

**STAFF REPORT TO THE
PLANNING COMMISSION
FOR THE CITY OF TIGARD, OREGON**



SECTION I. APPLICATION SUMMARY

CASE NAME: MARIJUANA FACILITIES DEVELOPMENT CODE AMENDMENT

CASE NO.: Development Code Amendment (DCA) **DCA2014-00002**

PROPOSAL: The City of Tigard proposes legislative amendments to the Tigard Development Code (TDC) to establish reasonable time, place, and manner regulations for marijuana facilities. Proposed changes include new definitions to be placed within Chapter 18.120 (Definitions); text amendments to Chapter 18.210 (General Administrative Provisions) to remove a requirement that development be consistent with federal law; and creation of a new chapter to be titled 18.735 (Marijuana Facilities) that would limit hours of operation, establish minimum buffer distances from residential and park zones, require exterior design requirements to enhance security, establish off-site odor standards, and create an associated review procedure. The proposed text and map amendments for the Planning Commission's review are included in **Attachment 1**, and summarized below in Section IV of this report:

APPLICANT: City of Tigard
13125 SW Hall Blvd.
Tigard, OR 97223

ZONES: Citywide

LOCATION: Citywide and properties identified in the Attached Maps.

**APPLICABLE
REVIEW
CRITERIA:**

Statewide Planning Goals 1 (Citizen Involvement), 2 (Land Use Planning), 6 (Air, Water, and Land Resources Quality), and 9 (Economic Development); ORS 475 (Oregon Medical Marijuana Act); Statewide Ballot Measure 91 (Control, Regulation, and Taxation of Marijuana and Industrial Hemp Act); Comprehensive Plan Goals 1.1.2, 2.1.2, 2.1.3, 2.1.6, 2.1.11, 2.1.21, 2.1.23, 2.1.24, 6.1.7, 9.1.3, 9.1.12, 10.2.1 and 10.2.8.; and TDC Chapters 18.380.020 and 18.390.060.G.

SECTION II. STAFF RECOMMENDATION

Staff recommends the Planning Commission find in favor of the proposed development code text amendments (Attachment 1); with any alterations as determined through the public hearing process, and make a final recommendation to the Tigard City Council.

SECTION III. BACKGROUND INFORMATION & PROJECT SUMMARY

The purpose of the Marijuana Facilities Project is to establish reasonable time, place, and manner restrictions on the full range of “medical” and “recreational” marijuana facilities soon to be allowed under State Law. A brief summary of legislative history is below, followed by a summary of the proposed changes and comparable regulations adopted by nearby jurisdictions.

Legislative Background

- November 3, 1998 - Oregon voters approved Ballot Measure 67 allowing the medical use of marijuana. Known as the Oregon Medical Marijuana Act (OMMA), the law protects medical marijuana users who comply with its requirements from state criminal prosecution.
- August 14, 2013 - Governor signs HB3460, which requires the Oregon Health Authority to develop and implement a process to register medical marijuana dispensaries so that patients could legally purchase medical marijuana. Under this bill, dispensaries cannot be within 1,000 feet of a school, 1,000 feet of another dispensary, and must be located within an industrial, commercial, or mixed-use zone.
- February 11, 2014 - City of Tigard adopts a temporary prohibition on medical marijuana dispensaries under Ordinance 14-04.
- March 19, 2014 – Governor signs SB1531 which authorizes local governments to adopt reasonable regulations regarding the hours of operation; location; and manner in which medical marijuana dispensaries are operated. SB1531 also states that a local jurisdiction may enact an ordinance declaring a one-year moratorium on dispensaries.
- April 22, 2014 - Tigard City Council extends the temporary prohibition on marijuana dispensaries until May 1, 2014 under Ordinance 14-08.
- November 4, 2014 - Oregon voters approved Ballot Measure 91 to legalize the use and possession of recreational marijuana on July 1, 2015. The law also directs the Oregon Liquor Control Commission to tax, license, and regulate recreational marijuana through a licensing system to be established by January 2016. The measure did not make any changes to the existing medical marijuana system.
- May 1, 2015 - Automatic sunset date of Tigard’s temporary prohibition on medical marijuana dispensaries. No further extensions allowed under state statute.

