



October 10, 2018

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Re: Marin County Local Coastal Program amendments

Dear Planning Commissioners:

The Environmental Action Committee of West Marin (EAC) submits the following comments regarding the Marin County (County) Planning Commission's recommendations to the Board of Supervisors concerning the proposed amendments and modifications to the certified County Local Coastal Program (LCPA), specifically Amendments Nos. 3 and 7, Land Use Plan Policy C-PK-3 and related Local Coastal Program (LCP) Map changes.

Since 2008, we have been actively involved in the County's LCP amendment process, participating in both County and Planning Commission public hearings. Our mission is to protect and sustain the unique lands, waters, and biodiversity of West Marin.

As our past comments indicate, we are not in favor of the piecemeal approach that the County has taken to the amendments. It is our perspective that the LCP amendments should have either been accepted or rejected in full this past

April. However, in the interest of moving forward, we are supportive of the County's efforts to continue the LCPA process and to include the Planning Commission, which has an important role to play in modifications to the LCPA, portions of which are part of the Development Code.

We do have a number of concerns related to the proposed language contained in the County's staff report prepared for the Planning Commission's October 11, 2018 hearing. In the interest of efficiency and moving this process forward, we focus on four main concerns related to County staff-proposed language that is 1) inconsistent with the Coastal Act, 2) inconsistent with the past certifications and revised findings of the California Coastal Commission (Coastal Commission) and/or 3) inconsistent with the Coastal Commission's past actions since 2014. We have included a table (*attached as Table 1*) with suggested proposed language for your consideration and review. Below, we provide the analysis which supports these suggested language modifications following the order of the County staff report. Our recommendations are intended to modify the County staff-proposed language to avoid adverse impacts to coastal resources, and to ensure consistency with the Coastal Act.

I. EAC's First Concern

AMENDMENT 3

3.1 Definition of **Ongoing Agriculture**

County staff-proposed revision:

~~“Examples of activities that are NOT considered ongoing agriculture but are not limited to:”~~

The proposed changes to the definition of ongoing agriculture contradict the Coastal Commission's July 2017 Revised Findings, adopted by the Coastal Commission in July 2017,¹ and are inconsistent with the Coastal Act. For instance, striking through “Examples of activities that are NOT considered ongoing agriculture but are not limited to:” directly contradicts the Coastal Commission's July 2017 Revised Findings, which addressed this issue and specifically rejected the County's prior attempts to say that the first six bullet points are the entire list of activities that are *not* ongoing agriculture. The July 2017 Revised Findings state: “The Commission finds that the six County-enumerated activities do not comprise the universe of activities requiring a CDP. Therefore, the Commission has conditionally certified a suggested modification converting the enumerated listing to a listing that is illustrative.”²

¹ Coastal Commission, *STAFF REPORT ADDENDUM for F11a Marin County Local Coastal Program Amendment Number LCP-2-MAR-15- 0029-1 Revised Findings (Marin LCP Update Revised Findings)*, July 13, 2017, available at: <https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/newdocs/ccr-revised-findings-staff-report-and-addendum-71417.pdf?la=en>

² See *id.* at page 32.

County staff-proposed revision:

- Other agricultural production activities that the Director of CDA determines will have significant impacts to coastal resources

Furthermore, the addition of the seventh bullet (“Other agricultural production activities that the Director of CDA [Community Development Agency] determines will have significant impacts to coastal resources”) is problematic in several respects. First, “other agricultural production activities” is not defined, so it is unclear what activities it includes. Second, it is inconsistent with the permit administration provisions of Amendment 6 (*Permit Administration*).³ Pursuant to 22.68.030, a Coastal Permit is required for development unless the development is categorically excluded, exempt, or qualifies for a *de minimis* permit.⁴ Ongoing agriculture is exempt pursuant to 22.68.050.A.12.⁵ The seventh bullet point implicitly grants the Director of CDA the unilateral authority to make a single finding, that some undefined activity *will not have* significant impacts to coastal resources, and is thus exempt from permit requirement. This authority circumvents the already established *de minimis* permit waiver process provided for in LCPA Amendment 6 (*Permit Administration*), Section 22.68.070, which the Coastal Commission certified in November 2016 and the County Board of Supervisors approved last April.⁶ Section 22.68.070 (*De Minimis Waiver of Coastal Permit*) requires a number of findings including: “**A. No Adverse Coastal Resource Impacts.** The development has no potential for adverse effects, either individually or cumulatively, on coastal resources.”⁷

