City and AEB motions are
7 similar to motions made under Civil Rule 12(b)(6). The court grants such motions only
8 sparingly. *Collins v. Lomas & Nettleton*, 29 Wn.App. 415, 419 (1981). All of the factual
9 allegations in the appeal must be accepted as true (*Dennis v. Haggan*, 35 Wn.App.
10 432, 434 (1983)) and the motion will be granted only when an appellant can prove no
11 facts that would entitle that appellants to the relief requested. See *Orwick v. City of*
12 *Seattle*, 103 Wn.2d 249 (1984).
13

14 As will be shown below, even if the Hearing Examiner has jurisdiction to rule on
15 these motions, the motions of the Respondents do not meet the high standard
16 required by the applicable legal authority.

17 **3. NATURE OF REVIEW OF SITE PLANS.**

18 As described in the motions filed, this appeal concerns a RMC 21.76.070.Y
19 “Site Plan Entitlement” or “SPE.” Under Subsection 3, the “Decision Criteria” are
20 extraordinarily broad:
21

- 22 3. Decision Criteria.
 - 23 a. The Technical Committee, composed of the Departments of Planning
24 and Public Works, shall review all Development Review permits with the State
25 Environmental Policy Act and the RZC.

Thus the entire Redmond Zoning code is incorporated into the decision criteria.

1 Included in RMC 21.76.070.Y is the purpose section, which requires that review
2 “achieve the following purposes:”

3 Y. Site Plan Entitlement.

4 1. Purpose. The purpose of this section is to ensure that site plans
5 reviewed individually or collectively by the Technical Committee, Design Review
6 Board, Landmarks and Heritage Commission, and Code Administrator achieve
7 the following purposes:

8 a. Compliance with the provisions of the RZC and all other applicable
9 law;

10 b. Coordination, as is reasonable and appropriate, with other known or
11 anticipated development on private properties in the area and with known or
12 anticipated right-of-way and other public projects within the area;

13 c. The encouragement of proposals that embody good design principles
14 that will result in high-quality development on the subject property;

15 d. The adequacy of streets and utilities in the area of the subject property
16 to serve the anticipated demand from the proposal.

17 e. Determination that the proposed access to the subject property is the
18 optimal location and configuration for access.

19 In addition, RMC 21.70.070.B includes a list of criteria “applicable to all land use
20 permits” which includes consistency with the Comprehensive Plan and matters such
21 as the level of development, including measure of density, the availability of
22 infrastructure and the “character of the development.”

23 **4. RESPONSE TO OBJECTIONS BY ISSUE.**

24 **4.1 ISSUE #1: ADEQUACY OF ACCESS.**

25 Both the City and AEB claim the challenge of Mr. Zakhareyev to the adequacy
of access, as stated in Issue #1, is somehow improper because he cites to WSDOT
standards. As will be discussed herein, the objections should be denied because they
require evidence and testimony to be deduced at the hearing and are incorrect as a
matter of law.

1 The motions are particularly inappropriate because they seek to shield from
2 review property and permit actions of both the City and AEB.

3 As the City motion indicates, the City was negotiating an easement which would
4 allow AEB to use and widen an existing access point for its parcel while it was
5 reviewing the AEB application for Site Plan Entitlement (SPE). City Motion at 3, lines
6 11-13. It was only after the SPE for AEB was issued, and this appeal filed, that the
7 City/AEB negotiations concluded and the City recorded the requested easement on
8 July 9, 2018. This easement was essential to the approval of the project because the
9 existing fourteen foot curbcut would be inadequate for the AEB religious facility use.
10

11 The history of the easement is important, but not fully disclosed. The City
12 admits that its ownership of right-of-way in the area derives from a 1991 Deed from
13 WSDOT to the City (Motion page 2, lines 9-13) and attaches the Deed to its motion as
14 Exhibit D. What the City - and AEB - don't disclose is the limitation in the 1991 Deed,
15 as follows:
16

