



MEMO

DATE: June 28, 2018

TO: Sonoma County Planning Commission

FROM: Amy Lyle and Katie Olding, Permit Sonoma
Tim Ricard, EDB Cannabis Program Manager
Sita Kuteira and Kate Baldrige, County Counsel

SUBJECT: ORD18-0003, Cannabis Ordinance Amendments Part 1

The Planning Commission held a public hearing on June 7, 2018 to consider amendments to the Cannabis Land Use Ordinance. At the conclusion of the hearing the Commission requested staff to provide clarification and additional research on the proposal.

The Board of Supervisors provided direction to move quickly on amendments to alleviate neighborhood compatibility issues by requiring use permits on smaller rural properties and align with state law where appropriate. Part 2 will include a more thorough review of neighborhood compatibility and other implementation efforts and will include robust outreach, data and mapping analysis, and extensive research by staff.

Consistent with the Board's direction the following items requested by the Commission will be further researched during Part 2. We will be scheduling a separate Commission hearing, along with other outreach opportunities, at a later time.

- 1. Cannabis Processing on Agricultural Land:** Staff recommends allowing "processing only" facilities within Industrial Land Uses only at this time. Allowing processing on agricultural lands separate from cultivation requires more research and a close review of General Plan and Area Plan consistency.
- 2. Allowance of More than 1 Acre of Cannabis per Property:** Both the Commission and the Board support the investigation into larger cannabis permits on larger properties. More research and data are required to provide policy options.
- 3. Review of setbacks for cannabis from Rural Residential, Agricultural and Residential, and other excluded Zones:** Current setbacks include 100 feet from property lines and 300 from residences and businesses. Increasing these setbacks requires additional mapping and data that will take time to prepare. There are 5,635 parcels adjacent to zoning districts where cannabis may be permitted. Staff anticipates the issue to vary by neighborhood or zoning district and recommends conducting additional public outreach targeted on this issue. Once mapping and outreach is complete staff will provide the Commission with a full array of feasible options.
- 4. Dispensaries and the Potential Allowance within Industrial Properties:** The Board directed staff to review the dispensary ordinance in more detail within Part 2 including locations and a



review of the number allowed under the cap. This issue was reviewed during the 2016 Ordinance efforts and staff was reluctant to recommend any additional cannabis uses within industrial areas due to the low vacancy rate, which has not changed. According to Keegan & Coppin Company, Inc, there is currently a 4.2% vacancy rate among industrial land, 1.9% in the north corridor (Airport Area, Windsor, and Healdsburg). In addition, at this time the current dispensary cap of 9 has been reached and there isn't a need for additional sites.

NEW POLICY OPTIONS- NEW INFORMATION

The following information and research requested by the Commission are considered "new information" and a public hearing will be required. All comments during the public hearing are limited to the issues of the proposed canopy definition, the definition of non-volatile solvents, and setbacks from public parks.

5. CANOPY DEFINITION AND ALIGNMENT WITH STATE REGULATIONS

The direction of the BOS Cannabis Ad Hoc Committee, and the intent of staff, is to align the measurement of cultivation to the state. The state regulations were amended shortly before the June 7th Commission meeting and a revised definition is proposed as follows:

Current State Emergency Regulation Canopy Definition

"Canopy" means the designated area(s) at a licensed premises, except nurseries and processors that will contain mature plants at any point in time, as follows:

- (1) Canopy shall be calculated in square feet and measured using clearly identifiable boundaries of all area(s) that will contain mature plants at any point in time, including all of the space(s) within the boundaries;*
- (2) Canopy may be noncontiguous but each unique area included in the total canopy calculation shall be separated by an identifiable boundary that includes, but is not limited to, interior walls, shelves, greenhouse walls, hoop house walls, garden benches, hedgerows, fencing, garden beds, or garden plots; and*
- (3) If mature plants are being cultivated using a shelving system, the surface area of each level shall be included in the total canopy calculation.*

Proposed Revised Draft Canopy Definition

"Canopy" means the designated area(s) at a permitted cultivation site that will contain plants at any point in their life stage, as follows:

- (1) Canopy shall be calculated in square feet and measured using clearly identifiable boundaries of all area(s) that will contain plants at any point of their life stage, including all of the space(s) within the boundaries;
- (2) Canopy may be noncontiguous but each unique area included in the total canopy calculation shall be separated by an identifiable boundary that includes, but is not limited to, interior walls, shelves, greenhouse walls, hoop house walls, garden benches, hedgerows, fencing, garden beds, or garden plots; and
- (3) If mature plants are being cultivated using a shelving system, the surface area of each level shall be included in the total canopy calculation.
- (4) An additional area for propagation of seeds, starts, and immature plants up to a maximum of five percent (5%) of the total permitted canopy area may be allowed to support cultivation sites other than nurseries.

