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**TAAG CANNABIS PROJECT REVIEW COMMITTEE (CPRC)
JULY 30, 2020 COMMITTEE MEETING REPORT**

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**DRAFT RECOMMENDATIONS TO SLO COUNTY PROPOSED PHASE III CANNABIS
ORDINANCE
AMENDMENTS TO SLO COUNTY TITLE 22 SECTION 22.40 – CANNABIS ACTIVITIES**

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The TAAG Cannabis Project Review Committee held a publicly noticed Zoom teleconference meeting on July 30th. The CPRC met for approximately two and on-half hours. The following Committee members were present. Murray Powell Chair, Kristen Gemeny, Don Potts and Jon DeMoralis (Alternate Committee member). Several members of the public also participated and made public comments concerning the following two agenda items addressed during the meeting.

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- Draft a TAAG recommendation report presenting recommendations to County Board of Supervisors concerning County proposed cannabis ordinance amendments to the existing Title 22 Chapter 22.40 – Cannabis Activities be submitted to the full TAAG Board at its scheduled August 13, 2020 Board for approval and submission to the Board of Supervisors.
 - Review pending proposed cannabis project known as Eden Dreams (Project No. DRC2018-00183) and prepare a draft recommendation report concerning the approval of this project’s Land Use Permit application that is scheduled for an August 21st County Planning Department Minor Use permit approval hearing.

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REVIEW OF PROPOSED COUNTY CANNABIS ORDINANCE AMENDMENTS

During the July 16, 2020 TAAG Board meeting, the Committee advised the Board that a draft recommendation report will be submitted at TAAG’s scheduled August 13, 2020 Board meeting for approval of recommendations to be submitted to the Board of Supervisors (BOS) for consideration.

SLO COUNTY CANNABIS ORDINANCE BACKGROUND INFORMATION

In response to the passage of California’s 2016 Recreational Cannabis proposition , the County Board of Supervisors (BOS) adopted cannabis land use regulations on November 27, 2017. On June 19, 2018 during a BOS cannabis program update, the BOS directed staff to prepare amendments to the cannabis ordinance in two phases. Phase I amendments were adopted by the Board on December 10, 2018. On March 26, 2019, the BOS directed Planning to consider certain possible cannabis ordinance amendments and submit the proposed amendments to the Planning Commission and the BOS for review and approval. On June 4, 2019, the Board of Supervisors adopted several, but not all, amendments directed by the BOS in March 2019 as Phase II Cannabis Activities Ordinance Amendments. Pending amendments not adopted on June 4, 2019 were then designated as “Phase III” amendments that the CPRC Committee considered at this July 30th meeting. The following eight (8) Phase III proposed amendments are discussed in a 12 page Planning Staff report that was submitted to the County Planning Commission in connection with the Commission’s June 25, 2020 meeting concerning this matter. This report can be viewed at the following County website link:

<https://agenda.slocounty.ca.gov/iip/sanluisobispo/file/getfile/123064>

The eight (8) proposed amendments are the following:

- 1. Establish enforcement related remedies for cannabis violations, including options and scenarios related to a “3-strike” policy
- 2. Increase buffer distance from schools and other sensitive receptors

- 49 3. Evaluate and analyze options to prohibit outdoor cultivation
- 50 4. Disallow the payment of water offset fees over the Paso Robles Groundwater Basin
- 51 5. Disallow re-permitting if an operation ceases or violation occurs (no “revolving door”)
- 52 6. Require enclosed ventilation systems on indoor grows
- 53 7. Evaluate and analyze drying in hoop houses, and
- 54 8. Revise standards for ancillary nurseries to be encompassed in the overall cannabis cultivation area.

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56 The Committee recommended approval of each of these eight proposed amendments by unanimous 3 – votes.
57 The Committee also recommended that the following additional comments be made to revise amendment No.
58 2 above:

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- 60● Extend the proposed 1,500 foot sensitive site buffer distances to 2,000 feet measured from property line to
- 61 property line to be consistent with recently approved County hemp ordinance.
- 62● Incorporate residences into the existing cannabis ordinances sensitive receptor (sites) definitions. See
- 63 additional comments to follow below.