Further, the County staff-proposed language in bullet 7 is inconsistent with Section 30624.7 of the Coastal Act, which reserves the *de minimis* permit waiver power to the Coastal Commission itself.⁸ The requirements of Section 22.68.070 mirror the provisions of Coastal Act Section 30624.7,⁹ and the Coastal Commission relied on Coastal Act Section 30624.7 in approving and certifying the *de minimis* waiver provision (22.68.070) of LCPA Amendment 6. The provisions of 22.68.070, as described in the July 2017 Revised Findings state:

Finally, Section 22.68.070 includes a “de minimis waiver” procedure that allows the County to waive the requirement for obtaining a CDP [Coastal Development Permit] for certain types of projects and when certain findings are made, including that the project cannot involve potential for adverse effects on coastal resources, must be consistent with the LCP, and cannot be of a type or in a location where the project would be subject to a CDP by the Coastal Commission. The waiver is then also subject to certain procedural requirements, including

³ See Amendment 6 IP SECTIONS RELATED TO PERMIT REQUIREMENTS AND ADMINISTRATION, available at: https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/2018/attach8_amendment_6_permitting_admin.pdf?la=en

⁴ *Id.* at Section 22.68.070.

⁵ *Id.* at Section 22.68.050.A.12.

⁶ See *id.* at Section 22.68.070.

⁷ *Id.*

⁸ See *California Coastal Act*, 2018, Section 30624.7.

⁹ *Id.*

public notice and opportunities for public comment, the concurrence of the Coastal Commission's Executive Director, and a Notice of Final Action sent to the Commission within seven days of waiver issuance.¹⁰

The County's proposed language is attempting to evade the requirements of LCP Amendment 6, Section 22.68.070 by granting the Director of CDA the authority to declare an undefined class of agricultural activity exempt from permit requirements without public notice, the opportunity for public comment, or the concurrence of the Coastal Commission's Executive Director. Neither does the proposed language require the Director of CDA to make the other findings specified in 22.68.070, including that the activity is consistent with other provisions of the LCP, that it would not cumulatively impact coastal resources, and that it is not in a location where it would be appealable to the Coastal Commission. The proposed "significant impacts to coastal resources" language is also materially more permissive than the relevant "potential for adverse impacts" standard in LCP Amendment 6, Section 22.68.070, and Coastal Act Section 30624.7.

We recommend using the language as indicated in the attached *Table 1*.

II. EAC's Second Concern

3.3 "And Necessary for Operation of Agriculture"

22.62.060 – Coastal Agricultural and Resource-Related Districts...

Regarding the County's proposed changes to the language in Section 22.62.060, we support keeping the prior language, which is consistent with Policy C-AG-2A5¹¹, certified by the Coastal Commission (November 2016) and approved by the Board of Supervisors (April 2018). The Coastal Commission specifically considered and rejected the approach suggested by the County's staff report. Other agricultural uses have to be appurtenant and necessary to the operation of agriculture **on the same property** on which development is proposed. The Coastal Commission provided an example of an Other Agricultural Use that is not appurtenant and necessary in their July 2017 Revised Findings:

In order to classify development other than agricultural production itself as a principally permitted use of agricultural land, development must in fact be supporting agricultural production. ... These suggested modifications together will ensure that a cattle rancher, for example, cannot lease a portion of their land to a wine producer who could then turn an existing barn on the property into a

¹⁰ Coastal Commission, *STAFF REPORT ADDENDUM for F11a Marin County Local Coastal Program Amendment Number LCP-2-MAR-15- 0029-1 Revised Findings (Marin LCP Update Revised Findings)*, July 13, 2017, page 17,

available at: <https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/newdocs/ccc-revised-findings-staff-report-and-addendum-71417.pdf?la=en>

¹¹ *LCPA Amendment 2, Land Use Policy for Agriculture*, available at:

https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/2018/attach6_amendment_2_lup_ag.pdf?la=en

wine processing facility because that use is not accessory and incidental to, in support of, compatible with the cattle ranching operation.¹²

We recommend replacing the prior language as indicated in the attached *Table 1*.

