

**SUBDIVISION
AND
DEVELOPMENT APPEAL BOARD
AGENDA**

**Thursday, 10:30 A.M.
January 9, 2020**

**Hearing Room No. 3
Churchill Building,
10019 - 103 Avenue NW,
Edmonton, AB**

**SUBDIVISION AND DEVELOPMENT APPEAL BOARD
HEARING ROOM NO. 3**

TO BE RAISED

I 9:00 A.M. SDAB-D-19-504

WITHDRAWN

To remove and refrain from parking any commercial vehicles in the required front yard area. Remove and refrain from parking all vehicles exceeding 4600 kg from residential property and refrain from parking vehicles over this weight on the property in the future

7819 – 166 Avenue NW
Project No.: 341851203-003

II 10:30 A.M. SDAB-D-20-003

To leave as built a Semi-Detached House

9717 - 81 Avenue NW
Project No.: 340519935-002

TO BE RAISED

III 1:30 P.M. SDAB-D-19-218

To operate a Major Home Based Business (Landscaping Contractor)

18859 - 122 Avenue NW
Project No.: 147100006-008

NOTE: *Unless otherwise stated, all references to “section numbers” refer to the authority under the Edmonton Zoning Bylaw 12800.*

ITEM II: 10:30 A.M.

FILE: SDAB-D-20-003

AN APPEAL FROM THE DECISION OF THE DEVELOPMENT OFFICER

APPELLANT:

APPLICATION NO.: 340519935-002

APPLICATION TO: Leave as built a Semi-Detached House

DECISION OF THE DEVELOPMENT AUTHORITY: Refused

DECISION DATE: November 19, 2019

DATE OF APPEAL: December 7, 2019

MUNICIPAL DESCRIPTION OF SUBJECT PROPERTY: 9717 - 81 Avenue NW

LEGAL DESCRIPTION: Plan 2700R Blk 55 Lot 14

ZONE: RF3 (Small Scale Infill Development Zone)

OVERLAY: Mature Neighbourhood Overlay

STATUTORY PLAN: Ritchie Neighbourhood Improvement Plan / Area Redevelopment Plan

Grounds for Appeal

The Appellant provided the following reasons for appealing the decision of the Development Authority:

The Development officer decision is prejudicial. The Applicant is willing to address any concerns the development officer may have in granting the decision. The area is high density area and require housing.

General Matters

Appeal Information:

The *Municipal Government Act*, RSA 2000, c M-26 states the following:

Grounds for Appeal

685(1) If a development authority

- (a) fails or refuses to issue a development permit to a person,
- (b) issues a development permit subject to conditions, or
- (c) issues an order under section 645,

the person applying for the permit or affected by the order under section 645 may appeal to the subdivision and development appeal board.

Appeals

686(1) A development appeal to a subdivision and development appeal board is commenced by filing a notice of the appeal, containing reasons, with the board,

- (a) in the case of an appeal made by a person referred to in section 685(1)
 - (i) with respect to an application for a development permit,
 - (A) within 21 days after the date on which the written decision is given under section 642, [...]

Hearing and Decision

687(3) In determining an appeal, the subdivision and development appeal board

...

- (a.1) must comply with the land use policies;
- (a.2) subject to section 638, must comply with any applicable statutory plans;
- (a.3) subject to clauses (a.4) and (d), must comply with any land use bylaw in effect;
- (a.4) must comply with the applicable requirements of the regulations under the *Gaming, Liquor and Cannabis Act* respecting the location of premises described in a cannabis licence and distances between those premises and other premises;

...

- (c) may confirm, revoke or vary the order, decision or development permit or any condition attached to any of them or make or substitute an order, decision or permit of its own;

- (d) may make an order or decision or issue or confirm the issue of a development permit even though the proposed development does not comply with the land use bylaw if, in its opinion,
 - (i) the proposed development would not
 - (A) unduly interfere with the amenities of the neighbourhood, or
 - (B) materially interfere with or affect the use, enjoyment or value of neighbouring parcels of land,
 - and
 - (ii) the proposed development conforms with the use prescribed for that land or building in the land use bylaw.

General Provisions from the *Edmonton Zoning Bylaw*:

Under section 140.2(7), **Semi-detached Housing** is a **Permitted Use** in the **(RF3) Small Scale Infill Development Zone**.

