TRINITY COUNTY PLANNING COMMISSION
STAFF REPORT

DATE: September 10, 2020

PLANNER: Kim Hunter, Director of Building and Planning

APPLICANT/APPELLANT: John Coogan

AGENT: James M. Underwood, Underwood Law Office

REQUEST: An appeal of Planning Director's Decision to approve Commercial Cannabis Cultivation License (CCL-2020-106).

LOCATION: 1050 Rowdy Bear Rd. (APN: 019-280-03-00)

APPROX. ACREAGE: 20.49 acres

ZONING DISTRICT: Unclassified (UNC)

ZONING DISTRICT OVERLAYS: None

GENERAL PLAN DESIGNATION: Rural Residential (RR)

STAFF RECOMMENDATION: Staff recommends that this appeal be denied. A site visit was conducted by the Cannabis Division compliance staff on June 4, 2020. The site was found to be in compliance with the requirements of the Commercial Cannabis Cultivation ordinance standards.

Mr. Coogan claims the cultivation setback requirements have are not in compliance with the Commercial Cannabis Cultivation requirements as outline in Trinity County Code Section 17.43. However, the residence in question (located on Assessor's Parcel Number 019-280-04-00) that is located within the 350-foot cultivation setback for a Small Type II cultivation site is an unpermitted structure that may be built very near or across the property line encroaching onto Mr. Petkov's parcel (see Attachment 3). Planning staff discussed this issue with Mr. Coogan during a meeting in October 2019 and recommended that the property line be confirmed by a licensed surveyor so this issue could be addressed appropriately. Without verification of the location of the property line in question, and the fact that the residential structure is unpermitted, a cultivation setback variance has not been required for CCL #106. Furthermore, the question of trespassing may also be in question due to the possible encroachment of Mr. Coogan's residence over the property line. Mr. Petkov has recently contacted a surveyor to have the property line verified.

ADJACENT LAND USE AND ZONING INFORMATION:

Direction	Land Use	Zoning	General Plan Designation
North	Residential	UNC	RR
South	Residential	UNC	RR
East	Residential	UNC	RR
West	Vacant	UNC	RR

SUMMARY: This appeal on the basis that the residents of adjacent properties around this commercial cannabis cultivation operation have been negatively impacted. Appellant John Coogan claims that the commercial cannabis operation has negatively impacted their quality of life in numerous ways including nighttime lights, sound pollution, odor, violations of setback requirements, trespassing, discharge of firearms, large amounts of dust, increased traffic, waste water run-off, and water usage. Mr. Coogan also states that Mr. Petkov, for three years, has ignored their requests or has not responded in an ethical manner to their repeated requests for mitigation of these issues. They express that they are fearful of retaliation by Mr. Petkov, his family, and his employees.

ATTACHMENTS:

1. Appeal form with email correspondence and attachments
2. Letter from Underwood Law Office, P.C. dated September 4, 2020
3. Satellite View of Vicinity
4. Premise Diagram for CCL #106 (APN 019-280-03-00)

COUNTY OF TRINITY

APPEAL OF PLANNING DIRECTOR'S DECISION TO PLANNING COMMISSION

Received Stamp

Name: JOHN COOGAN* Phone: 646·418·8595

Email: JOHN.COOGAN99@GMAIL.COM

Physical Address or APN: 019-280-04-00

Mailing Address: 723 WILLOW AVE, 2N, HOBOKEN, NJ 07030

Decision of Planning Director rendered on (date): _____

Planning Director's Decision was to: ◯ Approve ◯ Deny ◯ Continue

Request for: STOPPING CULTIVATION NEXT TO MY HOUSE
LIGHT SUPPRESSION
OVERALL REDUCTION IS SIZE OF OPERATION
PETKOV CCL-2015-106 for APN 019-280-03-00

Reason for Appeal:
COMPLIANCE WITH ORDINANCES
SET BACK, QUALITY OF LIFE, LIGHT ORDINANCE
SEE ATTACHED

Signature: _____ **Date:** 6/3/2019

Clerk's Use Only

Date Filed: _____ Fee Collected: _____

Hearing Date: _____ Receipt No.: _____

Notice Published: _____ Notice Mailed: _____

* ALL THREE NEIGHBORS SUPPORT THIS APPEAL AND SENT LETTERS TO RUTH HANDLER.

