



**COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING AND BUILDING
STAFF REPORT**

PLANNING COMMISSION

*Promoting the wise use of land
Helping build great communities*

MEETING DATE April 22 nd , 2021	CONTACT/PHONE Hannah Nguyen (805) 781-4163 hnguyen@co.slo.ca.us	APPLICANT Bradley Canyon Farms, LLC	FILE NO. DRC2018-00110
SUBJECT A request by Bradley Canyon Farms, LLC for a Conditional Use Permit (DRC2018-00110) to establish 1.23 acres (53,400 square feet) of outdoor cannabis cultivation area, 6,720 square feet of outdoor ancillary cannabis nursery, and 2,400 square feet of indoor ancillary cannabis nursery on a 100-acre parcel. The project would also include installation of new security fencing, surveillance cameras, eight new water tanks, portable restrooms, and two seatrain containers for storage of planting materials and equipment. The project would result in approximately 48,702 square feet of site disturbance, including 49 cubic yards of cut and 49 cubic yards of fill, to be balanced on-site. The project site is located within the Rural Lands land use category and is located at 1255 Tierra Redonda Road, approximately 0.75 mile north of the village of Oak Shores in the Nacimiento Sub Area of the North County Planning Area.			
RECOMMENDED ACTION 1. Adopt the Mitigated Negative Declaration in accordance with the applicable provisions of the California Environmental Quality Act, Public Resources Code Section 21000 et seq. 2. Approve Conditional Use Permit DRC2018-00110 based on the findings listed in Exhibit A and the conditions listed in Exhibit B.			
ENVIRONMENTAL DETERMINATION The Environmental Coordinator, after completion of the initial study, finds that there is no substantial evidence that the project will have a significant effect on the environment, and the preparation of an Environmental Impact Report is not necessary. Therefore, a Mitigated Negative Declaration (pursuant to Public Resources Code Section 21000 et seq., and California Code of Regulations Section 15000 et seq.) has been issued on February 11, 2021 for this project (SCH# 2021020246). Mitigation measures proposed to address potential impacts associated with Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, and Tribal Cultural Resources are included as Conditions of Approval.			
LAND USE CATEGORY Rural Lands	COMBINING DESIGNATION Sensitive Resource Area	ASSESSOR PARCEL NUMBER 080-021-052 and 080-021-051	SUPERVISOR DISTRICT(S) 1
PLANNING AREA STANDARDS: North County Planning Area – Nacimiento Sub-Area Does the project meet applicable Planning Area Standards: Yes – see discussion below			
LAND USE ORDINANCE STANDARDS: Section 22.40.040 – Requirements for All Cannabis Activities Section 22.40.050 – Cannabis Cultivation Does the project conform to the Land Use Ordinance Standards: Yes – see Attachment 4			
EXISTING USES: Single-family residence, agricultural accessory structures, agricultural farming			

ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING THE DEPARTMENT OF PLANNING & BUILDING AT:
 COUNTY GOVERNMENT CENTER γ SAN LUIS OBISPO γ CALIFORNIA 93408 γ (805) 781-5600 γ FAX: (805) 781-1242

SURROUNDING LAND USE CATEGORIES AND USES:

North: Agriculture/agricultural uses, single-family residence(s), accessory structure(s)
East: Agriculture/agricultural uses, single-family residence(s), accessory structure(s)
South: Single-family residence(s), accessory structure(s)
West: Agriculture/agricultural uses, undeveloped

OTHER AGENCY / ADVISORY GROUP INVOLVEMENT:

The project was referred to: County Agricultural Commissioner, County Building Division, CAL FIRE / County Fire Department, County Public Works, Air Pollution Control District, County Sheriff's Office, CA Fish and Wildlife, RWQCB, US Fish and Wildlife, Environmental Health, and AB 52 Tribes.

