



Planning Report

To: Arran-Elderslie Council

From: Megan Stansfield, Planner

Date: May 23, 2023

Re: Zoning By-Law Amendment Z-2022-127 (Thorn)

Recommendation:

That Council approve Zoning By-Law Amendment Z-2022-127 (Thorn), as attached.

Summary:

The application proposes to establish definitions in the Municipality's Zoning By-law for a 'micro-cultivation facility' and 'micro-processing cannabis facility' and to permit these uses on the subject lands with limits on the size of the use, and prohibition of on-site retail. The application also proposes a holding provision on the lands as they have high archaeological potential. If approved, the proposed amendment would facilitate the construction and operation of a Micro Cultivation and Micro Processing Cannabis Facility on the subject lands, under a licence to be obtained from Health Canada.

The proposed building is approximately 469 square metres in size with a grow surface of up to 200 square metres. The building will be completely enclosed, with a single exterior window, and an air filtration system that prevents odour escaping the building.

The lands are located at 46 Bruce Road 17, in the village of Tara/Invermay, Arran-Elderslie.

The Public Meeting for this file was held on April 5, 2023, and a Planning Report was presented at that time with some additional information.

Airphoto



Image of Proposed Development (rendering)



Planning Analysis for this site:

The following section provides an overview of the planning considerations that were factored into the staff recommendation for this application, including relevant agency comments (attached), public comments (attached) and planning policy sections.

Conformity with the County and Local Official Plan

This property is located partially within the settlement or “Urban Area” of Tara/Invermay, and partially outside the settlement area. The portion closest to the road, where the existing dwelling is located, is within the Residential designation of the Arran-Elderslie Local Official Plan. This plan is not applicable, as the proposed development is outside the Urban Area. The proposed facility will be located within the Rural designation of the County Official Plan, and the use therefore needs to meet the policies established for the Rural designation of the County Official Plan.

The role of the Official Plan is an overarching framework to establish a vision for the County which outlines goals, objectives and policies which help to dictate land use planning decisions. The use is evaluated relative to the criteria of the plan. The Rural Designation permits Agriculture Uses and Agriculture related uses as defined below.

Agriculture uses, as defined by the Provincial Policy Statement including agriculture, aquaculture, apiaries, agro-forestry, associated on-farm buildings and structures, growing of crops for biomass, maple syrup production, the growing of plants for food production, nurseries, the primary and secondary farm residence, and temporary farm accommodation for workers.

Agriculture related uses, as defined by the Provincial Policy Statement, including commercial or industrial uses that are directly related to the processing of agricultural products produced on the same property or providing products or services to farm operations in the area, in accordance with the policies of Section 5.5.9, and retail stands for the sale of agricultural products produced on the farm unit upon which the retail stand is to be located.

The proposed development is in conformity with the permitted uses of the Rural designation. Cannabis processing and cultivation is an agricultural or agricultural related use in the context of the Official Plan. A County Official Plan Amendment is not required to facilitate this application.

Zoning

The property is zoned R1- Residential: Low Density Single, and A1 - General Agriculture. The proposed building to house the Micro Cultivation and Micro Processing Cannabis Facility will be located within the Agriculture zone. The agriculture zone permits agricultural activities, specifically defined in the Zoning By-Law as:

'AGRICULTURAL GENERAL' means the growing of crops, including nursery and horticultural crops; raising of livestock; raising of other animals for food, fur or fibre, including poultry and fish; aquaculture; apiaries; agro-forestry; maple syrup production; and associated on-farm buildings and structures.

The proposed use of a Micro Cultivation and Micro Processing Cannabis Facility is not specifically listed or defined in the zoning by-law, and as such, the applicants require a zoning by-law amendment. The proposed amendment includes the definition of a Micro Cultivation and Micro Processing Cannabis Facility and the site-specific use. The amendment specifies the size and location of the building, to ensure that expansion does not occur without a further amendment to this by-law. The by-law also specifies that the retail sale of cannabis is not permitted on the subject lands - this is solely for cultivation and processing. Site plan control is recommended.