Under section 7.2(7), **Semi-detached Housing** means:

development consisting of a building containing two principal Dwellings joined in whole or in part at the side or rear with neither of those Dwellings being placed over another in whole or in part. Each principal Dwelling has separate, individual, and direct access to ground level. This type of development is designed and constructed as two Dwellings at the time of initial construction of the building. This Use does not include Duplexes.

Section 140.1 states that the **General Purpose** of **(RF3) Small Scale Infill Development Zone** is “to provide for a mix of small scale housing.”

Section 814.1 states that the **General Purpose** of the **Mature Neighbourhood Overlay** is:

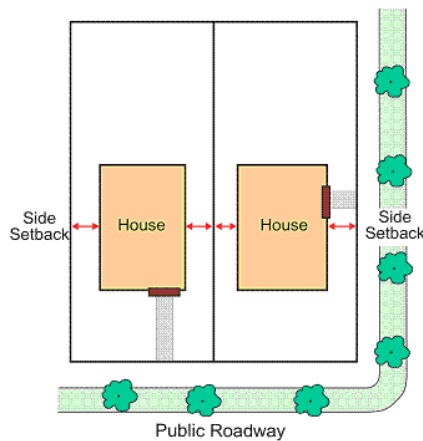
to regulate residential development in Edmonton’s mature residential neighbourhoods, while responding to the context of surrounding development, maintaining the pedestrian-oriented design of the streetscape, and to provide an opportunity for consultation by gathering input from affected parties on the impact of a proposed variance to the Overlay regulations.

Side Setback

Section 814.3(3)(a) states “where the Site Width is 12.0 m or less, the minimum required setback shall be 1.2 m.”

Under section 6.1, **Side Setback** means:

the distance that a development or a specified portion of it, must be set back from a Side Lot Line. A Side Setback is not a Side Yard, Amenity Space or Separation Space.



Development Officer’s Determination

The minimum required Side Setback shall be 1.2 m. (Reference Section 814.3(3).(a.))

Existing: 0.7 m

Deficient by: 0.5 m [unedited]

Community Consultation

Section 814.5(1) states the following with respect to Proposed Variances:

When the Development Officer receives a Development Permit Application for a new principal building, or a new Garden Suite that does not comply with any regulation contained within this Overlay, or receives a Development Permit for alterations to an existing structure that require a variance to Section 814.3(1), 814.3(3), 814.3(5) and 814.3(9) of this Overlay:

- a. the Development Officer shall send notice, to the recipient parties specified in Table 814.5(2), to outline any requested

variances to the Overlay and solicit comments directly related to the proposed variance;


- b. the Development Officer shall not render a decision on the Development Permit application until 21 days after notice has been sent, unless the Development Officer receives feedback from the specified affected parties in accordance with Table 814.5(2); and
- c. the Development Officer shall consider any comments directly related to the proposed variance when determining whether to approve the Development Permit Application in accordance with Sections 11.3 and 11.4.

Section 814.5(2) states:

Tier #	Recipient Parties	Affected Parties	Regulation of this Overlay to be Varied
Tier 3	The municipal address and assessed owners of the land Abutting the Site of the proposed development and the President of each Community League	The assessed owners of the land Abutting the Site of the proposed development	814.3(3) – Side Setbacks

Notice to Applicant/Appellant

Provincial legislation requires that the Subdivision and Development Appeal Board issue its official decision in writing within fifteen days of the conclusion of the hearing.

