David Whitaker, Esq. Director Irvin Corley, Jr. Executive Policy Manager Marcell R. Todd, Jr. Senior City Planner Janese Chapman Deputy Director

John Alexander LaKisha Barclift, Esq. M. Rory Bolger, Ph.D., AICP Elizabeth Cabot, Esq. Tasha Cowen **Richard Drumb** George Etheridge

City of **Betroit** CITY COUNCIL

LEGISLATIVE POLICY DIVISION

208 Coleman A. Young Municipal Center Detroit, Michigan 48226

Phone: (313) 224-4946 Fax: (313) 224-4336

Christopher Gulock, AICP Derrick Headd Marcel Hurt, Esq. Kimani Jeffrey Anne Marie Langan Jamie Murphy Carolyn Nelson Kim Newby Analine Powers, Ph.D. Jennifer Reinhardt Sabrina Shockley Thomas Stephens, Esq. **David Teeter Theresa Thomas** Kathryn Lynch Underwood Ashley A. Wilson

Deborah Goldstein TO:

COUNCIL MEMBERS

FROM:

David Whitaker, Director

Legislative Policy Division Staff

DATE:

October 23, 2019

RE:

Prince Realty, LLC & 5 K, LLC PA 210 Certificate Request

Commercial Rehabilitation Act, PA 210 of 2005

The Commercial Rehabilitation Act, PA 210 of 2005, is a tax incentive for the rehabilitation of commercial property for the primary purpose and use of a commercial business or a multifamily residential facility. The property must be located within an established Commercial Rehabilitation District. Exemptions are approved for a term of 1-10 years, as determined by the local unit of government. The property taxes are based upon the prior year's taxable value.

Prince Realty, LLC, is the project developer and owner of the properties located at 4725 16th, 4817 17th, 5000 W Grand River, 4885 15th, 4884 W Grand River, 4842 W Grand River, 4892 W Grand River. 1

The multifaceted Core City project clustered at Warren and Grand River avenues was announced in June 2018 with 50,000 square feet of retail, office and residential space, north across Grand River from Prince Concepts' existing Quonset hut apartment development, True North. They are west of Midtown near the intersection of I-96 and I-94. In this project the current tenant mix includes: bakery, commissary kitchen, jewelry designer, advertising agency, jujitsu studio, and event space.²

¹ The developer is seeking approval of six separate certificates for a singular project that involves 6 distinct tax parcels. Given the separate parcels each parcel requires a separate public hearing (one for each certificate).

² Developer builds on mixed-use campus in Detroit's Core City, branches out August 19, 2019 by ANNALISE FRANK https://www.crainsdetroit.com/construction/developer-builds-mixed-use-campus-detroits-core-citybranches-out

The PA 210 tax abatements will allow the developer to maintain the financial feasibility of the project and additionally, it will allow the developer to continue to invest in the components that maintain the astetics of the neighborhood, such as trees and parks. With out the abatements, the property taxes would increase significantly over the next few years, and the developer will not be able to maintain this financial burden of the increases due to the high development costs and reduced rents that are in place for this project, in order to allow for the project's location to compete with more established neighborhoods.

DEGC Project Evaluation Checklist

Prince Concepts Core City Developer: Prince Concepts Principle: Phil Kafka

Commercial Rehabilitation Act, **PA 210 of 2005 as amended** – Current taxes frozen at pre-rehabilitation values, local taxes abated for up to 10 years

Certificates
4725 16 th , 4817 17 th , 5000 W Grand River, 4885 15 th , 4884 W Grand River, 4842 W Grand River, 4892 W Grand River
District 6
Core City – Woodbridge
56,300
39,662
8,638

Prince Concepts is a real estate development company that has invested in properties in an area where there hasn't been any development for over 50 years.

Due to the lack of activity in the immediate vicinity of these Prince Concepts Core City projects, there wasn't an existing demand to live or have a business in this area. To attract tenants, the developer is taking steps to make the development as attractive to prospective tenants as possible by planting trees and focusing on design, and also subsidizing rent to make this unattended to neighborhood a place. Current tenant mix includes: bakery, commissary kitchen, jewelry designer, advertising agency, jujitsu studio, and event space.

The tax abatements will allow the developer to maintain the financial feasibility of the project and will additionally allow the developer to continue to invest in the components that make the neighborhood beautiful - trees and parks. If the property taxes increase significantly over the next few years, the developer will not be able to maintain this financial feasibility due to the high development costs and reduced rents that are in place to compete with more established neighborhoods.