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65 SLO Planning Department also publicly noticed an edited “redlined” draft of all proposed changes to the
66 County Title 22 Chapter 22.40 – Cannabis Activities ordinances that incorporate the eight proposals indicated
67 above and a number of other changes and proposed amendments not disclosed in 12 page Staff report. The
68 proposed edited 53 page Chapter 22.40 “redlined” draft can be viewed at the following County website link.



Chapter 22.40 53
page redlined edited

69
70 **PROPOSED AMENDMENTS INDICATED IN THE 53 PAGE EDITED “REDLINED” TITLE 22 CHAPTER 22.40 DRAFT**
71 **NOT REFERENCED IN THE JUNE 25TH STAFF REPORT**

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73 The Committee considered the following proposed amendments indicated in the attached Chapter 22.40
74 “redlined” draft.

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761. **Page 4 of 53.** A.2. - Application requirements.

77 1. Site plan, floor plans, and a general description of the nature, square-footage, and type of cannabis
78 activities being requested shall be submitted with the land use permit application.

79 2. An application for a project that includes indoor cultivation, indoor ancillary nursery or indoor commercial
80 nursery shall include the following:

81 **a. A detailed inventory of energy demand prepared by a Certified Energy Analyst.** The inventory shall
82 include an estimate of total energy demand from all sources associated with all proposed cannabis cultivation
83 activities including, but not limited to, lighting, odor management, processing, manufacturing and climate
84 control equipment.

85
862. **Page 5 of 53** A.4. – Application Requirements. “Evidence the applicant has submitted a business license
87 application to the County Tax Collector and obtained background check approval from the Sheriff’s Office.”

88
893. **Pages 8 and 9** R. - Application of Ordinance Amendments. “Except as otherwise provided in this Chapter, land
90 use permit applications for cannabis activities will be subject to ordinance requirements in effect on the date
91 of final review and approval or disapproval of the land use permit application. Except as otherwise provided in
92 this Chapter, applications for renewal or modification of approved land use permit applications for cannabis

93 activities will be subject to ordinance requirements in effect on the date of final review and approval or
94 disapproval of the land use permit renewal or modification application.”

95
964. **Page13** D.1.b. “No cannabis cultivation site shall be located within one thousand five hundred (1,500) feet of
97 another cannabis cultivation site or cannabis nursery. Distances shall be measured from the closest property
98 line of the existing cannabis cultivation site to the closest property line of the property containing the
99 proposed cannabis cultivation site.”

100
1015. **Page 16** 6.b. “Fencing materials shall be solid, such as wood, masonry or chain-link with security slats. All
102 fencing and/or walls shall be made from material that blends into the surrounding terrain and shall minimize
103 any visual impacts. Tarpaulins, scarp material, dust guard fencing, privacy netting, or woven or non-woven
104 polyethylene plastic, hedges, or bushes are not considered as fencing.” Also see similar fencing amendments
105 on pages 23 and 42 Items 6.b that were approved by the Committee.

106
1076. **Page 17** D.8. - Nuisance Odors. “All cannabis cultivation shall be sited and/or operated in a manner that
108 prevents cannabis nuisance odors from being detected offsite. All structures utilized for indoor cannabis
109 cultivation and ancillary processing, nursery, and distribution shall be equipped and/or maintained with
110 sufficient ventilation controls, in concert with carbon filtration or other equivalent or superior method(s) of
111 filtration, in a manner that results in the controlled exchange of air and eliminates nuisance odor emissions
112 from being detected outside of the structure.” Also see similar Nuisance Odor amendments on page 24 Item
113 4., page 29 Item 4., page 31 item 4 and page 32 Item 4. that were approved by the Committee.

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1157. **Page 18** D.11. Interior Lighting. “All facilities shall prevent interior lighting from being detected outside the
116 facilities between the period of 1 hour before dusk and 1 hour after dawn. All Facilities employing artificial
117 lighting techniques shall include shielding and/or blackout tarps that are engaged between the period of 1
118 hour before dusk and 1 hour after dawn and prevent all light from escaping.”

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1208. **Page 21** b. No cannabis nursery shall be located within one thousand five hundred (1,500) feet of another
121 cannabis cultivation site or cannabis nursery. Distances shall be measured from the closest property line of the
122 existing cannabis cultivation site, to the closest property line of the property containing the proposed cannabis
123 cultivation site. This location standard can be modified through Minor Use Permit approval when a Conditional
124 Use Permit is not otherwise required.