The proposed Cannabis production facility can be argued to be both an agricultural and an industrial use. By nature, it is an agricultural crop and requires the standard inputs of water, light, and nutrients. The proposed form of cannabis production has the character of an industrial use. The indoor facility requires artificial lights, temperature control, etc. and the associated planning concerns (lights, odours, security) are similar to those of industrial developments. Bruce County has other cannabis production facilities, located in industrial zones and agricultural zones. The province has previously considered cannabis production an agricultural crop, and therefore an agricultural use. It is often grown in greenhouses and greenhouses are permitted in agricultural zones. The use of a greenhouse can create additional problems, mainly related to lighting, which is not a factor in this development. County and Provincial decisions are elaborated on in the next section.

In considering the industrial character of this operation we can look to the Municipality of Arran-Elderslie's Zoning By-Law, which has setbacks for industrial uses. In Section 3.3 it states that "where an Industrial Zone abuts a Residential, Institutional Zone, residential use or institutional use the following regulations shall apply: i. no part of an industrial principle use building shall be located closer than 20 metres to a Residential Zone, Institutional Zone, residential use or institutional use." The proposal at 46 Bruce Road 17 is approximately 40 metres from the edge of the residential zone, about 50 metres from the edge of a sensitive use (cemetery), and the closest dwelling (the applicants) is about 150 metres away. This property is surrounded by light industrial uses, with a construction business and contracting yard to the north and a trucking business located to the south. The Lallemand Yeast Plant,

and industrial use, is also located within the Business Park Zone, within 200 metres from the property.

In sum, while this use is considered to be agricultural in nature, the industrial aspect should not be ignored. Implementing site plan control will assist in regulating the use, and its compatibility with the surrounding land uses.

Planning Approaches and Decisions From Other Areas

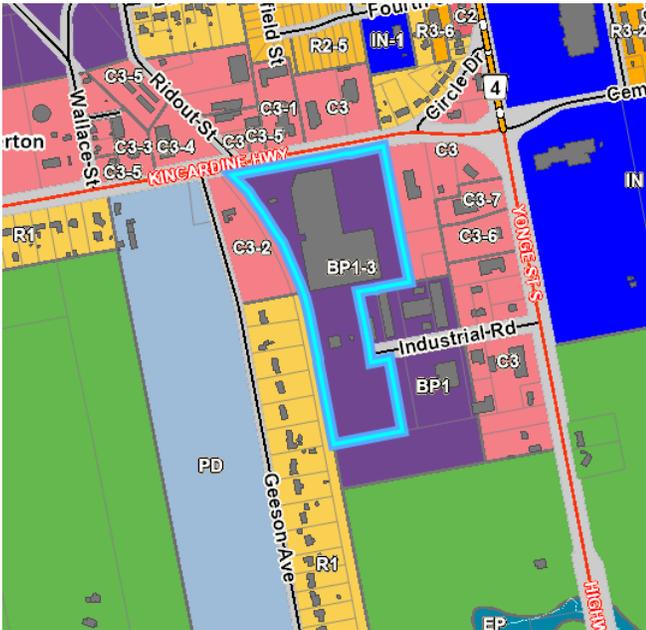
Other Bruce County Decisions

Bruce County Planning Staff has reviewed and provided recommendations for 3 other similar projects, throughout the County. Two projects located in Brockton in their Business Park 1 zone, and 1 located in South Bruce, within the agriculture zoning.

The facility proposed for South Bruce was similar in nature, though slightly larger. The 2018 zoning by-law amendment was for a greenhouse facility, approximately 8000 square metres in size, with private services, to be used for the growth of medical cannabis. Similar concerns were raised for this application, like odour, traffic, crime, and water usage. This proposal reiterated the requirements for licensing and strict guidelines the Ministry enforced. The zoning by-law was approved on the basis that this was an agricultural operation on agricultural lands.

One of the proposed projects in Brockton, located at 165 Kincardine Highway, in the Business Park 1 zone, is noteworthy as being adjacent to a residential zone. The proposal was to turn an existing warehouse building into a "Licensed Marijuana Growing Facility". While this project is located in the Business Park zone (a light industrial zone), the proposed use, in the existing building, is 17 metres from the closest residential use, substantially closer than the proposal in Tara. This by-law was passed by the Brockton Municipal Council however the use has not been established in that location at this time.