Rental Breakdown	
Retail Rent	\$18.04psf
Commercial Rent	\$12.29psf
Project Costs	
Total investment	\$8.4M
Uses	\$330k Acquisition (4%), \$7.2M Hard Construction (85%), \$926k Soft Costs (11%)
Sources	\$8.4M Owner's Equity (100%)
Project Benefits (10 years)	
Estimated jobs	58 FTE, 15 construction jobs
Estimated city benefits before	
tax abatement	\$2,145,054
Total nominal value of PA 210	\$342,370
Less cost of services & utility	
deductions	\$846,712
Net benefit to city	\$955,972

City of Detroit: Benefits, Costs, and Net Benefits over 10 Years

	Amount
Real Property Taxes, before abatement	\$447,977
Personal Property Taxes, before abatement	\$0
New Residential Property Taxes	\$0
Municipal Income Taxes - Direct Workers	\$352,044
Municipal Income Taxes - Indirect Workers	\$68,930
Municipal Income Taxes - Corporate Income	\$174,625
Municipal Income Taxes - Construction Period	\$45,027
Municipal Income Taxes - New Res, Inhabitants	\$0
Utility Revenue	\$498,395
Utility Users' Excise Taxes	\$29,557
State Revenue Sharing - Sales Tax	\$205,369
Building Permits and Fees	\$34,700
Miscellaneous Taxes & User Fees	\$288,430
Subtotal Benefits	\$2,145,054
Cost of Providing Municipal Services	(\$348,317)
Cost of Providing Utility Services	(\$498,395)
Subtotal Costs	(\$846,712)
Net Benefits	\$1,298,342

Impacted Taxing Units: Incentive Summary over 10 Years

	Additional		•	Business	Utility Users Tax	Net Benefits
	Benefits		Real	Personal	& Corporation	After Tax
	Before Tax	Additional	Property Tax	Property Tax	Income Tax	Abatements
	Abatements	Costs	Abatement	Abatement	Exemption	& Incentives
City of Detroit	\$2,145,054	(\$846,712)	(\$342,370)	\$0	\$0	\$955,972
Wayne County	\$166,924	(\$61,133)	(\$81,915)	\$0	\$0	\$23,877
Detroit Public Schools	\$614,189	(\$183,906)	(\$132,533)	\$0	\$0	\$297,750
State Education	\$81,232	\$0	\$0	\$0	\$0	\$81,232
Wayne RESA	\$54,577	\$0	(\$42,993)	\$0	\$0	\$11,584
Wayne County Comm. College	\$43,876	\$0	(\$33,039)	\$0	\$0	\$10,837
Wayne County Zoo	\$1,354	\$0	(\$1,019)	\$0	\$0	\$334
Detroit Institute of Arts	\$2,708	\$0	(\$2,039)	\$0	\$0	\$669
Total	\$3,109,914	(\$1,091,750)	(\$635,909)	\$0	\$0	\$1,382,255

Charts courtesy of the DEGC

Conclusion

The estimated total capital investment from the developer is approximately \$8.4M. It is estimated that 58 FTE, 15 construction jobs ³ as a result of the project.

Based on the investment and jobs, the project is estimated to provide the City of Detroit a net benefit of \$955,972, and all of the impacted taxing units, a net benefit of \$1,382,255 over 10 years, despite the \$635,909 tax abatement to the developer.

Please contact us if we can be of any further assistance.

Attachment: Finance Assessor's PA 210 Eligibility Letters

cc: Auditor General's Office

Arthur Jemison, Chief of Services and Infrastructure Maurice Cox, Planning and Development Department

Donald Rencher, HRD

Veronica M. Farley, HRD

Stephanie Grimes Washington, Mayor's Office

Malinda Jensen, DEGC

Kenyetta Bridges, DEGC

Jennifer Kanalos, DEGC

Brian Vosburg, DEGC

³ The developer submitted a revised plan late on October 22, 2019, with an additional housing component and 85 FTE, 15 construction jobs. However, CRIO has reviewed and approved the original plan, so we are going with DEGC's original calculations and data.