Proposed Amendments

At present the city is unable to issue any new permits or activities related to state-authorized marijuana use due a temporary prohibition, as discussed above, and a TDC requirement that all development be consistent with federal law. This places the Development Code at odds with recent legislative changes made by the Oregon State Legislature and Oregon Voters. The purpose of this project is to bring the City into compliance with state law while preventing or mitigating unwanted community impacts that could potentially result from marijuana facilities operating within the community.

As proposed, the new code language would result in the following:

- Amend the Tigard Development Code as follows:
 - Text Amendments to Chapter 18.120 (Definitions) to establish new definitions for “Marijuana” and “Marijuana Facility”
 - Text Amendments to Chapter 18.210 (General Administrative Provisions) to remove the requirement for consistency with federal law

- Creation of Chapter 18.735 (Marijuana Facilities) to establish development standards and a review process for marijuana facilities requiring a state license or registration.
- Proposed text changes to TDC 18.210 would reduce legal uncertainties and exposure to litigation presented to the City and applicants where state and federal law conflict on the matter of marijuana.
 - Tigard Development Code (TDC) Subsection 18.210.030.A presently requires all development applications to be consistent with federal law.
 - Continued federal classification of marijuana as a Schedule II drug may require the city to deny all land use applications for medical marijuana facilities as not being consistent with Federal law.
 - If the code remains unchanged, uncertainty will remain as some facilities may be able to open if no land use permits are required from the city (i.e. conversion of an existing retail space to a state licensed dispensary).
 - Measure 91 requires a petition and election of the voters for a jurisdiction to prohibit recreational marijuana licenses.
- Proposed text changes to create TDC 18.735 (Marijuana Facilities) would apply a uniform set of development standards to facilities requiring a state license or registration under ORS 475 (Oregon Medical Marijuana Act) and Statewide Ballot Measure 91 (Oregon Legalized Marijuana Initiative).
- Would supplement existing state rules regarding buffer and zone requirements for the siting of medical marijuana dispensaries, and any future state requirements for the siting of recreational marijuana facilities as the OLCC and State Legislature establish new regulations for their location and operation.
 - Would require a minimum 500' buffer between a site containing a marijuana facility and a property within a residential zone or park zone, or within 500' of a library
 - Would require a minimum 1,000' buffer between a site containing a marijuana facility and a property containing a public or private school, or a career school where minors are present.
 - Would limit hours of operation to between 10am and 8pm.
 - Would establish design requirements and odor standards to prevent off-site nuisances and enhance security.
- Would apply to the full range of activities associated with the production, processing, distribution, and sale of marijuana.
- Would not remove or replace existing code requirements for the underlying use. For example, a dispensary or an indoor grow facility would be required to meet all development code requirements applicable to "Sales-Oriented Retail" or "General Industrial" land uses in the underlying zone.

Other Jurisdictional Responses

To facilitate deliberation and establish a framework for what is considered "reasonable" by other jurisdictions, staff is including a summary of how other cities have chosen to regulate marijuana dispensaries within their borders. Note, the proposed text amendments included as Attachment 1 will apply to the full chain of production and distribution, in anticipation of future licensing authorized under Measure 91, and are not limited to dispensaries as is the case with each city or county below.

Washington County

- Limited to hours between 8:00am and 10:00pm.
- Allowed in specified commercial and industrial districts, with square footage limited to 3,000 square feet within the Industrial (IND), General Commercial (GC), and Rural Commercial (R-COM) Land Use Districts.
- Minimum 2,000 feet between dispensaries.
- Minimum 1,500 feet from any light rail platform.
- Entrances and off-street parking areas must be well lit and not visually obscured from public view.

City of Salem

- Limited to hours between 10:00am and 8:00pm.
- Cannot be located within:
 - Central Business Zoning District.
 - Within a residence or mixed-use property that includes a residence.
 - Within 500 feet of a public park or public playground.
 - Within 100 feet of a residentially zoned property unless the location abuts a major arterial or parkway.
 - Within 100 feet of a certified child care facility.
- Drive-through windows prohibited.
- All odors must be contained to premises.

City of Beaverton:

- Limited to hours between 7:00am and 10:00pm.
- Limited to three zones: GC (General Commercial), CS (Community Service), and CC (Corridor Commercial).