Staff proposes adopting a slightly modified version of the state definition of canopy to replace the "Cannabis Cultivation Area" definition within current code. The key differences focus on the County's desire to account for the canopy of all areas where cannabis plants will be grown, not just areas that will contain mature plants. Instead the County is proposing allowing up to an additional five percent (5%) of the allowed canopy for propagation where the mother plants, starts, or seedlings are contained to support the onsite cultivation operation.

Aligning with measurement methods used by the state will provide clarity across the multi-agency permitting and regulatory process and provide a level playing field for cultivators operating in a competitive statewide marketplace. Measuring all cultivation, but providing additional space for propagation will allow the County to minimize potential land use impacts of the propagation activities.

This change is reflected within the Planning Commission Recommended Draft contained within Exhibit A to the staff report.

6. VOLATILE AND NON-VOLATILE SUBSTANCE DEFINITIONS

Sonoma County Code allows for nonvolatile cannabis manufacturing with a use permit, however, volatile manufacturing is currently prohibited. The proposed ordinance would not alter the local regulations with regards to volatile solvents for cannabis manufacturing. The proposal changes the definition of volatile solvent to provide clarity and to better align with State regulations.

The proposed definition within the Planning Commission Recommended Draft is:

“Any solvent that is or produces a flammable gas or vapor that, when present in the air in sufficient quantities, will create explosive or ignitable mixtures.”

This proposed definition aligns with the State regulatory definition, except that the State’s definition also includes *“Examples of volatile solvents include, but are not limited to, butane, hexane, and propane.”* (Cal. Code Regs. § 40100(ppp).) In the proposed ordinance, the restrictions that used to be part of the volatile solvent definition (i.e. restrictions on dangerous poisons, toxins, and carcinogens) are now included in Sec. 26-88-250(c)(v), so there have been no changes to what substances are prohibited.

Permit Sonoma and Fire and Emergency Services consider ethanol and carbon dioxide to be nonvolatile solvents and are reviewing cannabis manufacturing permit applications that propose to use these solvents. For clarification proposes staff proposes to add the state definition of nonvolatile solvent as follows:

Nonvolatile Solvent: Any solvent used in the extraction process that is not a volatile solvent. For purposes of this chapter, ‘nonvolatile solvents’ means carbon dioxide and ethanol.

This new definition is reflected within the Planning Commission Recommended Draft contained within Exhibit A to the staff report.

7. SEPARATION CRITERIA- SETBACK TO PUBLIC PARKS

The existing separation criteria requires a 1,000 ft setback from parks for outdoor and mixed light (greenhouse) cannabis operations. The Commission requested policy options to address potential issues with the measurement and reduction opportunities related to larger regional parks. Currently, the setback from public parks is measured as follows:

“The distance shall be measured in a straight line from the property line of the protected site to the closest property line of the parcel with the cannabis cultivation use.”

A cannabis operation may be 1,000 ft away from the park’s property line but because a portion of the property lies within the 1,000 ft buffer area, the entire property is ineligible. This has proven to be problematic because of the number of state and regional parks and their large acreage. Much of these lands are rugged and remote with little access points or public trails.

Policy Options:

- A. **Measure 1,000 Feet from the Premises:** Retain 1,000 feet setback, but measure from the cultivation site “premise” to the property line of the park. “Premises” is proposed to be defined as *“the designated structure or structures and land specified in the application that is owned, leased, or otherwise held under the control of the applicant or person holding a valid permit where commercial cannabis activity will be or is conducted.”* This would reduce whole properties being eliminated and may allow for certain appropriate portions of properties to apply for cannabis operations.
- B. **Measure 2,000 Feet from Premises:** This option would measure from the cultivation site premises to the property line of the park but would increase the setback to 2,000 feet.
- C. **Allow a Reduction of Setback with a Use Permit:** This option would allow flexibility to reduce the setback from parks in certain circumstances. The proposed language is as follows:

“The setback from public parks may be reduced with a use permit when it is determined that an actual physical separation exists due to topography, vegetation or slope; that no offsite impacts will occur; and that the cannabis operation is not accessible or visible from the park.”