	<h2 style="margin: 0;">Application for Minor Development Permit</h2>	Project Number: 340519935-002 Application Date: SEP 23, 2019 Printed: November 19, 2019 at 11:04 AM Page: 1 of 2
This document is a Development Permit Decision for the development application described below.		
Applicant	Property Address(es) and Legal Description(s) 9717 - 81 AVENUE NW Plan 2700R Blk 55 Lot 14	
	Specific Address(es) Suite: 1, 9717 - 81 AVENUE NW Suite: 2, 9717 - 81 AVENUE NW Entryway: 1, 9717 - 81 AVENUE NW Entryway: 2, 9717 - 81 AVENUE NW Building: 1, 9717 - 81 AVENUE NW	
Scope of Application To leave as built a Semi-Detached House.		
Permit Details		
# of Dwelling Units Add/Remove: 0 # of Secondary Suite Dwelling Units To Construct: Client File Reference Number: Minor Dev. Application Fee: Leave as Built Single Detached House Secondary Suite Included?: N	# of Primary Dwelling Units To Construct: Class of Permit: Class B Lot Grading Needed?: New Sewer Service Required: N/A Stat. Plan Overlay/Annex Area: Mature Neighbourhood Overlay	
I/We certify that the above noted details are correct. Applicant signature: _____		
Development Application Decision Refused Issue Date: Nov 19, 2019 Development Authority: FOLKMAN, JEREMY Reason for Refusal The minimum required Side Setback shall be 1.2 m. (Reference Section 814.3(3).(a.)) Existing: 0.7 m Deficient by: 0.5 m Rights of Appeal The Applicant has the right of appeal within 21 days after the date on which the decision is made, as outlined in Section 683 through 689 of the Municipal Government Act.		
Fees		
Dev. Application Fee	Fee Amount \$167.00	Amount Paid \$167.00
		Receipt # 06161066
		Date Paid Sep 23, 2019
THIS IS NOT A PERMIT		



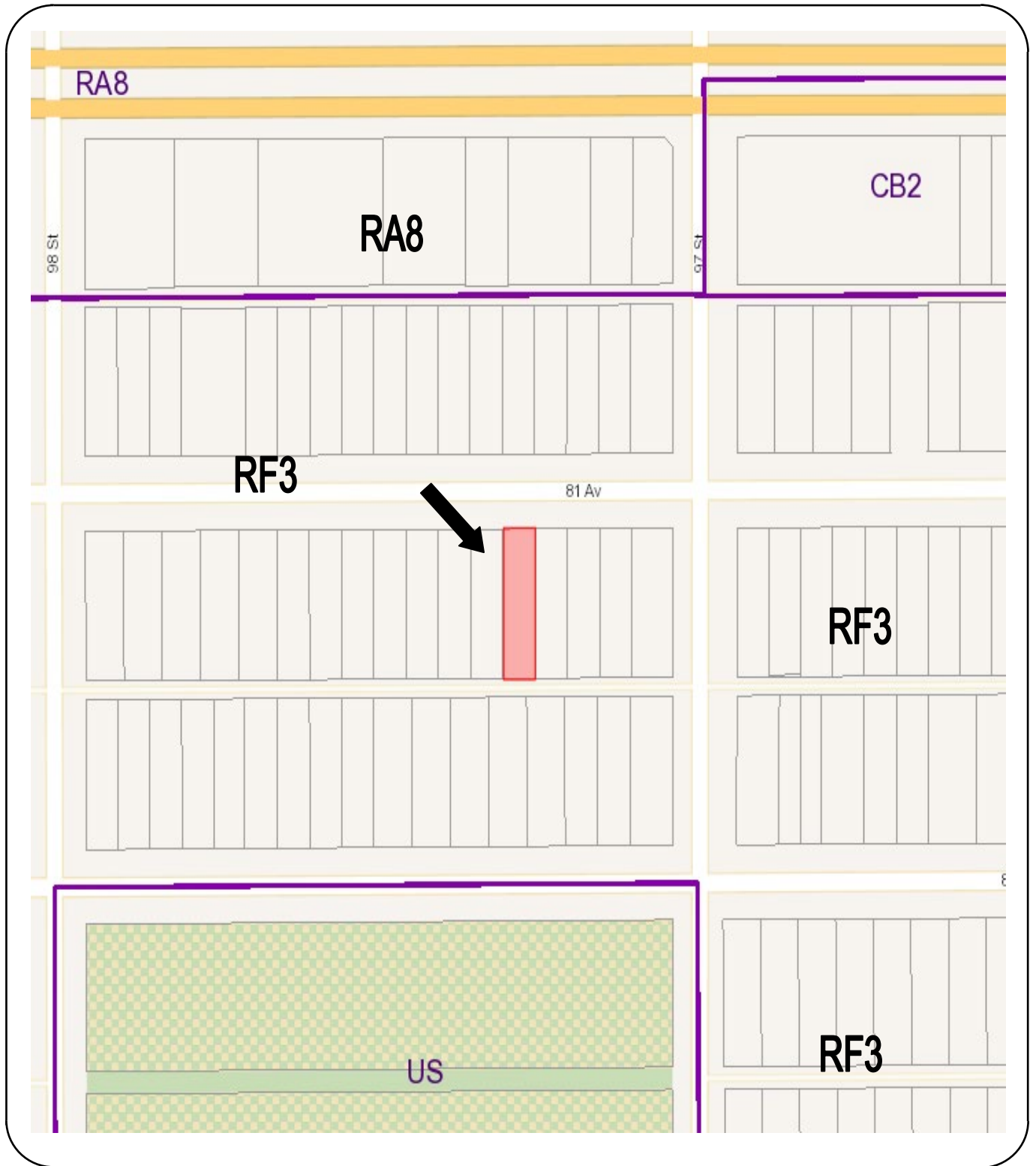
Application for Minor Development Permit