Zoning of 165 Kincardine Highway and Surrounding Area



Considerations

Through the pre-consultation process planning staff identified key considerations to the applicants regarding their proposal, namely, odour, lighting, security and traffic. These issues were addressed in the Planning Justification Report provided by the applicant's planner. The major concerns noted, are summarized below; please refer to the Planning Justification Report for details on these considerations.

Odour

Cannabis has a distinct odour that can impact surrounding sensitive uses and needs to be considered when evaluating the suitability of the location of the proposal. The proposed building will be completely enclosed and will be equipped with activated carbon filters on the air handling units which exhaust air outside. The air circulating the facility is also passed through a unit with filters to reduce any odours. In addition, the report notes that no open cannabis will be handled in an area that contains an exterior door. Prior to obtaining a license from Health Canada, it must be demonstrated that sufficient odour controls are in place. Health Canada states that it takes odour complaints seriously, and during inspections ensures that the facility is meeting odour control requirements. It is also noted that there may still be odours from indoor production, even when an air filtration system is in place, but the air filtration does limit odour intensity and frequency.

Lighting

Typically, there is concern when the facility is a greenhouse, where lights must be on when daylight is insufficient which can contribute to light pollution and general displeasure from those in the surrounding area. The proposed facility in Tara is completely enclosed - the only

window being one for the office. As such lighting associated with cultivation is not a concern. External, motion-activated lighting is proposed for security purposes.

Security

Health Canada has specific requirements regarding security of the facility, and plans are required to be submitted to Health Canada prior to obtaining a license for the facility.

Traffic

The Planning Justification Report notes that occasional shipments of materials will occur, with the bulk of materials being delivered at the beginning of operation start-up and processed goods are shipped approximately every 3 months. Subsequent correspondence indicates approximately 6 shipments out of the facility per year. Operational staff reside on site.

Public Comments

Through the public notice process, neighbours and residents of the surrounding area have expressed further concerns for the development.

A summary of the public concerns and the applicant's response are listed in the table below. The full comments provided by the public are appended to this report, in addition to the Planning Justification Report that was submitted with the application.



Public Concern	Explanation	Applicant Comments
Security Concerns and Crime	The community has concerns regarding increased crime in the area. Concerns of guns being used due to increased security presence were mentioned in a few comments, while others were just generally concerned with increased potential for crime	<p>Applicant Comment: The proposed business is committed to running a secure compliant facility. The site has been designed to prevent any un-authorized access and intrusion via a solid structure, physical barriers, and restricted access controls. Visual surveillance for access and exit points into the site is achieved using interior and exterior cameras. Access control is being managed via keylock systems and card readers organized in several layers to only allow authorized staff entry into the operations areas. There will be no guns involved in the security process.</p> <p>Planner Comment: The applicants have provided a detailed security plan in the Planning Justification Report. Because the facility is completely indoors, there is no need for fencing or additional security or guns. Health Canada requires a detailed security plan in order for the business to obtain a license.</p>
Operating Hours		Applicant Comment: operating hours would be from either 8 am to 4 pm or 9 am to 5 pm.
Property taxes/home values	Commenters are concerned that the proposed development will impact the value of their homes	Applicant Comment: Based on the investment on the current house and proposed new building which is similar to other buildings in the area, the difference being this will be a new building that would blend into the property. This

		<p>indoor facility will not show any indication of being a small craft cannabis business</p> <p>Planner Comment: This is not a matter than can be evaluated in a planning context and holds no merit in the planning decision</p>
<p>Environmental Concerns/ Fertilizers/chemicals in the water/proximity to the river</p>	<p>Concerns that fertilizers and chemicals will get into the water.</p>	<p>Applicant Comment: The operation is Health Canada regulated and would not allow the use of damaging chemicals. Health Canada has a very high bar on how one would operate which is a good thing for this industry. There would be no runoff in any event that would impact well water or the river.</p> <p>Planner Comment: This facility is completely indoors, so it is unclear how the river or groundwater surrounding the facility could be impacted by any fertilizers used in the facility. Grey Sauble Conservation Authority and the Source Water Risk Management Office were circulated on the proposal and saw no concerns, nor had any objections.</p>
<p>Odours</p>	<p>Commenters noted the odours produced by cannabis. Many likened the proposed facility to the 7 Acres facility in Tiverton, and many noted that this would compound the odour from the Lallemand Yeast Plant</p>	<p>Applicant Comment: As per Section 81 of the Cannabis Regulations, any facility where cannabis is produced, packaged, labelled, stored, or tested must be equipped with a ventilation system which ensures the prevention of the escape of cannabis odours to the outdoors. The proposed site is designed in a manner where all exhaust points are controlled for odours. The heating, ventilation, and air conditioning (HVAC) system is equipped with a series of high-performing activated carbon (also known as activated charcoal) filters which are the gold standard for achieving odour mitigation in cannabis facilities. The Strict Operational Practices (SOP's) at the facility, dictated by</p>