City of Ashland

- Limited to hours between 9:00am and 7:00pm.
- Limited to properties adjacent to a boulevard, and prohibited within the Downtown Design Standards Zone.
- Design standards
 - Must be located within a permanent building.
 - Drive-through windows prohibited.
 - Security bars and grates prohibited.
 - Establishes off-site odor standards.

City of McMinnville

- Limited to hours between 10am and 7pm.
- Minimum 1,000 foot buffer from a preschool, public library, aquatic center, and community center.

City of Albany

- Minimum 300 foot distance buffer from any property zoned residential, mixed-use, Office Professional, or Neighborhood Commercial.
- Restrictions do not apply to property zoned Industrial Park, Light Industrial, or Heavy Industrial.

SECTION IV. APPLICABLE CRITERIA, FINDINGS AND CONCLUSIONS

STATEWIDE PLANNING GOALS AND GUIDELINES

State planning regulations require cities to adopt and amend Comprehensive Plans and land use regulations in compliance with the state land use goals. Because the proposed Code Amendments have a limited scope and the text amendments address only some of the topics in the Statewide Planning Goals, only applicable Statewide Goals are addressed below.

Statewide Planning Goal 1 – Citizen Involvement:

This goal outlines the citizen involvement requirement for adoption of Comprehensive Plans and changes to the Comprehensive Plan and implementing documents.

FINDING: This goal has been met by complying with the Tigard Development Code notice requirements set forth in Section 18.390.060 (Type IV Procedures). Notices were sent by US Postal Service on December 16, 2015 to affected government agencies and the latest version of the City's interested parties list. A notice was published in the Oregonian newspaper and the City published newsletter (Cityscape) prior to the hearing. Project information and documents were published to the City website prior to the public hearing. A minimum of two public hearings will be held (one before the Planning Commission and the second before the City Council) at which an opportunity for public input is provided. This goal is satisfied.

Statewide Planning Goal 2 – Land Use Planning:
This goal outlines the land use planning process and policy framework.

FINDING: The Department of Land Conservation and Development (DLCD) has acknowledged the City's Comprehensive Plan as being consistent with the statewide planning goals. The Development Code implements the Comprehensive Plan. The Development Code establishes a process and standards to review changes to the Tigard Development Code in compliance with the Comprehensive Plan and other applicable state requirements. As discussed within this report, the applicable Development Code process and standards have been applied to the proposed amendment. This goal is satisfied.

Statewide Planning Goal 6 – Air, Water, and Land Resources Quality:
This goal seeks to maintain and improve the quality of the air, water and land resources by the state.

FINDING: The Department of Land Conservation and Development has acknowledged the City's Comprehensive Plan as being consistent with the statewide planning goals. The proposed text amendments create a land use control that will buffer land uses and prevent or mitigate off-site impacts that could lead to conflicting impacts upon air resources. Consistency with the City's air quality goal and policies are discussed later in this report under applicable policies of the Tigard Comprehensive Plan. This goal is satisfied.

Statewide Planning Goal 9 – Economic Development:
This goal seeks to provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

FINDING: The Department of Land Conservation and Development has acknowledged the City's Comprehensive Plan as being consistent with the statewide planning goals. Consistency with the City's Comprehensive Plan Economic Development goals and policies is discussed later in this report under Tigard Comprehensive Plan Goal 9.1 and associated policies. This goal is satisfied.

CONCLUSION: Based on the findings above and the related findings below, staff finds the proposed code amendments are consistent with applicable Statewide Planning Goals.

APPLICABLE PROVISIONS OF THE OREGON MEDICAL MARIJUANA ACT

Initially adopted by State ballot measure in 1998, the Oregon Medical Marijuana Act (ORS 475) governs the production, distribution, and use of medical marijuana within the State of Oregon. In March 2014, the Oregon Legislature amended ORS 475 under Senate Bill 1531 which authorizes local governments to impose reasonable regulations on the operation of medical marijuana facilities.