Staff Recommendation: Option A and C.

Staff recommends Policy Options A and C. Option A would require measurement from the “premises” of the commercial cannabis operation and require a 1,000 foot setback to a park. Option C would allow flexibility to grant a setback reduction on a case by case basis, provided that the use is not visible from the park.

Staff has consulted with Sonoma County Regional Parks staff. Their primary concern is security including access and visibility from the parks. They are comfortable with staff’s recommendation but have requested a consultation/referral on all projects adjacent to parks and a new standard to reduce visibility from parks as follows:

Section 26-88-254(f)(20): No outdoor or mixed light cultivation sites located on parcels adjacent to public parks shall be visible from trails or public access points.

This new language is reflected within the Planning Commission Recommended Draft contained within Exhibit A to the staff report.

8. INSPECTION NOTIFICATION- DEPT OF HEALTH SERVICES

Staff from the Department of Health Services has requested an amendment of Section 26-88-250 (k) to allow inspections of edible manufacturing facilities and dispensaries anytime without 24 advance notice, consistent with their existing inspection practices. This change is reflected within the Planning Commission Recommended Draft contained within Exhibit A to the staff report.

9. INDOOR SETBACK FROM SCHOOLS- EXCLUDE FROM INDUSTRIAL

Based on public comment received during the Commission’s hearing staff recommends the following amendment to the Draft Ordinance to eliminate the setback for indoor cultivation within industrially zoned properties.

*Section 26-88-254(f)(6): Indoor cultivation **within agricultural and resource zones** shall be setback a minimum of six hundred feet (600') from a school providing education to K-12 grades. The distance shall be measured in a straight line from the property line of the protected site to the closest property line of the parcel with the cannabis cultivation use.*

This change is reflected within the Planning Commission Recommended Draft contained within Exhibit A to the staff report.

QUESTIONS FROM THE PLANNING COMMISSION

10. CAN PRIVATE ENTITIES CAN BRING LEGAL ACTION TO ENFORCE COUNTY ORDINANCES?

The Commission asked if private entities can bring legal action against private parties to enforce County adopted regulations. In response, pursuant to Section 1-7.2 of the Sonoma County Code, “[a]ny person damaged by any violation of Sections 7-5, 7-13, 7-17, 24-33 or [26-92-200] of this code may institute a civil proceeding for injunctive relief against such violation, for money damages, and for whatever other or additional relief the court deems appropriate.” (The citation for violations of Chapter 26 is currently incorrect and amendments are proposed via an ordinance coming before the Board in July.) This provision allows for a private right of action for violations related to zoning (Chapter 26), building (Chapter 7) and septic permits (Chapter 24).

11. CEQA MAUCRSA EXEMPTION EXPLANATION

The Commission asked for more explanation regarding the California Environmental Quality Act (CEQA) exemption proposed for this ordinance amendment package. Generally, both an ordinance establishing permitted activities and the permits applied for thereunder are subject to environmental review (unless otherwise exempt). MAUCRSA includes an express exemption from CEQA for “the adoption of an ordinance, rule, or regulation by a local jurisdiction that requires discretionary review and approval of permits, licenses, or other authorizations to engage in commercial cannabis activity.” (Cal. Bus. & Prof. Code 26055(h).) The discretionary approvals authorized by the local law must be subject to environmental review as required by CEQA. (Ibid.) This statutory provision means that the adoption of a County ordinance authorizing discretionary use permits for commercial cannabis activity is exempt from CEQA because the use permits will be subject to the required environmental review.

12. HOW DOES THE APPEAL PROCESS WORK FOR MINISTERIAL PERMITS?

The County may, but is not required to, provide for an administrative appeal of ministerial/zoning permits. On appeal, the review body is limited to determining whether or not the proposed project meets the standards in the ordinance and cannot use discretion in determining whether to grant, deny, or condition the permit.