Clear

COUNTY OF TRINITY

APPEAL OF PLANNING DIRECTOR'S DECISION TO PLANNING COMMISSION

Received Stamp

Name: John Coogan Phone: 646 418-8595

Email: john.coogan99@gmail.com

Physical Address or APN: 890 Rowdy Bear Road, Post Mountain CA 96041, apn 019-280-04-00

Mailing Address: 723 Willow Ave, 2N, Hoboken NY 07030

Decision of Planning Director rendered on (date): _____

Planning Director's Decision was to: ◯ Approve ◯ Deny ◯ Continue

Request for:

Denial of cannabis license pending compliance with ordinances

Reason for Appeal:

Inability to get compliance. Ongoing (4 year) violations: particular light suppression (the covering of greenhouses),sound suppression (fans), a lack of opaque fencing between greenhouses and Coogan residence.

We (the three adjacent land owners) cite quality of life issues such as night time shooting with improper sighting and lighting in a community with many children, The development of a major grow has created numerous issues with dust, traffic, noise, and trespassing. We also believe in general that the site was never properly reviewed and its CEQA exemption needs to be reconsidered in light of current size, water demand and run off.

Signature: _____ Date: _____

JOHN COOGAN JULY 14, 2020

Clerk's Use Only

Date Filed: _____ Fee Collected: _____

Hearing Date: _____ Receipt No.: _____

Notice Published: _____ Notice Mailed: _____

Clear

COUNTY OF TRINITY

APPEAL OF PLANNING DIRECTOR'S DECISION TO PLANNING COMMISSION

Received Stamp

Name: John Coogan Phone: [redacted]

Email: [redacted]

Physical Address or APN: 890 Rowdy Bear Road, Post Mountain CA 96041 , apn 019-280-04-00

Mailing Address: [redacted]

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JOHN COOGAN JULY 14, 2020

Clerk's Use Only

Date Filed: _____ Fee Collected: _____

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Clear

COUNTY OF TRINITY

APPEAL OF PLANNING DIRECTOR'S DECISION TO PLANNING COMMISSION

Received Stamp

Name: JOHN COOGAN* Phone: [redacted]

Email: [redacted]

Physical Address or APN: 019-280-04-00

Mailing Address: [redacted]

Decision of Planning Director rendered on (date): _____

Planning Director's Decision was to: ◯ Approve ◯ Deny ◯ Continue

Request for: STOPPING CULTIVATION NEXT TO MY HOUSE
LIGHT SUPPRESSION
OVERALL REDUCTION IS SIZE OF OPERATION
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SET BACK, QUALITY OF LIFE, LIGHT ORDINANCE
SEE ATTACHED

Signature: _____ **Date:** 6/3/2019

Clerk's Use Only

Date Filed: _____ Fee Collected: _____

Hearing Date: _____ Receipt No.: _____

Notice Published: _____ Notice Mailed: _____

* ALL THREE NEIGHBORS SUPPORT THIS APPEAL AND SENT LETTERS TO RUTH HANDLER.

Clear

Reasons for Appeal:

SHUTTING DOWN TWO GREENHOUSES :

SET BACK – Per the ordinances, grows must be set back 350 feet from a neighbor's residence. Two of Petkov's greenhouses are 50 and 80 feet from my house respectively. These greenhouses need to stop being used for marijuana. {My house straddles our property line but nevertheless has prescriptive rights. See letters, tax records, etc on file with Planning (Mr. Dickey) from Harland Law, Eureka, CA.

LIGHT – All the greenhouses need to be covered so that light does not disturb neighbors. This has been an ongoing issue for three years.

QUALITY OF LIFE – The overall size of the farm creates much noise, light, dust, exhaust, fan noise and smell. Shutting down the two greenhouses will help "right size" the operation especially vis a vis living in my home with my young son.

WHY THE SIZE AND SCOPE OF THE OPERATION NEEDS TO BE CURTAILED

We three adjoining properties, all of whom sent letters to Ms. Hanover, are concerned about the on-going impact of a large farm on our community and the environment.

