

Camilla Rocks
Planning & Heritage Services

Statement of Environmental Effects

252 Bonoak Road Beggan Beggan

Primitive Camping Ground (3 sites)

19 April 2022



CAMILLA ROCKS
Town Planner

This Statement of Environmental Effects has been prepared by Camilla Rocks, on behalf of the proponent for the development of a primitive campground (3 sites) at 252 Bonoak Rd, Beggan Beggan NSW.

Material is provided for the assessment of a Development Application and an associated Section 68 application only. If material is required for any other use, the user is to contact Camilla Rocks for permission.

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1 Introduction

1.1 Overview of the Proposal

This Statement of Environmental Effects (SEE) has been prepared by Camilla Rocks on behalf of Julia Atkin, the owner of “Bumgum”, 252 Bonoak Road, Beggan Beggan (the proponent) to accompany a Development Application (DA) for the site (the subject site).

The application seeks approval for 3 primitive camping sites on the property.

The cost of works is expected to be \$16,000.

1.2 Property Description and Site Analysis

The subject site is located at 252 Bonoak Road, Beggan Beggan, which is a small holding comprising several lots, approximately 32ha in size. The part of the site subject of this application is legally described as Lot 381, DP 753590. It is located approximately 3.6km, as the crow flies, south of Harden-Murrumburrah. The holding is an irregular shape which fronts Bonoak Road and extends as far north and east as Cunningham Creek, which forms the property boundary.

The site is currently occupied by a single storey dwelling and outbuildings with frontage to Bonoak Road. In addition, there are numerous farm buildings and the site is an operating farm, specialising in a regenerative approach to pasture management and an organic orchard. There are 2 dams and a vegetated gully connecting to Cunningham Creek in the south-eastern part of the site. The site is largely cleared, with established habitat corridors and mature vegetation scattered across the site and along the watercourses.

1.2.1 Past Development Applications

No past development applications were found

1.3 Supporting Documentation

- Site Plan, prepared by the proponent, April 2022
- Statement of Environmental Effects, prepared by Camilla Rocks, April 2022

2 The Proposal

2.1 Proposed Development

The application seeks approval for the use of part of the site as a primitive camping ground. There are 3 sites the owner has selected. The sites will be registered on an online platform such as Hipcamp and managed by the owner.

Each site is designed to accommodate a self-contained vehicle or 2 tents, with a maximum permitted number of guests capped at 6 per site.

Works proposed to enable the camping are:

- Minor earthworks to flatten a pad for each site
- Installation of a Dump-Ezy plus Aqua Global pump well (6000 litre) capacity effluent collection system

Campsite 1 is located at the north western end of the lot and provides for views down over the watercourse with extensive birdlife and other native fauna. It is accessed by an existing track, an extension of Bonoak Rd and maintained by the owner, and is situated more than 40m from the watercourse.



Figure 1 Proposed campsite 1



Figure 2 Proposed Campsite 2



Figure 3 Proposed Campsite 3



Figure 4 Access to Proposed Campsite 1

3 Assessment of the Development

This section provides our assessment of the proposed development against the relevant matters for consideration under section 4.15 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The following Environmental Planning Instruments are applicable to the proposed development:

- ❖ Harden Local Environmental Plan (HLEP) 2011
- ❖ Draft Hilltops Local Environmental Plan (DHLEP)
- ❖ There is currently no Development Control Plan in force for the former Harden Shire council area

3.1 NSW Environmental Planning and Assessment Act, 1979

The NSW Environmental Planning and Assessment Act 1979 (EP&A Act) provides the legislative framework for the preparation of State Environmental Planning Policies (SEPPs), Regional Environmental Plans (REPs), and Local Environmental Plans (LEPs). The latter includes the WLEP2010. An assessment against the relevant provisions of the WLEP 2010 is included within Section 4.4 below.

3.2 Water Management Act, 2000

This Act was referenced in determining what is waterfront land. Preliminary discussions were held between a NRAR officer and the property owner. All three sites are greater than 40m from the mean

high water mark determined by applying NRAR Waterfront Land Tool. We understand that the proposal is not a controlled activity pursuant to the Act.

3.3 NSW Local Government Act, 1993

The new wastewater treatment system will require approval under Section 68 of this Act and a separate application will be submitted by the proponent. The camping ground will also need approval pursuant to Section 68 of the Act.

