

In addition to our original submission we would like to state that our signed Licence to Occupy agreements do not have any wording to suggest that they will be subject to an annual market appraisal to obtain a rental fee. The majority of residents have only ever signed their original Licence to Occupy and do not sign them yearly (refer Attachment 1).

The Licence to Occupy is not a Residential Tenancy agreement.

From approx. 1990 to 2020 the licence fees increased in line with the rates rental increase of Invercargill as per Clause 4 of the ICC Memorandum of Understanding (MoU - refer Attachment 2) and residents paid those amounts accordingly.

The Memorandum of Understanding was written by Bill Watt (Senior ICC Manager) in conjunction with Warwick Cambridge (Solicitor/Lawyer) in good faith. Mr Watt has signed a statement with our lawyer (Morgan Pearce) attesting to that fact. Richard King (ICC CEO) has also verbally acknowledged that the MoU existed.

In the Assistant Ombudsman's letter dated 20 September 2023 under the heading The Memorandum of Understanding Chloe Longdin-Prisk states:

*"The Council refutes that the MOU is a document that it ever created, promoted, recommended, or signed. The Council advises that despite its efforts, it has been unable to locate any records of or reference to the document."*

The fact that the current ICC staff cannot locate it does not mean it does not exist and all of the residents (apart from the 2 most recent sales) have their own copies which were issued when they signed their Licence to Occupy agreements.

In essence the current Council staff are questioning the integrity of 3 leading figures that served Invercargill well in their tenure with the Council and treated people (including Coopers Creek (CC) residents) with respect.

We would like to address the annual market appraisal increases in detail by year as follows:

### **2020/2021**

- \$815 up from \$765 (6.5% increase in line with the % rates increase of Invercargill).
- Both the above figures appear under Crib sites (Sandy Point Domain - per annum) in the Fees and Charges (refer page 1 of Attachment 3).
- Market appraisal carried out by Telfer Young 9 March 2020 but not implemented by ICC due to Covid. CC residents were not made aware that this appraisal had been done nor did they receive a copy.
- No individual consultation with key stakeholders despite Rhiannon Suter stating in her Fees and Charges Report presented to the Council on 9 June 2020: *"The consultation opportunity was promoted to the public via a range of means, including traditional and social media and via a new stakeholder email update."*

### **2021/2022**

- \$1,300 up from \$815 (60% increase)
- The figure of \$815 (only) appears under Crib sites (Sandy Point Domain - per annum) in the Fees and Charges (refer page 2 of Attachment 3). The 2nd column under 2021/2022 shows the wording Market Appraisal per m<sup>2</sup> despite the fact that the ICC had the figure of \$1,300 since 9 March 2020. We believe the omission of this figure was deliberate as it would have highlighted the significant increase to Councillors.
- Market appraisal carried out by Telfer Young 9 March 2020. CC residents had to request a copy of the appraisal.
- No individual consultation with key stakeholders despite Rhiannon Suter stating in her Fees and Charges Report presented to the Performance, Policy and Partnerships (PPP) Committee on 8 June 2021 under the heading Implications, point 5 states: *"Have the views of affected or*

*interested persons been obtained and is any further public consultation required?*

*Yes. No further consultation is required."*

- Rhiannon does not mention anything about the significant 60% increase in rental to the CC residents in her Report so Councillors were not made aware of it.
- Letter received from Caroline Rain dated 30 June 2021 advising of the \$1,300 rental increase after LTP Fees and Charges submissions had already closed and a full Council decision approved.
- Coopers Creek residents were not given the opportunity to submit against the 60% increase which they definitely would have done.

