

REPORT TO THE PLANNING COMMISSION



DATE: September 25, 2017

TITLE: Amendment to Conditional Use Permit No. 14-16, adding distribution to the development of a ground-up 45,000 square foot Marijuana Cultivation Facility on an approximately 9.75 acre parcel (APN 663-270-001). The project is located at the southeast corner of Little Morongo Road and Hacienda Avenue, in the Light Industrial (I-L) zone. Applicant: Chris Ganan/Desert Hot Springs Green Horizons, Inc.

Prepared by: Scott Taschner, Senior Planner

Reviewed by: Daniel Porras, Community Development Director

RECOMMENDATION

- 1) Staff Report;
- 2) Entertain Questions of Staff from City Council;
- 3) Open the Public Hearing;
- 4) Take Testimony from Applicant;
- 5) Take Public Testimony;
- 6) Opportunity for Applicant Rebuttal;
- 7) Close the Public Hearing;
- 8) Planning Commission discussion and questions to Staff; and

BACKGROUND

Applicant, Chris Ganan/Desert Hot Springs Green Horizons, Inc., a California non-profit mutual benefit corporation, received approval under Conditional Use Permit 14-16, along with Sign Permit 17-06 & an Art in Public Spaces and Development Agreement on May 16, 2017 to build and operate an indoor marijuana cultivation and extraction facility.

The approved project site (APN 663-270-001), Exhibit 1- Project Site Map is located at the southeast corner of Little Morongo Road and Hacienda Avenue and is currently undeveloped. The project site is rectangular in shape, generally flat, and has an area of approximately 424,710 sf (9.75 acres). The project site's width and street frontage along Little Morongo Road are approximately 355 feet with a depth of approximately 1,316 feet. Within the project area Little Morongo Road is paved; however, it is not fully improved (missing curb and gutter, sidewalk). Within the project area Hacienda Avenue is currently unimproved.

The proposed amendment to Conditional Use Permit 14-16 will add distribution to the permitted uses by reallocating approximately 963.38 square feet originally designated as warehouse space use, to use as product packaging and office space for distribution. This reallocation of square footage to allow for packaging and distribution does not increase in square footage, change the building footprint, or public improvements or any other previously approved condition of approval. Distribution is a specific allowable category of use detailed in the Applicant's Development Agreement, DA10-16.

PROJECT SUMMARY

Conditional Use Permit 14-16 was issued to applicant, Desert Hot Springs Green Horizons, Inc. (Chris Ganan), along with Sign Permit (SR 06-17) Art in Public Places (AIPP 01-17) and Development Agreement ("DA") 10-16 on May 16, 2017, approving a steel frame facility for the

indoor cultivation and extraction of medical marijuana (the “Facility”) on a 9.75 acre project site (Figure 1. Site Plan).

The Facility is comprised of a steel building and an attached enclosed greenhouse that would be located near the western boundary of the overall project site (frontage along Little Morongo Road). The proposed Facility has a total project footprint of 45,553 square feet with the following approximate square footages as originally approved and as amended;

APPROVED ALLOCATION OF SQUARE FOOTAGE	PROPOSED ALLOCATION OF SQUARE FOOTAGE
Cultivation (Greenhouse + one small grow room in the building): 23,406 sf	Cultivation (Greenhouse + one small grow room in the building): 23,018 sf
Ancillary Cultivation Uses 15,794 sf	Ancillary Cultivation Uses 6,620 sf
Misc. Industrial 4,184 sf	Misc. Industrial 12,476 sf
Total Offices and General Use: 2,616 sf	Total Offices and General Use: 2,456 sf
	Distribution/Packaging: 963.38 sf

The office, processing, warehouse, packaging and distribution portion of the Facility will have panel siding and a metal roof. The portion of the facility made up of the steel building with a maximum height of 34 feet, a width of 125 feet, and a length of 150 feet.

The remaining portion of the Facility includes a greenhouse of approximately 23,000 square feet. The greenhouse and support rooms will have a maximum height of 21 feet and 6 inches, a width of 175 feet, and a length of 150 feet. The greenhouse portion of the Facility would have metal insulated panel siding and a glass roof.

Construction of the Facility is in a single phase with the estimated time from start of construction to completion being 8 months. The overall architectural design and character of the Facility is that of an attractive, well-maintained industrial facility. As required by City ordinance, the Facility would include sufficient odor absorbing ventilation and exhaust systems.