Project Number: **340519935-002**
Application Date: SEP 23, 2019
Printed: November 19, 2019 at 11:04 AM
Page: 2 of 2

Fees

	Fee Amount	Amount Paid	Receipt #	Date Paid
Total GST Amount:	\$0.00			
Totals for Permit:	\$167.00	\$167.00		

THIS IS NOT A PERMIT



SURROUNDING LAND USE DISTRICTS

Site Location ←

File: SDAB-D-20-003



TO BE RAISED

ITEM III: 1:30 P.M.

FILE: SDAB-D-19-218

AN APPEAL FROM THE DECISION OF THE DEVELOPMENT OFFICER

APPELLANT:

APPLICATION NO.: 147100006-008

APPLICATION TO: Operate a Major Home Based Business
(Landscaping Contractor)

DECISION OF THE DEVELOPMENT AUTHORITY: Refused

DECISION DATE: October 1, 2019

DATE OF APPEAL: October 13, 2019

MUNICIPAL DESCRIPTION OF SUBJECT PROPERTY: 18859 - 122 Avenue NW

LEGAL DESCRIPTION: Plan 8922437 Blk 8 Lot 3

ZONE: DC2.369 Site Specific Development Control Provision

OVERLAY: N/A

STATUTORY PLAN: Kinokamau Plains Area Structure Plan

Grounds for Appeal

The Appellant provided the following reasons for appealing the decision of the Development Authority:

Primarily the main reason I am appealing this decision is so that I can continue my work and business unhindered. My last appeal before the board 5 years ago, a decisions as made to allow me to continue in business. I also at the same time was working to bring my property's curb appeal up to speed with the rest of the community. There were a number of complaints about the materials or equipment in my yard but the complainants were unaware of some of the issues I was dealing with on my property. (I.e.) water issues with the well, etc. I am a hard working one man operation and although a bit disorganized, I have endeavoured to keep everyone happy. My equipment (bobcats, etc) have

been borrowed by a number of my neighbors to assist with snow removal and other needs. So that many of my neighbors seem quite satisfied with my presence here. I will probably be in business only another 2 or 3 years so I am asking for an extension for my development permit and will conduct myself in a way that is acceptable to all. I'm asking the appeal board to overrule that decision so that I can move along. Because of Alberta's economy at this present time for me to look for and pay for a commercial site is not feasible or practical. Because I only have a 6 month window within which to operate, the ability to keep my own house in order has been challenging. Thank you for your consideration.

<i>General Matters</i>

Appeal Information:

The Board is advised that the appeal hearing was scheduled for January 9, 2020 at the request of the Appellant and with the consent of the Development Officer.

The *Municipal Government Act*, RSA 2000, c M-26 states the following:

Grounds for Appeal

685(1) If a development authority

- (a) fails or refuses to issue a development permit to a person,
- (b) issues a development permit subject to conditions, or
- (c) issues an order under section 645,

the person applying for the permit or affected by the order under section 645 may appeal to the subdivision and development appeal board.

Appeals

686(1) A development appeal to a subdivision and development appeal board is commenced by filing a notice of the appeal, containing reasons, with the board,

- (a) in the case of an appeal made by a person referred to in section 685(1)
 - (i) with respect to an application for a development permit,
 - (A) within 21 days after the date on which the written decision is given under section 642, [...]

685(4) Despite subsections (1), (2) and (3), if a decision with respect to a development permit application in respect of a direct control district

- (a) ...