### **2022/2023**

- \$1,855 up from \$1,300 (43% increase)
- No figure appears in the single column under 2022/2023 for the Crib sites (Sandy Point Domain - per annum) in the Fees and Charges (refer page 3 of Attachment 3). Instead it shows the wording Market Appraisal per m<sup>2</sup>.
- 5 April 2022 a letter was received from Anna Brown (Corporate Analyst) drawing our attention to a proposed increase in rental fees for our crib sites despite the market appraisal not having been completed at this stage. The ICC consider this individual consultation.
- 5 May 2022 a market appraisal was carried out by Telfer Young but not released to CC residents.
- 10 May 2022 CC residents present submissions to the PPP Committee on a non-existent amount despite the ICC knowing that the figure was \$1,855.
- 24 May 2022 (after submissions were closed) a letter was received from Caroline Rain advising us that the rental was now \$1,855 with the 5 May 2022 market appraisal attached. She also stated: *"it has been recommended to Council that implementation of market rate increases for 2022/2023 be delayed until the dispute resolution with the Crib Site Licensees is complete."*
- 15 September 2022 a letter was received from Heather Guise advising that the rentals for the 2022/2023 year currently remain at the rate of \$1,300 to allow time for completion of discussions with residents.
- As far as CC residents are concerned the dispute resolution has not been resolved and the discussions are ongoing.
- The figure of \$1,855 has not been approved by a full Council (refer original submission).

### **2023/2024**

- No figure provided
- No figure appears under Crib sites (Sandy Point Domain - per annum) in the Fees and Charges (refer page 4 of Attachment 3). Both columns show the wording Market Appraisal per m<sup>2</sup>.
- 7 March 2023 a letter was received from Rhiannon Suter stating *"Council intends to increase lease fees in line with market assessment. Note this change would be implemented only following the conclusion of the process taking into account the advice of the Ombudsman. This fee can be found on p39 of the Fees and Charges consultation schedule."*
- No figure appears on page 39 - refer page 4 of Attachment 3. Rhiannon also states: *"submit your views on this proposed change or any other in the fees and charges schedule."*
- Yet again we are expected to submit on a non-existent amount in a short time frame.
- 7 September 2023 Heather Guise advised via email to myself the following: *"Council have not carried out a market appraisal for the 2023 year as any rent increase has been delayed pending the decision of the Ombudsman."*

### **2024/2025**

- \$2,450 up from \$1,855 (32% increase)
- No figure appears under Crib sites (Sandy Point Domain - per annum) in the Fees and Charges (refer page 5 of Attachment 3). Both columns show the wording market appraisal per m<sup>2</sup>.

- 22 February 2024 a letter was received from Caroline Rain advising that a further market appraisal had been carried out and our rental would be increased to \$2,450. The market appraisal was attached.
- This is the first year that CC residents have been given both the market appraisal or the proposed rental figure in advance of submissions being heard.

## **CONCLUSION**

On the ICC website under Fees and Charges 2024/2025 it states: "*Council takes into account principles of transparency, efficiency and fairness to set its Fees and Charges.*"

The irony of this statement is not lost on the Coopers Creek residents. There has been no transparency to increases considering no figures appear in the Fees and Charges that are presented to the Council for approval as part of the Long Term Plan. We would like to think that the 7 Councillors that still remain on Council today would not have approved the 60% increase of our rental fees if they had been made aware of it in the first place. How is that transparent, efficient or fair? It also ~~comprises~~ compromises Councillors ability to support the people that elected them.

We are a captive audience and are being treated differently than ratepayers. Our market appraisals are being conducted annually as opposed to ratepayers having valuations calculated every 3 years. The way we have been treated to date is the equivalent of assessing a new QV value for ratepayers every year but not telling them what that figure is or individually contacting them instead relying on them to find one line in the Long Term Plan and submitting on a non-existent amount and finding out after submissions close that they have had significant increases. There is no way that a ~~135%~~ 200% increase over 3 years (\$815 to \$2,450) is acceptable to anyone.

Because of the lack of individual consultation with key stakeholders which prevented us having the ability to provide submissions we believe that any increase since the 2020/2021 should be overturned by the full Council meaning the starting figure would be \$815. Then the increases from 2021/2022 should be at the percentage rates increase of Invercargill as per Clause 4 in the MoU.

## **Additional Information**

We have included the rates paid by the Oki Street residents as a comparison to our excessive rental rates (refer Attachment 4).