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1269. **Page 21** E.1.c. “No industrial hemp cultivation may occur on a cannabis nursery site unless the review
127 authority first finds that specifically identified characteristics of the site or site vicinity would make the
128 prohibition of industrial hemp cultivation unnecessary and would not result in nuisance odors from being
129 detected offsite. The existence of or potential for industrial hemp being cultivated on surrounding sites shall
130 not be grounds for allowing industrial hemp cultivation on a cannabis cultivation site.”

131
13210. **Page 22** E.3.a -Setbacks. “Indoor Cannabis nurseries shall be setback as set forth in Section 22.30.310. Outdoor
133 cannabis nurseries shall be setback a minimum of 300 feet from the property lines of the site or public right-of-
134 way, whichever is closer.”

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136 **ADDITIONAL AMENDMENT RELATED ISSUES TO BE CONSIDERED FOR TAAG RECOMMENDATIONS**

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138 The Committee voted unanimously to submit the following additional possible amendment issues to the TAAG
139 Board for consideration.

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1. Reductions of establish ordinance standard minimum setback and buffer distances should be prohibited. The existing County cannabis ordinance offer more than thirty (30) setback and buffer distance modifications that allow reductions in these measurements, in certain cases, to zero (0) separation distances. Generally these ordinance modifications require that “specific conditions” exist to justify the County’s decision to grant such requests. However cannabis ordinance fails to define or provide any guidelines regarding what “specific existing project site conditions” would qualify for modifications. Other Chapters of County Title 22 ordinances provides this guidance but not cannabis chapter 22.40.
2. If the prohibition of setback modifications is not accepted, recommend that the cannabis ordinances specify the EXACT conditions that could be considered for possible modifications. Allowed “specific conditions” should be narrowly defined and limited in the cannabis ordinances. Expand County Cannabis Code Enforcement staffing to ensure that cannabis related complaints are answered in a timely manner. Presently the County Cannabis Code Enforcement staff consists of four (4) Code Enforcement Officers that are responsible for responding and investigating legally permitted and illegal cannabis operations throughout SLO County. Code enforcement is “overwhelmed”.
3. Prohibit public access to cannabis permitted properties. Certain approved and pending cannabis projects are licensed by the County to operate licensed vacation rentals, B&B’s, wine tasting operations and temporary events such as wedding venues that are attended by the public including minors. Cannabis Land Use Permit Conditions of Approval generally include a comment such as **“Throughout the life of the project, no minors or unauthorized personnel shall be permitted inside any restricted access areas, including the cultivation areas”**. Existing cannabis ordinances require that all cannabis activities permitted in accordance with Title 22 Chapter 22.40 require **“adequate measures that address enforcement priorities for cannabis activities including restricting access to minors**. These provisions fail to define “cannabis areas restricted to access by minors and other unauthorized personnel”.
4. Restrict Cannabis Manufacturing operations to County designated Industrial (IND) zones. Cannabis manufacturing operations involve high risk operations utilizing technical high pressure (5,000 psi) extraction equipment, use of flammable ethanol and high pressure CO2 gas. These processes are a danger to the public and to cannabis operation employees. Misuse of high pressure extraction equipment may cause explosions. Ethanol is a volatile flammable liquid or gas that has the potential to explode in poorly ventilated areas. Leaks of compressed CO2 in poorly ventilation areas may cause serious injury or death. Cannabis manufacturing has resulted in serious and deadly explosions and fires. Many approved and proposed cannabis manufacturing facilities are located in remote SLO County AG zones designated of High Severity Risk areas of the County not immediately accessible by emergency fire and medical services. County Planning recommended prohibiting cannabis manufacturing operations within County designated High Fire Severity Zones. The Board of Supervisors has ignored this recommended High Fire Severity Zones restriction.
5. **Public Notices** - Existing cannabis ordinances require that property owners within a minimum of 1,000 feet of proposed cannabis project property sites be notified by mail of a project’s Land Use Permit application submittal and of public hearings. In many cases these notices are sent to owner addresses not located on the noticed properties. Many properties are occupied by renters and lessees. In these circumstances, occupants may not receive project notices. Cannabis project noticing provisions should be amended to require that notices be sent to existing physical property mailing addresses in addition to property owner addresses.