- (b) is made by a development authority, the appeal is limited to whether the development authority followed the directions of council, and if the subdivision and development appeal board finds that the development authority did not follow the directions it may, in accordance with the directions, substitute its decision for the development authority's decision.

Section 2 of the *Edmonton Zoning Bylaw* concerning Repeal, Enactment and Transition Procedures states the following:

- 2.4 Subject only to the provisions in the Municipal Government Act respecting legal non-conforming Uses and notwithstanding the effect it may have on rights, vested or otherwise, the provisions of this Bylaw govern from the Effective Date onward. In particular, no application for a Development Permit shall be evaluated under the procedural or substantive provisions of the previous Land Use Bylaw after the Effective Date, even if the application was received before the Effective Date.

...

- 2.6 Any Direct Control Districts that were in effect immediately prior to the Effective date are hereby deemed to continue in full force and effect and are hereby incorporated into Part IV of this Bylaw.

- 2.7 Unless there is an explicit statement to the contrary in a Direct Control District or Provision, any reference in a Direct Control District or Direct Control Provision to a land use bylaw shall be deemed to be a reference to the land use bylaw that was in effect at the time of the creation of the Direct Control District or Provision.

At the time of the creation of the subject Direct Control Site, the *City of Edmonton Land Use Bylaw 5996* was in effect. An Alberta Court of Appeal decision in *Parkdale-Cromdale Community League Association v. Edmonton (City)*, 2007 ABCA 309 concluded that section 2.7 of the *Edmonton Zoning Bylaw* only applies if there is an express cross-reference in a Direct Control Bylaw passed before 2001 to a provision of the old *Land Use Bylaw*. In the absence of an express reference in the Direct Control Bylaw to the *Land Use Bylaw 5996*, it does not prevail over section 2.4 of the *Edmonton Zoning Bylaw*.

General Provisions from the *Edmonton Zoning Bylaw 12800*:

Section 3.2(1) provides the following with respect to ***Provisions for existing Development Permits and Direct Control Provisions***:

For the purpose of any Development Permit or Direct Control Provision:

...

- c. Major Home Occupation or Homecraft is deemed to be Major Home Based Business.

...

General Provisions from the DC2.369 Site Specific Development Control Provision:

Under section DC2.369.3.d, **Major Home Occupations** is a **listed Use** within the **DC2.369 Site Specific Development Control Provision**.

Section DC2.369.5.b states “Major Home Occupations shall be in accordance with Section 85 of the Land Use Bylaw.”

Section DC2.369.4.k states “Development in this District shall be evaluated with the respect to compliance with the General Development Regulations of Sections 50 to 79 inclusive of the Land Use Bylaw.”

Section DC2.369.1 states that the **General Purpose** of the **DC2.369 Site Specific Development Control Provision** is:

To establish a Site Specific Development Control District to accommodate rural residential development on lots a minimum of 0.4 ha in size, without the full range of piped urban utility services. The proposed District provides an interim solution to fulfil City Council's directive that Mooncrest Park be designated as a residential development, recognizing the current rural unserved nature of the area and the long term likelihood of neighbourhood area structure plans being prepared for the Mooncrest Park Subdivision and adjacent areas, as proposed in the Kinokamau Plains Servicing Concept Design Brief.

General Provisions from the Land Use Bylaw 5996:

Under section 10.2(6), **Major Home Occupation** means:

development consisting of the use of an approved Dwelling or accessory building by a resident of that Dwelling for one or more business(es) which business(es) may generate more than one (1) business associated visit per day. The business use must be secondary to the residential use of the building and shall not change the residential character of the Dwelling and/or accessory building. The Dwelling may be used as a workplace by a non-resident. This Use Class includes Bed and Breakfast operations but does not include General Retail Sales or Professional Offices.