# Attachment 1

Lot/Site	Name	Date of Issue	Fee	Date of Issue	Fee	Date of Issue	Fee
1	Kath & Brian McDonagh	31-03-06	\$ 500.00				
2	Vacant						
3	Vaughan* & Christine Smith	31-03-04	\$ 444.00				
3	Christine Smith	01-08-18	\$ 750.00				
4	Margaret Sands & Tristan Dawson	09-04-08	\$ 550.00				
5	Ted McCreath	05-07-91	\$ 202.50				
6	Vacant						
7	Eric & Eleanor Evans	28-12-05	\$ 470.00				
8	Wi-Richie & Nicola Tohiariki						
9	Richard & Glenda Rongen	04-02-05	\$ 444.00	21-07-18	\$ 750.00		
10	Maurice & Carol McLeod						
11	Bradley Diack	21-09-15	\$ 700.00				
12	Nikki Broad	29-05-85	\$ 100.00	03-07-98	\$ 406.00	01-08-18	\$ 750.00
13	Roger Kennedy	10-08-98	\$ 406.00				
14	Andrew & Lynda Christie	27-02-97	\$ 371.00				
15	Len & Mary Diack	09-04-02	\$ 420.00	01-08-18	\$ 750.00		
16	Katrina Harrison	14-10-13	\$ 685.00				
16	Katrina Ferns	17-07-18	\$ 750.00				
17	Vacant						
18	Vacant						
19	Vacant						
20	Jan Moesman	13-04-81	\$ 59.50	10-08-98	\$ 406.00		
21	Robert Duncan McMurdo*	08-06-87	\$ 128.00	08-07-98	\$ 406.00		
21	Sylvia McMurdo	28-07-16	\$ 730.00				
22	Vacant						
23	Vacant						
24	Robert & Lisa* McMurdo	08-03-94	\$ 204.45				
25	Vacant						
	* Denotes deceased						

Memorandum of Understanding (or Intent)

In regard to the village of Coopers Creek on the Sandy Point Domain, the Invercargill City Council makes the following observations:

(i) In 1992 the Sandy Point Domain was gazetted as a 'Recreation Reserve' under the Reserves Act 1977. The crib site areas at Coopers Creek (and at Oreti Sands) are currently recognised in the Sandy Point Domain Management Plan as non-conforming use within the Natural Environment Zone.

(ii) The Council also recognises the historic value of the area given that European settlement commenced in the vicinity of Coopers Creek twenty years prior to Invercargill being settled, and that the site is close to two Maori pas which predated and coincided with European settlement.

The purpose of a Recreational Reserve is to establish 'an area of land possessing open space, and outdoor recreation values especially suitable for recreation and sporting activities and the welfare and enjoyment of the public...'. The recent establishment of a picnic area in the environs of Coopers Creek has broadened the scope for public interest and enjoyment, especially for anyone interested in the history of the area.

The crib sites at Coopers Creek are well integrated into the surrounding landscape and are not visible from the road. The current standard of presentation of the crib sites does much to enhance the natural beauty of the area. As such the crib sites meet one of the primary objectives of a Recreation Reserve which is to 'conserve those qualities which contribute to the pleasantness, harmony and cohesion of the natural environment and to the better use and enjoyment of the reserve'.

The Council states its intention that, within its own sphere of influence, management policy will be directed towards preserving the historic village of Coopers Creek as it exists. For the purpose of giving stability, the conditions of the 'Licence to Occupy Crib Site' will be amended, where required, to read:

(1) There will be no further intensification or extension of the crib sites within the environs of Coopers Creek, and no extra facilities such as the provision of electric power, telephone, or improved roading will be made.

(2) The licensee of any crib site shall be granted an annual 'Licence to Occupy' with a permanent right of renewal, provided all the conditions of the 'Licence to Occupy' continue to be met.

(3) It is recognised that the continuous presence of some residents does provide security to the area, as well as assistance to the Council and general public in matters of common interest. Therefore any Licensee will be allowed to occupy his or her crib on a permanent basis provided all buildings and structures comply with the Bylaws, Code of Ordinances of the Invercargill City Council, and the relevant health requirements of the Department of Health.