The heavy use of the water table - emptied every season is worrisome for our own modest wells and the environment. We don't understand the generous water allowance with so little information regarding this shared resource. The farm also sits atop of a mountain where run-off erodes our roads and property before mixing into seasonal streams. We hope a full CEQA review with Fish & Game will help create a sustainable plan. In the meantime, we hope the County will err on the side of prudence and shrink the size of the grows.

My property includes an easement for Petkov which is based on "historical usage." Historically (since 1968) our area has been used for seasonal "hunting" and recreational cabins. The roads were never maintained for large scale agribusiness. One of my roads not included in the easements was nevertheless damaged by large vehicles and used without permission. We do not want a historical precedent set.

There is no accountability. The violations which have been corrected have only come through enforcement by CalFire and Trinity County. [I am in the process of getting copies of the CalFire citations.] Petkov is not a good neighbor who responds to neighbor's complaints. Numerous employees have disregarded property lines, light ordinances, noise restrictions, animal control. None of us feel comfortable confronting these strangers. One disgruntled worker came back to vandalize property. We are all concerned about those who are attracted to the large harvests and sums of cash such an operation produces. Therefore we have all put up gates, but the ineffectiveness was demonstrated when the lock was cut and Petkov brought heavy machinery in. Guns have been shot off and even aimed at "a light in the garden." There are four children among us neighbors.

We look for help from the county because Petkov has not responded favorably. When the first complaint about lights was made his mother proceeded to leave them on all night for two straight weeks, literally casting shadows in my cabin. A more petty note: the current placement of roosters outside my kitchen is a fair measure of Petkov's neighborly ethic. Having dogs tied to trees all night while they bark and howl is also disturbing. More serious are various threats to my house, confrontations with his mother, and the continued violations of the setback, light ordinances, road usage, dust, noise and smell. None of these complaints are new. Petkov has chosen to ignore informal, formal and official entreaties to mitigate the effects of his large farm. **We entreat the county to begin by limiting the operation by shutting down the two improperly setback greenhouses after the current DEP harvest which is in the next few weeks.**

Mary B. Brinkley

From: John Coogan <john.coogan99@gmail.com>
Sent: Tuesday, July 14, 2020 2:11 PM
To: Kim Hunter
Cc: Mary B. Brinkley; cedargirl11@gmail.com; bruce.gardiner@yahoo.com; John Fenley
Subject: Re: Filing an appeal of approved license for Petkov (APN 019-280-03-00)
Attachments: Appeal Form - COOGAN - original email.pdf; Appeal Form - COOGAN.pdf

Hi Mary

Please find attached my appeal form. I also attached my original email per Kim's suggestion.

Do you take credit cards?

Thanks

John Coogan

On Tue, Jul 14, 2020 at 4:37 PM John Coogan <john.coogan99@gmail.com> wrote:

Kim:

Thank you for your quick and informative reply.

Sincerely,

John Coogan

On Tue, Jul 14, 2020 at 1:08 PM Kim Hunter <khunter@trinitycounty.org> wrote:

John,
I'm going to jump in for Mary Beth on responding. Yes, there is a $500 appeal fee. It appears that you have clearly stated the grounds of the appeal in your email. You will need to fill out an appeal application but I do suggest the you attach the email you sent. You can always add more information later.

Categorically Exempt means the the "project" is not subject to the California Environmental Quality Act (CEQA) which is different than a variance. (I am out of the office and can't provide you with further information right now about any associated variance .)

The appeal form can be found at:
https://www.trinitycounty.org/sites/default/files/Planning/documents/Forms/Appeal%20Form%20%28PD%20Decision%20to%20PC%29.pdf

Best Regards,
Kim Hunter

Sent from my iPhone

On Jul 14, 2020, at 9:08 AM, John Coogan <john.coogan99@gmail.com> wrote:

Raymond Merolla-DiSanza

From: Kim Hunter
Sent: Tuesday, October 15, 2019 5:56 PM
To: 'John Coogan'
Cc: Bruce Gardiner; Mary B. Brinkley; John Fenley; Richard Kuhns
Subject: RE: In preparation for our meeting on Oct 22nd

Good morning John,
I will touch base with Mary Beth regarding your information request. We are able to provide you with copies of items that are part of the public record. Although I have a good deal of experience in land use planning and natural resource management, I am still rather new to Trinity County and the Commercial Cannabis Program. This program has been a rather large learning curve for me. Please be aware that I may not be able to immediately provide you with detailed answers to your questions about commercial cannabis cultivation licensing, CEQA, monitoring and reporting. However, I am happy to take your questions and follow-up with answers after the meeting. It will also be helpful to have your concise set of topics before the meeting that you hope to discuss.

