Exhibit B to PLN190072 Staff Report BEFORE THE PLANNING COMMISSION OF THE COUNTY OF SAN BENITO

Resolution No. 2020-

A RESOLUTION OF THE SAN BENITO COUNTY PLANNING COMMISSION APPROVING COUNTY FILE PLN190072: A USE PERMIT FOR AN AGRICULTURAL TOURISM OPERATION INCLUSIVE OF A RETAIL AND SITDOWN BAKERY VENUE AND RESTAURANT, BEER PRODUCTION AND DISTRIBUTION, PATIO DINING AND OUTDOOR GATHERING AREAS, AND GIFT SHOP. THE USE PERMIT WOULD INCLUDE FARM-TO-TABLE BANQUETS, BEER AND WINE TASTING, VARIOUS PUBLIC AND PRIVATE GATHERINGS AND EVENTS THAT MAY INCLUDE USE OF THE OUTSIDE GROUNDS AND ACOUSTIC OR AMPLIFIED MUSIC. 6310 SOUTHSIDE ROAD, HOLLISTER, CA, ASSESSOR'S PARCEL NUMBER 025-430-004.

WHEREAS, David and Lisa Jensen (Suncoast Organic Farms) filed an application on December 4, 2019 to establish a year-round agricultural tourism operation, inclusive of retail and sit-down bakery venue and restaurant, beer production and distribution, patio dining and outdoor gathering areas, gift shop, and include farm-to-table banquets, beer and wine tasting, various public and private gatherings and event activities that may include acoustic or amplified music; and

WHEREAS, the proposed facilities is to be sited on the 21.23-acre property west of Tres Pinos and South of Hollister along Southside Road (APN 025-430-004); and

WHEREAS, the subject parcel has a General Plan designation of (A) Agriculture and a zoning designation of AP Agricultural Productive; and

WHEREAS, the proposed project is consistent with the area's Agriculture (A) land use designation in the General Plan in that it meets or fulfills LU-3.1 Agricultural Diversification, LU-3.2 Agricultural Integrity, LU-3.4 Lower-Impact Agricultural Practices, LU-3.5 Locally Grown and Produced Food, LU-3.6 Agricultural Support Services, and LU-3.7 Visitor Serving Uses in Agricultural Areas, and

WHEREAS, the proposed project is consistent with policies of the Economic Development Element in that it meets or fulfills ED-1.6 Agricultural Base Diversification, ED-2.1 Business Expansion, ED-4.1 Wine and Hospitality Combining District, ED-5.4 Destination Attractions and; in that the propose use is an entrepreneurial diversification that increases economic viability and resilience of the applicants' farming operation, qualifies as an agricultural support use, and attracts and serves visitors to the County by marketing the agricultural character of the area, and;

WHEREAS, the proposed project is consistent with the parcel's Agricultural Productive (AP) designation under the County's zoning ordinance, in that the project qualifies as a commercial recreational use, as a permanent stand for the sale of agricultural products, or similar (§25.07.005(I) Commercial recreational uses, including but not limited to RV parks, hunting clubs and riding clubs; §25.07.005(K) Permanent stands for the sale of agricultural products; and §25.07.005(Z) Uses similar to the above as determined by the Planning Commission), and;

- **WHEREAS**, the County assessed the potential for any substantial effect on the environment for the project consistent with the California Environmental Quality Act (CEQA), and found the project exempt from the requirements of that statute; and
- **WHEREAS**, County staff received the proposal as Use Permit PLN190072 and distributed this plan to responsible County and peer agencies for review and comment; and
- **WHEREAS,** the subject parcel is the location for Suncoast Organic Farms bakery agritourism operation and the applicants has had the Suncoast Organic Bakery operations under a Rural Home Enterprise (RHE) (09-13) since April 22, 2009, on the proposed subject parcel; and
- **WHEREAS,** the business's popularity has resulted in "out-growing" the Rural Home Entreprise; and
- **WHEREAS,** the applicants proposal is to bring into compliance all Suncoast Organic Farm current operations, and extending agritourist operations year-round to include more food items at Suncoast Organic Bakery, Suncoast Brew production and distribution, beer garden, gift shop, and farm-to-table/event activities; and
- WHEREAS, no adverse effects have been observed in the last 10 years under the Rural Home Enterprise permit for the bakery activities, nor has any of the bakery activities caused any damage, hazard, or nuisance to persons or property; despite being monitored for safety and security by law enforcement, fire, environmental health personnel, and engineering personnel; and
- **WHEREAS**, on February 19, 2020, the Planning Commission in considering Use Permit PLN190072 heard and received all oral and written testimony and evidence that was made, presented, or filed, and all persons present were given an opportunity to hear and be heard with respect to any matter related to the petition; and
- **WHEREAS,** at the conclusion of the public testimony, the Planning Commission closed the public hearing, deliberated, and considered the merits of the proposal.