COLEMAS A YOUNG MUNICIPAL CENTER 2 WOODWARD AVENUE, SULL 824 DETROIT, MICHIGAN 48226 (313) 224-3011 • TLY 711

October 1, 2019

Katharine G. Trudeau, Deputy Director Planning & Development Department Coleman A. Young Municipal Center 2 Woodward Ave, Suite 808 Detroit, MI 48226

RE: Commercial Rehabilitation Certificate – *Prince Realty LLC*Parcel Number: 10000599.001

Property Address: 4884 and 4892 W. Grand River

Dear Ms. Trudeau

The Office of the Chief Financial Officer, Office of the Assessor, has reviewed the Commercial Rehabilitation District certificate application for the properties located at 4884 and 4892 W. Grand River in the Woodbridge area in the City of Detroit

The rationale for issuing Commercial Rehabilitation certificates under PA 210 of 2005, as amended, is based on the anticipation of increased market value upon completion of new construction and /or significant rehabilitation of existing commercial property and commercial housing property. Normal repair and maintenance are not assessed and do not necessarily generate additional market value.

The project as proposed by Prince Realty LLC involves rehabilitating the warehouse building at 4892 W. Grand River, part two-story and part one-story with 5,942 total square feet of building area for retail use. The rehabilitation will include installing heating and cooling, updating electrical and updating plumbing. The project at 4884 W. Grand River involves rehabilitating the building, a two-story warehouse with 11,970 square feet of building area into 4 sintes on the first floor and 3 suites on the second floor. The first floor will have a coffee roasting facility, a commissary kitchen, possible voga studio and possible café. The second floor will contain a boxing gym on half of the floor. The rehabilitation will include installing heating and cooling lupdating electrical and plambing and demolishing walls.

The 2019 values are as follows:

	Parcel #	Address	Building \sadjiji1 Value (367)	Building Takabio Valuo	Land Assessed Villing	Land Takable Value
- [10000599.001	4884 W. Grand River	\$52,000	\$29,343	\$ 11.600	\$ 6546

This property meets the criteria set forth under PA 210 of 2005, as amended, it applies to a building or a group of contiguous buildings, a portion of a building or group of contiguous buildings previously used for commercial or industrial purposes, obsolete industrial property, and vacant property which, within the immediately preceding 15 years, was operating as a commercial business enterprise.

A review of the general plans, along with the criteria set forth under the Commercial Rehabilitation Act, indicated that the proposed project located at 4884 and 4892 W. Grand River Avenue is eligible as it pertains to the Commercial Rehabilitation certificate criteria under P.A. 210 of 2005, as amended.

Sincerely.

Charles Ericson, MMAO Assessor, Board of Assessors

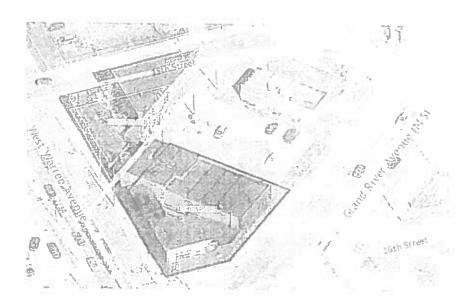


Commercial Rehabilitation District Prince Realty LLC Page 2

PRINCE REALTY LLC 10000599.001 4884 AND 4892 W GRAND RIVER

N GRAND RIVER 1 THRU 3 & VAC ALLEY ADJ MARY E ARMSTRONGS SUB L6 P8 PLATS, WIC R 10/48: W 34 FT OF PIC 44 LYGIN OF GRAND RIVER AVE 100 FT WD AND E & ADJ TO LOT 1 OF MARY E ARMSTRONGS SUB 10/--- 104 IRREG

SPLIT/COMBINED ON 11/20/2018 FROM 10000601, 10000599, 10000600, 10000602;





COLEMAN A. YOUNG MUNICIPAL CUNTER 2 WOODWARD AVENUE, SUITE 824 DETROIT, MICHIGAN 48226 (313) 224-3011 • TTY 711

September 26, 2019

Katharine G. Trudeau, Deputy Director Pianning & Development Department Coleman A. Young Municipal Center 2 Woodward Ave, Suite 808 Detroit, MI 48226

RE: Commercial Rehabilitation Certificate - Prince Realty LLC

Parcel Number: 10000598

Property Address: 5000 W. Grand River

Dear Ms. Trudeau!

The Office of the Chief Financial Officer, Office of the Assessor, has reviewed the Commercial Rehabilitation District certificate application for the property located at 5000 W. Grand River in the Woodbridge area in the City of Detroit.