		<p>Health Canada-approved SOP's, will also ensure the prevention of odour release to surrounding areas. Open cannabis will not be handled in areas that contain an exterior door. All areas that contain an exterior door must only contain cannabis that is vacuum sealed and stored in sealed containers in order to prevent odour release. Odour controls, as directed by Section 81 of the Cannabis Regulations, are a strict requirement from Health Canada and every licence applicant must demonstrate sufficient odour mitigation strategies using carbon filtration and airflow prior to being awarded a licence. Upon licensing, the enforcement of odour control requirements is carried out by Health Canada's Compliance and Enforcement Officers during regular on-site inspections of cannabis licence holders. During inspections, licence holders must demonstrate the continued functionality of odour controls at their site and must also present their approved facility maintenance schedule and maintenance logs to demonstrate that the odour control features at the site are regularly maintained and are continually operational.</p> <p>Planner Comment: While there is no guarantee that there will be no odour associated with this development, it has been noted by the applicants and Health Canada that regulations are in place to address odour.</p>
Noise	Concerns for noise generated by fans and generators	<p>Applicant Comment: The business is family owned and operated and must follow Health Canada rules and regulations. This operation will be considered a small craft business with no automation, just the use of our hands to plant, grow, harvest, and package.</p>

		<p>Planner Comment: Arran-Elderslie has a noise by-law in place which would cover any issues related to noise, and this doesn't need to be reiterated in the site-specific zoning by-law</p>
Increased Traffic	Concerns of increased traffic	<p>Applicant Comment: The proposed operation will have less traffic than any other business in the area, or even residences. Aside from initial order of supplies there would be potentially 6 shipments out to the province annually which would require a small vehicle footprint of a typical rented U-Haul.</p> <p>Planner Comment: Bruce County Transportation was circulated the application and they did not have any comments regarding the proposal, increased traffic or any entrance requirements</p>
Lighting	Concerns for light pollution and lights being constantly on, "green lights" coming from the building	<p>Applicant Comment: The proposed facility is a completely self-contained production site which does not produce any exterior light pollution other than the light generated from general office lighting from the single exterior window. Exterior lighting will be limited to motion-sensitive spot lighting on the building envelope near entry and exit points which would activate only in the proximity of an individual approaching an exterior door</p> <p>Planner Comment: Some comments related to lighting seem to liken the facility to a greenhouse, and the light pollution produced there. The facility is a completely enclosed building with one window, at the office, so there will be no 'green lights' from the facility.</p>

		The applicants have noted the outdoor lights are motion sensor lights, pointing at the doors to the facility, in place for security reasons
'Eye sore'	Concerns of chain link fence/ "prison-like" look due to security fencing	Applicant Comment: The proposed new building will blend in as any other building in the surrounding area. This is not a business that requires security fencing around the perimeter as the building will be secured similar to most businesses in the area.
Greenhouse	Concerns related to a greenhouse building	Planner Comment: The proposed facility is completely enclosed, with only one window in the office.
Close to church/cemetery	Church hosts weddings, Food Bank, Alcoholics Anonymous and also public concern surrounding the stigma of having a cannabis facility near a church	Applicant Comment: The goal is to invest in the property, house and proposed new building that the community would have no issues with. The family plans to be part of the community and help in such good causes as the food bank. Based on the small scale of the operations there would be no impact to the historical cemetery.
Expansion	One commenter noted concerns that the project would expand to the use of a greenhouse or other facilities once approval was given	Planner Comment: The By-Law specifically limits the space to the 470 square metre building. Expansion would require an additional Planning Act Application.
Water Use	Concerns of extensive water usage, depleting surrounding wells/ affecting water table	Applicant Comment: The water use and runoff would be similar to someone running a flower nursery. Planner Comment: The facility is regulated by Health Canada. Extraction of water in excess of 50,000L/day