TOPOGRAPHY:

Nearly level to moderately sloping

VEGETATION:

Urban-built up, oak woodland, grassland

PROPOSED SERVICES:

Water supply: Two on-site wells
 Sewage Disposal: Individual septic system
 Fire Protection: CAL FIRE/County Fire Department

ACCEPTANCE DATE:

April 30, 2019

DISCUSSION

PROJECT HISTORY

From 2016 to April 2020, the project site supported outdoor cannabis cultivation registered under County Urgency Ordinance No. 3334 (Condition Compliance Monitoring number CCM2016-00361), issued to Helios Dayspring. On November 27, 2017, in conjunction with adoption of the cannabis land use ordinance in the unincorporated inland and coastal areas of San Luis Obispo County, the County Board of Supervisors adopted Resolution No. 2017-298 ("Temporary Abeyance Resolution"), which established a limited abeyance of enforcement policy for existing registered cultivation operations on compliant sites with registrants who were diligently pursuing land use permit approval. The project site's registration for cannabis cultivation did not constitute a permit approval; therefore, the applicant submitted an application for a land use permit in November 2018 to maintain and expand existing cultivation activities. Cannabis cultivation activities on-site ceased operation in April 2020 as discussed below. However, the existing hoop structures that supported the cultivation activities remain in place.

Code Enforcement

On April 24, 2017, a complaint was received regarding potential violations for cannabis cultivation. Site inspections in May and August 2017 by Code Enforcement staff revealed that there were two unpermitted buildings with electrical, plant counts exceeded registered numbers, and no fencing. On August 15, 2017, a site reinspection confirmed that plant count was reduced, electrical service was removed, and necessary fencing was installed. On September 7, 2017, building permit applications were submitted (PMTTC2017-00760 & PMTTC2017-00761) to legalize the unpermitted buildings. These outstanding permits are pending review of the applicant's land use permit (DRC2018-00110).

On April 5, 2020, a complaint was received regarding the potential unpermitted use of lights within hoop structures for cannabis operations. During a site inspection on April 8, 2020, Code Enforcement staff confirmed that strands of electrical lights were being used within the hoop structures for cannabis cultivation, and a Notice of Abatement for removal of the lights was issued on April 9, 2020. During a follow-up site inspection on April 20, 2020, Code Enforcement staff verified that the violation was voluntarily abated by the operator, and the notices were resolved through a stipulated order.

PROJECT DESCRIPTION

The project is a request to establish 1.23 acres, or 53,400 square feet, of outdoor cannabis cultivation area, 6,720 square feet of outdoor ancillary cannabis nursery, and 2,400 square feet of indoor ancillary cannabis nursery (within an existing structure). Associated site improvements consist of installation of new security fencing, surveillance cameras, eight (8) new water tanks, portable restrooms, and two (2) 320-square-foot seatrain containers for storage of planting materials and equipment. The project would result in approximately 48,702 square feet of site disturbance, including 49 cubic yards of cut and 49 cubic yards of fill to be balanced on-site. The site takes access via Tierra Redonda Road, previously known as County Road 22, which is an unpaved public roadway.

Outdoor Cultivation

The proposed outdoor cultivation consists of 42,720 square feet of cultivation canopy within a 53,400 square foot cultivation area. Cannabis plants would be grown in above-ground pots.

Outdoor cultivation would occur within 18 existing cannabis hoop structures ranging in size from 1,680 square feet to 3,600 square feet and approximately 12 feet in height with metal framing and white plastic hoop coverings. White plastic hoop coverings would be installed at the beginning of the outdoor cultivation season in March and removed following the last harvest in October. These coverings serve to protect the cultivation areas from inclement weather conditions. Additional coverings that have black interiors and white exteriors (i.e., panda film) would be utilized to enclose the entirety of the structures, including ends and sides, during evening hours to simulate nighttime and assist in the process of flowering. Per County Ordinance and Building Code standards, no lighting or electronic equipment would be installed within the hoop structures. Outdoor cultivation areas would yield up to three harvests per year and products would be transported off-site to be tested, processed (e.g., dried, cured, trimmed, etc.), and distributed. All cannabis plant waste and used soil would be composted on-site within a designated compost area.

Outdoor and Indoor Ancillary Nurseries

The proposed ancillary nursery would consist of 5,376 square feet of outdoor cultivation canopy within a 6,720 square foot cultivation area and 2,400 square feet of indoor cultivation canopy within an existing 2,400-square-foot accessory structure. Ancillary nursery cultivation would be planted in above-ground pots within three existing cannabis hoop structures and in the accessory structure. Hoop structures used for outdoor ancillary nursery would also include installation of white plastic hoop coverings during the outdoor cultivation season from March to October and use of additional panda film covers in the evening and morning hours between 5:00 P.M. and 7:00 A.M. In accordance with LUO Section 22.40.050.A.3.a, nursery plants grown on-site would be limited to support on-site cultivation operations and would not be transported for off-site use.