After a little bit of review of the situation, I would like to know if the property line between the two parcels has been confirmed by a licensed surveyor? Thank you and have a good day, K.

From: John Coogan
Sent: Wednesday, October 9, 2019 5:52 PM
To: Kim Hunter
Cc: Bruce Gardiner
Subject: In preparation for our meeting on Oct 22nd

Hello Ms. Hunter:

Bruce Gardiner and I are most grateful to be afforded the opportunity to follow-up on some outstanding questions with you, Mr. Kuhns and Supervisor Fenley. We also look forward to getting guidance of various evolving processes going forward - licensing, CEQA, monitoring, reporting.

Mary Beth Brinkley suggested I request information I do not have in my files, specifically the county's response or findings re: light violations and set-back violations at the Petkov property (019-280-03-00). I have the three years of photos and emails with various members of Planning (including from this Spring) regarding light violations, but I do not have a record of the county's response(s). Likewise, I have a thorough record regarding the inadequate set-back of the Petkov greenhouses including our lawyer's letters affirming my residence's "standing," (tax records etc) but I do not have the county's finding. Was there a site visit? Was there a measurement? Did the county disagree with our assertion that the greenhouses need to be set-back as per the ordinances?

I understand that Ms. Brinkley can find and forward me such information as to the county's findings and actions if such exists.

We would appreciate all records of the county's actions in regards to the Petkov property to integrate with our timeline.

As the time approaches, I will offer a concise set of topics we hope to discuss. We also will be bringing letters from other adjoining neighbors who until now have been reluctant to go public, and whose concerns echo many of mine and Bruce Gardiner's.

John Coogan <john.coogan99@gmail.com>

12:08 PM (4 hours ago) 07/14/2020

to Mary, cedargirl11, bruce.gardiner, Kim, John Fenley

Hello Mary Beth:

Speaking for the three adjacent landowners to the grow (cced} that Petkov leases out to persons unknown, we have a few questions as we consider filing an appeal which we understand is due by the 16th.

1.) Does the county still charge its citizens $500 simply to request an appeal?

2.) Does being "categorically exempt" mean that no existing variances with ordinances are considered?

3.) Our arguments against this grow remain the same

a.) Noise, dust, light pollution (all recently documented and sent to Planning)