The proposed amendment to the Conditional Use Permit 14-16 is consistent with chapter 17.16 of the Desert Hot Springs Municipal code as it meets all necessary design, and development standards and does not change the setback, building footprint and total square footage of the project. The amendment has no impact on the single phase construction and and staff anticipates that the entire site will be constructed in one phase estimated to be approximately 8 months.

CUP AMENDMENT ANALYSIS

General Plan and Zoning Consistency: The project proposes to establish a Medical Marijuana Cultivation Facility in accordance with Section 17.180 of the Desert Hot Springs Municipal Code, which allows this use with approval of a CUP and Regulatory Permit.

Site Coverage: The project site consists of one lot totaling 9.75 gross acres (424,710 sf) in size. Under the Industrial Zoning District standards, the maximum allowable coverage is 75 percent of the site area. The proposed project would construct a 45,000 sf facility or 9.4 percent of the site. The proposed project conforms to this standard.

Facility Height: The highest point of the proposed facility would be approximately 34 feet from adjacent grade. This is below the maximum height of 50 feet allowed in the I-L District.

Facility Setbacks: The minimum setbacks in the City's Light Industrial (I-L) Zone are 20 feet in front, 10 feet in the rear, and 10 feet on the side. The proposed facility would maintain a setback of approximately 186 feet from the western property line along Little Morongo Road, approximately 112 feet from the northern property line, approximately 82 feet from the southern property line, and approximately 830 feet from the eastern property line. Therefore, all existing and proposed structures meet minimum setback standards.

Circulation, Fire Access and Parking: Ingress and egress to the site will be provided from Hacienda Avenue via one driveway apron. Access to the site would be controlled via a perimeter security fence with a security gate. A total of 74 parking spaces will be provided (70 standard and 4 handicap spaces). The parking lot would be paved with asphalt, interspersed with 20 large deciduous trees would be planted including; Chinese Pistache, Palo Verde, and Australian Willow. A 30-foot wide fire lane would be provided along the east and southern side of the proposed facility with a separate access from the improved Hacienda Avenue.

Per DHSMC Section 17.48.040, parking requirements include 1 parking space per 2,500 sf of cultivation use, 1 parking space per 750 sf of industrial warehousing uses, and 1 parking space per 250 sf of office and general uses (projects with 2,001 to 7,500 sf of office and general uses). Per DHSMC Section 17.48.050, projects with 25-75 parking spaces require 3, including 1 van accessible, handicap spaces. The project as amended provides an excess of the required parking based on the following staff calculation:

Parking Calculation			
Proposed Uses	Zoning Requirements ¹	Number of Spaces Required	Number of Spaces Provided
Total Cultivation: 23,406 sf	1 spaces/ 2500 sf	9.36	74 (including 4 for Handicap Access)
Total Industrial Warehousing: 19,978 sf	1 space/750 sf	26.64	
Total Offices, General: 2,616 sf	1 space/250 sf	10.4	
Total		46.4 (46)	
Handicap Spaces Required ²			
Total Number of Parking Spaces Provided		Number of Handicapped Parking Spaces Required	
25 - 50		2, including 1 van accessible	
51-75		3, including 1 van accessible	

Notes: 1. DHS Municipal Code Section 17.48.040

2. DHS Municipal Code Section 17.48.050

Temporary parking for tractor trailers / semi- trucks will be provided on the southwest side of the building. The 10x14 roll-up doors are directly in front of the temporary parking.

CONDITIONAL USE AMENDMENT PERMIT FINDINGS

Conditional Use Permits are regulated under Section 17.76 of the Desert Hot Springs Municipal Code and require that certain findings be made by the Planning Commission before granting a CUP request. Staff has developed recommendations for each finding, as follows:

1. *That the proposed use is conditionally permitted within the subject land use*

district and complies with all of the applicable provisions of this Zoning Ordinance.

The application is to amend a previously approved for a medical marijuana cultivation facility which is identified in Section 17.180.060 of the City of Desert Hot Springs Zoning Ordinance as permitted within any industrial zone which includes the I-L (Light Industrial) zone, subject to approval of a Conditional Use Permit. The proposed project would be developed in an undeveloped property that is zoned I-L and would comply with applicable provisions of the Zoning Ordinance. The proposed use will comply with applicable Zoning Ordinance provisions. Staff recommends this finding.