		requires a Permit to Take Water from the Ministry of Environment, Conservation and Parks. The applicant has stated that they estimate that the plants will require an average of 1730 litres of water per day. The estimate is based on the need for 1L of water per 1 square foot of flowering plant canopy, or 10L per square metre. The article is cited at the end of this report. The spreadsheet, provided by the applicant is appended.
Public Notification Process	A couple commenters noted their displeasure at the lack of, or late notification for this proposal	Planner Comment: Notice timelines are established under the Planning Act. Notices were issued with more time than required by the Act.
Residential Area/Sensitive use	Commenters reiterated that this is largely a residential area, and they feel that the proposed development is in too close proximity to the residential area	Planner Comment: see discussion above.
Retail sale concerns	Public concerns that a retail store will be established on the property	Applicant Comment: All sales will occur via 4-6 deliveries per year to OCS (Ontario Cannabis Stores) DC in Guelph. The provincial government controls the distribution to the 1,700 plus retail stores in Ontario. Planner Comment: A retail store is not proposed, and not permitted in the proposed zoning by-law amendment. A retail store would require an additional zoning by-law amendment.

Drainage and run off	Concerns that the proposed building will cause drainage and run off issues	<p>Applicant Comment: The water use and runoff would be similar to someone running a flower nursery. We have been working with an engineering group (MTE) that will be providing a grading and drainage design. This design does not allow any water to runoff into other people's property or the Sauble River.</p> <p>Planner Comment: Drainage and lot grading is addressed through the building permit stage. The Chief Building Official reviews and approves the final plans. The Grey Sauble Conservation Authority has been circulated on this proposal and noted no objections to the proposed development.</p>
General stigma		<p>Applicant Comment: Aside from the current communication the objective is that it would not be apparent that there is a <u>LEGAL & Health Canada regulated</u> small craft micro-operations.</p> <p>Planner Comment: While it is understood that there is a general stigma surrounding cannabis, this cannot be evaluated from a land use planning perspective.</p>
Economics	A few comments noted that no, or few jobs were being created and that this doesn't benefit the community economically	<p>Applicant Comment: The proposed Micro Cultivation and Micro Processing Facility will promote local economic development initiatives and prosperity in the County by broadening the range of business activity. The proposed use will strengthen the agricultural community as a viable and vital component of the County's economy, while at the same time recognize and promote the rural area as an important community and economic resource.</p> <p>Planner Comment: While the economics of the facility is not within the scope of land use planning matters, it is</p>