Odor Management

Per LUO Section 22.40.050.D.3.b, the proposed outdoor cultivation area would be setback a minimum of 300 feet from all property lines and the public right-of-way to prevent nuisance odors from being detected off-site. The proposed setback distances range between approximately 380 feet to 1,026 feet for the outdoor cultivation area. In addition, the existing 2,400 square foot accessory structure proposed for indoor nursery operations would be equipped with ventilation fans and located within an existing structure that is a minimum of 680 feet from the nearest property line or public right-of-way. Based on the proposed use having less potential for strong odors due to having no flowering plants, the location of the use, and proposed ventilation of the structure, the proposed indoor nursery would be consistent with LUO Section 22.40.050.D.8 to prevent any cannabis cultivation odors from being detected off-site.

In addition, the project would be conditioned to comply with the Cannabis Monitoring Program to identify appropriate odor management practices. The project site would be inspected four (4) times annually to verify ongoing compliance with the Conditions of Approval. In the event of a verified nuisance complaint, the County may pursue remedial action that can include (a) the reduction or cessation of operations until a revised Operations Plan is reviewed and approved by the County Department of Planning and Building, (b) abatement of the violation pursuant to LUO Section 22.40.130, and/or (c) permit revocation pursuant to LUO Sections 22.40.110 & 22.40.120.

Water Use

Based on the water management plan provided by the applicant, the project would result in a water demand of approximately 1.44 acre-feet per year (AFY). The project is not located within a groundwater basin designated as Level of Severity (LOS) III per the County's Resource Management System or in an Area of Severe Decline by the Sustainable Groundwater Management Act (SGMA). The project would be served by two existing, on-site wells and multiple water storage tanks (existing and proposed). There is a third well on the site that does not currently serve the existing or proposed cannabis activities. Four-hour well pump tests were conducted (Pro-H2O Water Well Drilling & Pump Company, 2016) and demonstrated the existing, on-site wells have a combined sustained yield of approximately 9.8 gallons per minute. Existing irrigation lines currently serve seven of the 21 existing hoop structures, and new subsurface irrigation lines would be installed to reach the remaining 14 hoop structures proposed for cannabis cultivation and nursery. In addition to existing, on-site water storage tanks, the project will also include the installation of 8 new 5,000-gallon water tanks for a total of 21 tanks to support on-site irrigation activities. See Attachment 7 –Mitigated Negative Declaration for a detailed analysis of project water use and supply.

Energy Use

Energy needs of the irrigation system for the project will initially be supplied by a 60-Hertz diesel fuel generator (less than one hp) for the proposed outdoor cultivation. The temporary generator would later be replaced by a new extension of underground Pacific Gas & Electric Company (PG&E) service lines from an existing connection on the property.

The project would be required to monitor energy use, and usage will be verified as part the Cannabis Monitoring Program. See Attachment 7 – Mitigated Negative Declaration for a detailed analysis of project energy demand, associated environmental impacts, and mitigation measures.

Security Measures

The project site currently includes existing six-foot-high, three-strand barbed wire fence around three sides of the project area as well as existing six-foot-high deer fencing around the center of the proposed cultivation area. The project would also include installation of new six-foot-high chain-link fencing with opaque security slats to enclose each of the proposed cannabis cultivation areas. Security cameras with infrared technology would also be installed throughout the project area to ensure security of the site.

Operations

The project would employ a maximum of six full-time employees to maintain project operations between 6:00 A.M. and 8:00 P.M. daily, and a maximum of 8 additional seasonal employees for the proposed one- to two-week harvest periods to occur up to three times a year. The project would also provide seven parking spaces, which is sufficient for parking requirements outlined in LUO Section 22.18.050.