III. EAC's Third Concern

AMENDMENT 7

7.6 Service capacity analysis for private wells (Section 22.64.140)

As part of our mission, it is critical to EAC's organizational values that our coastal resources receive the strongest possible protections. We are concerned that the suggested revisions to Section 22.64.140, as well as the County's staff report findings, weaken coastal resource protections by excluding many private wells based on an arbitrary standard that appears to have been pulled from thin air.

County staff-proposed revision:

3) For public water supply projects, projects proposing the subdivision or rezoning of land that would increase the intensity of use, and or projects on developed lots that would increase the amount of water use by more than 50%, ...

Numerous times, going back to 2014, the Coastal Commission has considered and rejected the County's attempts to exempt private wells from required standards. The current County staff recommendation is yet another attempt. The change to 22.64.140.A.1.b(3) suggested by County staff is inconsistent with Policy C-PFS-16(3) of the certified Land Use Policy amendments: "Allow a well only where a finding is made that it will not have adverse direct or cumulative impacts on coastal resources."¹³ In its 2015 consideration of the County's Implementation Plan amendment, the Coastal Commission found that the 300 foot standard for private and public wells ("that the extraction will not adversely impact other wells located within 300 feet of the proposed well") emanated from protections adopted by the Commission in other LCPs in order to assure statewide consistency with the protections of coastal waters and groundwater supplies required by Coastal Act Section 30231, and of coastal resources generally, as required by Coastal Act Section 30250.^{14,15} Although the County withdrew the Implementation Plan amendment

¹² Coastal Commission, *STAFF REPORT ADDENDUM for F11a Marin County Local Coastal Program Amendment Number LCP-2-MAR-15- 0029-1 Revised Findings (Marin LCP Update Revised Findings)*, July 13, 2017, page 25,

available at: <https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/newdocs/ccr-revised-findings-staff-report-and-addendum-71417.pdf?la=en>

¹³ *LCPA Amendment 1, Land Use Plan*, Section Policy C-PFS-16(3), available at: https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/2018/attach5_amendment_1_lup.pdf?la=en

¹⁴ *California Coastal Act*, 2018, Sections 30231 and 30250.

¹⁵ Coastal Commission, *STAFF REPORT ADDENDUM for Th7a Marin County Local Coastal Program Amendment Number LCP-2-MAR-13- 0224-1 Part B (Marin Implementation Plan*

before Coastal Commission action, the 2015 findings are incorporated by reference in the Commission's November 2016 certification of the County's Amendment 7.

The current 1981 LCP also requires a finding of no individual or cumulative adverse impact on coastal resources before a permit can be issued for any well, public or private, as codified in Section 22.56.130I.A.1(d) of the Interim Code. In addition to proposing to weaken the current standard, County staff provides no justification whatsoever for its arbitrary attempt to exclude private well expansions of less than 50% from those standards. It is unclear on what basis the County determined that a 49% expansion of a private well's capacity would certainly have no impact on coastal resources, but a 51% expansion might.

We recommend deleting the County staff-proposed language as indicated in the attached *Table 1*.

IV. EAC's Fourth Concern

7.7 22.64.170 – Parks, Recreation, and Visitor-Serving Uses

C-PK-3 Mixed Uses in the Coastal Village Commercial/Residential Zone (Revised).