3.3.1 Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021 Part 3 Caravan parks, camping grounds and moveable dwellings

Part 3 applies to the operation of camping grounds therefore is relevant to this application. Division 3 relates to caravan, camping grounds and moveable dwellings. Subdivisions 1-8 do not apply to primitive camping grounds. Subdivision 9 applies to primitive camping grounds. **Primitive camping ground** means a camping ground specified in its approval as a primitive camping ground.

Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021		
Division 3 Caravan parks, camping grounds and moveable dwellings		
Clause	Regulation	Compliance of Proposed Development
Subdivisions 1-8 do not apply to primitive camping grounds		
Subdivision 9 Primitive Camping Grounds		
131 Primitive camping grounds	(1) The maximum number of designated camp sites in a primitive camping ground must not exceed an average of 2 for each hectare in the camping ground.	Satisfied. 3 designated camp sites are proposed, with an average of approximately 0.1 sites per hectare
	(2) If the approval to operate a primitive camping ground does not designate camp sites, a council may impose a condition on the approval that the installation of tents, caravans, campervans and annexes is not permitted in specified areas of the primitive camping ground— (a) for the health and safety of occupiers of the camping ground, or (b) to ensure consistency with the principles of ecologically sustainable development, or (c) for another purpose.	Noted. The proponent has designated camp sites as noted on submitted plans.
	(3) The following conditions apply to a primitive camping ground—	
	(a) if at least 1 camp site is designated— camping is not permitted within the primitive	3 camp sites are designated as shown in the submitted

Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021		
	camping ground other than on the designated camp site or sites,	plans. No camping will be permitted other than within the designated sites
	(b) if no camp sites are designated—the maximum number of caravans, campervans and tents permitted to use the camping ground at the same time must not exceed an average of 2 for each hectare in the camping ground,	Noted
	(c) a caravan, annexe or campervan must not be permitted to be installed within 6 metres of another caravan, annexe, campervan or tent,	Satisfied. Each site is separated by at least 200m.
	(d) a tent must not be permitted to be installed within 6 metres of a caravan, campervan or an annexe or within 3 metres of another tent,	Satisfied. Each site is separated by at least 200m.
	(e) the camping ground must be provided with a water supply, toilet and refuse disposal facilities as specified in the approval for the camping ground,	Satisfied. Potable water and compost toilet is available in a central area as shown on plans. A bin system will be placed at each site for visitors to dispose of general rubbish, food waste and recycling. An effluent collection facility will be installed at the southern end of the lot.
	(f) unoccupied caravans, campervans and tents are not permitted to remain in the camping ground for more than 24 hours,	Noted
	(g) if a fee is charged for camping—a register must— (i) be kept in accordance with section 121, and (ii) must specify the size of the group accompanying the registered person,	Noted

Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021		
	(h) fire fighting facilities required by the approval must be provided at the primitive camping ground.	Satisfied. Each site is provided with a backpack firefighting unit.
	(4) Subdivisions 1–8 do not apply to a primitive camping ground.	Noted
	(5) The general manager of the council for the area in which a primitive camping ground is located may modify the conditions applying to the camping ground if the general manager is reasonably satisfied that it is necessary to accommodate displaced persons.	Noted
	(6) In subsection (3)(b), 2 or more tents occupied by no more than 12 persons camping together must be counted as 1 tent.	Noted
	(7) In this section— <i>average</i> means the average calculated over the total area of the primitive camping ground.	Noted

3.4 State Environmental Planning Policy – Exempt and Complying Development
The subject proposal does not fall under the provisions of this instrument.

4 State Environmental Planning Policy (Resilience and Hazards) 2021

The information publicly available about former uses of the site indicates that the land was used for farming since the early 1920s. Prior to that it was a designated water reserve for travelling stock and contains evidence of gold diggings dating back to the 19th century. The management of the site currently uses organic fertilisers and herbicides. Management of the site before 2017 involved the use of herbicides, however there is no evidence of dipping sites or other yards in the vicinity of the development. The proposal does not change the use of the site and it is expected to remain as an agricultural holding into the foreseeable future.

The site is not listed as contaminated land. There is no evidence of dumping of any materials. Likewise, there is no physical evidence of contamination of the site.

No further assessment of potential land contaminating activities is considered warranted. It is considered that Council can be satisfied that the site is not likely to be contaminated and is suitable in its current state for the proposed use.

4.1 State Environmental Planning Policy (Biodiversity and Conservation) 2021

4.1.1 Chapter 3 Koala habitat protection 2020

The land is zoned RU1 and is subject to this chapter of the SEPP as it is greater than 1 hectare. We understand that the land is not koala habitat or potential koala habitat and it is largely cleared, along

with the neighbouring land. The proposed campsites are cleared areas that are not likely to be koala habitat.