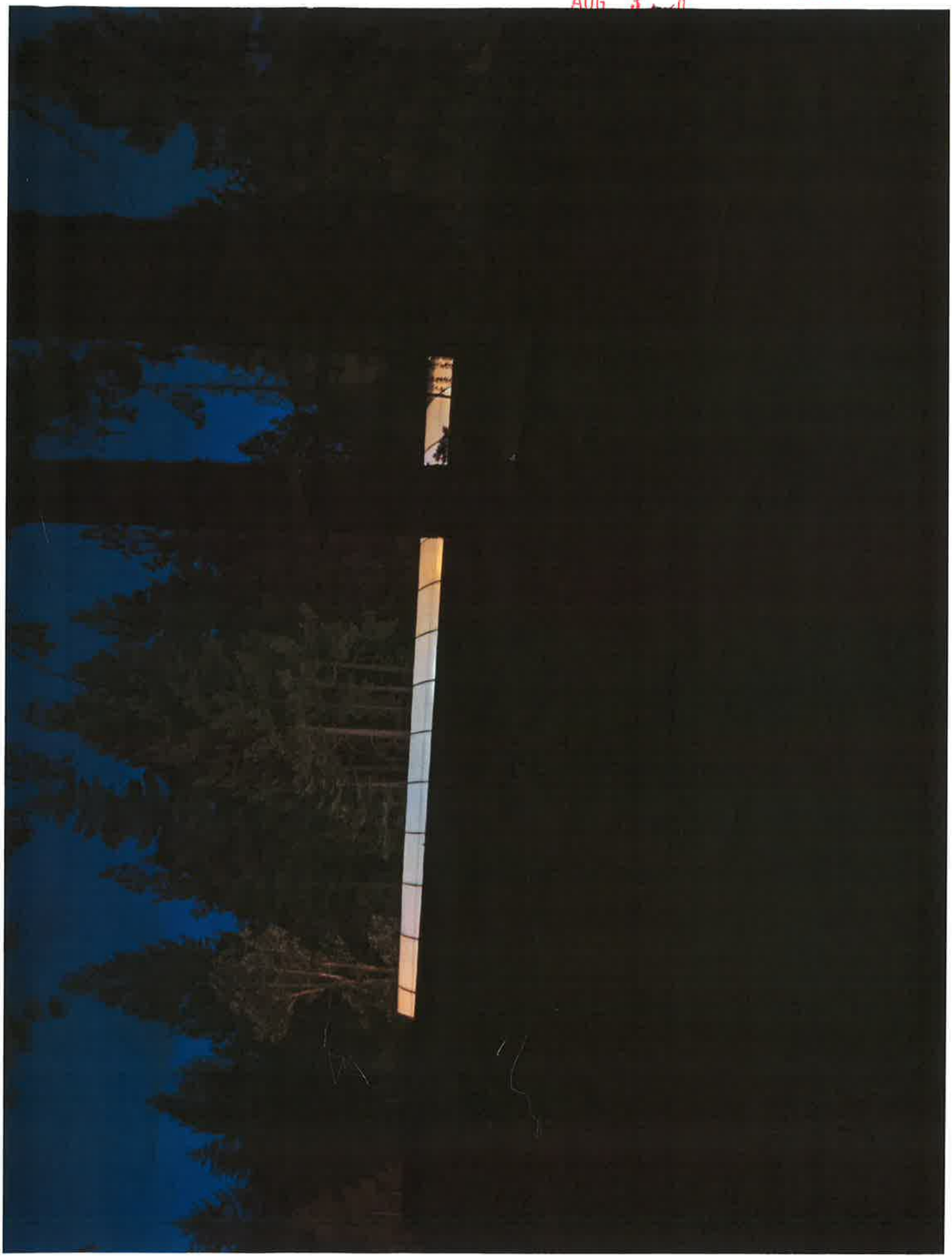
b.) The unrestricted and unmeasured exploitation of aquifer that is run dry most seasons.

c.) The environmental impact - rodenticides, agricultural run off into streams etc (we all live on top of a mountain). We believe, based on conversations with Fish & Game and local attorneys that this grow because of its size and location is not and will be found to not comply with state SEQA standards.

d.) Petkov is not a "good neighbor." He has a long history of not responding to complaints including lights, noise (as noted by the county 2017-2019 with letters), the continued lack of a full opaque fence, the multiple roosters, the guns shot off at night without proper lighting or targeting in an community with numerous children, etc etc.

Bottomline: Is there a process by which the license can be made contingent upon compliance with ordinances and their enforcement? And if so, would our filing an appeal be a part of that process?

Thank you for your efforts in thesechallenging times.



UNDERWOOD LAW OFFICES, P.C.

Weaverville Office:
PO Box 2428
121 Forest Ave., Ste. A
Weaverville, CA 96093
Telephone: 530-623-2200

James M. Underwood

Redding Office:
1274 Court Street
Redding, CA 96001
Telephone: 530-276-8246

HAND-DELIVEDED & E-MAIL
(khunter@trinitycounty.org)

RECEIVED
SEP 04 2020
TRINITY COUNTY
PLANNING DEPARTMENT

September 4, 2020

Dan Frasier, Chair
And Members of the Trinity County Planning Commission
c/o Kim Hunter, Planning Director
11 Court Street
Weaverville, CA 96093

Re: Appeal of Planning Director's Decision - Commercial Cannabis License CCL-2020-106 (Petco Petkov; APN 019-280-03)

Dear Chair Frasier and Commissioners:

My office represents John Coogan (the "Appellant") and other proposed project neighbors Bruce Gardiner and Cedar Brunette. As shown on Attachment A, also showing the proposed commercial cannabis operation location, Mr. Coogan owns the adjoining property located immediately south of the proposed project (APN 019-280-04); Mr. Gardiner owns the parcel immediately east of the proposed project (APN 019-280-05); and Ms. Brunette owns three (3) parcels immediately to the north of the proposed project (APNs 019-280-14, 15 & 16). Each of these area owners share a common property line and historic road access with the applicant.