The rationale for issuing Commercial Rehab litation certificates under PA 210 of 2005, as amended, is based on the anticipation of increased market value upon completion of new construction and for significant rehabilitation of existing commercial property and commercial housing property. Normal repair and maintenance are not assessed and do not necessarily generate additional market value.

The project as proposed by Prince Realty LLC involves rehabilitating the building for white box commercial use. The property contains a one-story 14,025 square feet former furniture store one-628 eares of land for white box. The rehabilitation will include installing heating and cooling, updating electrical and plumbing repairing the roof and waterproofing the walls and windows.

The 2019 values are as follows:

		Building 40000 1	Building	Land Assisted Value!	Land
Parcel #	Address	Value (SEV)	Takaola Value	529	Taxabio Value
10000598	5000 W. Grand Rive	\$59,700	5 22,343	3 20,000	S 7.487

This property meets the criteria set forth under PA 210 of 2005, as amended it applies to a building or a group of contiguous buildings, a portion of a building or group of contiguous buildings previously used for commercial or industrial purposes, obsolete industrial property, and vacant property which, within the immediately preceding 15 years, was operating as a commercial business enterprise.

A review of the general plans, along with the criteria set forth under the Commercial Rehabilitation Act, indicated that the proposed project located at 5000 W. Grand River Avenue is eligible as it pertains to the Commercial Rehabilitation certificate criteria under P.A. 210 of 2005, as amended

Sincera

Charles Ericson, MMAO Assessor, Board of Assessors



Commercial Rehabilitation Certificate Prince Realty LLC Page 2

Property Owner, 5K LLC

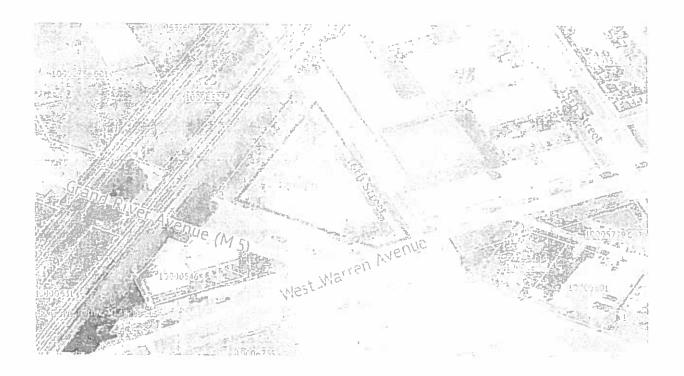
Property Address: 5000 W GRAND RIVER

Parcel Number 10000598.

Legal Description: N GRAND RIVER ALL THAT PART OF STANTON FARM LYSIN OF GRAND RIVER AVE E OF MICRR R/W ALSO LOTS 11

THRU 4 AND VAC STREET & ALLEY ADJ MARY E ARMSTONGS SUB L6 P8 PLATS, WICIR 10/48 27,895 SQ FT

The legal description matched the applicant's submitted legal description





COLLYAN A YOUNG MUNICIPAL CENTUR 2 WOODWARD AVENUE, SUITE 824 DETROIT, MICHIGAN 48226 (313) 224-3011 • TTY 711

September 26, 2019

Katharine G. Trudeau, Deputy Director Planning & Development Department Coleman A. Young Municipal Center 2 Woodward Ave, Suite 808 Detroit, MI 48226

Parcel Number 10006928

Property Address 4817 17** Street

Dear Ms. Trudeau:

The Office of the Chief Financial Officer, Office of the Assessor, has reviewed the Commercial Rehabilitation District certificate application for the property located at 4817-17th Street in the Core City area in the City of Detroit

The rationale for issuing Commercial Rehab litation certificates under PA 210 of 2005, as amended, is based on the anticipation of increased market value upon completion of new construction and for significant rehabilitation of existing commercial property and commercial housing property. Normal repair and maintenance are not assessed and do not necessarily generate additional market value.

The project as proposed by Prince Realty LLC involves demolishing the derel at structure and building new office/retail structure along with creating a public park area. The abandoned car disassembly factory is a one-story storage warehouse with 11,321 total square feet of building area on 1,212 acres of land. The rehabilitation will include new building(s) new heating and cooling system. New electrical and plumbing and varied landscaping for the park area.