4.2 State Environmental Planning Policy (Primary Production) 2021

This policy applies to the State however there are no provisions relevant to the subject development.

4.3 Harden Local Environmental Plan 2011

4.3.1 Part 2 Permitted or Prohibited Development

The proposal is consistent with the zone objectives for the RU1 Primary Production zone, being:

1. *To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.*
2. *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
3. *To minimise the fragmentation and alienation of resource lands.*
4. *To minimise conflict between land uses within this zone and land uses within adjoining zones.*
5. *To encourage the development of non-agricultural land uses that are compatible with the character of the zone.*

The proposed land use is ***camping ground*** defined in the LEP Dictionary as an area of land that has access to communal amenities and on which campervans or tents, annexes or other similar portable and lightweight temporary shelters are, or are to be, installed, erected or placed for short term use, but does not include a caravan park. The proposed development is consistent with the definition here but, as a primitive camping ground, provides only basic amenities such as the composting toilet and effluent disposal system.

The proposal is consistent with the objectives of this section. The proposed primitive camping sites will permit the continued primary production activities on the site, whilst allowing visitors to enjoy the scenic and peaceful environs thus 'encouraging the development of non-agricultural land uses compatible with the character of the zone'. The proposal for primitive camping on the land will allow the current owner to retire with a supplemented income, whilst remaining on land that has been in the family for 41 years.

The proposed setback is designed to minimise conflict between the existing agricultural holding and adjoining land. As the proposal is for primitive camping, with no permanent structures, we consider it is compatible with the rural character of the area.

4.3.2 Part 3 Exempt and Complying Development

The proposed work is not identified as exempt or complying development under the provisions of this section.

4.3.3 Part 4 Principal development standards

There are no provisions in this part that are applicable to the proposed development.

4.3.4 Part 5 Miscellaneous provisions

4.3.4.1 *Clause 5.10 Heritage Conservation*

The 'Bumgum' homestead and former dairy are listed as local items of environmental heritage. The objectives of this clause are as follows—

- a. *to conserve the environmental heritage of Harden,*

- b. *to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
- c. *to conserve archaeological sites,*
- d. *to conserve Aboriginal objects and Aboriginal places of heritage significance.*

The proposal is for the establishment of 3 primitive camping sites on the property. There is no proposal to alter the existing buildings or gold exploration sites and the proposed camp sites are not close to the buildings. The proposal will not impact the heritage significance of the buildings on the site and will not impact views to or from the items.

The site includes three Aboriginal Cultural heritage sites which are registered on AHIMS. One of the registered sites is a carved Yellow Box tree. This tree was carved by local Wiradjuri elder, Roy Levett, in honour of the life of John Taylor (deceased) and his commitment to preserving the Aboriginal Cultural Heritage values of the area. Each of the campsites is greater than 80m from the closest Aboriginal Cultural Heritage site. None of the campsites are within the curtilage of the sites.

Elders and members of Young LALC visit the property regularly. The campsites will give people an opportunity to camp on Country.

The proposal is consistent with the objectives of this section.

4.3.4.2 Clause 5.21 Flood planning

The site is not mapped as being within the flood planning area. Cunningham Creek does flood and the main gully on the site connects to Cunningham Creek. As a result of land management instigated since 1981, there is no significant run off to the creek via this gully. The campsites are located more than 40m from the mean high watermark of Cunningham Creek.

4.3.5 Part 6 Additional Local Provisions

4.3.5.1 Clause 6.1 Earthworks

Minor and ancillary earthworks are proposed for the development to create a flat camping area. The works are of a scale that would meet exempt development provisions.

4.3.5.2 Clause 6.3 Riparian Land and Watercourses

There is a significant watercourse mapped along the north-western boundary of the site. The development is not proposed within the watercourse or within 40 metres of the watercourse therefore this clause is not applicable.

4.3.5.3 Clause 6.4 Groundwater Vulnerability

The site is mapped as groundwater vulnerability therefore the provisions apply. Considering the historical use of the site, land clearing that has occurred in the past and activities related to farming that can impact on the water table. The proposed development will be managed to mitigate and minimise environmental impacts. The site is connected to the Goldenfields mains water supply. Non-potable water is supplied from the farm dam so there is no need to extract additional water for the development. The self-contained effluent collection system is designed to be impervious and is not likely to impact on groundwater. Regular checks and servicing will be undertaken over the life of the system.