Neighborhood Compatibility

It is understood by the project applicant and project agent that the surrounding community may have concerns regarding neighborhood compatibility. The following project features are intended to address compatibility concerns:

- The project is located well over the required 1,000 feet from any pre-school, elementary school, junior high school, high school, library, park, playground, recreation or youth center, licensed drug or alcohol recovery facility, or licensed sober living facility.
- The proposed areas for cannabis activities exceed minimum setback requirements from property lines and off-site residential uses.
- The project incorporates, and is conditioned to provide, odor management controls to ensure that potential odors associated with cannabis-related uses would not be detected off-site.
- The project application includes well pump tests that demonstrate existing wells on-site can provide adequate water supply to serve the proposed cannabis operations and would not substantially affect the local groundwater supply for surrounding properties.
- The project includes security features, such as 6-foot-high chain-link fencing with security slats and surveillance cameras, to prevent unauthorized access to the site.
- Mitigation measures are incorporated into the project as conditions of approval to reduce potential impacts regarding Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology, Hazards and Hazardous Materials, and Hydrology and Water Quality to a less than significant level.
- Cannabis has been legally cultivated outdoors on this property from 2016 to April 2020, and cannabis-related code enforcement issues have been voluntarily abated in a timely manner.

PROJECT ANALYSIS

CONDITIONAL USE PERMIT

Per LUO Sections 22.40.040.C & 22.40.050.E.6, any site proposing cannabis activities where there have been verified violations of a County Ordinance or other laws relating to cannabis within the last 24 months shall require a Conditional Use Permit (CUP) approval and a special finding that the proposed project or use will not contribute to repeat violation on the site and that the subject site is in compliance with all laws, rules, and regulations pertaining to land uses, building and construction, health and safety, and any other applicable provisions of the this Title, and that violation processing fees have been paid.

Staff comments: Since there have been cannabis-related code enforcement cases documented on the property with the last 24 months, the applicant submitted for the required CUP application. While there have been identified violations at the site, based on the applicants' timely voluntary compliance with County Code following identification and notification, staff is able to recommend that the proposed project or use will not contribute the repeat violations on the site and that the proposed project and subject site, as conditioned, would be in compliance with all laws, rules, and regulations, pertaining to land uses, building and construction, health and safety, and all other applicable provisions of Title 22. The project has been conditioned to resolve all code enforcement cases prior to commencing permitted activities.

LAND USE ORDINANCE STANDARDS

Project compliance with relevant LUO standards specific to cannabis land uses is summarized in the Land Use Ordinance Consistency Analysis Table (Attachment 4). As conditioned, the project would comply with all applicable LUO standards.

Legal Access

Project compliance requires that a site have legal access. One issue raised by the neighbors is the applicant's use of Tierra Redonda Road (known as "County Road 22"). Correspondence was submitted by the neighboring property owners stating there is not legal access to the project site because the current unpaved access road is an easement through a parcel owned by the one of the neighbors. However, the unpaved road is considered Tierra Redonda Road, which is designated as a public, but privately maintained road. Therefore, the project is compliance with the legal access requirement.

Previous Cannabis Related Violations

Under County Code (Section 22.40.040.C) any site proposing cannabis activities where there have been verified violations of a County ordinance or other laws relating to cannabis within the last twenty-four (24) months shall require a Conditional Use Permit and requires a special finding (Section 22.40.050.E.6) that the proposed project or use will not contribute to repeat violation on the site and that the subject site is in compliance with all laws, rules, and regulations pertaining to land uses, building and construction, health and safety, and any other applicable provisions of this Title, and that violation processing fees have been paid.

While there were identified violations at the site, based on the nature of the violation related to applicant's abeyance cultivation operation, and the applicants timely voluntary compliance with County Code following identification and notification, staff is able to recommend that the proposed project or use will not contribute to repeat violations on the site and that the currently proposed project and subject site, as conditioned, are in compliance with all laws, rules, and regulations pertaining to land uses, building and construction, health and safety, and all other applicable provisions of Title 22.

PLANNING AREA STANDARDS

LUO Section 22.94.070 – Nacimiento Sub-area Standards

The project is located within the Nacimiento Sub-area and is subject to standards outlined in LUO Section 22.94.070. These standards include various requirements for all development and new land uses. Standards applicable to this project are detailed in LUO Sections 22.94.070.F.1, G, & H.