As described below, and in the attached Notice of Appeal form, the Appellants are seeking to have the Planning Commission reverse the Planning Director's approval of CCL-2020-106 (Application No. P-20-25). The Applicant and other interested property owners do not generally oppose commercial cannabis cultivation, but insist that such operations be properly licensed, following adequate environmental review, and that the proposed licensee be a respectful neighbor.

PROCEDURAL STATUS

The Planning Director recently approved the subject renewal application for CCL-2020-106. Before approving the subject license application nothing was done to demonstrate compliance with the California Environmental Quality Act (CEQA), even in the form of a proposed Notice of Exemption for this proposed project. Appellant timely filed his notice of appeal on August July 14, 2020, requesting that the Planning Commission reverse the Planning Director's license approval decision based on CEQA and other grounds.

GROUNDS FOR APPEAL

My clients have several grounds on which to appeal to the Planning Director's license approval decision: (1) inadequate CEQA review; (2) Cannabis Ordinance non-compliance; (3) nuisance conditions to be permitted; and (4) failure to comply with the California Planning and Zoning Law.

A. Inadequate CEQA Review

No such review, based on the Planning Department file, has occurred for this proposed license renewal in 2020. A Class 1 (Existing Facilities) Categorical Exemption (CE) was prepared for license renewal in 2019, but even that CE improperly concluded that one or more of the exceptions listed in CEQA Guidelines section 15300.2 did not apply.

Any new proposed CE for this proposed renewal could not properly conclude that there are no: (a) cumulative impacts associated with the project; and/or (b) unusual circumstances creating significant adverse environmental impacts. Cumulative impacts, in order to comply with CEQA must consider the impacts of the proposed project together with those caused by similar impacts in the vicinity of the proposed project. If a proper review were to occur there could not be a conclusion that the exception provided for in Guidelines Section 15300.2 (b) does not apply. Nor could there be, in light of the substantial light, noise, dust, road traffic and other commercial operation impacts associated with this proposed renewal project, a proper determination that there are no significant environmental impacts associated with this proposed cannabis project, due to these unusual environmental circumstances.

In short, because absolutely no CEQA review has been done, which is prerequisite to renewal license approval, the Planning Commission has no choice but to uphold this appeal. This CEQA defect cannot likely be rectified, at least until there has been a certified Cannabis Ordinance EIR on which projects like this can attempt to tier in order to address cumulative impacts, and even then not until a properly prepared Mitigated Negative Declaration is prepared addressing all of the more project specific environmental impacts. But without any CEQA review for this renewal project the Commission has no legal discretion to deny this appeal.

B. Commercial Cannabis Ordinance Non-Compliance

The Planning Department license file documents a long history of applicant non-compliance with the applicable County Code, even following repeated Planning Department notices of such violations spanning multiple years that have given the applicant an opportunity to achieve compliance. Some such code violations include those for unpermitted structures; failure to demonstrate adequate progress on permit that have been obtained; a continuing failure to meet the County's "no light escape" standard (Ord. 315-8236(m); an apparently outdated Cannabis Waste Management Plan for this project; absence of documentation of legal road right of way to this parcel; unpermitted hoop houses; and improper set-backs from neighboring dwellings (Ord. 315-8236(o), due to proximity to Mr. Coogan's residence.

One glaring example of these continuing violations is illustrated by photos in the Planning Department file showing that the applicant's hoop house structures emit significant light glare at

night. This is in continuing violation of the County Cannabis Ordinance. The license application file also makes clear the applicant's failure to provide, along with the renewal license application, information on which the Planning Department could make an informed determination concerning CEQA and Commercial Cannabis Ordinance compliance before approving the proposed license. Nor has the applicant provided confirmation of the existence of an adequate water source for the proposed commercial cannabis operation, without adversely impacting adjoining property owners.