17 The Grantee herein, its successors or assigns, shall have no right of ingress
18 and egress to, from and between said SR 520 and the lands herein conveyed
19 and will maintain the control of ingress and egress to, from and between the
20 lands herein conveyed and the lands adjacent thereto, as indicated by the
prohibition of access symbol appearing on said Exhibit "A";

21 Parcel 5326 on Sheet 11 was the "Haggen" parcel, which has now been conveyed to
22 the AEB. The "Road Approach Schedule" near the bottom of the page indicates that
23 the Haggen parcel will have a "Type A" approach to SR 520. The "Access Notes" on
24 the same page say:

25 Type A Approach is an off and On approach, in legal manner, not to exceed 14'

1 in width, for sole purpose of serving a single family residence.

2 The City acknowledges this restriction in Exhibit E to its motion, the "Access Easement
3 Agreement" in Recital C, page 2:

4 A portion of the Limited Access Land was secured from Grantee with the
5 provision that future access to Grantee's property be restricted to a Type A
6 Road Approach on the north side of the FF line, Opposite Station 15+75 of the
7 Highway Plan: SR520, Northrop Interchange to Jct SR 202.

8 Notwithstanding the limitations in their deed from WSDOT, the City has now granted
9 an easement that violates the express terms of that deed. It allows expansion of the
10 easement from 14 to 20 feet, and allows use by AEB, a religious facility equivalent,
11 instead of continuing the limitation to use by a single family residence.

12 The Appellant has raised, in its appeal, the inconsistency of the access granted
13 by the City's deed with other regulations, and with the easement recently granted to
14 AEB. The City contends this discussion is outside the Hearing Examiner's subject-
15 matter jurisdiction.

16 Notwithstanding the foregoing, the City admits that all lots in the City must have
17 access to a public right of way under RZC 21.52.030. Motion at 5, lines 8-11. The
18 AEB property does have access to NE 51st Street pursuant to the 1991 quit claim deed
19 for a single family house, a right not contested herein. The issue is whether it is
20 appropriate to grant expanded access, which was expressly prohibited in the 1991 quit
21 claim deed.
22

23 AEB contends in its motion that approval criteria for SPE are limited by RZC
24 21.76.070.Y. However the "Decision Criteria" found in Subsection 3 of that section are
25

1 both broad and vague:

2 3. Decision Criteria.

3 a. The Technical Committee, composed of the Departments of Planning
4 and Public Works, shall review all Development Review permits with the State
5 Environmental Policy Act and the RZC.

6 Thus the entire Redmond Zoning code is incorporated into the decision criteria.

7 However even RZC 21.76.070.Y.1, the purpose section, emphasizes that SPE
8 review must consider access issues:

9 d. The adequacy of streets and utilities in the area of the subject
10 property to serve the anticipated demand from the proposal.

11 e. Determination that the proposed access to the subject property is the
12 optimal location and configuration for access.

13 Both of these subsections emphasize road issues and Subsection (e) specially
14 required consideration of whether the “proposed access to the subject property is the
15 optimal location and configuration for access.” This broad standard clearly allows
16 consideration in this appeal of whether the access is consistent with access standards
17 and criteria, including those WSDOT standards particularly related to access to limited
18 access highways.

19 In addition, a memo from the Mayor to the City Council on May 1, 2018,
20 attached as Attachment 1 to the Declaration of Eugene Zavhareyev in Opposition to
21 Motion to Dismiss (Zavhareyev Decl.), addressed the granting of an easement by the
22 City to AEB. In pertinent part, the Memo provides:

23 While WSDOT no longer owns the property, the terms of the quitclaim deed
24 require the City to follow WSDOT design criteria when considering proposals to
25 widen access from adjacent properties to the City-owned section of NE 51st
Street. (WSDOT letter, August 24, 2012).