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6. **Pesticide Drift** – During the Committee’s July 30th meeting a member of the public requested that TAAG recommend a cannabis ordinance amendment that would prohibit cannabis operations from filing lawsuits against traditional crop operations concerning pesticide drift onto neighboring cannabis cultivation areas. Pesticide drift is an issue because state regulations impose substantially stricter cannabis pesticide residue thresholds than the residue thresholds allowed for traditional crops.

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The SLO County Department of Agriculture recognizes potential incompatibility issues between cannabis activities and traditional production of crops such as citrus, avocado, vineyards, vegetables and strawberries. The establishment of cannabis projects in the vicinity of traditional established agricultural operations has the potential to cause traditional agricultural operations to cease or curtail their crop production activities near the proposed cannabis site due to pesticide “drifting” to existing cannabis cultivation sites. See the following AG Department letter.



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SLO DEPT AG -
Pesticide Hold Harmle

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The County has received substantial evidence indicating pesticide applicators would refuse to serve an agricultural operation if a cannabis site is permitted in close proximity to traditional agricultural operations because fear of potential crippling legal liabilities alleged by nearby cannabis operations. The County has received reports in other jurisdictions, such as the County of Santa Barbara, of agricultural operations curtailing activities because of nearby cannabis operations as well as lawsuits being filed by cannabis operations against nearby traditional agricultural operations and pesticide applicators related to cannabis allegedly made unmarketable by pesticide applications in nearby traditional agricultural fields. Threats of lawsuits have also occurred in the Nipomo area of SLO County.

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The County is requiring that the approval and issuance of certain cannabis Land Use Permits be subject to a condition of approval of the permit a Waiver and Release of Liability – Pesticide Use By Neighboring Agricultural Operations. However this is not a requirement of existing County Cannabis ordinances.

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The Committee refers this issue to TAAG Board to considered whether a Waiver and Release of Liability – Pesticide Use By Neighboring Agricultural Operations or a similar agreement be incorporated in the County’s cannabis ordinances as a required condition of approval of cannabis Land Use Permits.

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REVIEW OF CANNABIS PROJECT EDEN DREAMS PROJECT NO. DRC2019-00183

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The July 30, 2020 CPRC meeting was not attended by the project’s applicant, or the applicant’s Planning consultant Kirk Consultants or by a responsible County Planning Department representative.

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This project was originally reviewed by TAAG and by the TAAG CPRC Committee during publicly noticed December 2018 meetings. The applicant and the applicant’s Planning Consultants (Kirk Consulting) attended both of TAAG’s 2018 TAAG meetings. TAAG recommended denial of the project on the basis of the project’s inability to comply with County ordinances that prohibit offsite visibility of cannabis plants, an unjustified request for an outdoor cultivation setback reduction of the County’s minimum outdoor cultivation 300 foot setback distance to 100 feet, and the failure to provide plans, documentation and other information required by County ordinances and Planning Department policies and guidelines to be submitted as part of the project’s Land Use Permit application. TAAG voted in December 2018 to recommend denial of this project unless

237 several specific conditions were complied with including the project’s proposed violations of then existing
238 various County Title 22 Land Use ordinances including Chapter 22.40 – Cannabis Activities. The following
239 attachment is this project’s December 2018 CPRC committee review report that discusses in much detail the
240 issues associated, many that are not currently resolved, that was the basis for TAAG’s 2018 denial of this
241 project.



CPRC December
2018 den Report.PDF

242
243 **Project Description**

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245 The current project description differs somewhat from the description reviewed by TAAG during December
246 2018. For example the project was not presented as a “phased” project and a 7,500 ancillary nursery area was
247 not proposed in 2018.