(4) When the Licensor does grant to the Licensee a renewal of this annual Licence, on its renewal the licence fee and any rates imposed by the Invercargill City Council on the property shall be subject to review. The total of any rates imposed and the licence fee together shall not exceed the current licence fee in the first year, and any increases in future years shall not exceed the percentage rate increase for Invercargill city.

(5) The exterior colour scheme of all buildings and fences is subject to the approval of the Manager of the Parks Division. Approval is to be obtained by submitting a proposed scheme to the Manager of the Parks Division before painting begins. The Licensor reserves the right to require the Licensee to repaint in a colour scheme approved by the Manager of the Parks Division. The Licensor will notify

the Licensee of any such requirement by registered letter forwarded to the Licensee at his last known address specifying the time in which the colour change is to be made.

(5) The Licensee shall maintain in good order and condition all buildings, drains, sanitary water and electrical apparatus, and all other improvements including gardens, grounds, hedges and gates.

(6) Maintenance to cribs will be permitted provided the reconstruction of any building does not increase the footprint of the building that currently exists on the property, or rise more than one storey except in the case of A-frame buildings. Extensions such as patios and verandas will be no greater than 30% of the building prior to extension, and will not be considered part of the footprint area for the purpose of reconstruction. Before the Licensee erects, alters or demolishes any building, on the site, proper plans and specification must be approved by the parks manager before being lodged with the City Council for planning approval. The Licensee shall pay all fees and obtain all necessary local body permission connected with the erection, alteration or demolition of any building on the site.

(7) The Licensee shall not, nor shall he allow any other person to, remove or damage any native tree, shrub or bush on the demised area without the prior consent of the Manager of the Parks Division.

(8) The Licensee will not assign, sublet, or part with the possession of the demised premises or any part thereof for the whole or any part of the term hereby created without consent in writing of the Licensor first had and obtained, PROVIDED THAT such consent shall not unreasonably or arbitrarily withheld in the case of a responsible and solvent proposed assignee or subtenant.

Licensor's Reservations:

a) The Licensor shall not be liable to contribute towards the cost of erection or repair of any fences on the land.

b) The Licensor shall not be liable to contribute towards the cost of repairing any damage to the leased land or buildings caused by fire, drifting sand or any other cause whatsoever.

c) The Licensor shall not be liable for any expense or inconvenience caused to the Licensee, his successors in title, or assigns arising out of difficulty in gaining access to the demised land.

d) The Licensor shall not be liable on termination of the licence due to forfeiture through failure to comply with terms of this Agreement to pay to the Licensee any compensation for improvements.

e) The Licensee reserves the right to require the Licensee to agree to the revision of all or any of the conditions of this Agreement in the event that any such revision becomes necessary to any Act, Regulation, Bylaw or other requirement of any Local Body affecting the land by executing a new Licence or by amending this Licence.

f) Failure by the Licensee to comply with the terms and conditions of this Agreement shall entitle the Licensor to terminate the licence at the end of the annual licence period. In this case the Licensee must be given the reasons for the termination in writing, and has the right of appeal to the Invercargill City Council. Should this appeal fail the Licensee has six months to either remove any building, fences, or other improvements owned by him from the site, or sell the property as it exists in such a way as to cease holding involvement in the use of the property. All correspondence from the Council or the Parks Division on this matter should be by registered letter forwarded to the Licensee at his last known address. Failure to comply within the final six month period will result in forfeiture of any building or improvements to the Licensor.