2. *That the proposed use would not impair the integrity and character of the land use district in which it is to be located.*

Section 17.12.010.B.2 of the Desert Hot Springs Zoning Ordinance identifies the underlying I-L (Light Industrial) zone as intended for, “...*business parks and the development of any and all industrial uses operating entirely in enclosed facilities, and those requiring limited and screenable outdoor storage. Examples include clean manufacturing operations, warehousing and distribution facilities, mini-warehouse storage, and a variety of light manufacturing businesses.*” As amended, the use of the medical marijuana cultivation facility qualifies as “industrial uses operating entirely in enclosed facilities” and as “clean manufacturing operations, warehousing and distribution facilities”, and will occupy existing commercial / industrial facilities similar to other industrial facilities in the area. The amended square footage will produce goods and products in a manner similar to other industrial uses and will not introduce any activities outside of industrial uses that could impair the integrity or character of the land use district in which it is to be located. Staff recommends this finding.

3. *That the subject site is physically suitable for the type and intensity of land use being proposed.*

The project site is raw land which is relatively flat. As amended the proposed medical marijuana facility is physically organized similar to other existing industrial establishments and positioned on the site in a manner which will limit the impacts on adjacent properties. The proposed site development plan provides more parking spaces than are required by the code and the proposed lot coverage (under 10%) is well below the maximum the code allows (75%). On this basis, the site is physically suitable for the type and intensity of the proposed cultivation facility as amended. Staff recommends this finding.

4. *That the proposed use is compatible with the land uses presently on the subject property.*

The project site is currently undeveloped. The proposed medical marijuana cultivation facility is an industrial use and can be considered similar to other industrial establishments allowed in the I-L (Light Industrial) zone such as; plant nurseries, food products, distribution, light manufacturing, and wholesaling. The proposed cultivation facility with distribution does not appear to be outside the range of activities typical for an industrial facility. Moreover, the project is not seeking any modification to the required; DHSMC I-L Zone height restriction, setbacks, permitted floor area, or parking requirements. Staff recommends this finding.

5. *That the proposed use would be compatible with existing and future land uses within the general area in which the proposed use is to be located.*

Lands to the north, east, and south are vacant. The project site shares half of its northern border (eastern half) and its entire eastern border with the Morongo Wash Special Provisions Area which lies within the Upper Mission Creek/Big Morongo Canyon Conservation Area. The proposed development would be located in the western half of the project site (portion of the project parcel closest to Little Morongo Road). As such, the proposed development would not be located directly adjacent to the Upper Mission Creek/Big Morongo Canyon Conservation Area. Little Morongo Road abuts the project site along its western border. There are existing rural residential uses on the western side of Little Morongo Road. All cultivation activities and packaging of product will be contained within the proposed facility, and the operation will appear as an industrial use consistent with the permitted uses of the I-L (Light Industrial) zone. Consequently, the proposed cultivation facility is expected to be compatible with existing and future land uses in the surrounding general area. The building is also well outside of the required building setback areas. Parking and landscaping areas also help to buffer the cultivation and distribution traffic operations from the residential zones to the west and north. All cultivation and ancillary uses will be completely contained within the building and best-practices of odor control methods will be used to contain odors within the building. Staff recommends this finding.

6. *That the proposed use is compatible in scale, mass, coverage, density, and intensity with all adjacent land uses.*

The proposed project would develop an industrial steel-framed cultivation facility surrounded by parking and landscaping for the indoor cultivation of medical marijuana. Lands to the north, east, and south are vacant. Lands to the west are sparsely developed with rural residential uses. Future industrial development is currently prohibited by the Municipal Code from exceeding 50 feet in height and 75 percent lot coverage. The maximum height of the proposed facility would be 34 feet. The project site consists of one lot totaling 9.75 gross acres (424,710 sf) in size. The proposed project would construct a 45,000 sf facility or 9.4 percent of the site. The scale, mass, coverage, density and intensity of the proposed use will be consistent with general industrial activities, and the site's location and development plan are compatible with

adjacent commercial/industrial uses and religious institutions in the vicinity. The building is well outside of the required building setback areas. Parking and landscaping areas also help to buffer the cultivation operations from the residential zones to the west and north. All cultivation and ancillary uses involving distribution will be completely contained within the building and best-practices of odor control methods will be used to contain odors within the building. Staff recommends this finding.