248
249 Phased establishment of: three-acres (130,680-square-feet) of outdoor cannabis cultivation canopy area,
250 27,500-square-feet (22,000 sf canopy area) of indoor cannabis cultivation, 4,000-square-feet of ancillary
251 cannabis processing (drying and curing), and 7,500-square-feet of ancillary cannabis nursery, within a new
252 40,000-square-foot greenhouse. In addition, site development will include construction of a new 5,000-square-
253 foot processing/storage building, and associated improvements. The project is located on a 99.11- acre parcel
254 located at 4337 South El Pomar Road east of the community of Templeton. This project will be developed in
255 two phases – Phase 1 will include the construction of a 40,000-square-foot greenhouse for 27,500-square-feet
256 (22,000 sf canopy area) of indoor cannabis cultivation, 4,000-square-feet of ancillary cannabis processing
257 (drying and curing), and 7,500-square-feet of ancillary cannabis nursery. Phase 1 will also include construction
258 of a new 5,000-square-foot processing/storage building, and approximately 1.75-acres of outdoor cannabis
259 cultivation area. Phase 2 will include an additional 2-acres of outdoor cannabis cultivation. Outdoor cannabis
260 cultivation canopy will be limited to 3-acres total. The project would employ up to 6 full-time employees with
261 an additional 10 part-time employees during harvest season for a maximum of 16 employees; the project will
262 operate seven days per week between the hours of 7:00 AM to 4:30 PM.

263
264 See the following attached current Kirk Consulting project description. The current project description differs
265 from the description reviewed by TAAG during December 2018. For example the project was not presented as
266 a “phased” project and a 7,500 ancillary nursery area was not proposed in 2018.



Kirk revised Project
Description - Updated

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270 For unknown reasons, this project’s Land Use Minor Use permit application, submitted during October 2018,
271 was not scheduled until very recently for a Planning Department Minor Use permit approval hearing on August
272 21, 2020. Since TAAG’s December 2018 project review, certain County cannabis ordinance amendments have
273 become effective, certain revised project operating plans have surfaced and TAAG has become aware of other
274 issues such as the Paso Ground Water Basin’s required 2:1 water offset for this project that were not consider
275 during TAAG’s December 2018 project review.

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277 Additionally, the County issued two Mitigated Negative Declarations (MND’s) environmental determinations in
278 September 2019 (89 pages) and a revised 129 page MND filed for public review on July 9, 2020. MND’s are
279 CEQA documents intended to support the County’s environmental determination that the project does not
280 create any “potentially significant environmental impacts” that would violate California CEQA laws.

281

282 Residents in the project area have engaged an environmental attorney to review the July 9, 2020 MND. The
283 attorney has determined that the project will result in a substantial number of “potentially significant
284 environmental impacts” that requires the preparation of an Environmental Impact Report (EIR). California
285 CEQA law “requires an (EIR) because a fair argument exists that the Project may have a significant effect on the
286 environment”. Accordingly, the County is required to prepare a full Environmental Impact Report (EIR)
287 published and publicly noticed for public review before this project is eligible for a Land Use Permit approval
288 hearing.

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290 The Committee’s review of the current proposed project discloses the following issues that required resolution
291 by TAAG to consider approval of the project during December 2018 remain unresolved.

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- 294 **1.** An odor control plan must be developed to include specific controls to ensure that nuisance odors are
295 not detected off-site. County cannabis ordinances require an Odor management plan has not been
296 provided to the CPRC for review. The project’s “operation plan” (Kirk Consulting’s Revised Project
297 Description) makes the following Odor Management comments:
 - 298 **2.** “Odor Management Odor from the outdoor cultivation area is naturally mitigated by the distance to
299 the nearest residence being over 480’ away from the outdoor cultivation, with an existing drainage
300 and line of trees in between. The cultivation site will be located 693’ from the northern, 1,800’ from
301 the southern, 937’ from the eastern, **and 100’ from the western property lines. The adjacent**
302 **property, APN # 034-321-004 is separated from view by a vegetated drainage corridor and has a**
303 **current application for cannabis cultivation. No offsite nuisance odor impacts would occur with this**
304 **adjacent property also being utilized for cannabis cultivation.** The indoor grow facility will also provide
305 an air scrubbing system that has carbon filtration to reduce the odor within the areas/rooms
306 containing cannabis plants. **Refer to the Odor and Water Plan for detailed information.”**