Currently, ministerial permits issued by the Permit and Resource Management Department may be subject to administrative appeals heard by the Board of Zoning Adjustments. (Sec. 26-92-040.) Ministerial permits reviewed by the Department of Agriculture/Weights and Measures are governed by appeal provisions in Chapter 11 (Sec. 26-88-252(e)), which provide that decisions on ministerial permits are final, subject only to judicial review.” (Sec. 11-10-010.) The County could choose to make cannabis permits issued by the Department of Agriculture/Weights and Measures subject to appeal provisions in Chapter 26, which would enable interested parties to appeal decisions on those permits to the Board of Zoning Adjustments.

13. CEQA AND ALLOWING CANNABIS WITHIN THE MARK WEST SPRINGS WATERSHED

During the public hearing a question was asked about the impacts to the Mark West Creek Watershed and the allowance of cannabis permits. The Commission requested a response from staff.

Impacts to groundwater and surface water are addressed by requirements to show adequate and sustainable water supply and groundwater monitoring. (Negative Declaration, pp. 33-35.) The majority of the Mark West Creek Watershed is in Groundwater Availability Zones 3 and 4. For all projects in these zones, either with a ministerial or use permit that use well water, applicants must show that “*the proposed facility would not result in a net increase in water use on the site through*

implementation of water conservation measures, rainwater catchment or recycled water reuse system, water recharge project, or participation in a local groundwater management project[.]” (Sec. 26-88-254(g)(10)(d)(2)(a).) Alternatively, applicants can provide a hydro-geologic report prepared by a qualified professional “providing supporting data and analysis and certifying that the onsite groundwater supply is adequate to meet the proposed uses and cumulative projected land uses in the area on a sustained basis[.]” ((Sec. 26-88-254(g)(10)(d)(2)(c).)

14. EXCLUSION ZONES AND THE BALLOT MEASURE PROCESS

The Commission asked for information related to the possibility for an Exclusion Combining District to be applied to an area of the County by ballot measure. County ballot measures, with limited exception, are voted on by the entire county. The voters of the entire county, including those residing within incorporated cities, would vote on an exclusion zone ballot measure which may only apply to unincorporated areas of the county.

CLARIFICATION OF PROPOSED CHANGES

15. DEFINITION OF CANNABIS DISTRIBUTOR VERSES A TRANSPORTER.

The Commission requested additional information regarding these two permit/license types listed within the state and local regulations.

State Distributor License – Arrange for testing, check for appropriate packaging and labeling, collect taxes, transport cannabis and cannabis products, and may act as a wholesaler. All transportation shall be conducted by distributor licensees and their direct employees.

- Transportation shall only be conducted by persons holding a distributor license under the Act, or employees of those persons
- Cannabis and cannabis products must pass through a distributor prior to being sold to customers at a retail establishment.
- Distributors must arrange for the laboratory testing and quality assurance for cannabis and cannabis products.
- Distributors may package and label cannabis (dried flower) but may not package cannabis products pursuant to the distributor license.

State Distributor Transport-Only license – A distributor can choose to be a Transport only Distributor, which transports cannabis but does not perform any of the other functions of a distributor. The state has two tiers of Transport Only Distributer licenses; those that can only transport cannabis products cultivated or manufactured by the licensee, and those that can also transport products for other licensees, Transportation to retail licensees is prohibited for all Transport Only Distributers, unless the licensees are transporting immature plants and seeds from a nursery to a retailer.

Proposed Revised Draft Cannabis Ordinance – Currently allows for the distributor permit in Industrial Zones with a Minor Use Permit. The proposed amendments would allow a Distributer Transport-Only permit in all areas where commercial cultivation is permitted. However, the County proposes restricting Distributer Transport-Only permit holders to transporting cannabis or cannabis products that the permit holder has cultivated or manufactured. This change is reflected within the Land Use Table listed as Exhibit B to the staff report.

16. MANUFACTURING INFUSION (N LICENSE) AND PACKAGING (P LICENSE)

The Commission asked for clarification on the state’s allowance for infusions within the existing state license structure and regulations.

- N state license allows for infusion of cannabis oil into products like edibles, pre-rolled joints, and topical products.

- P state license allows for operators to package and repackage, label and relabel cannabis flower and products.

These two license types are subcategories of the state Type 6 license. The cost of state licensure as well as the cost of buildout for N and P licenses can be significantly less than a full type 6. Since the County currently allows Type 6 licenses in industrial zones, the Cannabis Advisory Group recommended adding the Type N and P licenses in industrial areas.