1 (Emphasis supplied). At page 6 of the SPE Decision, at Paragraph 8 (Exhibit A to the
2 City motion) admits that “Additional Standards are applicable to the use (churches)”
3 and says that condition is met because the “project was reviewed for compliance by
4 WSDOT who signed off on 12.12.2017.” These materials confirm the WSDOT
5 standards were applied to the approval of the access and easement from the City of
6 Redmond to AEB and are appropriately reviewed in this application.
7

8 The City further claims that consideration of the 1991 deed is outside the
9 jurisdiction of the Hearing Examiner because it involves title to real property. Motion at
10 page 5, lines 17-19. However, as Attachment 1 to the Zavhareyev Decl. indicates, the
11 proposed easement was not a proprietary transaction involving city property, but the
12 easement was a part of the review of the SPE for AEB. As the memo states:
13

14 The proposed easement was reviewed by Planning and Community
15 Development as part of the site plan entitlement (SPE) application
16 submitted by the property owner, listed as Project No. LAND-2013-
00171.

17 Thus, the whole point of the easement granted to AEB was to allow AEB’s
18 project to proceed; indeed, as noted above, the easement from the City to AEB
19 acknowledges the limitations under the 1991 deed.

20 It is concerning that the City is attempting to remove from review significant
21 issues of access, when the City is the key player in granting municipal rights to a
22 private, religious developer. This is particularly so when the easement granted frankly
23 acknowledges the violation of the 1991 Quit Claim Deed.
24

25 The motion to dismiss should be denied. The Hearing Examiner should hear

1 evidence and argument on the propriety of access to the property, an issue expressly
2 related to SPE review.

3 4.2. ISSUES #2 AND 3: CHALLENGE TO DETERMINATIONS CONCERNING
4 AEB SEATING CAPACITY.

5 Issues 2 and 3 in the appeal concern challenges to decisions related to seating
6 capacity in the proposed building. In Issue 2, the appellant contends that if seating
7 capacity was correctly calculated, then the proposal would require a Type III
8 Conditional Use Permit because the seating capacity would exceed 250. Issue 3
9 contends that required parking was miscalculated based on the same miscalculation of
10 seating capacity. AEB requests dismissal of these issues because of an alleged
11 failure to file an administrative appeal of an interpretation decision, though that
12 decision is not attached to their motion. This portion of the motion should be denied
13 and these issues continue to the full hearing.

14 First, the Redmond code has specific provisions for the timing and sequencing
15 of permit appeals in RZC 21.76.050.E:
16

17 4. Where a development requires more than one land use permit but the
18 applicant elects not to submit all applications for consolidated review,
19 applications may be submitted and processed sequentially, provided that the
20 permit subject to the highest numbered process type must be submitted and
21 obtained first, followed by the other permits in sequence from the highest
22 numbered type to the lowest.

23 A Type II request must be submitted and a decision obtained thereon before the Type
24 I administrative interpretation can be sought. In the present case, the Administrative
25 Interpretation is a Type I decision and the SPE is a Type II. See RZC Table
21.76.050B, Classification of Permits and Decisions. Accordingly, the Type II SPE

1 must precede the Type 1 Administrative Interpretation.

2 Second, RZC 21.76.060.D.3 sets requirements for the Type I decisions,
3 including the requirement that: "The decision shall be mailed as provided in RZC
4 21.76.080.G, Notice of Final Decision." RZC 21.76.080.G sets forth the requirement
5 for Notices of Final Decisions:
6

7 G. Notice of Final Decision. The Administrator shall mail the Notice of Final
8 Decision and the final SEPA determination, if any, to all parties of record. The
9 Notice of Decision shall include a statement of any threshold determination
10 made under SEPA and the procedures for administrative appeal, if any. For
11 those project permits subject to SEPA, the Notice of Decision shall contain the
12 requirements set forth in RZC 21.70, State Environmental Policy Act (SEPA)
13 Procedures. The exception shall be for Notice of Decision for Historic Landmark
Designations, which shall conform to the notice procedures found in King
County Code Chapter 20.62. For Shoreline Substantial Development Permits,
Shoreline Conditional Use Permits, and Shoreline Variances, see RZC
21.68.200.C.6.b and 21.68.200.C.6.c.

14 Mr. Zakhareyev was indeed a party of record concerning this application, long before
15 the Administrative Interpretation was issued. Not only did Mr. Zakhareyev not receive
16 a Notice of Final Decision, but, as far as we know, no such notice was issued by the
17 City. See Zakhareyev Decl.