The 2019 values are as follows

Parcel #	Ad-Irass	Suilding Assess I /xite 55%	Building Takana Vali a	Land Alferred (# 50) 537	Land Taxa ^L le Value
10006928	4817 17th St	\$0	\$0	\$42,200	\$ 42,200

This property meets the criteria set forth under PA 210 of 2005, as amended. It applies to a building or a group of contiguous buildings, a portion of a building or group of contiguous buildings previously used for commercial or industrial purposes, obsolete industrial property, and vacant property which, within the immediately preceding 15 years, was operating as a commercial business enterprise.

A review of the general plans, along with the criteria set forth under the Commercial Rehabilitation Act, indicated that the proposed project located at 4817 17th Street is eligible as it pertains to the Commercial Rehabilitation certificate criteria under P.A. 210 of 2005, as amended

Sincer

Charles Ericson, MMAO
Assessor, Board of Assessors



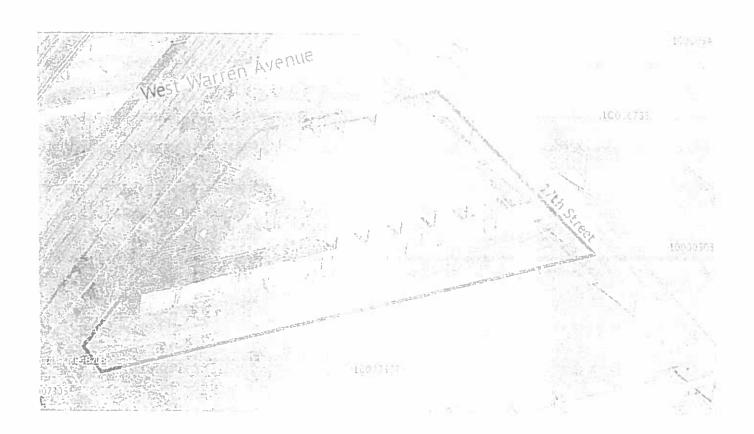
Commercial Rehabilitation Certificate Prince Realty LLC Page 2

Property Owner: PRINCE REALTY LLC Froperty Address: 4817-17TH ST Farcel Number: 10006928

Legal Description. W 17TH S 16 83 FT OF 838 839 THRU 844 836 & 835 EXC A 16 FT STRIP FOR MCRR R/W & VAIC ALLEY BETW SD LOTS ALSO N 1/2 OF VAC ALLEY LYG S OF & ADJSD LOTS & E 1/2 OF VAC 16TH ST LYG W OF & ADJ STANTONS SUB STANTONS SUB

L10 P16 PLATS, WCR 10/39 48,420 SQ FT

The legal description matched the applicant's submitted legal description





COLLMAN A. YOUNG MESCUPAL CENTER 2 WOODWARD AVENUE, SUITE 824 DETROIT, MICHIGAN 48226 (313) 224-3011 • TTY 711 (313) 224-3010

September 26, 2019

Katharine G. Trudeau, Deputy Director Planning & Development Department Coleman A. Young Municipal Center 2 Woodward Ave, Suite 808 Detroit, MI 48226

Parcel Number: 10000599.003

Property Address: 4842 W. Grand River

Dear Ms. Trudeau:

The Office of the Chief Financial Officer, Office of the Assessor, has reviewed the Commercial Rehabilitation District certificate application for the property located at 4842 W. Grand River in the Woodbridge area in the City of Detroit

The rationale for issuing Commercial Rehabilitation certificates under PA 210 of 2005, as amended, is based on the anticipation of increased market value upon completion of new construction and /or significant rehabilitation of existing commercial property and commercial housing property. Normal repair and maintenance are not assessed and do not necessarily generate additional market value.

The project as proposed by PK 4842 LLC involves renabilitating the former one-story repair shop with 2,116 total square feet of building area on 199 acres of land into restaurant/bar use. The renabilitation will include installing heating and cooling, updating electrical and plumbing, new windows and installing a commercial kitchen.

The 2019 values are as follows

		Building 4 (C act	Building	Land 4 =1V+0=	Land
Parcel #	Address	Value c∃EV)	Talish S Value	SEV	Takable Vidue
10000599,003	4842 W Grand River	\$ 13 000	S 13,000	\$ 7,400	S 7,400

This property meets the criteria set forth under PA 210 of 2005, as amended. It applies to a building or a group of contiguous buildings, a portion of a building or group of contiguous buildings previously used for commercial or industrial purposes, obsolete industrial property, and vacant property which, within the immediately preceding 15 years, was operating as a commercial business enterprise.