C. General Nuisance Conditions

The environmental impacts outlined above, in addition to requiring CEQA compliance and a determination that the applicant is not performing in a way consistent with the Commercial Cannabis Ordinance, constitute public and private nuisance conditions. Additionally, as made known to the Planning Department by Mr. Coogan previously, the applicant appears to have also intentionally directed night-time light at his residence and has housed roosters on their common property line. Whether or not this has occurred for the sole purpose of antagonizing Mr. Coogan, these actions continue to create nuisance conditions.

The applicant also dumps cannabis waste on the property lines common to Mr. Coogan and Ms. Brunette in a way that does not appear to be consistent with his original Waste Management Plan. This also creates a continuing fire hazard.

The applicant also, whether directly or via armed guards, regularly patrols his property boundary and randomly fires weapons in doing so, in a manner that is both unsafe and a nuisance. Given that the applicant shares common property lines with my clients, and is in immediate proximity to their respective residential properties, this is extremely alarming, annoying, and unsafe.

The applicant's excessive use of ground water also causes significant ground water impacts. Additionally, when the applicant's well goes dry, as it does each summer, substantial water truck traffic creates noise, dust, and road impacts, also constituting an improper nuisance as well.

D. Other Reasons for Granting of the Appeal

This proposed commercial cannabis project is not consistent with the County General Plan and Zoning Plan. The Trinity County General Plan makes no mention of nor permits commercial cannabis operations of the kind proposed. Specifically, the Land-Use Element of the General Plan, as apparently last updated in the 1980s, neither speaks of nor allows any commercial cannabis cultivation, in any established district.

Similarly, the County Zoning Ordinance (Ord. 315), in establishing the existing land use zoning districts, does not expressly allow this kind and intensity of "agriculture." Nor can such a commercial cannabis use be implied as permitted. This is the case as a matter of ordinance construction generally. Importantly, County Zoning Ordinance 315 also makes this clear by properly

noting the specificity by which a "definite plan of development" was to be achieved when the existing Zoning Ordinance was adopted. (See Zoning Ord. 315, Sec. 2.)

Importantly, even if the County's Zoning Ordinance were to allow commercial cannabis activities that ordinance would need to be consistent with the County's General Plan. (See *Corona-Norco Unified School Dist. v. City of Corona* (1993) 17 Cal.App. 4th 985, 994 (under the "consistency doctrine" local governments must maintain their zoning in a manner that is consistent with their General Plans; and every zoning action must be consistent with the General Plan).) And consistency as between the General Plan and the Zoning Ordinance can only properly be said to exist if the General Plan is current and conforms to all requirements of the California Planning & Zoning Law (Government Code Sections 65000 et seq.). (See *No Oil, Inc. v. City of Los Angeles* (1987) 196 Cal.App. 3rd 223, 243 (the requirement of "consistency" is the lynchpin of California's land use and development laws). Similarly, general plans must be integrated and internally consistent, both among elements and within each element, including mandatory and optional elements. (Gov. Code 65300.5; *Garat v. City of Riverside* (1991) 2 Cal.App. 4th 704, 717.)

The Board's recent action to authorize the engagement of a General Plan update consultant evidences that the existing County General Plan is woefully out of date and in need of updating, making proper consistency findings unsupported. As a result, in considering approval of CCL-2020-106 the Planning Director could not have, and based on a review of the license application file does not seem to have, found the proposed license project to be consistent with the General Plan, as required. Nor can the zoning designation be found to be consistent with a flawed, and wholly outdated, General Plan as a matter of law. So, even if the zone district on which the proposed licensee's property is located were to properly allow commercial cannabis activities, which is does not, the underlying General Plan and Zoning Ordinance deficiencies make license approval improper.

CONCLUSION

Given the substantial omissions regarding meeting the statutory requirements above outlined, including the County's failure to fully comply with CEQA and thereby identify and mitigate the significant adverse potential cumulative and site-specific impacts from the proposed project, the Commission's granting of this appeal must occur. Denial of this appeal, by finding CEQA compliance and General Plan and Zoning Plan consistency, would be without a proper factual basis.