Major Home Occupation regulations

Section 85 of the *Land Use Bylaw 5996* states a Major Home Occupation shall comply with the following regulations:

- 1) there shall be no exterior display or advertisement other than an identification plaque or sign a maximum of 20 cm (8") x 30.5 cm (12") in size located on the Dwelling;
- 2) **there shall be no mechanical or electrical equipment used which creates external noise, or visible and audible interference with home electronics equipment in adjacent Dwellings;**
- 3) **the Major Home Occupation shall not, in the opinion of the Development Officer, generate pedestrian or vehicular traffic, or parking, in excess of that which is characteristic of the District in which it is located;**
- 4) the number of non-resident employees or business partners working on-site shall not exceed two (2) at any one time;
- 5) there shall be no outdoor business activity, or outdoor storage of material or equipment associated with the business. Indoor storage related to the business activity shall be allowed in either the Dwelling or accessory buildings;
- 6) the Major Home Occupation shall not change the principal character or external appearance of the Dwelling or accessory buildings;
- 7) a Bed and Breakfast Operation, operating as a Major Home Occupation shall have a maximum of two (2) Sleeping Units. Cooking facilities shall not be located within the Sleeping Units. In addition to any other parking requirements of this Bylaw, one additional parking space shall be provided for each Sleeping Unit;
- 8) in addition to the information requirements of Section 15.1 of this Bylaw, each application for a Development Permit for the Use Class Home Occupation, Major shall include a description of the business to be undertaken at the premise, an indication of the number of business visits per week, provision for parking, and where any materials or equipment associated with the business use are to be stored; and
- 9) **the Major Home Occupation shall not be allowed if, in the opinion of the Development Officer, such use would be more appropriately located in a Commercial or Industrial District having regard for the overall compatibility of the use with the residential character of the area.**

Development Officer's Determination

DC2.369.5 - The Major Home Occupation is not in accordance with Section 85 of the Edmonton Land Use Bylaw 5996 at the time the Direct Control Provisions were passed for the following reasons:

1. Land Use Bylaw 85(2) - There shall be no mechanical or electrical equipment used which creates external noise, or visible and audible interference with home electronics equipment in adjacent Dwellings

- Overweight commercial truck driving on and off the property generates external noise, which can create interference with adjacent Dwellings.

2. Land Use Bylaw 85(3) - the Major Home Occupation shall not, in the opinion of the Development Officer, generate pedestrian or vehicular traffic, or parking, in excess of that which is characteristic of the District it is located in.

- Although commercial vehicles proposed to be stored in Accessory Building (Quonset), the access to the storage area is through a residential area. Over time the weight of the commercial vehicles may damage the roads and access onto property.

3. Land Use Bylaw 85(9) - the Major Home Occupation shall not be allowed if, in the opinion of the Development Officer, such use would be more appropriately located in a Commercial or Industrial District having regard for the overall compatibility of the use with the residential character of the area.

- Commercial vehicles are not suited to be stored in residential area and is more suited for Commercial/Industrial zoning.

Objects Prohibited or Restricted in Residential Zones / Districts

Section 45(1)(a) of the *Edmonton Zoning Bylaw 12800* states "No person shall keep in any part of a Site in any Residential Zone any commercial vehicle, loaded or unloaded, having a maximum gross vehicle weight (G.V.W.R.) exceeding 4 600 kg."

Section 55(1)(a) of the *Land Use Bylaw 5996* states "No person shall keep in any part of a site in any Residential District: any commercial vehicle, loaded or unloaded, of a maximum gross vehicle weight (G.V.W.) exceeding 4 500 kg (9,920 pounds)."

Development Officer's Determination

4. Section 45(1)(a) - No person shall keep in any part of a Site in any Residential Zone, any commercial vehicle having a maximum gross vehicle weight (GVWR) exceeding 4,600 kg


- Business proposes to store 2 bobcats, a 2014 Durastarr Truck and a 16 foot hydraulic dump trailer.