Staff does not feel that adding the Type N and P license is necessary as applicants can currently obtain a Minor Use Permit for Cannabis Manufacturing which would allow them to apply for state license for Type 6, N, or P License. The County is permitting land use not state licenses.

17. PROPAGATION IN SUPPORT OF ONSITE CULTIVATION OPERATION.

The Commission asked for additional information regarding the proposed allowance for propagation areas and how this would function. Propagation Areas are specific locations where the mother plants, starts, and seedlings are contained to support the onsite cultivation operation. The existing code does not express an allowance or limitation on the amount of propagation area. Due to this ambiguity applicants and staff have experienced problems with clarifying the taxable area or the maximum amount of cultivation allowed on a property.

Based on research of state regulations and other jurisdictions, staff is proposing the allowance of up to 5% of permitted canopy to be used for non-flowering propagation. This allowance would allow vegetative and other propagative cannabis plant material to be cultivated for use on-site without impacting overall permitted canopy. Staff originally proposed using a floor area of up to 5% of the size of the permitted cultivation area but to avoid confusion staff is now proposing measuring the propagation area in the same manner as canopy.

18. PERMIT RENEWAL PROCESS

Under the existing Ordinance cannabis permits are required to be renewed annually. Applicants are required to apply for renewal at least 90 days prior to expiration of their permit. The base fee is \$957.00 for a use permit (processed on “at cost” basis) and \$615.00 for a zoning permit. If there are changes or expansions from the original approval additional referral, environmental review, or hearing fees may be applied as appropriate.

The process for renewal includes a thorough review of the operation and a site visit. If nothing has changed and there are no complaints or issues noted in the site review the planner will either post a notice intending to approval administratively and waive a public hearing, or schedule for a public hearing.

19. CLARIFICATION ON STUDIES REQUIRED FOR CANNABIS OPERATIONS WITHIN GROUNDWATER ZONES 1 AND 2.

The Commission asked why we require studies for Groundwater Zones 1 and 2. The existing ordinance requires a hydrogeologic study be prepared for any proposed cannabis operation within Groundwater zones 1 and 2, only if they are within a medium or high priority groundwater basin as identified by the State Department of Water Resources. Sonoma County has three designated basins; the Santa Rosa Plain, Sonoma Valley, and Petaluma Valley. There has been documented decline in groundwater levels within these areas and they are now under review of the Groundwater Sustainability Agencies (GSA). Staff recommends retaining the requirement for hydrogeologic studies to address impacts related to groundwater.

20. CONSISTENCY WITH AREA PLANS.

The Commission requested clarification regarding whether the Cannabis Ordinance consistency with Area Plans, specifically those that have a strong emphasis on preserving agriculture. During the

development of the Cannabis Land Use Ordinance, staff conducted extensive research to ensure consistency amongst the County of Sonoma General Plan, Area Plans, and Specific Plans.

The Penngrove Area Plan was highlighted within public comments. This Area Plan, among others, includes language that provides a strong emphasis on preserving agriculture, which is reflected in the following citations:

“(2) Accommodate a variety of rural living environments while protecting agriculture and recognizing septic and water constraints.” (Pg. 6)

“(4) Preserve agricultural lands and encourage agriculture.” (Pg. 9)

“C. Agriculture. A goal of this Area Plan is to protect and enhance the profitability of existing agriculture and protect agricultural soils for future generations.” (Pg. 11)

“Based on the goals and policies of the Penngrove Area Plan and the descriptions of the land use categories, the primary emphasis in these areas shall be to promote, protect and preserve agricultural land uses.” (Pg. 29)

“(1) These areas are presently farm lands and preservation of agriculture is a high priority of the plan. Low density zoning will aid in the retention of the character of the area.” (Pg. 33)

The General Plan, Zoning Code, and Area Plans allow for uses other than agriculture as long as they are consistent with these principles. The Cannabis Land Use Ordinance was written with this compatibility in mind and only allows for small scale operations through a combination of minimum parcel sizes and a 1 acre maximum of cultivation per parcel. Specific standards were also incorporated. For instance, the “Farmland Protection” section of the Ordinance includes reference to General Plan Policy AR-4a which requires that “the use of any parcel in the three agricultural zoning districts (LIA, LEA, DA) to be primarily used for agricultural production and related processing, support services, and visitor serving uses.” The Farmland Protection section also requires compliance with Land Conservation Act (Williamson Act) contracts, if applicable, and conversion of agricultural land to cannabis use is limited to previously developed structures and areas. One of the primary goals of the Cannabis Land Use Ordinance is to allow existing agricultural operations to diversify and stabilize incomes.