7. *That there are adequate provisions for water, sanitation, public utilities, and services to ensure that the proposed use would not be detrimental to public health and safety.*

The project site is currently undeveloped and lack water, sanitation, and other public utilities. The proposed project would construct all water, sewer, and electric utilities to the project site. The proposed amendment to the uses of the medical marijuana cultivation facility will not create an extraordinary demand for water, sanitation or other public utilities and services that would result in any detriment to public health and safety. The proposed project would employ an irrigation recirculation system to minimize water needs of the cultivation operations. Staff recommends this finding.

8. *That there will be adequate provisions for public access to serve the site.*

The proposed project would construct a new driveway from Hacienda Avenue, which will be improved by the proposed project. The proposed project would provide 74 parking spaces. The Public Works Department is recommending conditions to assure that street driveway access meets current design standards. Staff recommends this finding.

9. *That there will not be an adverse effect upon desirable neighborhood characteristics.*

Desirable neighborhood characteristics include long-range views from existing businesses of surrounding mountains. The proposed medical marijuana cultivation facility will fully occupy a newly proposed facility that would be below allowed height limits and is not expected to affect long-range views from the surrounding areas. Staff recommends this finding.

10. *That the proposed use is necessary and essential to the community.*

The proposed addition of distribution to the medical marijuana cultivation facility can be considered necessary and essential to the community to the extent that it is supported by customers that cause it to succeed as a local commercial/industrial business. Further, the proposed use must also operate under City regulations and conditions of approval so that only the necessary and essential elements of the business – as determined by the City – are expressed over the life of the business. Staff recommends this finding.

11. *That the proposed use is consistent with applicable goals and policies of the General Plan.*

Staff has identified the following General Plan goals and policies applicable to the application and provides responses to each.

Administration

Goal: Comprehensive and integrated administration and implementation of all elements of the Desert Hot Springs General Plan through consistent and effective policies and programs.

The City has adopted a zoning ordinance to implement the General Plan and provide for review and approval of individual development projects. The proposed medical marijuana cultivation facility will be subject to all requirements of this Conditional Use Permit, as prescribed by the Zoning ordinance and the adopted conditions of approval.

Policy 7: The City shall encourage in-fill development within already urbanized areas of the corporate boundaries of the City, and expansion of new development shall be logically phased and, as appropriate, guided by the development of existing and new Specific Plans.

The proposed medical marijuana cultivation facility will be located on an undeveloped parcel zoned I-L (Light Industrial). No specific plan has been adopted for the subject property.

Policy 8: City shall provide opportunities for review and comment on development proposals through public hearing notices sent to owners of property located at least within 300 feet of development proposal sites.

Prior to Planning Commission review of the requested amendment to the approved Conditional Use Permit, notice of the proposed medical marijuana cultivation facility amendment to the conditional use permit hearing was provided to property owners within 300 feet of the proposed site. In addition, a public hearing before the Planning Commission has in fact been held where persons were provided a meaningful opportunity to be heard.

Industrial Land Use

Goal: Lands that provide for the development of non-polluting, energy-related and other clean industrial development that broadens the economic and employment base of the City, and assures compatible integration with other, non-industrial land uses.

The amended use to the Conditional Use Permit will have no change to the proposed medical marijuana cultivation facility in that it will be a clean industrial development and will expand the economic and employment base of the community by the products it will offer and transport to dispensaries throughout the State of California and the new employees that will be hired. The proposed cultivation facility will operate with security and environmental measures that will assure its compatibility with all surrounding uses.

Policy 2: Industrial lands shall be located in areas that maximize all available and planned infrastructures including but not limited to; water and sewer service, electric and natural gas service, major transportation corridors, which should minimize the impact on public health and safety.

The project site is currently undeveloped vacant land and is not served by existing utilities. The amendment to the proposed project would connect to existing infrastructure located along Little Morongo Road, which border the project site along its western boundary. The amendment to proposed project would also improve the southern one-half of Hacienda Avenue from Little Morongo Road for the entire length of the proposed facility. The proposed project would also install a new 12-inch water main along the entire length of the project parcel along its northern boundary. A review of the proposed amendment to the project indicates that no significant impact on public health and safety will occur.