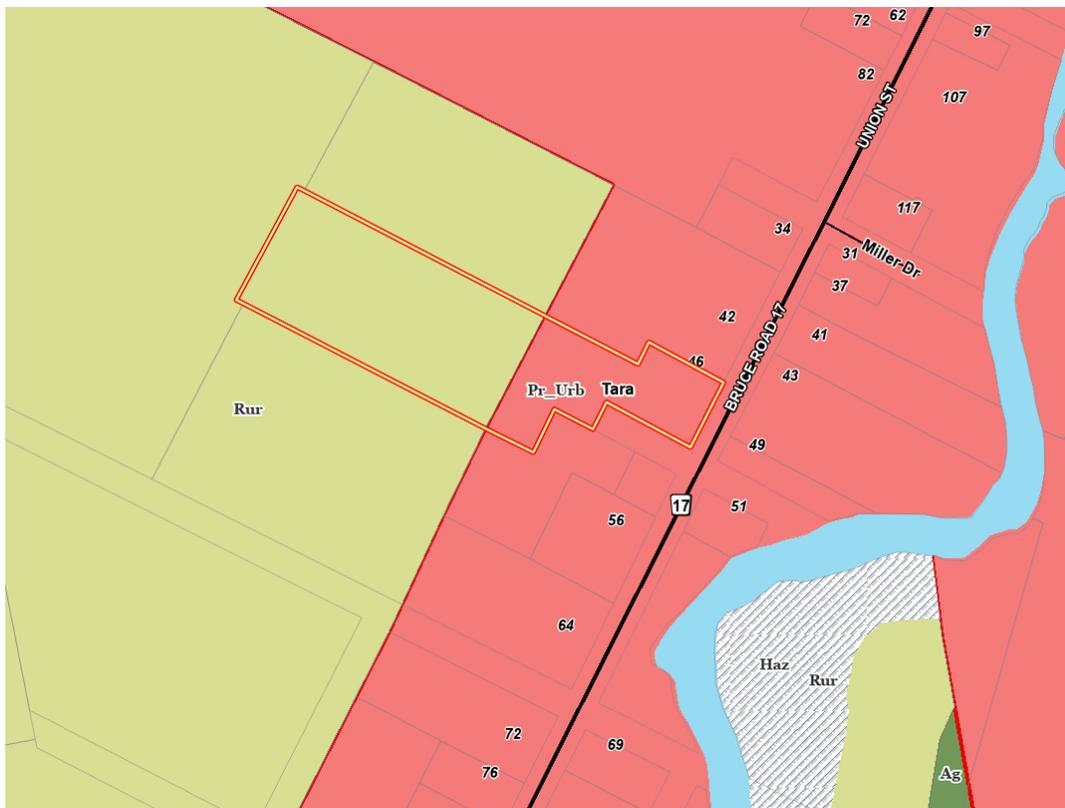
		understood that the community feels the economics benefits may not outweigh the costs imposed on the neighbours. The facility is creating jobs and therefore adding income to the area to be spent in the area.
Children walking past the facility to go to school/daycare		Applicant Comment: The investment on the house and proposed new building should reflect a residential owner who cares about the land and property. The building would show similarly to any of the neighbouring company buildings, being fully enclosed & secured.
Health Risks	Concerns of health risks due to the odour in the air, specifically: Hypersensitivity pneumonia, allergic rhinitis, asthma patients having more reaction, mold spores in air causing respiratory infections	Planner Comment: In an evidence brief on "Odours from cannabis production", by Public Health Ontario, it was stated that there was no scientific literature identifying health effects associated with exposure to cannabis odours. The production of cannabis is highly regulated by Health Canada.
Cemetery	Concerns of unmarked graves in the vicinity	Planner Comment: As part of the planning process, the applicants have been asked to complete an Archaeological Assessment. Their archaeologist will need to consult with Saugeen Ojibway Nation (SON), who will oversee the assessment.



Appendices

- County Official Plan Map
- Local Official Plan Map
- Local Zoning Map
- List of Supporting Documents and Studies
- Agency Comments
- Public Comments
- Public Notice

County Official Plan Map (Designated Primary Urban Communities & Rural)



Local Official Plan Map (Designated Residential and Institutional & Community Facility)



Local Zoning Map (Zoned R1 - Residential: Low Density Single & A1 - General Agriculture)



List of Supporting Documents

- Planning Justification Report
- Lighting Letter
- Applicant submitted information on water use
 - Spreadsheet detailing Plant Cycle Water Usage
 - Report of Estimated Annual Production

References:

Greenhouse Grower. January 2022. Ways to calculate Water Use and Transpiration Rates for Indoor Cannabis Cultivation. (provided by applicant) Link: <https://www.greenhousegrower.com/production/how-to-calculate-water-use-and-transpiration-rates-for-indoor-cannabis-cultivation/>

Health Canada. May 2022. Cannabis Odours and Odour Control. Link: <https://www.canada.ca/en/health-canada/services/drugs-medication/cannabis/industry-licensees-applicants/cannabis-odours-control.html>

Public Health Ontario, April 2018. Evidence Brief: Odours from Cannabis Production. Link: https://www.publichealthontario.ca/-/media/Documents/E/2018/eb-cannabis-production-odours.pdf?rev=dd4efc937211468392cdc427ff3e8e13&sc_lang=en

Ontario Land Tribunal Hearing. 2023. Township of Oro-Medonte. Link: <https://www.canlii.org/en/on/onlt/doc/2023/2023canlii5427/2023canlii5427.html?searchUrlHash=AAAAAQAIY2FubmFiaXMAAAABABBSU08gMTk5MCwgYyBQLjEzAAAAQAOLzM3NS1jdXJyZW50LTEB&resultIndex=2>