4.3.5.4 Clause 6.6 Salinity

The site is not shown on the map as a dryland salinity area therefore this clause is not relevant to the proposal. The watercourse is mapped as dryland salinity however the proposal will not introduce any construction or activities that would adversely affect the land.

4.3.5.5 Clause 6.7 Highly Erodible Soils

The site is not identified on the land map as having highly erodible soils therefore this clause is not relevant to the proposal.

4.3.5.6 Clause 6.8 Essential Services

The site is not within one of the prescribed zones therefore this clause is not relevant to the proposal.

4.4 Development Control Plans

There are no DCPs in force at this time.

4.5 Draft Environmental Planning Instruments

The draft Hilltops Local Environmental Plan 2021 has been exhibited and is currently at gateway implementation stage, according to the DPIE website. There are no provisions contained within the draft instrument that would impact the assessment of this application. The proposal is consistent with the draft EPI.

4.6 Summary

This application is generally consistent with all relevant controls and objectives. The proposed development is for primitive camping on the site and will be managed to mitigate against adverse environmental impacts.

5 Assessment of Environmental Impacts

5.1 Context & Setting

The site is an established and operating agricultural enterprise. The primitive camping site is proposed as an extra source of income for the owners as well as a way to share the unique attributes of the land with minimal impact.

The development is suitable and appropriate and provides a low impact activity for visitors. The placement of the camping sites on the property allows for different experiences such as water views, wildlife access, location near infrastructure or isolation.

Minimal work is required for the proposal as the camping will be primitive. Only minor levelling of land is proposed to provide a clear, flat camping area. Existing access tracks and fencing will be used. The existing compost toilet and Goldenfields water supply will be utilized, with the only new structure being an effluent disposal system. Minimal facilities are provided in order to reduce the environmental impact of the development and encourage visitors who will appreciate the tranquil setting.

The primitive camping site will be listed on an online accommodation site and conditions of use will be provided there to ensure that potential visitors are aware of the expectations of the owners and council. It is not anticipated that the proposal would require any signage as clear directions will be provided to visitors once they have booked a site.

5.2 Traffic, access and parking

The site is accessed by Bonoak Road, an unsealed road largely maintained by council. As the property is located at the termination of the road, the owners maintain the last section. Within the property, there are access tracks to each campsite. There is sufficient area at each site for the parking of vehicles.

A short portion (LOT 6849 DP 1205509) of the access track to campsites 2 and 3 is Crown Land leased by the owner. This section of the track is currently used by farm trucks and livestock. Use of this track by campers will not change the nature of current use.

5.3 Noise

The site is located in a rural area and the development is ancillary to the agricultural holding. The distance between the campsites and the closest neighbouring residence is greater than 1.25km. Noise generated from the site would come from use of the camping area by the occupants and the impact on nearby properties would be negligible given the distance between them. As the camping site is intended as a peaceful retreat, it is expected that minimal noise will be generated. Expectations will be laid out in the listings for the site. The owners live on the site and will monitor noise levels when campers are in residence.

5.4 Odour

The primitive camping sites are not likely to create odour in the vicinity. An effluent disposal system is proposed to be installed and managed so as not to generate offensive odour.

The existing composting toilet will have increased usage with additional visitors to the site. It has been in operation for at least 14 years and is actively managed by the owners so that it doesn't generate offensive odour.

5.5 Waste

Each camping site will be provided with a bin system to collect hard waste, recycling and green waste. The owners will empty and replenish the bins after guest departure.

An effluent disposal system will be installed to allow visitors to empty effluent tanks. The system comprises of a pump well with 6000 litre capacity which will be pumped out when full. The system will have a height indicator that the owners can check to see when it is nearing capacity. A 'dump ezy' point is included for vehicles to unload effluent with a wash hose. This system is a pump out system which will need to be pumped out by an authorised contractor when needed. NSW Health have accredited the system and its suppliers. The certificate is uploaded as part of the document package in the Planning Portal.

The existing Clivius Multrum/Nature Loo compost toilet will be utilised by visitors. It has been in full time use by the owners and is actively managed to operate efficiently and produce compost as garden fertiliser. The chambers are currently changed over every 18 months to 2 years. Increased demand on the system can be accommodated, if required, by the purchase of a third composting container. There is a potable water supply nearby for handwashing.