Per LUO Section 22.94.070.F.1, approval of a CUP is contingent upon the applicant executing an agreement with the County to maintain portions of the site not intended for development in open space use. Guarantees of open space preservation may be in the form of agreements, easements, contracts, or other appropriate instruments, provided that such guarantees are not to grant public access unless desired by the property owner.

Staff comments: The project has been conditioned to demonstrate compliance with this standard prior to initiation of site disturbance or building permit issuance associated with the project.

Per LUO Section 22.94.070.G, projects requiring CUP approval shall provide for utilities being placed underground unless an exception is made by the Planning Commission.

Staff comments: The project has been conditioned to require all proposed utility extensions to be placed underground, and no exception is requested.

Per LUO Section 22.94.070.H, new development is required to not be visible from Highway 1.

Staff comments: Due to a substantial distance between the project site and Highway 1, the project would not be visible from Highway 1 and would, therefore, be in compliance with this standard.

LUO Section 22.94.072 – Land Use Category Standards for the Nacimiento Sub-area

Land uses identified as allowable, permitted, or conditional uses within the Rural Lands (RL) land use category may be authorized in compliance with the land use permit requirements.

Staff comments: The project is located in the RL land use category and the cannabis cultivation and ancillary activities, are allowed uses within this land use designation, subject to the land use permit required by the specific use standards (LUO Section 22.06.030). As such, the applicant has applied for a CUP to operate the cannabis project.

COMBINING DESIGNATIONS STANDARDS

LUO Section 22.14.110 – Sensitive Resource Area

The project site is located within a Sensitive Resource Area (SRA) and is subject to standards outlined in LUO Section 22.14.110. The SRA is a combining designation applied to areas of the County with special environmental qualities or areas containing unique or endangered vegetation or habitat resources. Proposed uses within the SRA are required to be designed with consideration to protect identified sensitive resources and satisfy standards relating to site design and development outlined in LUO Section 22.14.110.D. A Use Permit application may be approved, if findings detailed in LUO Section 22.14.110.C.5 can be made.

Staff comments: The project site is located on the eastern hillside and base of Tierra Redonda Mountain, a broad, landmark table-top mountain located north of Lake Nacimiento. The project site is primarily located within the Tierra Redonda Mountain SRA, which encompasses approximately 1,300 acres and was designated for the purpose of maintaining the mountain biological ecosystem and preserving the scenic quality of the natural communities in the area. The North County Area Plan states “emphasis should be placed on maintenance of the entire mountain as an undisturbed ecosystem rather than several small, isolated preserve areas. Use should be carefully regulated because of fire hazard problems and potential damage to fragile ecosystems.”

The project is also within the viewshed of Interlake Road, a view corridor designated as an SRA by the County due to its scenic quality. Interlake Road at this location is also an Officially Designated County Scenic Highway as designated by the State Scenic Highway Program.

Most of the structures and equipment utilized for the project are existing. As proposed, the project would result in the addition of new coverings (i.e., white plastic hoop coverings and white, black-out tarps) for 21 hoop structures, eight 8-foot-high dark green plastic 5,000-gallon water tanks, two earth-tone-colored seatrains, six new gray portable restrooms, 6-foot-high chain-link fencing with security slats surrounding each cultivation area, and security cameras. Based on site inspections by staff (July 2018 and August 2019) and prepared Visual Impact Assessment Reports (Firma Consultants, Inc., 2019 & 2020), project components would be visible from various viewpoints along Tierra Redonda Road, Lynch Canyon, and Interlake Road within a mile distance. Due to the high level of contrast from the surrounding natural landscape, the proposed white hoop structure covers would be the most noticeable and detract from the quality of the scenic vista. Other components, such as the seatrains, water tanks, portable restrooms, fencing and surveillance cameras, would be substantially less noticeable due to the use of earth-tone-colored materials. Proposed security cameras would utilize infrared technology and would not create any lighting within the visible spectrum.

To reduce the degree of visibility and contrast from the natural landscape for project components, a mitigation measure has been incorporated to require preparation and implementation of a Visual Screening Plan to achieve a 75% reduction in visibility of all high contrast materials when viewed from Tierra Redonda Road, Lynch Canyon, and Interlake Road. The project has been conditioned to require the applicant to demonstrate compliance prior to initiation of the proposed activities.