NOW THEREFORE BE IT RESOLVED that based on the evidence in the record, the Planning Commission of the County of San Benito hereby finds as follows:

California Environmental Quality Act (CEQA) Finding

Finding: In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15074, the Planning Commission considered the comments received during the public review process prior to approving the project, and finds, on the basis of the whole record before it, that the proposed project is Categorically Exempt under CEQA Guidelines Sections 14 C.C.R. §15301 (a, d, and e), §15303(c and e), § 15304(a and b), and §15323.

Evidence: Section 15301(a, d, and e) Existing Facilities exemptions consist of "the operation, repair, maintenance, permitting... or minor alterations of existing public or private structures." The existing agritourism facility includes a range of small existing accessory structures. These were previously permitted and are allowed by right under AP zoning. Under this determination

for a use permit the project would continue to operate and maintain the previously permitted accessory structures.

Evidence: Section 15303(c and e) New Construction or Conversion of Small Structures exemptions consists of "a store, motel, office, restraint or similar structure not involving the use of significant amounts of hazardous substances, and not exceeding 2,500 square feet in floor area" and "accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences." One bakery has been approved by the County Building Department and is permitted by right as an accessory structure in areas with an Agriculture land use designation. New Construction exempts large accessory structures, a determination that is consistent with regional practice.

Evidence: Section, 15304(e) Minor Alterations of Land exemptions consist of "minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees," including "grading on a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated scenic area, or in officially mapped areas of severe geologic hazard" and "new gardening or landscaping." No trees were removed under the rural home enterprise permit, and no mature scenic trees are proposed to be removed for this use permit or any associated activities. Only minor alterations of the land were required for the establishment of the Suncoast Organic Bakery and Suncoast Nuthouse Brew.

Evidence: Section 15323 Normal Operations of Facilities for Public gatherings consists of "the normal operations of existing facilities for public gatherings for which the facilities were designed, where there is a past history of the facility being used for the same or similar kind of purpose." The uses being proposed include a past history of existing on the premises as far as the bakery operations, and the new operations being proposed do not warrant a significant change.

Finding: No significant impact from the project as conditioned, as to noise or traffic.

Evidence: The project is conditioned to set standards as specified in San Benito County Code § 19.39 Noise Control Regulations and § 25.37.035 Noise Level Standards. As project is conditioned for special events for more than 50 people to provide traffic control.

BE IT FURTHER RESOLVED, by the Planning Commission of the County of San Benito that it hereby finds as follows:

Use Permit Findings

Finding 1: That the proposed use is properly located in relation to the General Plan, and the community as a whole and to other land uses, transportation, and service facilities in the vicinity.

Evidence: This project conforms to the General Plan's Agriculture (A) land use designation for this area and contributes to its implementation. The primary purpose of this land use category is to "maintain the productivity of agricultural land," and "allows agricultural support uses" necessary to maintain existing farm operations through their continued development and diversification. The proposed project qualifies as an agricultural support use in that Suncoast Organic Farm and Suncoast Nuthouse Brew operations generates revenue sufficient to maintain the economic viability of the applicant's farming operation.

Evidence: The project is properly located in relation to the General Plan, to the community as a whole, and to other land uses. The subject property is surrounded by large fields kept in row crops, vineyards, and orchards year-round—the proper location for an agritourism/event center, offering as context an ideal and culturally appropriate rural landscape, at some distance from the few residences in the area.

Evidence: The project is sited along Southside Road just west of Airline Highway (HWY 25), and properly located in relation to transportation infrastructure and service facilities. Ambulance response times are about 15 minutes, and the site is well-served and/or easily accessed by fire and law enforcement services.

Finding 2: That the proposed use, if it complies with the conditions upon which approval is made contingent, will not adversely affect other properties in the vicinity or cause any damage, hazard or nuisance to persons or property.

Evidence: The proposed use is located within a primarily agricultural land use context with few residential neighbors nearby.

Evidence: No noise complaints or disturbances at this site, nor safety issues, have been reported by neighbors or property owners in the vicinity.