## Attachment 3 - page 1 of 5

Winter Sports - Continued	2019/2020 \$	2020/2021 \$
▪ <b>Hockey</b> – artificial turf (enclosure)	920.00	935.00
▪ <b>Football</b> – artificial turf (enclosure)	920.00	935.00
<b>Sandy Point Domain</b>		
<b>Clubs occupying Sandy Point Domain</b>		
▪ Club buildings	415.00	420.00
▪ Grounds Annual charge to be assessed on the area of land occupied per hectare or part thereof, minimum charge 1 ha. Where a building is also on the site, the charge shall be the land area plus the building rate.	193.00	195.00
▪ Crib sites	765.00	815.00
▪ Sandy Point Domain – per annum		
<b>Buildings other than Sandy Point</b>		
Buildings other than Sandy Point	Current market value	Current market value
<b>Fencing Contribution</b>		
<b>For reserves boundary fences</b>		
▪ Half cost of materials, up to a yearly set fee per lineal metre	As per Fencing Act Requirements	As per Fencing Act Requirements
<b>Miscellaneous Charges</b>		
<b>Applications Requiring Management Plan Change</b>		
Initial application fee	60.00	60.00
Associated costs of application including but not limited to advertising, Minister of Conservation fee, survey fees, legal fees etc.	Recovery of actual cost incurred by Council	Recovery of actual cost incurred by Council
<b>Firewood</b>		
* Permit – issued for up to two weeks	15.00	
<b>Hire of Plants from Mclvor Road Nursery</b>		
<b>(Charges do not include delivery)</b>		
Planter Bag Sizes 2, 3 or 5	3.00 (each)	3.00 (each)
Planter Bag Sizes 8, 12 or 28	4.00 (each)	4.00 (each)
Planter Bag Size 40	6.00 (each)	6.00 (each)
Tubs	12.00 (each)	12.00 (each)

**Note:**

\* Permit available for charitable purposes only. Must be registered charitable organisation and suitably qualified.

The 2020/2021 Annual Plan and fees and charges schedule have been developed in a time of greater uncertainty than normal as a result of Covid-19.

Fees and charges are subject to change. Any required changes will be consulted on in line with legislative requirements.

SANDY POINT DOMAIN		2020/2021	2021/2022
		\$	\$
Annual charge to be assessed on the area of land occupied per hectare or part thereof, minimum charge 1 ha. Where a building is also on the site, the charge shall be the land area plus the building rate.			
Crib sites Sandy Point Domain – per annum		195.00	204.80
BUILDINGS OTHER THAN SANDY POINT			
Buildings other than Sandy Point	Current market value	815.00	Market Appraisal per m <sup>2</sup>
FENCING CONTRIBUTION			
For reserves boundary fences			
Half cost of materials, up to a yearly set fee per lineal meter	As per Fencing Act Requirements		As per Fencing Act Requirements
MISCELLANEOUS CHARGES - APPLICATIONS REQUIRING MANAGEMENT PLAN CHANGE			
Associated costs of application including but not limited to advertising, Minister of Conservation fee, survey fees, legal fees etc.	Recovery of actual cost incurred by Council		Recovery of actual cost incurred by Council
PARKS AND SERVICES - CEMETERIES AND CREMATORIUM			
BURIAL FEES			
Monday to Saturday, excluding Sundays and public holidays, including pre-purchase of right of burial. Hours 8am to 4pm weekdays (summer months); 8am to 3.30pm weekdays (winter months); 8am to 12pm Saturdays.			
Person over five years of age		896.10	1573.58
Child five years of age or under (children's burial area)		535.60	562.40
Stillborn and child up to one year		319.30	335.27
Breaking concrete	Actual time taken		Actual time taken
Second burials – and subsequent burial/s		1,050.60	1,103.10





A3 - page 3 of 5

SANDY POINT DOMAIN		2022/2023 \$
Annual charge to be assessed on the area of land occupied per hectare or part thereof, minimum charge 1 ha. Where a building is also on the site, the charge shall be the land area plus the building rate.		
Crib sites Sandy Point Domain – per annum		210.00
Market Appraisal per m²		
BUILDINGS OTHER THAN SANDY POINT		2022/2023 \$
Buildings other than Sandy Point	Current market value	
FENCING CONTRIBUTION		2022/2023 \$
For reserves boundary fences Half cost of materials, up to a yearly set fee per lineal meter	As per Fencing Act Requirements (see brochure online for more information)	
APPLICATIONS REQUIRING MANAGEMENT PLAN CHANGE		
Associated costs of application including but not limited to advertising, Minister of Conservation fee, survey fees, legal fees etc.	Recovery of actual cost incurred by Council	
PARKS AND SERVICES - CEMETERIES AND CREMATORIUM		
BURIAL FEES		2022/2023 \$
Monday to Saturday, excluding Sundays and public holidays, including pre-purchase of right of burial. Hours 8am to 4pm weekdays (summer months); 8am to 3.30pm weekdays (winter months); 8am to 12pm Saturdays.		
Person over five years of age		1,700.00
Child five years of age or under (children's burial area)		580.00
Stillborn and child up to one year		345.00
Breaking concrete	Actual time taken and disposal costs	
Second burials – and subsequent burial/s (excluding maintenance costs which apply to first burial)		1,190.00