18 Washington courts have held that a decision must include appeal provisions
19 and is not final and not issued unless the city has followed the process in its entirety:
20

21 ... a final land use decision should memorialize the terms of the decision, not
22 simply reference them, in a tangible and accessible way so that a diligent
23 citizen may "know whether the decision is objectionable or, if it is, whether there
is a viable basis for a challenge."

24 *Durland v. San Juan Cnty.*, 174 Wn. App. 1, 14, 298 P.3d 757, 763 (2012) (quoting
25 *Vogel v. City of Richland*, 161 Wn. App. 770, 779-80, 255 P.3d 805 (2011)).

1 And where a local jurisdiction sets forth a process for making a land use
2 decision, the land use decision is not final unless the jurisdiction has complied
3 with the process and the entire process is complete.

4 *Durland* (quoting *Heller Bldg., LLC v. City of Bellevue*, 147 Wn. App. 46, 55-56, 194
5 P.3d 264 (2008)).

6 No exhaustion of administrative remedies requirement arises without issuance
7 of a final, appealable order. [20] An agency's letter does not constitute a final
8 order unless the letter clearly fixes a legal relationship as a consummation of
9 the administrative process. [21] The letter must be clearly understandable as a
final determination of rights, and doubts as to the finality of such
communications must be resolved in favor of the citizen.

10 *WCHS, Inc. v. City of Lynnwood*, 120 Wn.App. 668, 679, 86 P.3d 1169, (2004).

11 The importance of the Notice of Final Decision is that it informs parties of record
12 of “the procedures for administrative appeal.” As noted above, the procedure in the
13 City of Redmond is that Type II decisions are made before Type I decisions, so a Type
14 I decision would not ordinarily be appealable until the Type II decision is made.

15 Without a Notice of Decision, the City and AEB cannot contend that Appellant
16 did not exhaust administrative remedies.

17 The City’s motion to dismiss Issues 2 and 3 should be denied.

18 4.3 ISSUES 6, 9 AND 10: ADEQUACY OF TRAFFIC AND TRANSPORTATION
19 REVIEW.

20 Issues 6, 9 and 10 raise issues concerning adequacy of traffic impact studies.
21 Issue 6 references traffic studies previously submitted by the applicant. Issue 9 alleges
22 error in the traffic and parking analysis because it did not take into account traffic and
23 parking impacts from the entire building. Similarly, Issue 10 asserts error because
24 traffic analysis assumed there would be no growth in the membership of the AEB.
25

1 These issues are fully within the purview of provisions of the RZC.

2 As described above the City has taken specific and special actions to address
3 traffic issues for the AEB project. These include an easement conveyed by the City to
4 AEB for a driveway to the property because, as Recital D in the easement states in
5 regard to the AEB proposal: “Conditions of development for such use requires (*sic*) a
6 wider driveway than provisions allow.” See Exhibit E to the City motion.
7

8 Traffic impact analysis is considered under chapter 21.52 of the RZC. A
9 “Transportation Management Program” is required under RZC 21.52.020 and AEB has
10 submitted such a program to the city, accompanied by several traffic studies including
11 JTE Technical Memorandum (July 2012), traffic and parking letter from JTE (May 23,
12 2013), and JTE Engineering technical comments (June 2014), among others. These
13 reports and studies are incorporated by reference.
14

15 The decision specifically points out that under RZC 21.08.280 a “traffic
16 mitigation plan is required for a church use and is met by a draft plan submitted.” See
17 Exhibit A to City Motion, page 5, Paragraph 5. In addition, as described above a SPE
18 is intended to determine: “The adequacy of streets and utilities in the area of the
19 subject property to serve the anticipated demand from the proposal” under RZC
20 21.70.070.1.d. The code also requires consistency with the Redmond Comprehensive
21 Plan under RZC 21.76.070.B.1. , including policies to protect residential
22 neighborhoods such as OV-33 with its requirement to “locate driveways and streets in
23 such a way as to minimize through traffic on primarily residential streets and reduce
24 other adverse impacts on residential neighborhoods.”
25