STAFF RECOMMENDATION

Staff recommends that the Planning Commission:

1. Hear the Staff Presentation,
2. Hold a Public Hearing on the Limited New Information,
3. Deliberate and Take Straw Votes on Policy Options, and
4. Adopt Resolution recommending that the Board approve the Zoning Code Amendments.

INFORMATIONAL REQUESTS

The Commission requested additional information and resources which are attached as follows:

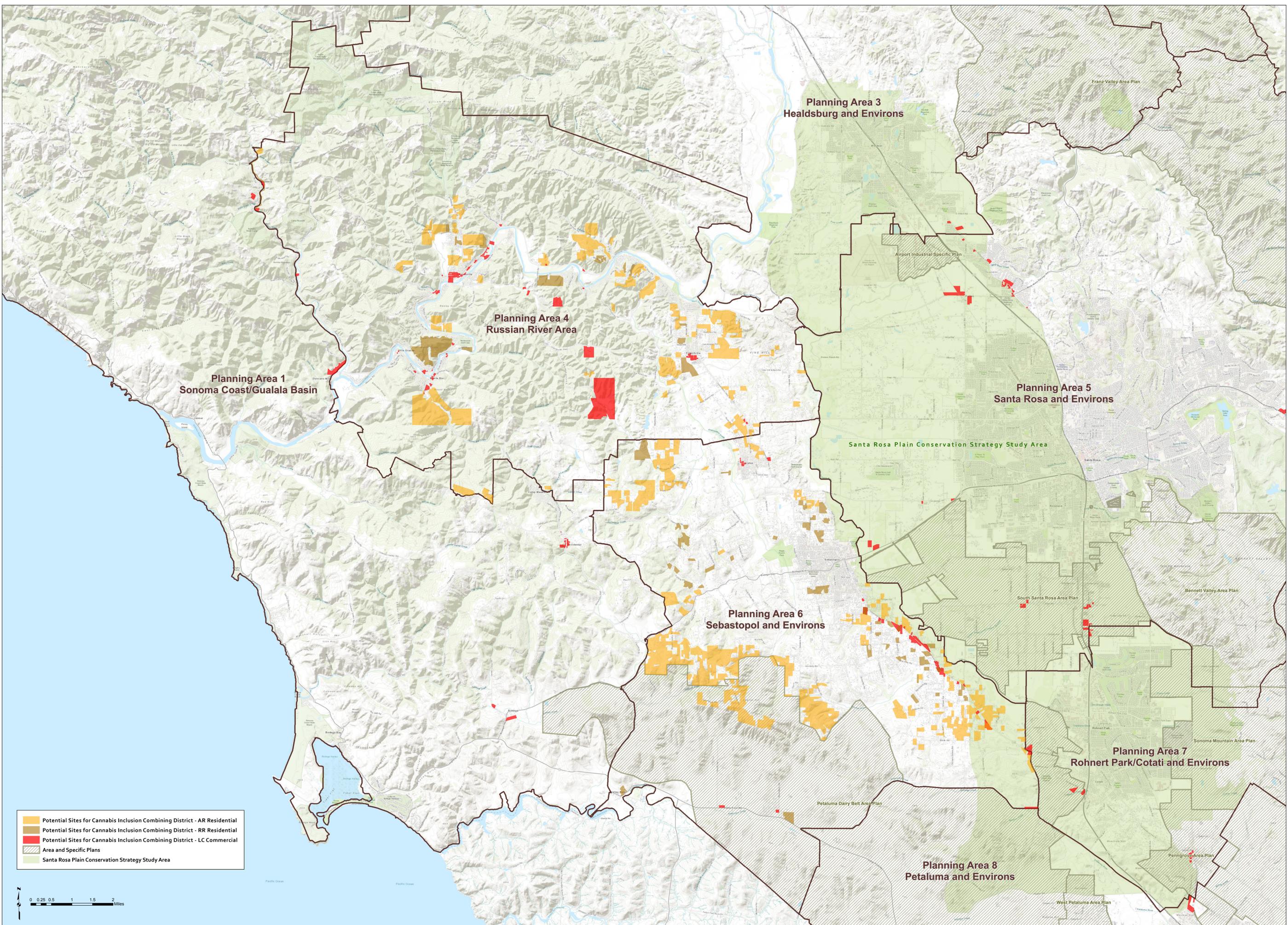
Cannabis Site Evaluation Tool: sonomacounty.ca.gov/cannabis