SANDY POINT DOMAIN	2022/2023 \$	2023/2024 \$
<b>Clubs occupying Sandy Point Domain</b>		
Club buildings	450.00	470.00
Annual charge to be assessed on the area of land occupied per hectare or part thereof, minimum charge 1 ha. Where a building is also on the site, the charge shall be the land area plus the building rate.	210.00	220.00
Crib sites, Sandy Point Domain – per annum	Market Appraisal per m <sup>2</sup>	Market Appraisal per m <sup>2</sup>
<b>BUILDINGS OTHER THAN SANDY POINT</b>	2022/2023 \$	2023/2024 \$
Buildings other than Sandy Point	Current market value	Current market value
<b>FENCING CONTRIBUTION</b>	2022/2023 \$	2023/2024 \$
For reserves boundary fences Half cost of materials, up to a yearly set fee per lineal meter	As per Fencing Act Requirements (see brochure online for more information)	As per Fencing Act Requirements (see brochure online for more information)
<b>RESERVES GENERAL</b>	2022/2023 \$	2023/2024 \$
Shipping Container (per container per annum)	100.00	100.00
<b>APPLICATIONS REQUIRING MANAGEMENT PLAN CHANGE</b>	2022/2023 \$	2023/2024 \$
Associated costs of application including but not limited to advertising, Minister of Conservation fee, survey fees, legal fees etc.	Recovery of actual cost incurred by Council	Recovery of actual cost incurred by Council
<b>PARKS AND SERVICES - CEMETERIES AND CREMATORIUM</b>	2022/2023 \$	2023/2024 \$
<b>BURIAL FEES</b>	2022/2023 \$	2023/2024 \$
Monday to Saturday, excluding Sundays and public holidays, including pre-purchase of right of burial. Hours 8am to 4pm weekdays (summer months); 8am to 3.30pm weekdays (winter months); 8am to 12pm Saturdays.		
Person over five years of age	1,700.00	1,770.00
Child five years of age or under (children's burial area)	580.00	605.00
Stillborn and child up to one year	345.00	360.00



# Parks and Recreation continued

## Ngā papa rēhia me ngā whenua tāpui

	2023/2024 \$	2024/2025 \$
<b>SANDY POINT DOMAIN</b>		
Clubs occupying Sandy Point Domain		
Club buildings	470.00	510.00
Annual charge to be assessed on the area of land occupied per hectare or part thereof, minimum charge 1 ha. Where a building is also on the site, the charge shall be the land area plus the building rate.	220.00	240.00
Crib sites, Sandy Point Domain - per annum	Market Appraisal per m <sup>2</sup>	Market Appraisal per m <sup>2</sup>
<b>BUILDINGS OTHER THAN SANDY POINT</b>		
Buildings other than Sandy Point	Current market value	Current market value
<b>FENCING CONTRIBUTION</b>		
For reserves boundary fences Half cost of materials, up to a yearly set fee per lineal meter	As per Fencing Act Requirements (see brochure online for more information)	As per Fencing Act Requirements (see brochure online for more information)
<b>RESERVES GENERAL</b>		
Shipping Container (per container per annum)	105.00	115.00
<b>APPLICATIONS REQUIRING MANAGEMENT PLAN CHANGE</b>		
Associated costs of application including but not limited to advertising, Minister of Conservation fee, survey fees, legal fees etc.	Recovery of actual cost incurred by Council	Recovery of actual cost incurred by Council