ENVIRONMENTAL DETERMINATION

A Mitigated Negative Declaration (MND) has been prepared for the project pursuant to State CEQA Guidelines Section 15070(b) (SCH# 2021020246). Mitigation measures have been identified to address potential impacts associated with Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, and Tribal Cultural Resources. With incorporation of recommended mitigation measures for these issue areas, project-specific and cumulative impacts were determined to be less than significant and less than cumulatively considerable.

In accordance with Section 15073 of the State CEQA Guidelines, the MND was circulated for public review and comment for 30 days from February 11, 2021 to March 12, 2021. During the 30-day review period, the Department of Planning and Building received comment letters from the California Department of Toxic Substances Control (DTSC) and California Department of Food and Agriculture (CDFA) (Attachment 8). See Attachment 9 – Staff Responses to MND comments for detailed responses to comments received during the public review period for the MND.

The comments do not require any modifications to the MND that would necessitate re-circulation as required by Section 15073.5 of the CEQA Guidelines because the comments did not identify a new, avoidable significant effect, mitigation measure(s), or project revision that would reduce one or more significant impacts to a level of insignificance. Section 15074(b) requires the decision-making body of the lead agency to consider the proposed MND together with any comments received during the public review process.

SOURCE REFERENCES

The MND analysis was supported by the following technical reports, reference materials and supporting information provided with the project permit application package:

Althouse and Meade, Inc., Biological Resources Assessment, November 2018.

Althouse and Meade, Inc., Addendum to Biological Resources Assessment, June 2019.

Firma Consultants, Inc., Visual Impact Assessment Report, April 2020.

Althouse and Meade, Inc., Native Tree Impact Assessment, January 2020.

Heritage Discoveries Inc., Phase I Archaeological Survey, April 2019.

PRO-H2O, Well Pump Test Reports, August 2016.

Abalone Coast Analytical, Inc., Water Quality Analysis, December 2018.

Developer's Statement & Mitigation Monitoring Program for Bradley Canyon Farms, LLC Conditional Use Permit DRC2018-00110, February 8, 2021.

COMMUNITY ADVISORY BOARD COMMENTS

No advisory board review is required based on the project location.

AGENCY REVIEW

Department of Public Works	Per referral response, dated July 3, 2019, from David Grim of the County Department of Public Works, comments and recommended Conditions of Approval regarding access, drainage, and stormwater pollution prevention were provided for the project. These recommendations have been incorporated into the Conditions of Approval.
Building Division	Per referral response, dated July 17, 2018, from Michael Stoker of the County Building Division, building permit and standard code requirements were identified as applicable. Recommendations from the Building Division have been incorporated into the Conditions of Approval.
CAL FIRE / County Fire Department	Per referral response, dated October 21, 2019, from Clinton Bullard of CAL FIRE / County Fire Department, requirements prior to final inspection and occupancy of the project were identified. These requirements from CAL FIRE have been incorporated into the Conditions of Approval.

Environmental Health Services Per referral response, dated July 26, 2019, from Kealoha Ghiglia of Environmental Health Services, submittal of a Hazardous Materials Declaration Flowchart has been identified as a requirement. Additional requirements have also been identified should there be future changes to the project regarding intensified use of the existing water system. Recommendations from Environmental Health Services have been incorporated into the Conditions of Approval.

Northern Chumash Tribal Council
(NCTC) Per referral response, dated April 25, 2020, from Fred Collins of the NCTC, the project archaeological report was reviewed, and no additional comments or requests for consultation were received.

LEGAL LOT STATUS

Parcel A (APN: 080-021-052) was legally created by a parcel map (Parcel Map Book 41, Page 25).

Staff report prepared by Hannah Nguyen and reviewed by Cassidy Williams (SWCA Environmental Consultants) and Eric Hughes.

ATTACHMENTS

- Attachment 1 – Exhibit A – Findings
- Attachment 2 – Exhibit B – Conditions of Approval
- Attachment 3 – Graphics
- Attachment 4 – LUO Consistency Table
- Attachment 5 – Project Description
- Attachment 6 – Referral Responses
- Attachment 7 – Final MND
- Attachment 8 – MND Comments
- Attachment 9 – Staff Responses to MND Comments
- Attachment 10 – Correspondence Received