Evidence: No adverse effects have been observed under the Rural Home Enterprise permits for the same activities proposed here, on the same site, nor has the proposed activities believe to cause any damage, hazard, or nuisance to persons or property.

Evidence: The County agencies are aware of events to be monitored for safety and security by law enforcement, fire, engineering personnel, environmental health, and related responsible agencies for ten years at this location.

Evidence: County departments and responsible agencies have reviewed the application and recommended conditions of project approval to address possible effects on the vicinity and the overall County general public and to prevent hazard or nuisance to persons and property.

Conditions of Approval

1. Indemnification: APPLICANT shall defend, indemnify, and hold San Benito County, its agents, officers, and/or employees (hereinafter "COUNTY") free and harmless from any and all suits, fees, claims, demands, causes of action, proceedings (hereinafter collectively referred to as "Legal Action"), costs, losses, damages, liabilities and expenses (including, but not limited to, an award of attorneys' fees, expert witness fees, and court costs) incurred by COUNTY arising (directly or indirectly) or resulting from the review, processing, consideration, or approval of APPLICANT'S Project or action taken by COUNTY thereon, including Legal Actions based on the negligence of COUNTY. APPLICANT will reimburse COUNTY for any damages, costs, or fees awarded pursuant to any settlement, default judgment, or other judgment taken against the County, whether the result of Applicant's decision not to defend Legal Action or otherwise. COUNTY retains its discretion to direct counsel regarding whether to defend, settle, appeal, or take other action regarding any Legal Action. APPLICANT shall defend COUNTY'S actions with competent legal counsel of APPLICANT's choice without charge to COUNTY, subject to COUNTY approval, which shall not be unreasonably withheld. Nothing contained in the foregoing, however, shall be construed to limit the discretion of COUNTY, in the interest of the public welfare, to settle, defend, or appeal, or to decline settlement or to terminate or forego defense or appeal of a Legal Action.

Furthermore, in no event shall COUNTY have any obligation or liability to APPLICANT in connection with COUNTY'S defense or prosecution of litigation related to the Project (including, but not limited to, the outcome thereof) or in the event COUNTY elects not to prosecute a case or defend litigation brought against it. If either COUNTY or APPLICANT determines in good faith that common counsel presents a bona fide conflict of interest, then COUNTY may employ separate counsel to represent or defend the COUNTY, and APPLICANT shall pay the reasonable attorneys' fees and costs of such counsel within thirty (30) days of receiving an itemized billing statement or statements. [Planning]

- 2. Successors in Interest: The conditions of approval are binding on all successors in interest of Applicant, whether succession is by agreement, operation of law, or other means, including but not limited to all future owners utilizing this use permit. [Planning]
- **3. Agreement with All Conditions of Approval:** Prior to or upon approval by the Planning Commission, Applicant shall sign the statement below certifying that Applicant is in agreement with all conditions of approval. [Planning]

	by the Planning Commission, or Board of Supervisors as applicable, on this Permit		
b.	Applicant Signature:		
c.	Date:		

a. I certify that I understand and agree to comply with all Conditions of Approval imposed

- **4. Compliance Documentation:** Compliance Documentation: Prior to issuance of building permits, the applicant shall submit a summary response in writing to these conditions of approval documenting compliance with each condition, including dates of compliance and referencing documents or other evidence of compliance. [Planning]
- 5. Conformity with Plan: The development and use of the site shall conform substantially to the proposed project description, site plan, and conditions of approval as approved by the Planning Commission. Any increase in the nature or intensity of land use on the site beyond that already analyzed shall be subject to further Planning review and approval. Approved plans and specifications shall not be substantially changed, modified or altered without written authorization from the Planning Department. All work shall be in accordance with the approved plans and with San Benito County Code. [Planning]

Attractions and Operations		Utilities and Structures	
Existing:	New:	Existing:	New:
-Bakery/retail/patio	-Expand bakery to	-Bakery/commercial kitchen/deli	-Design modifications
area with 50 seats	include more food and	-Bakery retail	for cold storage for
-Olive orchard with	drink options	-Offices and public restroom	kitchen expansion
400 olive trees	-Beer Garden	-Bakery exterior covered patio	-Design modifications
	-Store	-Cold storage and proposed	of garage for future
	-Farm-to-table	kitchen expansion	winery and brewery
	dinners/event activities	-Storage shed and proposed ADA	production and storage
		restrooms	-Design modifications
		-Detached garage and proposed	to greenhouse for
		winery and brewery production	future storage
		and storage	-Design modifications
		-Greenhouse and proposed	for future winery and
		storage	brewery production and
		-Barn and future winery and	retail tasting
		brewery production and retail	-Future exterior "beer
		tasting	garden" patio for new
		-ADA Ramp	winery and brewery
		-Electricity/solar panels	service
		-Bathrooms / Septic	-area for overflow
		-Shade Structures	parking upon future
		-Water Storage Tanks of almost	expansion
		15,000 gallons	-Future exterior patio
		-Paved parking, entrance, and	and deck area
		round-a-bout	-Future live
		-Gravel exit	entertainment stage