Previous Subdivision and Development Appeal Board Decisions

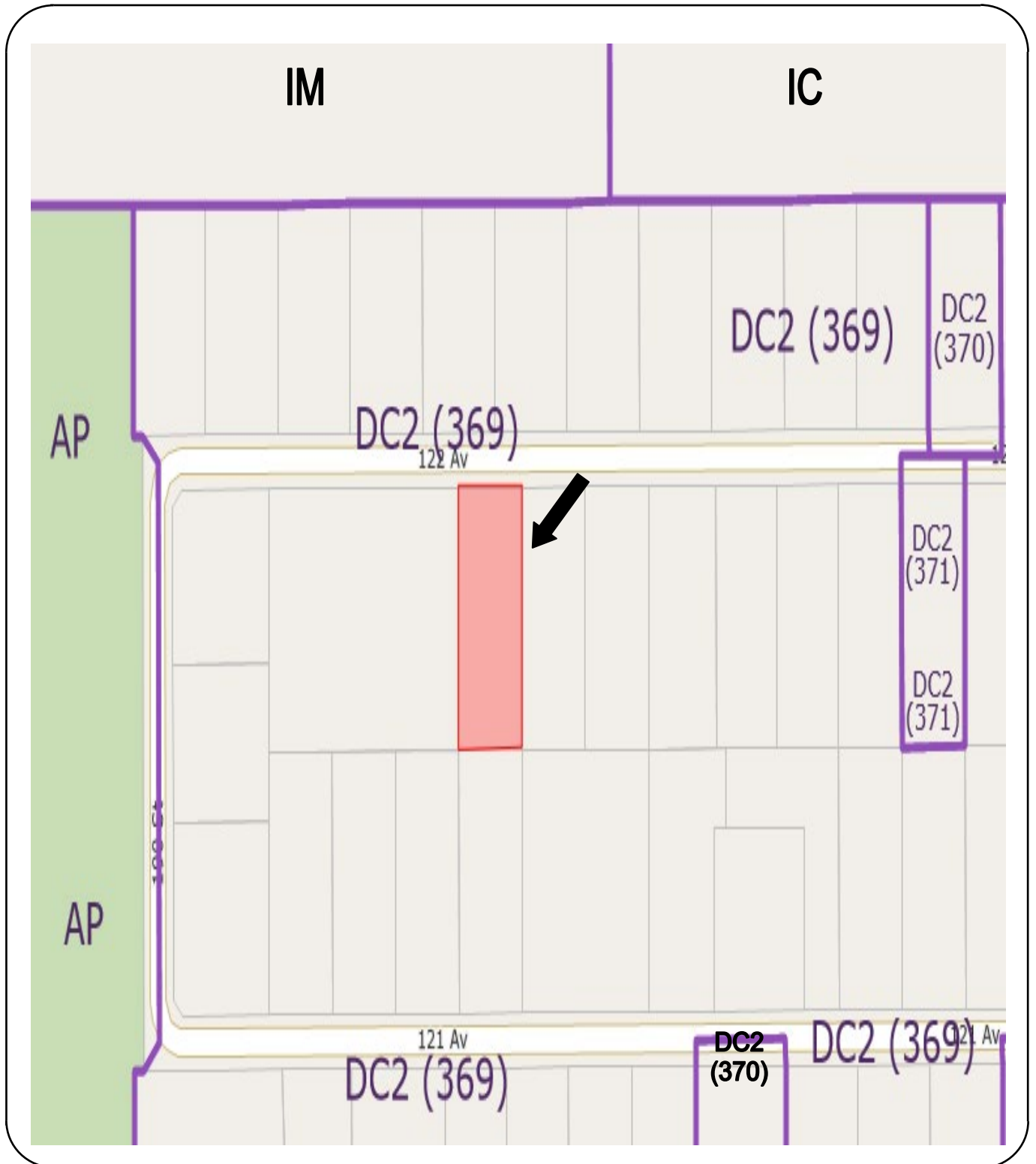
Application Number	Description	Decision
SDAB-D-14-094	Operate a Major Home Based Business (Landscaping Contractor)	April 24, 2014; the appeal be DENIED and the decision of Approval by the Development Authority CONFIRMED.
SDAB-D-06-061	Construct an Accessory Building (Shed - 9.14 metres by 15.24 metres)	April 7, 2006; the appeal be ALLOWED and the DEVELOPMENT GRANTED.

Notice to Applicant/Appellant

Provincial legislation requires that the Subdivision and Development Appeal Board issue its official decision in writing within fifteen days of the conclusion of the hearing.