Policy 4: The City of Desert Hot Springs shall seek to attract appropriate industrial users for which the area is particularly suited and encourage those industries to take advantage of the local labor force and markets with which the City has a comparative advantage.

The City has adopted policies and standards to encourage the development of a medical marijuana cultivation industry. The applicant's proposed amendment to the cultivation facility is in conformance with these policies and standards and is expected to take advantage of the local labor force and markets.

Policy 6: The City shall require adherence to applicable development standards and guidelines to assure aesthetically acceptable industrial developments for all new industrial sites.

The proposed amendment to the project has been reviewed against applicable local development standards and guidelines. The proposal has been determined to meet these standards and guidelines or conditions have been imposed to assure that the project conforms.

Community Design

Goal 2: Variety of community design, architecture, and landscaping compatible with the City's desert setting and surrounding development.

The proposed amendment to the project would build a one story steel-frame facility compatible with the visual character of light industrial zones in the City. A landscaping plan has been created that is compatible with the City's desert setting and enhances the view of the project site from public viewpoints along Little Morongo Road and Hacienda Avenue. The proposed amendment to the project would landscape areas along the perimeter of the project site between Little Morongo Road and Hacienda Avenue and the proposed facility. The landscaping plan has been reviewed by staff to assure compatibility.

Policy 1: Private and public-sector development projects shall equally apply City community design standards, thereby protecting the community's scenic viewsheds, providing community cohesion and enhancing the image of Desert Hot Springs as a resort residential community.

The proposed amendment to project would be located within a partially developed area with a light industrial zoning and General Plan designation southeast of the intersection of Little Morongo Road and 13th Avenue/Hacienda Avenue. Existing land uses in the vicinity of the project area include Little Morongo Road and rural residential to the west, vacant land and the Upper Mission Creek/Big Morongo Canyon Conservation Area to the north and east, and vacant land to the south. The visual character of the district can be described as an industrial setting with parcels of undisturbed vacant land. The Proposed Project property has distant and partially obstructed views of the Santa Rosa Mountains toward the south, the San Jacinto Mountains to the southwest, and the San Bernardino Mountains to the northwest. Distant and unobstructed views of the Little San Bernardino Mountains are also available from the project site to the north. No designated scenic vistas are in the vicinity of the project site. The proposed project consists of an industrial steel-framed facility with a maximum height of approximately 34 feet. The proposed amendment to the project features would blend with the existing setting and are not anticipated to adversely alter the existing viewsheds of any scenic vistas.

Policy 9: Signs shall be limited to the minimum size, scale and number needed to provide functional identification and exposure necessary to convey messages, while minimizing impacts on traffic safety, streetscape, and scenic viewsheds.

No signs are approved as part of this Conditional Use Permit. All exterior signs were reviewed and approved under a separate application as in conformance with the Desert Hot Springs Zoning Code, including limitations on size, scale, and number. The code does not permit signs to exceed the height of existing construction which will result in no impacts on scenic viewsheds. No exposed neon shall be used for signs or window graphics.

Policy 10: Lighting shall be limited to the minimum height, number, and intensity of fixtures needed to provide security and identification in residential, commercial and industrial development, taking every reasonable measure to preserve the community's night skies.

The proposed amendment to the project has no impact on the requirement that exterior lighting shall comply with Section 17.40.170 (Outdoor Lighting) to assure that only the minimum level of lighting necessary to provide the needed security is installed. All proposed exterior lighting shall be reviewed by staff for conformance to the applicable standards. Therefore, the proposed medical marijuana cultivation facility is taking reasonable steps to preserve the night skies.

Economic Development:

Goal 1: A broadly based, healthy, and balanced economy that provides a full range of economic and employment opportunities.

The proposed medical marijuana cultivation facility, with added distribution will expand the type of commercial/industrial services available in the community and provide opportunities for new employment and business support services.

Goal 2: Continued growth, which assures the maintenance of a revenue base adequate to support present and future public services and facilities needs.

Allowing distribution to the medical marijuana cultivation facility and will provide additional tax and fee revenues to the City to support present and future public needs.

Policy 11: Make every effort to expedite the processing of development proposals, which address the economic development goals of the community and take the initiative to incubate new programs and projects.

The application to amend a Conditional Use Permit is required by the Desert Hot Springs zoning code to assure compatibility with surrounding land uses and to develop project-specific conditions to assure successful operation in concert with the City's development goals. The application was received on and deemed complete on July 20, 2017. Since receiving final submittals in July of 2017, staff has processed the application expeditiously.