A review of the general plans, along with the criteria set forth under the Commercial Rehabilitation Act, indicated that the proposed project located at 4842 W. Grand River is eligible as it pertains to the Commercial Rehabilitation certificate criteria under P.A. 210 of 2005, as amended.

Sincer

Charles Ericson, MMAO Assessor, Board of Assessors



Commercial Rehabilitation Certificate PK 4842 LLC Page 2

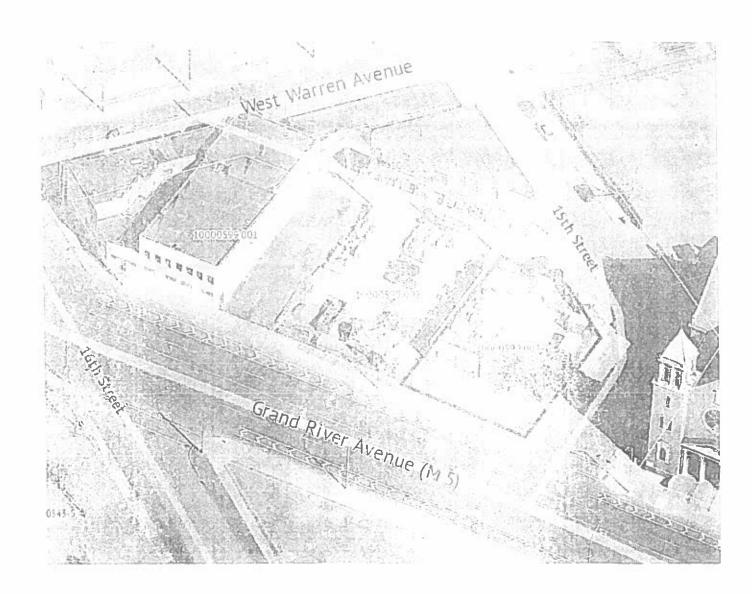
Property Owner: PRINCE REALTY LLC Property Address: 4842 W GRAND RIVER Parcel Number: 10000599.003

Legal Description: N W GRAND RIVER ALL THAT PT OF P C 44 LYG N & AND GRAND RIVER AVE 100 FT WD, E & ADJ LOT 1 OF MARY

E ARMSTRONGS SUB AND W & ADJ LOT 2 OF O'BRIENS SUB 10/--- 120 X 120

SPLIT/COMBINED ON 11/20/2018 FROM 10000601., 10000599., 10000600., 10000602.;

The legal description matched the applicant's submitted legal description





COLLMAN A. YOUNG MUNICIPAL CENTER 2 WOODWARD AVENUE, SUITE 824 DETROIT, MICHIGAN 48226 (313) 224-3011 • TTY-711

September 26, 2019

Katharine G. Trudeau, Deputy Director Planning & Development Department Coleman A. Young Municipal Center 2 Woodward Ave, Suite 808 Detroit, MI 48226

RE Commercial Rehabilitation Certificate - PK Realty LLC

Parcel Number 10006330.

Property Address: 4725 16th Street

Dear Ms. Trudeau:

The Office of the Chief Financial Officer, Office of the Assessor, has reviewed the Commercial Rehabilitation District certificate application for the property located at 4725 16th Street in the Core City area in the City of Detroit

The rationale for issuing Commercial Rehabilitation certificates under PA 210 of 2005, as amended, is based on the anticipation of increased market value upon completion of new construction and /or significant rehabilitation of existing commercial property and commercial housing property. Normal repair and maintenance are not assessed and do not necessarily generate additional market value.

The project as proposed by PK Realty LLC involves rehabilitating the cuilding for retail use. The property comprises of a former automotive shop with a 3,798 square foot building on 113 acres of land. The rehabilitation will include installing heating and cooling, updating electrical and updating plumbing.

The 2019 values are as follows:

Parcel #		Building A = 1 Value SEVI		La 1d 455 10	Software	Land Taxable	Value
10006330.	4725 16th Street	\$ 14 500	\$8,906	5	2.500	S	1,533

This property meets the criteria set forth under PA 210 of 2005, as amended. It applies to a building or a group of contiguous buildings, a portion of a building or group of contiguous buildings previously used for commercial or industrial purposes, obsolete industrial property, and vacant property which, within the immediately preceding 15 years, was operating as a commercial business enterprise.