OKI STREET, ORETI BEACH - RATES INFORMATION 2020 - 2024

No.	Street	Area	2017 Capital Value	2020 Capital Value	2023 Capital Value	2020/2021 Rates	2021/2022 Rates	2023/2024 Rates
97	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 75.67	\$ 126.26	\$ 142.13
99	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 75.67	\$ 126.26	\$ 142.13
93	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 414.30	\$ 306.26	\$ 344.75
94	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 414.30	\$ 306.26	\$ 344.75
98	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 414.30	\$ 306.26	\$ 344.75
102	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 414.30	\$ 306.26	\$ 344.75
106	Oki Street	1004	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 414.30	\$ 306.26	\$ 344.75
110	Oki Street	1004	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 414.30	\$ 306.26	\$ 344.75
112	Oki Street	3036	\$ 22,000.00	\$ 40,000.00	\$ 130,000.00	\$ 417.91	\$ 312.90	\$ 352.23
82	Oki Street	2016	\$ 25,000.00	\$ 45,000.00	\$ 165,000.00	\$ 428.71	\$ 329.52	\$ 370.93
86	Oki Street	341555	\$ 175,000.00	\$ 180,000.00	\$ 250,000.00	\$ 510.90	\$ 598.06	\$ 673.24
91	Oki Street	1012	\$ 85,000.00	\$ 170,000.00	\$ 240,000.00	\$ 644.95	\$ 744.84	\$ 838.46
74	Oki Street	1965	\$ 120,000.00	\$ 210,000.00	\$ 290,000.00	\$ 771.09	\$ 877.74	\$ 988.06
75	Oki Street	1799	\$ 125,000.00	\$ 215,000.00	\$ 300,000.00	\$ 789.10	\$ 894.35	\$ 1,006.77
81	Oki Street	2024	\$ 140,000.00	\$ 230,000.00	\$ 330,000.00	\$ 843.14	\$ 944.19	\$ 1,062.87
95	Oki Street	1012	\$ 145,000.00	\$ 235,000.00	\$ 330,000.00	\$ 861.16	\$ 960.80	\$ 1,081.57
87	Oki Street	1012	\$ 160,000.00	\$ 255,000.00	\$ 350,000.00	\$ 915.22	\$ 1,027.25	\$ 1,156.37
100	Oki Street	1012	\$ 160,000.00	\$ 255,000.00	\$ 290,000.00	\$ 915.22	\$ 1,027.25	\$ 1,156.37
92	Oki Street	3028	\$ 170,000.00	\$ 265,000.00	\$ 370,000.00	\$ 951.25	\$ 1,060.48	\$ 1,193.78
105	Oki Street	1004	\$ 225,000.00	\$ 330,000.00	\$ 460,000.00	\$ 1,149.47	\$ 1,276.44	\$ 1,436.89
96	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 500,000.00	\$ 414.30	\$ 306.26	\$ 1,586.50
101	Oki Street	1012	\$ 270,000.00	\$ 380,000.00	\$ 500,000.00	\$ 1,311.64	\$ 1,442.57	\$ 1,623.90
103	Oki Street	1012	\$ 370,000.00	\$ 430,000.00	\$ 550,000.00	\$ 1,672.01	\$ 1,608.70	\$ 1,810.91
78	Oki Street	2023	\$ 400,000.00	\$ 530,000.00	\$ 660,000.00	\$ 1,780.12	\$ 1,940.96	\$ 2,184.93
1 - 87	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 75.67	\$ 126.26	\$ 142.13
2 - 87	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 75.67	\$ 126.26	\$ 142.13
1 - 92	Oki Street	1012	\$ 21,000.00	\$ 38,000.00		\$ 75.67	\$ 126.26	
1 - 102	Oki Street	1012	\$ 21,000.00	\$ 38,000.00	\$ 100,000.00	\$ 75.67	\$ 126.26	\$ 142.13

The yellow highlighted lines denote bare sections