SGL Planning and Design. May 2021. City of Niagara Falls: Cannabis Growing Facilities, Land Use Review. Link: <https://niagarafalls.civicweb.net/document/36020/PBD-2021-23,%20Attachment%20-%20Cannabis%20Growing%20Facilit.pdf?handle=30313C5EAFB04F7ABC9ED1933597FFB4>

WSP. March 2021. Springwater Cannabis Production Review Study. Link: <https://www.springwater.ca/en/business-and-development/resources/Documents/Cannabis-Production-Review-Study.pdf>

Agency Comments

Arran Elderslie Public Works: No comments

Grey Sauble Conservation Authority: No objections, provided in full below

Source Water: No policies apply to the activities identified. Portion of the property is located in the Wellhead Protection Area E for the Tara Drinking Water System, which requires a Risk Management Plan for storage and/or application of pathogens (agricultural source material)

Saugeen Ojibway Nation: Archaeological Assessment is required

Bruce County Transportation: No comment

1 Harvest

1200 Plants

State	Total Litres	State	State	Total Litres	State	Total Litres
1-Jan Clones	24	1-Feb Flower	2000	1-Mar Flower	2000	
2-Jan Clones	24	2-Feb Flower	2000	2-Mar Flower	2000	
3-Jan Clones	24	3-Feb Flower	2000	3-Mar Flower	2000	
4-Jan Clones	24	4-Feb Flower	2000	4-Mar Flower	2000	
5-Jan Clones	24	5-Feb Flower	2000	5-Mar Flower	2000	
6-Jan Clones	24	6-Feb Flower	2000	6-Mar Flower	2000	
7-Jan Clones	24	7-Feb Flower	2000	7-Mar Flower	2000	
8-Jan Clones	24	8-Feb Flower	2000	8-Mar Flower	2000	
9-Jan Clones	24	9-Feb Flower	2000	9-Mar Flower	2000	
10-Jan Clones	24	10-Feb Flower	2000	10-Mar Flower	2000	
11-Jan Clones	24	11-Feb Flower	2000	11-Mar Flower	2000	
12-Jan Clones	24	12-Feb Flower	2000	12-Mar Flower	2000	
13-Jan Veg	1000	13-Feb Flower	2000	13-Mar Flower	2000	
14-Jan Veg	1000	14-Feb Flower	2000	14-Mar Flower	2000	
15-Jan Veg	1000	15-Feb Flower	2000	15-Mar Flower	2000	
16-Jan Veg	1000	16-Feb Flower	2000	16-Mar Flower	2000	
17-Jan Veg	1000	17-Feb Flower	2000	17-Mar Flower	2000	
18-Jan Veg	1000	18-Feb Flower	2000	18-Mar Flower	2000	
19-Jan Veg	1000	19-Feb Flower	2000	19-Mar Flower	2000	
20-Jan Veg	1000	20-Feb Flower	2000	20-Mar Flower	2000	
21-Jan Veg	1000	21-Feb Flower	2000	21-Mar Flower	2000	
22-Jan Veg	1000	22-Feb Flower	2000	22-Mar Flower	2000	
23-Jan Veg	1000	23-Feb Flower	2000	23-Mar Flower	2000	
24-Jan Veg	1000	24-Feb Flower	2000	24-Mar Flower	2000	
25-Jan Veg	1000	25-Feb Flower	2000	25-Mar Flower	2000	
26-Jan Veg	1000	26-Feb Flower	2000	26-Mar Flower	2000	
27-Jan Flower	2000	27-Feb Flower	2000	27-Mar Flower	2000	
28-Jan Flower	2000	28-Feb Flower	2000	28-Mar Flower	2000	
29-Jan Flower	2000			29-Mar Flower	2000	
30-Jan Flower	2000			30-Mar Flower	2000	
31-Jan Flower	2000			31-Mar Flower	2000	

1 Harvest

State	Total Litres
Clones	288
Veg	14000
Flower	112000
Total	126288

5 Harvest/year	631440
Average Litres/day	1730
Average Gallons/day	381
Drilled Well	
Gallons/day available	6480

Proposed Annual Production Capacity	
Dried Cannabis (kg/yr)	350
TOTAL [Dried Cannabis] (kg/yr)	350