5.6 Social and Economic Impact

It is not expected the development will have significant or greater adverse impacts on the amenity of any residents of the area than has been experienced in the past.

The site is an approved agricultural site and the proposed primitive campsites will provide the general community a way to visit the site.

Some of the benefits of the development to the community are:

- Achieve improved nutrition and promote sustainable agriculture.
- Good health and wellbeing for all ages.
- Inclusive and equitable quality education.
- Build resilient infrastructure.
- Foster innovation.
- Protect, restore, and promote sustainable use of terrestrial ecosystems. Halt and reverse land degradation. Halt biodiversity loss.
- Promote peaceful and inclusive societies for sustainable development.

Furthermore, the site will allow the general community to learn about and appreciate Aboriginal cultural heritage. Visitors can camp on Country and engage with the environment, hopefully fostering an approach of care for the environment. The development has the support of the local Land Council, as evidenced by the letter attached to this report.

5.7 Privacy

The site is within a rural area. Due to the layout of the sites and topography, the camping sites will not intrude on any neighbouring living or entertaining area.

5.8 Land Use Conflicts

The proposal is for primitive camping so will introduce minimal works that would impact on neighbouring sites. The primitive nature of the development will attract visitors that are comfortable and familiar with this style of camping. Use of the sites will be intermittent and will not impact on agricultural activities on the subject site or adjoining sites.

5.9 Heritage

The site has local heritage significance and the proposed development would have negligible impact on the heritage significance of the heritage items. There is no permanent construction proposed and the land use is compatible with the heritage significance.

5.10 Landscaping

No removal of vegetation on site is required. Additional buffer planting can be provided if council requires it.

5.11 Construction

There is no construction required for the proposed development apart from minor earthworks to level a pad for each site.

5.12 Utilities

Necessary utilities are available to the site. The property has a connection to the Goldenfields water supply. There are powered sheds in the vicinity of the camp sites.

5.13 Natural Hazards

The site is not within the flood planning area, as defined. The watercourse forms the north – north-eastern boundary of the site and bookings would be cancelled/not taken if there was a threat of flood.

The site is not identified as bushfire prone land. A level pad will be made for each camping site to allow sufficient area for a campfire within a designated fire pit, with visitors restricted to making fires outside the bushfire danger period. The owners will supply a backpack firefighting unit for each site to allow visitors to manage campfires or bushfire. There is a clear access track to each site to allow for emergency access and to enable visitors to escape to the homestead if required. The owners will be on site when there are visitors, to manage any emergency.

6 Conclusion

The proposal has been considered under the provisions of Section 4.15 of the EP&A Act and is considered acceptable and worthy of approval for the following reasons:

- ❖ The proposal is in keeping with surrounding development.
- ❖ The proposed location of the camping sites are an appropriate distance from the watercourse.
- ❖ The proposed development has been designed in accordance with the provisions of the HLEP 2011 and relevant SEPPs and Regulations.
- ❖ The proposal will have minimal detrimental impact on surrounding amenity.
- ❖ Approval of the proposal is within the public interest.

Having considered all the relevant considerations under Sections 4.15 and 4.55 of the EP&A Act 1979, we conclude that the proposal represents a positive outcome that would result in no negative environmental impacts. The application should therefore be recommended for approval.



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14 April 2022

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Dear Andrew

Young LALC wishes to advise Council that we have been informed by Dr Julia Atkin, 'Bumgum', 252 Bonoak Rd, Beggan Beggan NSW 2587, that she is submitting a Development Application for Primitive Campgrounds on 'Bumgum'.

As I believe you know, Young LALC and Cunningham Valley Landholders have jointly applied to have the northern section of Cunningham Valley declared as an Aboriginal Place. On 4th April, Young LALC Elders and members, and many of the Cunningham Valley Landholders, met with two officers from Heritage NSW, Roy Barker and Damian Tybussek. Roy informed us that the application has been approved by the Aboriginal Heritage Advisory Committee for full assessment which it is now undergoing. Young LALC and Cunningham Valley Landholders are working with Heritage NSW to develop a Draft Management Plan for the LOTS that has been proposed for inclusion in the declared Aboriginal Place. The development of primitive campgrounds is one of many ways of providing access to Country that will be included in the Draft Management Plan.

Young LALC fully supports this Development Application by Dr Julia Atkin. The primitive campgrounds proposed will add value as it will give an opportunity for people to camp on Country and connect with the Aboriginal Cultural Landscape values of the area.

Norma Freeman

CEO
Young LALC