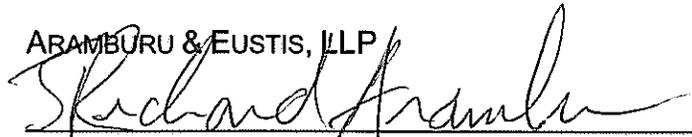
1 Issues 6, 9 and 10 address the adequacy of traffic analysis by the City and AEB
2 in the traffic management plans submitted. These issues are fully within the scope of
3 considerations within the RZC and are proper appeal issues to be heard on testimony
4 and evidence at the scheduled hearing.
5

6 **5. CONCLUSION.**

7 The motions of AEB and the City should be denied. The issues raised in the
8 appeal are fully within criteria for issuance of an SPE for the AEB facility.

9 Respectfully submitted on this 20th day of August, 2018.

10 ARAMBURU & EUSTIS, LLP

11 

12 J. Richard Aramburu, WSBA #466
13 Attorney for Appellant
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ARAMBURU & EUSTIS, LLP

1 CERTIFICATE OF SERVICE

2 I am an employee in the law offices of ARAMBURU & EUSTIS, LLP, well over
3 eighteen years of age and competent to be a witness herein. On the date below, I
4 distributed copies of the foregoing document to counsel of record by email:

5 Office of the Hearing Examiner, c/o cdxanthos@redmond.gov
6 James Haney, Redmond City Attorney, jhaney@omwlaw.com
7 Sarah Mack, Attorney for Applicants, mack@tmw-law.com, cc cohee@tmw-law.com
8 Applicants eliyasy@microsoft.com, ahaveliwala@gmail.com
9 Planner dlee@redmond.gov
10 Appellant eugenez@outlook.com

11 I declare under penalty of perjury under the laws of the State of Washington
12 that the foregoing is true and correct to the best of my knowledge and belief.

13 DATED: August ^{20th}, 2018.

14 

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16 Carol Cohoe

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BEFORE THE HEARING EXAMINER
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Burhani Mosque at 15252 NE 51st
Street, Redmond

Appeal No. LAND-2018-00701
Of
LAND-2013-00171

**DECLARATION OF EUGENE
ZAKHAREYEV IN OPPOSITION TO
MOTIONS TO DISMISS**

I am the appellant in this appeal of a Site Plan Entitlement decision of the city to grant site plan entitlement to Anjuman-E-Burhani.

Attachment 1 to this Declaration is a memo from the City of Redmond Mayor to the City Council dated May 1, 2018, discussing the AEB proposal and the potential easement that the City was considering for access to the AEB property.

An issue is raised in the AEB Motion to Dismiss regarding an interpretation issued by the City for the calculation of seating capacity in the proposed AEB facility.

AEB contends issues 2 and 3 should be dismissed because an Administrative Interpretation was issued on the subject of seating capacity on April 29, 2015, but not

1 appealed.

2
3 I was party of record at the time the interpretation was allegedly issued (April
4 29, 2015). However, I never received a copy of a Notice of Final Decision from the
5 City on that interpretation.

6 In addition, I have submitted several public records requests to the City for all
7 documents related to the AEB SPE application, but no Notice of Final Decision for the
8 Administrative Interpretation has ever been provided.

9 I am over the age of 18 years, competent to testify, and make this statement
10 from personal knowledge.

11 I declare under the penalty of perjury under the laws of the State of Washington
12 that the foregoing is true to the best of my knowledge and belief.

13 Dated this ____ day of August, 2018.

14
15
16 *See next page for signature*
17 _____
18 Eugene Zakhareyev, Appellant

1 appealed.

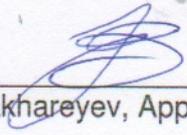
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3 I was party of record at the time the interpretation was allegedly issued (April
4 29, 2015). However, I never received a copy of a Notice of Final Decision from the
5 City on that interpretation.

6 In addition, I have submitted several public records requests to the City for all
7 documents related to the AEB SPE application, but no Notice of Final Decision for the
8 Administrative Interpretation has ever been provided.