A review of the general plans, along with the criteria set forth under the Commercial Rehabilitation Act, indicated that the proposed project located at 4725 16th Street is eligible as it pertains to the Commercial Rehabilitation certificate criteria under P.A. 210 of 2005, as amended.

Sincere

Charles Ericson, MMAO Assessor, Board of Assessors



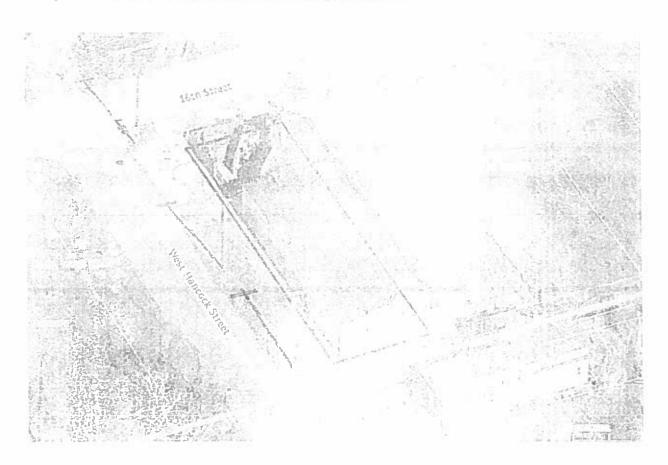
Commercial Rehabilitation Certificate PK Realty LLC Page 2

Property Owner, PRINCE REALTY LLC Property Address: 4725 16th STREET

Parcel Number: 10006330

Legal Description . W 16TH S 38 80 FT 596 SUB OF P C 44 Lo3 P2-3 DEEDS . W C R 10/31 38 80 X 126 67A

The legal description matched the applicant's submitted legal description.





COLEMAN A YOUNG MUNICIPAL CENTR 2 WOODWARD AVENUE, SUITE 824 DETROIT, MICHIGAN 48226 (313) 224-3011 • TTY 711

September 26, 2019

Katharine G. Trudeau, Deputy Director Planning & Development Department Coleman A. Young Municipal Center 2 Woodward Ave, Suite 808 Detroit, MI 48226

Commercial Rehab litation Certificate – PK Power Plant LLC Parcel Number: 10005729.002L Property Address: 4885 15th Street

Dear Ms. Trudeau:

The Office of the Chief Financial Officer, Office of the Assessor, has reviewed the Commercial Rehabilitation District certificate application for the property located at 4885 15th Street in the Woodbridge area in the City of Detroit.

The rationale for issuing Commercial Rehabilitation certificates under PA 210 of 2005, as a needed, is based on the anticipation of increased market value upon completion of new construction and /or significant rehabilitation of existing commercial property and commercial housing property. Normal repair and maintenance are not assessed and do not necessarily generate additional maintenance value.

The project as proposed by PK Power Plant LEC involves rehabilitating the warehouse building part two-story and part one-story with 8,994 total square feet on 141 acres of land for retail use. The rehabilitation will include installing heating and cooling updating electrical and updating plumbing

The 2019 values are as follows:

		Building Assessed	Building	Fand 15.081877/1 (6)	Land
Parcel #	Address	Valle BE/	Taxabla Value	357	Takable Value
10005729.002L	4835 15th Street	\$17,300	\$17,300	S 3 200	S 3 200

This property meets the criteria set forth under PA 210 of 2005, as amended. It applies to a building or a group of contiguous buildings, a portion of a building or group of contiguous buildings previously used for commercial or industrial purposes, obsolete industrial property, and vacant property which, within the immediately preceding 15 years, was operating as a commercial business enterprise.

A review of the general plans, along with the criteria set forth under the Commercial Rehabilitation Act, indicated that the proposed project located at 4885 15th Street is eligible as it pertains to the Commercial Rehabilitation certificate criteria under P.A. 210 of 2005, as amended.

Sincerely

Charles Ericson, MMAO Assessor, Board of Assessors



Commercial Rehabilitation Certificate PK Power Plant LLC Page 2

Property Owner. PRINCE REALTY LLC Property Address 4885 15th STREET Parcel Number 10005729 002L

Legal Description: W 15TH 10'BRIENS SUB OF PT OF E1/2 OF LAFONTAINE FARM L20 P44 PLATS, W C R 10/49 1 27.17 IRREG

The legal description matched the applicant's submitted legal description.