Implementation Program Section 22.64.170(A)(3)

3. Mixed uses in coastal village commercial/residential zones.

We agree with Coastal Commission and County staffs that restrictions on residential uses in the C-VCR district should be limited to a commercial core area defined in overlay maps. However, under the County staff-proposed language there will still be two principally permitted uses (PPUs) within one zoning district, making all uses appealable in that district.¹⁶ Perhaps, County staff has misunderstood the Coastal Commission staff's expression of support for maps that depict village commercial core areas¹⁷ as also including support for designating residential use as principally permitted. We suggest revisions to the language in these sections in the attached *Table 1* so that the limitations on residential use will apply only in the commercial core of the C-VCR district and that throughout the district, both within and outside the core, commercial use is the single principal permitted use.

Update), April 15, 2015, page 76, available at:

<https://documents.coastal.ca.gov/reports/2015/4/th7a-4-2015.pdf>

¹⁶ See *Coastal Commission, LCP Update Guide: Part 2 - Updating LCP Implementation Plan (IP) Procedures*, December 28, 2010, page 29, available at:

https://documents.coastal.ca.gov/assets/lcp/IPUpdate/LCP_Update_Guide_Part_II_IP_Full.pdf

“County LCPs must clearly indicate the principal permitted use in each zoning district because every project other than the one principal permitted use in each zoning district is appealable to the Coastal Commission.”

¹⁷ Coastal Commission letter, May 9, 2017, page 8 (Attachment 2 to County staff report, available at: https://www.marincounty.org/-/media/files/departments/cd/planning/local-coastal/planning-commission-oct11/attach_2.pdf?la=en).

V. Conclusion

In conclusion, we hope the Planning Commission values the past decade of work, and strongly urges that the Commission recommend to the Board of Supervisors that the above suggested revisions be made to the amendments before submitting them to the Board and the Coastal Commission. Provided that the suggested revisions are made, we support the LCPA moving forward so we can all begin to reap the benefits of an updated LCP, which will address environmental hazards.

Thank you for considering our comments. We look forward to continuing our long-standing participation in the County's LCP Update and the C-SMART planning process as we move toward the completion of the environmental hazards sections – critical planning tools for our communities to adapt to the impending threats of sea-level rise.

Respectfully,



Morgan Patton
Executive Director



Ashley Eagle-Gibbs
Conservation Director

cc: Brian Crawford, Marin County Community Development Agency Director
Dennis Rodoni, Marin County Supervisor
Jeannine Manna, California Coastal Commission

Table 1 to EAC October 10, 2018 Comments: LCP Amendments
 Planning Commission Meeting Oct. 11, 2018

CDA Staff Report Recommended Language	EAC Recommended Language [Revised text in boldface]
<u>AMENDMENT 3</u>	
3.1 Definition of <u>Ongoing Agriculture</u>	
<p><u>Agriculture, ongoing</u> Agricultural production activities (including crop rotation, plowing, tilling, planting, harvesting, and seeding, <u>grazing, and raising of animals</u>) which have not been expanded into areas never before used <u>areas-for agriculture</u>. Determinations of such ongoing activities may be supported by Marin County Department of Agriculture, Weights and Measures information on such past activities. <u>Examples of activities that Are NOT considered ongoing include but are not limited to: The following types of activities are not considered ongoing agriculture</u></p> <ul style="list-style-type: none"> • Development of new water sources (such as construction of a new or expanded well or surface impoundment), • Installation or extension of irrigation systems, • Terracing of land for agricultural production, • Preparation or planting of land for viticulture, • Preparation or planting of land for cannabis, • Preparation or planting of land with an average slope exceeding 15% • <u>Other agricultural production activities that the Director of CDA determines will have significant impacts to coastal resources.</u> <p>A Coastal Development Permit will not be required if the County determines the activity qualifies for a de minimis waiver pursuant to the requirements Section 22.68.070 or is</p>	<p><u>Agriculture, ongoing</u> Agricultural production activities (including crop rotation, plowing, tilling, planting, harvesting, and seeding, <u>grazing, and raising of animals</u>) which have not been expanded into never before used areas. Determinations of such ongoing activities may be supported by Marin County Department of Agriculture, Weights and Measures information on such past activities. Examples of activities that are NOT considered ongoing include but are not limited to:</p> <ul style="list-style-type: none"> • Development of new water sources (such as construction of a new or expanded well or surface impoundment), • Installation or extension of irrigation systems, • Terracing of land for agricultural production, • Preparation or planting of land for viticulture, • Preparation or planting of land for cannabis, • Preparation or planting of land with an average slope exceeding 15% <p>A Coastal Development Permit will not be required if the County determines the activity qualifies for a de minimis waiver pursuant to the requirements Section 22.68.070 or is categorically excluded pursuant to Categorical Exclusion Order 81-2 or 81-6.</p>