This mapping tool been updated with two layers showing the potential sites that would be eligible for rezoning under the Cannabis Inclusion Combining District proposal.

Attachment A: Draft Map of Potential Sites for Inclusion Combining District

Attachment B: List of Regional Parks with Acreage Size

Attachment C: Total County Parcel Data by Zoning, Size, and Supervisorial District



- Potential Sites for Cannabis Inclusion Combining District - AR Residential
- Potential Sites for Cannabis Inclusion Combining District - RR Residential
- Potential Sites for Cannabis Inclusion Combining District - LC Commercial
- Area and Specific Plans
- Santa Rosa Plain Conservation Strategy Study Area



Proposed Cannabis Inclusion Zones

Residential Inclusion Zone - AR & RR Base Zone, 5 Ac and larger, Planning Areas 4 & 6
 Commercial Inclusion Zone - LC Base Zone, all acreages, all Planning Areas

County of Sonoma

Permit and Resource Management Department
 2550 Ventura Avenue, Santa Rosa, California 95403
 707-565-1900 FAX 707-565-1103



Attachment B: List of Regional Parks with Acreage Size

Regional Parks	Acreage Size
Alder Park	4.85
Arnold Field	9.18
Bouverie Wildflower Preserve	22.61
Cloverdale River Park	41.93
Crane Creek Regional Park	128.84
Del Rio Woods	6.18
Doran Park	116.5
Ernie Smith Park	207.84
Foothill Regional Park	11.68
Gualala Regional Park	160.44
Guerneville River Park	6.62
Healdsburg Beach	11.52
Helen Putnam Regional Park	255.85
Hood Mountain Regional Park	2,442.67
Kenwood Plaza Park	2.07
Laguna DeSanta Rosa	71.05
Larson Park	7.27
Maddux Ranch Park	10
Mason's Marina	5.78
Maxwell Farms Regional Park	82.15
Moran Goodman Park	0.63
Moorland Park	4.22
North Sonoma Mountain RP & OPP	820.02
Occidental Community	1.65
Pinnacle Gulch Trail & Beach	21.2
Ragle Ranch Regional Park	155.47
Riverfront Park	247.06
Shaw Park	3.02
Shiloh Regional Park	859.23
Sonoma Valley Regional Park	237.09
Soda Springs Reserve	48-87
Spring Lake Park	299.36
Spud Point Marina	6.11
Steelhead Beach	26.91
Stillwater Cove Regional Park	226.71
Sunset Beach River Access	1,104.28
Taylor Mountain	1,1769
Tolay Lake Regional Park	1,657
Tolay Creek Property	3,426
Watson School/Wayside Park	0.85

Table 1: Total County Parcel Data by Zoning and Acreage

Zoning	All Parcels	Less than 2 acres	2 - 5 acres	5 - 10 acres	More than 10 acres
DA	6,162	1,866	1,599	1,102	1,595
LEA	1,822	212	202	172	1,236
LIA	2,955	659	443	395	1,458
RRD	7,613	2,127	618	612	4,256
AR	10,639	5,499	3,307	1,231	602
RR	20,744	16,665	2,786	854	439
Total Parcels:	49,935	27,028	8,955	4,366	9,586

Table 2: Total County Parcel Data by Zoning and Supervisorial District

Zoning	All Parcels	District 1	District 2	District 3	District 4	District 5
DA	6,162	1,254	1,088	181	706	2,896
LEA	1,822	192	934	0	229	394
LIA	2,955	485	0	0	2,354	90
RRD	7,613	1,356	11	8	2,209	3,896
AR	10,639	1,386	3,575	11	992	4,653
RR	20,744	5,316	1,717	387	2,683	10,615
Total Parcels:	49,935	9,989	7,325	587	9,173	22,544