Estimated Facility Areas (m²)	
Total Site Area	453.5 m ²
Total Production Area	315 m ²
Total Production Area (excluding Grow Areas)	64 m ²
Total Canopy Grow Area	186 m ²
Total Storage Area	21 m ²
Total Non-Operations Area	59.5 m ²
Total Grow Areas	251 m ²

(See page 2 for Estimated Surface Areas Floor Plan)

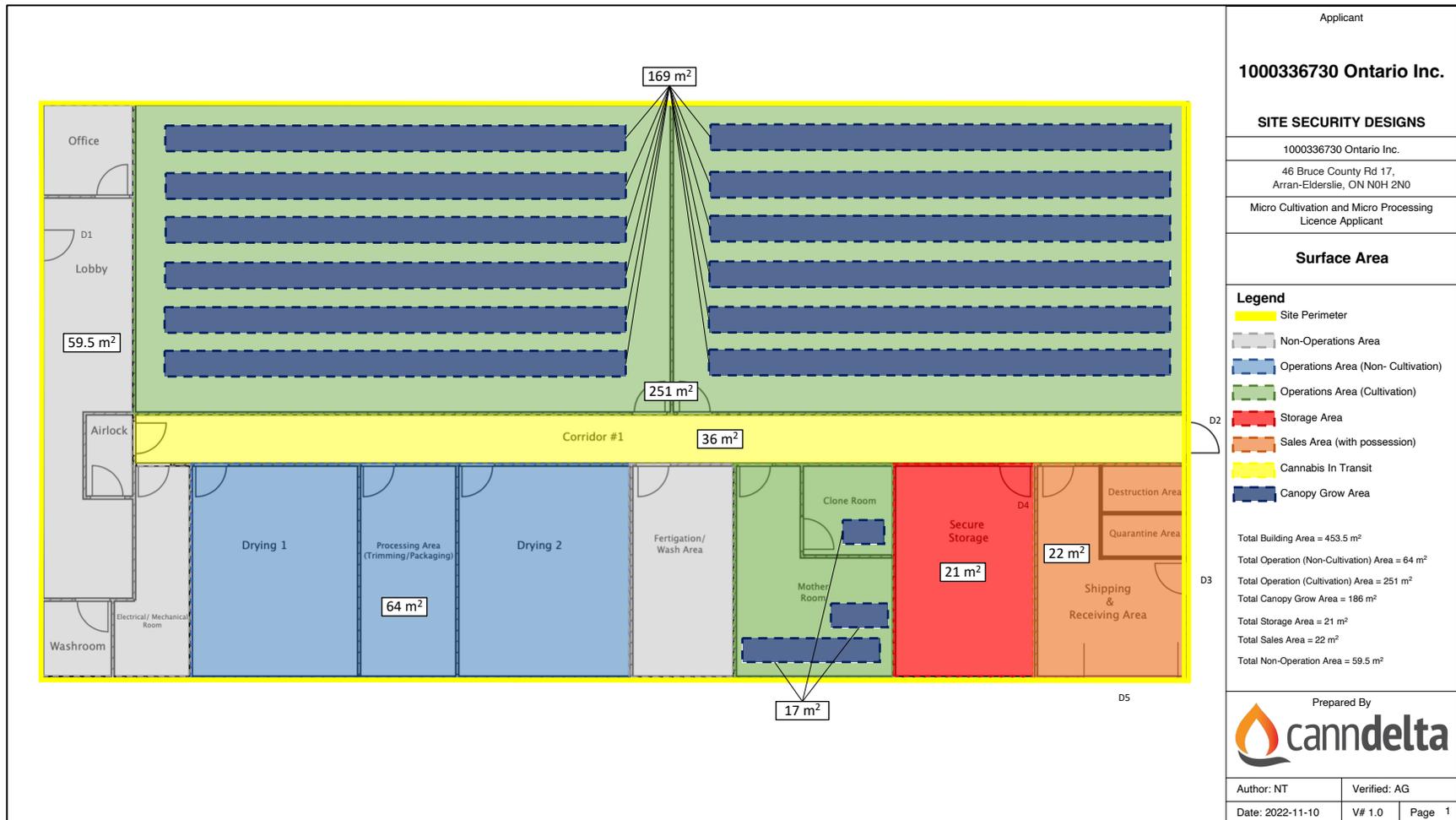


Figure 1. Estimated Surface Areas Floor Plan.