OPERATIONS AND DEVELOPMENT PLAN TIMELINE:

Approval of this project would permit the applicant to host the following activities year-round:

- Suncoast Organic Bakery and Restaurant
- Suncoast Nuthouse Brew production and distribution
- Beer Garden
- Store
- Special Events: farm-to-table dinners, and similar one-off events

All seating occupancy is located outside on outdoor patio seating.

Phased Operations

Phase 1 To Start Immediately: Occupancy 50 people

The main goal of phase 1 is to bring into compliance all Suncoast Organic Farm business operations and future activity. The bakery currently has an open retail area with no seating and a patio area that has 50 seats. Occupancy of seating varies from 30 -70 percent during current business activity on Fridays and Saturdays.

New activity for Phase 1 will include the startup of Suncoast Nuthouse Brew production and distribution in pole barn (E) with no public accessibility. This will allow us to work out all operational activity and troubleshoot production issues that can arise. Product will be packed in cans and growlers for purchase with their bakery item.

Additional ADA improvements listed on site plan as items (22) and (25) pedestrian access and painting handicap parking.

Phase 2 May start within first year: Occupancy 60 people

This phase consists of construction and implementation of the beer garden. This will include the addition of two ADA compliant unisex restrooms and the installation of the taproom to serve beer and wine. This will provide room for additional six seats and a bar for patrons to walk up and order beer and wine. The property improvements to pave the access approach at the south exit. All building plans to be provided for building permits.

Phase 3 May start within two years' time: Occupancy 120 people

Restoration of site plan item (K) storage shed gift shop. At this time all engineered designed plans will be provided for building permits. There will be no seating, only roughly 12'x 32' or 384 square feet. There will be a building addition of a 20' x 60' carport for the storage of farm equipment, and the installation of additional solar on roof as part of this phase. The plans will be submitted at that time.

• Farm to Table/Event Activity:

Design and development of 20' x 60' shade structure (26). Design of this structure may influence the dimension to add aesthetics and style to this structure. Initially this could be a temporary event tent or canopy that will provide seating for 100 customers. During large events of 50-100 customers, this will be the only business activity. Suncoast Bakery and Nuthouse Brew would be closed to the public to support the private event. Hours of operation for events would only be between 9am to 9pm Thursday through Saturday and 9am to 6pm on Sundays or similar days and times. All event activity will end by 9pm. This structure will also provide an overflow area for the bakery patio and beer garden.

Permanent structure will be dependent on business growth and revenue at that point architectural drawings and engineering will be provided.

• Overflow Parking:

An addition of 43 parking spots on decomposed granite marked on site plan as item (18).

Phase 4 5-10 years

The last phase is contingent on the growth of Suncoast Organic Farm business success.

A new 1,169 square foot Brewhouse (R), restoration of the walnut drying barn for the move from pilot brewery pole barn (E). Architectural and engineering for restoration of walnut processing barn (R) will be provided. Occupancy will be determined at that time

Expansion of the commercial kitchen to area (J). Architectural drawings and engineering will be provided at that time.

Ongoing/Continuous Operations

Signage: Any signage would be subject to County Code.

Dark Skies Rules: Night-time lighting may be limited (pointed down, shielded) to maintain

rural feel, night vision, &etc. (w/exceptions for safety).

Amplified Music: Allowed inside. Allowed outdoors, but subject to County Code § 19.39 Noise Control Regulations and § 25.37.035 Noise Level Standards maximum permissible sound pressure levels for Land Use designation Agricultural Productive for Noise Level (dBA) of 45 at Day and 35 at Night (Day and Night as defined per County Code § 19.39), measured at property line and to not extend past 9 p.m.. As conditioned there no significant this meets and exceeds Noise Control Regulations.