	<h2 style="margin: 0;">Application for Home Occupation</h2>	Project Number: 147100006-008 Application Date: MAY 29, 2019 Printed: October 15, 2019 at 11:12 AM Page: 1 of 2
This document is a Development Permit Decision for the development application described below.		
Applicant	Property Address(es) and Legal Description(s) 18859 - 122 AVENUE NW Plan 8922437 Blk 8 Lot 3	
Scope of Application To operate a Major Home Based Business (Landscaping Contractor)		
Permit Details		
# of business related visits/day: 0 Administration Office Only?: Y Class of Permit: Do you live at the property?: Y Outdoor storage on site?: Y	# of vehicles at one time: 0 Business has Trailers or Equipment?: Y Description of Business: Administration office for landscaping contractor and equipment storage. Expiry Date:	
I/We certify that the above noted details are correct. Applicant signature: _____		
Development Application Decision Refused Issue Date: Oct 01, 2019 Development Authority: HETHERINGTON, FIONA		
THIS IS NOT A PERMIT		

	<h2 style="margin: 0;">Application for Home Occupation</h2>	<p>Project Number: 147100006-008 Application Date: MAY 29, 2019 Printed: October 15, 2019 at 11:12 AM Page: 2 of 2</p>																				
<p>Reason for Refusal</p> <p>DC2.369.5 - The Major Home Occupation is not in accordance with Section 85 of the Edmonton Land Use Bylaw 5996 at the time the Direct Control Provisions were passed for the following reasons:</p> <ol style="list-style-type: none"> 1. Land Use Bylaw 85(2) - There shall be no mechanical or electrical equipment used which creates external noise, or visible and audible interference with home electronics equipment in adjacent Dwellings <ul style="list-style-type: none"> - Overweight commercial truck driving on and off the property generates external noise, which can create interference with adjacent Dwellings. 2. Land Use Bylaw 85(3) - the Major Home Occupation shall not, in the opinion of the Development Officer, generate pedestrian or vehicular traffic, or parking, in excess of that which is characteristic of the District it is located in. <ul style="list-style-type: none"> - Although commercial vehicles proposed to be stored in Accessory Building (Quonset), the access to the storage area is through a residential area. Over time the weight of the commercial vehicles may damage the roads and access onto property. 3. Land Use Bylaw 85(9) - the Major Home Occupation shall not be allowed if, in the opinion of the Development Officer, such use would be more appropriately located in a Commercial or Industrial District having regard for the overall compatibility of the use with the residential character of the area. <ul style="list-style-type: none"> - Commercial vehicles are not suited to be stored in residential area and is more suited for Commercial/Industrial zoning. 4. Section 45(1)(a) - No person shall keep in any part of a Site in any Residential Zone, any commercial vehicle having a maximum gross vehicle weight (GVWR) exceeding 4,600 kg <ul style="list-style-type: none"> - Business proposes to store 2 bobcats, a 2014 Durastarr Truck and a 16 foot hydraulic dump trailer. 																						
<p>Rights of Appeal</p> <p>The Applicant has the right of appeal within 21 days after the date on which the decision is made, as outlined in Section 683 through 689 of the Municipal Government Act.</p>																						
<p>Fees</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;"></th> <th style="width: 15%; text-align: right;">Fee Amount</th> <th style="width: 15%; text-align: right;">Amount Paid</th> <th style="width: 10%; text-align: right;">Receipt #</th> <th style="width: 10%; text-align: right;">Date Paid</th> </tr> </thead> <tbody> <tr> <td>Dev. Application Fee</td> <td style="text-align: right;">\$321.00</td> <td style="text-align: right;">\$321.00</td> <td style="text-align: right;">05881950</td> <td style="text-align: right;">May 29, 2019</td> </tr> <tr> <td>Total GST Amount:</td> <td style="text-align: right; border-top: 1px solid black;">\$0.00</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Totals for Permit:</td> <td style="text-align: right; border-top: 1px solid black; border-bottom: 1px solid black;">\$321.00</td> <td style="text-align: right; border-top: 1px solid black; border-bottom: 1px solid black;">\$321.00</td> <td></td> <td></td> </tr> </tbody> </table>				Fee Amount	Amount Paid	Receipt #	Date Paid	Dev. Application Fee	\$321.00	\$321.00	05881950	May 29, 2019	Total GST Amount:	\$0.00				Totals for Permit:	\$321.00	\$321.00		
	Fee Amount	Amount Paid	Receipt #	Date Paid																		
Dev. Application Fee	\$321.00	\$321.00	05881950	May 29, 2019																		
Total GST Amount:	\$0.00																					
Totals for Permit:	\$321.00	\$321.00																				
<p>THIS IS NOT A PERMIT</p>																						



SURROUNDING LAND USE DISTRICTS

Site Location ←

File: SDAB-D-19-218