Hazardous and Toxic Materials

Goal: The assured safety of City of Desert Hot Springs residents and visitors through the regulation of the manufacture, transport, use and disposal of toxic and hazardous materials.

The proposed amendment adding distribution does not add any hazardous or toxic materials. All such materials associated with the approved operation shall be regulated by the provisions of all applicable law, including the Desert Hot Springs Municipal Code, including Section 5.50 (Medical Marijuana Facilities Regulatory Permit), Section 17.40 (Property Development Standards) and Section 17.180 (Medical Marijuana Facilities Location).

Fire and Police Protection

Goal: A high level of police and fire protection and service.

A security plan has been developed for the proposed project, which incorporates the packaging and distribution area. Consequently, the proposed medical marijuana cultivation facility is not expected to demand a high level of police and fire protection services.

Policy 1: All new and improved developments shall be reviewed for their impact on safety and the provision of police and fire protection services.

The proposed amendment application and associated regulatory permits will include requirements for review of the proposed operation by City police and fire services. Any identified impacts on safety will be addressed by conditions of approval or regulatory requirements.

Policy 2: Enforce fire standards and regulations in the course of reviewing facility plans and conducting facility inspections.

All project plans, which will include the distribution and packaging area will be subject to review and enforcement under fire codes and regulations. The project is consistent with the applicable goals and policies of the General Plan. Staff recommends this finding.

12. That there will not be significant harmful effects upon environmental quality and natural resources.

The proposed amendment to the marijuana cultivation facility allowing distribution facility would be located on a property with a Light Industrial (I-L) zoning and General Plan land use designation. A cultivation facility that includes distribution is an allowed use within this zoning subject to a Conditional Use Permit. Project operations and distribution of marijuana would be conducted in accordance with the City's regulations and conditions of approval. Consequently, no significant adverse or harmful effects on the environment or on any natural resources are anticipated. Staff recommends this finding.

13. That the negative impacts of the proposed use are mitigated and/or a mitigated negative declaration may be filed.

A Mitigated Negative Declaration was approved for the underlying Conditional Use Permit. Additionally, application to amend the underlying Conditional Use Permit required the applicant to submit a traffic study, which determined that the addition of distribution to the proposed project would not have a significant impact on the environment, with the implementation of mitigation measures. A Mitigation Monitoring Program has been developed for the proposed project which outlines the potential impacts, mitigation measures.

14. That the proposed location, size, design, and operating characteristics of the proposed use would not be detrimental to the public interests, health, safety, convenience, or welfare of the City.

The proposed amendment adding to distribution as an allowable use to the marijuana cultivation facility has been reviewed by City's departments and other public agencies for any potential detrimental effects on public interests, health, safety, convenience or welfare of the City. Any potential concerns have been addressed by recommended conditions of approval, and no unresolved concerns remain. Staff recommends this finding.

In reviewing this application, plans, documents, and other supporting information, staff has determined that the Planning Commission can make these findings.

FISCAL IMPACT

The project has paid all fee associated with the amendment and will be required to pay all fees assessed at issuance of building permit.

ENVIRONMENTAL ANALYSIS

In accordance with the provisions of the California Environmental Quality Act ("CEQA"), an Initial Study has been prepared and which determined that development of the proposed project would not have a significant impact on the environment, with the implementation of mitigation measures. A Mitigated Negative Declaration is proposed and contains mitigation measures to minimize potential significant impacts to biological and cultural resources to a less than significant level. The Mitigated Negative Declaration was approved concurrent with the underlying Conditional Use Permit 14-16.

RECOMMENDATION

Staff is adding two conditions of approval in regards to the existing power pole on Hacienda Avenue and the applicants desire to take access off Hacienda Ave. These conditions can be found in the attached conditions of approval.

Staff recommends approval of the Amendment to Conditional Use Permit No.14-16 allowing distribution activities within the previously approved cultivation facility, subject to the attached conditions of approval, the mitigation measures outlined in the underlying MND, and the subsequent traffic study and the findings contained herein.

EXHIBIT(S)

1. New Conditions of Approval
2. Explanation Memo to the City about Distribution
3. Color Site / Floor Plan
4. Revised Floor Plans
5. Traffic Study