- **6.** Notice of Determination (Fish & Game Fees): The applicant/owner shall be required to file a CEQA exemption for the project. The notice shall be provided by the County Planning Department and filed with the County Clerk within five (5) days of approval of the project. An administrative fee of \$50.00 shall be submitted to the Planning Department for the filing of the notice. Check shall be made to the County of San Benito [Planning/CDFW]
- 7. Cultural Resources: If, at any time in the preparation for or process of excavation or otherwise disturbing the ground, discovery occurs of any human remains of any age, or any significant artifact or other evidence of an archeological site, the applicant or builder shall:
 - a. Cease and desist from further excavation and disturbances within two hundred feet of the discovery or in any nearby area reasonably suspected to overlie adjacent remains.
 - b. Arrange for staking completely around the area of discovery by visible stakes no more than ten feet apart, forming a circle having a radius of not less than one hundred feet from the point of discovery; provided, however, that such staking need not take place on adjoining property unless the owner of the adjoining property authorizes such staking. Said staking shall not include flags or other devices which may attract vandals.
 - c. Notify the Sheriff-Coroner of the discovery if human and/or questionable remains have been discovered. The Resource Management Agency Director shall also be notified.
 - d. Subject to the legal process, grant all duly authorized representatives of the Coroner and the Resource Management Agency Director permission to enter onto the property and to take all actions consistent with Chapter 19.05 of the San Benito County Code and consistent with §7050.5 of the Health and Human Safety Code and Chapter 10 (commencing with §27460) of Part 3 of Division 2 of Title 3 of the Government Code. [Planning]

Planning:

- **8. Title Report:** The applicant shall submit a Title Report prior to obtaining any permits on-site that verify legal description of parcel and existing easements and right-of-way.
- 9. ABC License: The applicant/owner shall apply for, obtain, and maintain compliance with Type 23 (or similar) ABC License from the State of California Department of Alcoholic Beverage Control, and provide documentation to the Planning Director of any ABC licenses and license renewals.
- **10. Traffic Control:** The applicant shall, at the discretion of County Engineer, provide traffic control and directing measures at Phase 3 private events during periods prior to event start time / arrival of customers and end time of event / departure of customers, for those larger events that exceed 50 customers.

Division of Environmental Health:

- 11. Hazardous Materials: The owner has indicated there will be no storage of any hazardous material in the quantities as stipulated by the Hazardous Materials Business Plan (HMBP). This department has no further comment at this time, but reserves the right to make comment if there are any changes to the proposed project. [Environmental Health]
- 12. Sewage Disposal: The existing septic system for the Bakery appears adequate for the proposed Restaurant/Bakery. The owner will install the Big Dipper grease trap as required. Note, a new septic system, as designed by San Benito Engineering, will be implemented for Phase II of this project. This proposed system will serve the proposed Beer Brewing/Processing Structure and the two proposed ADA restrooms for the proposed Beer Garden. This department has no further comment at this time, but reserves the right to make comment if there are any changes to the proposed project. [Environmental Health]
- 13. Water: SWRCB Division of Drinking Water, subject to C.C.R. Title 22, states that the proposed Restaurant/Bakery does not meet the definition of a "Public Water System" and the existing water system is adequate for the current use. However, the SWRCB will reevaluate the current water system prior to completion of Phase II beer garden. Prior to opening of the beer garden at phase II, applicant shall supply letter from SWRCB for the water system clearance. This department has no further comment at this time, but reserves the right to make comment if there are any changes to the proposed project. [Environmental Health/SWRCB Division of Drinking Water]
- **14. Food/Beverage Service Tasting Room Restrictions:** The owner states that all food items will be only provided and served at the proposed Restaurant/Bakery area. Patrons will be required to consume their alcoholic beverages with any purchased food items from the Restaurant/Bakery in the designated outdoor dining area and/or proposed Beer Garden in Phase II. This department has no further comment at this time, but reserves the right to make comment if there are any changes to the proposed project.
- **15. Commercial Retail Food/Beverage Facilities:** A food facility inspection of the site was conducted on January 21, 2020. Upon completion of some corrections/upgrades, the existing Bakery is approved to be reclassified as a standing Restaurant/Bakery and will no longer be under the Rural Home Enterprise regulations. All requirements stipulated under the California

Retail Food Code (CRFC) shall apply to this food facility. This department has no further comment at this time, but reserves the right to make comment if there are any changes to the proposed project.