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CDA Staff Report Recommended Language	EAC Recommended Language [Revised text in boldface]
categorically excluded pursuant to Categorical Exclusion Order 81-2 or 81-6.	
3.3 <u>“And Necessary for Operation of Agriculture”</u>	
<p>22.62.060 – Coastal Agricultural and Resource-Related Districts...</p> <p>B.</p> <p>1. C-APZ (Coastal, Agricultural Production Zone) District...</p> <p>d. Other Agricultural Uses, <u>limited to the following uses that are</u> appurtenant and necessary to the operation of agriculture, <u>limited to:</u></p> <ol style="list-style-type: none"> 1. Agricultural product sales and processing of products grown within the farmshed, provided that for sales, the building(s) or structure(s), or outdoor areas used for sales do not exceed an aggregate floor area of 500 square feet, and for processing, the building(s) or structure(s) used for processing activities do not exceed an aggregate floor area of 5,000 square feet; 2. Not for profit educational tours. 	<p>22.62.060 – Coastal Agricultural and Resource-Related Districts...</p> <p>B.</p> <p>1. C-APZ (Coastal, Agricultural Production Zone) District...</p> <p>d. Other Agricultural Uses, appurtenant and necessary to the operation of agriculture, limited to:</p> <ol style="list-style-type: none"> 1. Agricultural product sales and processing of products grown within the farmshed, provided that for sales, the building(s) or structure(s), or outdoor areas used for sales do not exceed an aggregate floor area of 500 square feet, and for processing, the building(s) or structure(s) used for processing activities do not exceed an aggregate floor area of 5,000 square feet; 2. Not for profit educational tours

Table 1 to EAC October 10, 2018 Comments: LCP Amendments
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CDA Staff Report Recommended Language	EAC Recommended Language [Revised text in boldface]
<u>AMENDMENT 7</u>	
<p><u>7.6 Service capacity analysis for private wells (Section 22.64.140)</u></p> <p>22.64.140.A.1.b. An application for new or increased well production shall include a report prepared by State Licensed Well Drilling Contractors, General (Class A License) Engineering Contractors, Civil Engineers, or Geologists which demonstrates, to the satisfaction of the Director, that:</p> <ol style="list-style-type: none"> 1) The sustainable yield of the well meets the LCP-required sustained pumping rate (minimum of 1.5 gallons per minute) and must be equal to or exceed the project’s estimated water demand. 2) The water quality meets safe drinking water standards. 3) <u>For public water supply projects, projects proposing the subdivision or rezoning of land that would increase the intensity of use, and or projects on developed lots that would increase the amount of water use by more than 50%,</u> the extraction will not adversely impact other wells located within 300 feet of the proposed well; adversely impact adjacent biological and hydrogeologically-connected resources including streams, riparian habitats, and wetlands that are located on the subject lot or neighboring lots; and will not adversely impact water supply available for existing and continued agricultural production or for other priority land uses that are located on the subject parcel or served by the same water source. 	<p><u>7.6 Service capacity analysis for private wells (Section 22.64.140)</u></p> <p>22.64.140.A.1.b. An application for new or increased well production shall include a report prepared by State Licensed Well Drilling Contractors, General (Class A License) Engineering Contractors, Civil Engineers, or Geologists which demonstrates, to the satisfaction of the Director, that:</p> <ol style="list-style-type: none"> 1) The sustainable yield of the well meets the LCP-required sustained pumping rate (minimum of 1.5 gallons per minute) and must be equal to or exceed the project’s estimated water demand. 2) The water quality meets safe drinking water standards. 3) The extraction will not adversely impact other wells located within 300 feet of the proposed well; adversely impact adjacent biological and hydrogeologically-connected resources including streams, riparian habitats, and wetlands that are located on the subject lot or neighboring lots; and will not adversely impact water supply available for existing and continued agricultural production or for other priority land uses that are located on the subject parcel or served by the same water source.