9
10 I am over the age of 18 years, competent to testify, and make this statement
11 from personal knowledge.

12 I declare under the penalty of perjury under the laws of the State of Washington
13 that the foregoing is true to the best of my knowledge and belief.

14 Dated this 19 day of August, 2018.

15
16 
17 _____
Eugene Zakhareyev, Appellant

Attachment 1



MEMO TO: Members of the City Council

FROM: Mayor John Marchione

DATE: May 1, 2018

SUBJECT: **Approval to Convey an Access Easement to the Anjuman-E-Burhani Property, 15250 NE 51st Street (King County Tax Parcels 218250-0080 and 218250-0082)**

I. RECOMMENDED ACTION

Authorize the Mayor to grant an easement to increase the access width from the Anjuman-E-Burhani property to NE 51st Street from 14- to 20-feet, subject to paying the City \$67,000 for the value of the easement (see attachments A: Draft Easement Document and B: Property Location).

II. DEPARTMENT CONTACTS

| | |
|--|--------------|
| Malisa Files, Finance Director | 425-556-2166 |
| Terry Marpert, AICP, Finance-Real Property | 425-556-2428 |

III. DESCRIPTION/BACKGROUND

Anjuman-E-Burhani, site plan entitlement applicant, seeks City approval to build a mosque, changing the land use on the applicant's property from a single-family residential to a religious institution use. For safety reasons, the new use is required to have access to NE 51st Street that is 20-feet wide; six feet more than the existing 14-foot wide access. The proposed easement was reviewed by Planning and Community Development as part of the site plan entitlement (SPE) application submitted by the property owner, listed as Project No. LAND-2013-00171.

The area of NE 51st Street adjacent to the applicant's property was acquired by the City in 1991 through a quitclaim deed from the Washington State Department of Transportation (WSDOT). A condition of the quitclaim deed is that the City "will maintain the control of ingress and egress to, from and between the lands herein conveyed and the lands adjacent thereto..." While WSDOT no longer owns the property, the terms of the quitclaim deed require the City to follow WSDOT design criteria when considering proposals to widen access from adjacent properties to the City-owned section of NE 51st Street. (WSDOT letter, August 24, 2012).

Consistent with WSDOT requirements, the following conditions shall apply to the proposed access easement:

- Compliance with WSDOT’s Design Manual, Chapter 530, Subsection 530.10 (July 2016);
- Restriction of access at NE 51st Street to right-in/right-out;
- Sight distance standards shall be met where the access connects to NE 51st Street;
- Any channelization changes extending into WSDOT right-of-way shall be approved by WSDOT; and
- The owner of the Anjuman-E-Burhani property shall pay \$67,000 to the City of Redmond as compensation for the easement based on a third-party valuation of the easement.

IV. PREVIOUS DISCUSSIONS HELD

| Date | Action / Committee Presentation |
|----------------|--|
| April 10, 2018 | Planning and Public Works Committee of the Whole |

V. IMPACT

A. Service/Delivery:

The easement will allow access to NE 51st Street from the Anjuman-E-Burhani property to increase by six feet, from 14- to 20-feet wide. This is the width necessary to provide safe access to a religious institution use.

B. Fiscal Note:

There are no costs involved with conveying this easement. The City will receive \$67,000 in compensation for the easement as mentioned above.

VI. ALTERNATIVES TO STAFF RECOMMENDATION

The City Council could choose not to approve this easement. This would prevent the access width necessary to safely connect the Anjuman-E-Burhani Property to NE 51st Street.

VII. TIME CONSTRAINTS

A delay in approving the access easement would delay approval of the SPE for the Anjuman-E-Burhani property.

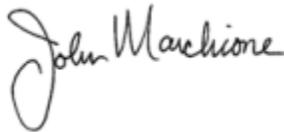
VIII. LIST OF ATTACHMENTS

Attachment A: Draft Easement Document

Attachment B: Property Location



Malisa Files, Finance Director



Approved for Agenda _____

John Marchione, Mayor