Public Works:

- **16. Right of Way:** The applicant shall be required to record easement in a form satisfactory to County Counsel, that includes an irrevocable offer of dedication for half of an 110-foot right of way (fifty-five feet) along the property frontage on Southside Road, presently designated as an arterial in the County General Plan.
- 17. Improvement Plan: The applicant shall enter into a deferred improvement agreement with the County, in a form satisfactory to County Counsel, to install half of road 94-foot AC on 96-foot roadbed along the property frontage on Southside Road, or such lesser improvements as the County may require when making future improvements to Southside Road, road section fronting the property.
- **18.** Access: Prior to completion of Phase II, the applicant shall be required to improve the existing driveway approaches (entrance and exit) to County standards, per County standard detail (detail of which is available at RMA-PW office) and said approaches shall be paved, at the minimum from the existing edge of pavement on Southside Road to the right-of-way limit line.
- **19. Encroachment Permit:** The applicant shall obtain an Encroachment Permit, Pursuant to \$19.27.004 of the County Code, for any work being performed within the County Right-of-Way, and for any road section offered for dedication to the County prior to commencement of any improvements associated with this project.
- 20. Drainage & Erosion Control: The applicant shall comply with County Drainage and Erosion Control Standards, shall provide a more detailed exhibit showing but not limited to the following:
 - a. Drainage: Show how the runoff from the site is being controlled and directed to either an existing or proposed storm drainage system with supporting documentation as to the adequacy of the system to handle project runoff resulting from impervious surfaces that had been created by the existing improvements as well as by the proposed improvements as part of this project prior to building permit issuance.
 - b. Erosion Control Plans indicating proposed methods for the control of runoff, erosion and sediment control prior to building permit issuance.

Fire Department:

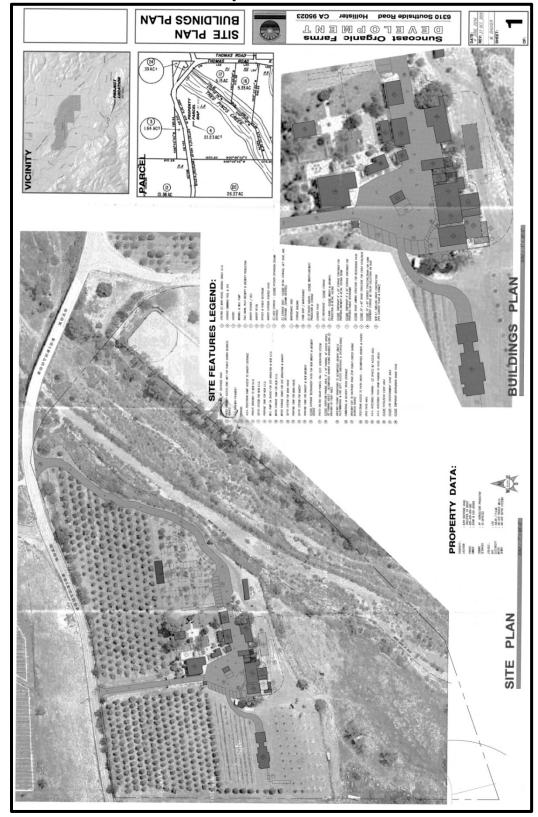
- **21. Access Road:** The project's southern exit shall meet Fire access road standard width requirement of 20 feet. [Fire, Public Works]
- 22. Approach: The project requires to make following improvements to the southern exit approach and shall be paved to meet Public Works and Fire safety requirements prior to completion of Phase II. [Fire, Public Works]
- **23. Knox Key and Box:** The project requires knox key switch to be added at southern exit gate and knox box to be added at building. [Fire]
- **24. Fire Hydrant:** The project requires to make following improvements and add (1) Fire Hydrant at south part of property, exact location to be determined by Fire Marshall. [Fire]

- **25. Sprinkler System:** The project requires to make following improvements to the sprinkler system and extend/add sprinklers to new proposed business. [Fire]
- **26. Fire Proofing:** The project requires that the temporary tents to be fire proof and shall meet all fire life safety requirements, exits, electrical, and fire extinguishers. [Fire]

PASSED AND ADOPTED BY THE PLANNING COMMISSION OF THE COUNTY OF SAN BENITO THIS $19^{\rm TH}$ DAY OF FEBRUARY 2020 BY THE FOLLOWING VOTE:

AYES: NOES:	
ABSENT: ABSTAIN:	
	Valerie Egland, Chair San Benito County Planning Commission
	San Beinto County Framming Commission
ATTEST:	
AIIESI.	
Taven M. Kinison Brown, Pr Resource Management Agenc	

Attachment 1. Suncoast Organic Farms Proposed Site Plan County File PLN190072



Attachment 2. Suncoast Organic Farms Proposed Circulation Plan County File PLN190072