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CDA Staff Report Recommended Language	EAC Recommended Language [Revised text in boldface]
<p>7.7 <u>22.64.170 – Parks, Recreation, and Visitor-Serving Uses</u></p>	
<p><u>C-PK-3 Mixed Uses in the Coastal Village Commercial/Residential Zone (Revised).</u></p> <p>Continue to permit a mixture of residential and commercial uses in the C-VCR zoning district to maintain the established character of village commercial areas.</p> <p>Within the mapped village commercial core area of the C-VCR zone Commercial shall be the principal permitted use and Residential shall be a permitted use. In this area Residential uses shall be limited to: (a) the upper floors, and/or (b) the lower floors if not located on the road-facing-side of the property. Residential uses on the ground floor of a new or existing structure on the road-facing side of the property shall only be allowed provided that the development maintains and/or enhances the established character of village commercial areas</p> <p>Outside of the village commercial core area of the C-VCR zone, Residential shall be the principal permitted use, and Commercial shall be a permitted use.</p> <p>Maintenance and repair of any legal existing residential use shall be exempt from the above provision and shall be permitted.</p>	<p><u>C-PK-3 Mixed Uses in the Coastal Village Commercial/Residential Zone (Revised).</u></p> <p>In the C-VCR district, the principal permitted use shall be Commercial. Continue to permit a mixture of residential and commercial uses in the C-VCR zoning district to maintain the established character of village commercial areas.</p> <p>Within the mapped village commercial core area of the C-VCR zone Commercial shall be the principal permitted use and Residential shall be a permitted use. In this area Residential uses shall be limited to: (a) the upper floors, and/or (b) the lower floors if not located on the road-facing-side of the property. Residential uses on the ground floor of a new or existing structure on the road-facing side of the property shall only be allowed provided that the development maintains and/or enhances the established character of village commercial areas</p> <p>Maintenance and repair of any legal existing residential use shall be exempt from the above provision and shall be permitted.</p>
<p><u>Implementation Program Section 22.64.170(A)(3)</u></p>	
<p>3. Mixed uses in coastal village commercial/residential zones.</p> <p>Continue to permit a mixture of residential and commercial uses</p>	<p>3. Mixed uses in coastal village commercial/residential zones.</p> <p>Continue to permit a mixture of residential and commercial uses</p>

Table 1 to EAC October 10, 2018 Comments: LCP Amendments
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<p>in the C-VCR zoning district to maintain the established character of village commercial areas.</p> <p><u>Within the mapped village commercial core area of the C-VCR zone</u> Commercial shall be the principal permitted use of the C-VCR zone and Residential shall be <u>a permitted use allowed in the C-VCR zone subject to all other LCP standards. In this core area</u> Residential uses shall be limited to: (a) the upper floors, and/or (b) the lower floors if not located on the road-facing side of the property within the commercial core area (i.e. the central portion of each village that is predominantly commercial). Residential uses on the ground floor of a new or existing structure on the road-facing side of the property shall only be allowed provided that the development maintains and/or enhances the established character of village commercial core areas</p> <p>...</p>	<p>in the C-VCR zoning district to maintain the established character of village commercial areas.</p> <p>Commercial shall be the principal permitted use and Residential shall be a permitted use. Within the mapped village commercial core area Residential uses shall be limited to: (a) the upper floors, and/or (b) the lower floors if not located on the road-facing side of the property within the commercial core area (i.e. the central portion of each village that is predominantly commercial). Residential uses on the ground floor of a new or existing structure on the road-facing side of the property shall only be allowed provided that the development maintains and/or enhances the established character of village commercial core areas</p> <p>...</p> <p><i>Conform tables 5-4-xxx to show Principal Permitted Use and Permitted Use in C-VCR districts</i></p>
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