Respectfully Submitted,

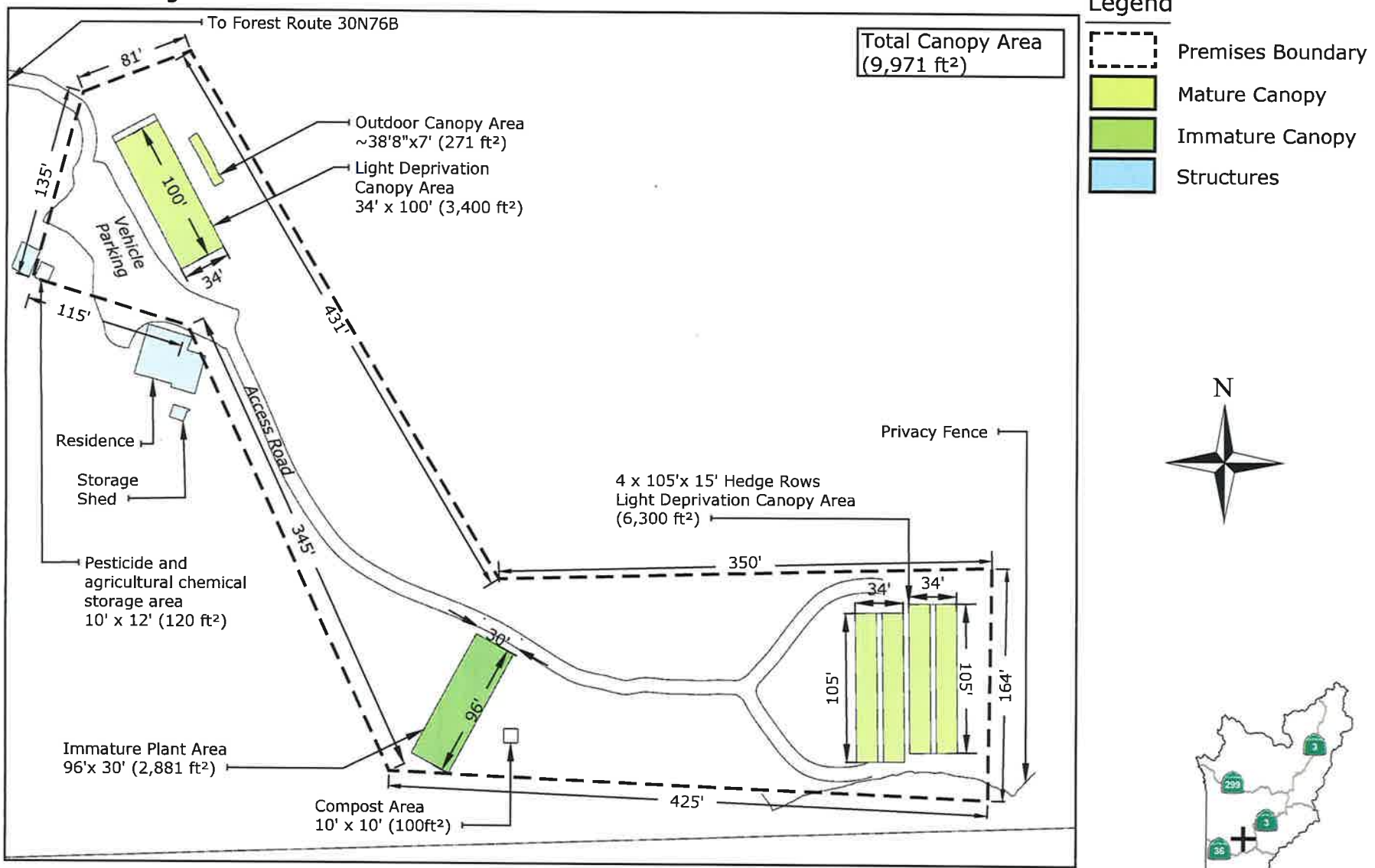
JAMES M. UNDERWOOD

CC: John Coogan
Bruce Gardiner
Cedar Brunette

Attachments

NatureFarm Inc; Petko Petkov; 019-280-03-00

Premises Diagram



Date: 08/28/2018

Agenda Item 6
Attachment 3
Coogan Appeal of CCL #106 (P-20-27)