307
308 This statement is not an Odor Management Plan. In fact these comments refer to an attached plan
309 that has not been provided to TAAG for review. County Cannabis ordinances require that outdoor
310 cannabis cultivation areas be setback a minimum of 300 foot from the project’s property lines and that
311 cannabis odor not be detected offsite. Distances to the “nearest” residence are irrelevant. Existing
312 ordinances prohibit odor detection from the project site’s property lines not from existing residences
313 regardless of the distance from a residence to an outdoor cultivation area. Essentially effective
314 cannabis outdoor odor mitigations systems do not exist and the project does not propose to install
315 such systems or establish other mitigating odor control factors intended to prevent offsite odor
316 detection. Considerable undisputed evidence exists that the outdoor cultivation 300 foot minimum
317 setback distance, not to mention a 100 foot setback, are ineffective in preventing offsite cannabis odor
318 detection. The statement that an adjacent property has a pending cannabis application and according
319 **“No offsite nuisance odor impacts would occur with this adjacent property also being utilized for**
320 **cannabis cultivation” laughable.** Two adjacent cannabis properties will greatly increase not eliminate
321 the effects of cannabis odor detection offsite!

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- 324 **3.** Resolve the issue of security concerns regarding allowing public access to the property’s licensed three
325 bedroom B&B facility. This facility will be located within a very short walking distance to the proposed
326 outdoor and indoor cannabis cultivation and processing areas. Access by minor is a special concern.
327 Minors and other unauthorized persons are restricted from (undefined) cannabis areas according to
328 most currently approved cannabis project conditions of approval. However there are no known
 - 329 **4.** Resolve the problem with visibility from neighboring properties and residences by relocating or
330 otherwise eliminating the direct view of cannabis activity on the site. Existing County Cannabis
331 ordinance Section 22.40,050 requires that Cannabis plants not be easily visible from offsite. An

332 adjacent property has two residences located at elevate heights with clear views looking down of the
333 project’s proposed outdoor cannabis cultivation areas. Restricting visibility from these neighboring
334 properties and possibly from other elevated properties in the surrounding area is not possible.
335

336 5. The County cannabis ordinances require that “specific conditions” exist that would justify the County’s
337 granting of outdoor cultivation and other setback and buffer distances reductions. Obviously, as
338 discussed above, outdoor cannabis activities on an adjacent property does not justify a setback
339 modification of any distance. There are no existing conditions that would justify the requested setback
340 modification.
341

342 6. **Neighborhood Compatibility.** County Cannabis ordinances require a statement of neighborhood
343 compatibility and a plan for addressing compatibility issues. This statement and plan have not been
344 submitted to TAAG for review. The project’s Kirk Consulting Revised Project Description make the
345 following statement.
346

347 “ Neighborhood Compatibility. Cannabis cultivation is consistent with previous and current agricultural use
348 of the property and surrounding area. There is no projected increase in noise level from this project. To
349 continue viable vineyard operations on the site and cultivate the cannabis in a minimally visible location, a
350 modification of the westside setback is requested. The adjacent property closest to the outdoor cultivation
351 area, APN # 034-321-004, is separated from view by a vegetated drainage corridor and has a current
352 application for cannabis cultivation. The nearest off-site residence is 480’ to the west of the outdoor
353 cultivation site. No offsite nuisance odor impacts would occur with this adjacent property also being
354 utilized for cannabis cultivation.
355

356 The first red highlighted comment is inaccurate and misleading. The entire general area surrounding the
357 project consists of wine grape vineyards, wineries, tasting rooms, dry farmed cultivated almond and
358 walnut orchards (many abandoned) and unirrigated grazing land. One very small 1,000 foot recently
359 approved indoor only cannabis project is located on So. El Pomar Road in the area. A close neighboring
360 property operates a horse training business that provides services to minors. The area adjacent to the
361 project’s east side property lines consists of a rural residential neighborhood where no known cannabis
362 activities exist.
363

364 The second highlighted comment is irrelevant, and a repeat of the comment discussed above. A pending
365 unapproved cannabis project application on an adjacent property does not constitute compatibility with
366 the surrounding neighborhood.
367

368 Please contact me if you have any questions or comments.
369

370 Murray Powell
371 TAAG Vice Chair
372 CPRC Chair
373 805-434-0707
374 510-914-3754 (Cell)