SECTION 2. Notwithstanding ORS 633.738, the governing body of a city or county may adopt ordinances that impose reasonable regulations on the operation of medical marijuana facilities registered, or applying for registration, under ORS 475.314 that are located in the area subject to the jurisdiction of the city or county. For purposes of this section, “reasonable regulations” includes reasonable limitations on the hours during which a medical marijuana facility may be operated, reasonable limitations on where a medical marijuana facility may be located within a zone described in ORS 475.314 (3)(a) and reasonable conditions on the manner in which a medical marijuana facility may dispense medical marijuana.

FINDING: As detailed in Attachment 1, the proposed amendments establish reasonable restrictions on hours of operation, allowed locations, and design and operational requirements to prevent or mitigate potential off-site community impacts. Because SB1531 does not define the word “reasonable”, the amendments are based in part on pre-existing development code restrictions already adopted and enforced within the city of Tigard, or elsewhere across the state and Pacific Northwest. As detailed in Attached 2, preliminary mapping of the effects of the proposed location restrictions indicates that a significant portion of the City can comply with the buffer restriction, and would not create an undue burden on businesses trying to find a location to operate. This requirement is met.

CONCLUSION: Based on the findings above, staff finds that the proposed code text amendment is consistent with the Oregon Medical Marijuana Act.

APPLICABLE PROVISIONS OF THE CONTROL, REGULATION, AND TAXATION OF MARIJUANA AND INDUSTRIAL HEMP ACT (MEASURE 91)

On November 4, 2014, Oregon voters approved Ballot Measure 91 (Control, Regulation, and Taxation of Marijuana and Industrial Hemp Act) to legalize the use and possession of recreational marijuana on July 1, 2015. The law also directs the Oregon Liquor Control Commission to tax, license, and regulate recreational marijuana. Section 59 of the act specifically authorizes local governments seeking to impose reasonable time, place, and manner restrictions in order to address adverse community impacts.

SECTION 59. Authority of cities and counties over establishments that serve marijuana.

(1) Cities and counties may adopt reasonable time, place and manner regulations of the nuisance aspects of establishments that sell marijuana to consumers if the city or county makes specific findings that the establishment would cause adverse effects to occur.

FINDING: As detailed in Attachment 1, the proposed amendments establish reasonable restrictions on hours of operation, allowed locations, and design and operational requirements to prevent or mitigate potential off-site community impacts. Because Measure 91 does not define the word “reasonable”, the amendments are based in part on pre-existing development code restrictions already adopted and enforced within the city of Tigard, or elsewhere across the state and Pacific Northwest. As detailed in Attached 2, preliminary mapping of the effects of the proposed location restrictions indicates that a significant portion of the City can comply with the buffer restriction, and would not create an undue burden on businesses trying to find a location to operate.

As detailed below and in the purpose statement of the proposed Marijuana Facilities chapter, the purpose of the proposed amendments is to prevent or mitigate possible adverse community impacts associated with marijuana facilities. These include, but are not limited to, the following:

- Diversion of marijuana to unauthorized cardholders, particularly minors;
- Unpleasant odors associated with the growing, processing, and consumption of marijuana;
- Unwanted noise generated by visiting customers during early or late hours, and/or the constant hum of electrical generators and fans;
- Crime such as theft, burglary, armed robbery, and kidnapping that can result due to the presence of large amounts of cash, a product that can be resold for significant amounts of money on the black market, and potentially vulnerable users visiting the facilities;
- Threats to health, life and property resulting from facilities not constructed to code; and/or
- Explosions resulting from the use of butane as a processing agent.

These impacts are intended to be prevented or controlled by creating minimum distances between marijuana facilities and residential neighborhoods or other places where children are present, by limiting hours of operation, limiting off-site odors, and requiring minimum design standards to facilitate security and safety. This requirement is met.

CONCLUSION: Based on the findings above, staff finds that the proposed code text amendment is consistent with the Oregon Medical Marijuana Act.

TIGARD COMPREHENSIVE PLAN

State planning regulations require cities to adopt and amend Comprehensive Plans and land use regulations in compliance with the state land use goals and consistent with Comprehensive Plan Goals and Policies. Because the Development Code Amendments have a limited scope and the text amendments address only some of the topics in the Tigard Comprehensive Plan, only applicable comprehensive plan goals and associated policies are addressed below.

Comprehensive Plan Goal 1: Citizen Involvement

Policy 1.1.2: The City shall define and publicize an appropriate role for citizens in each phase of the land use planning process.

FINDING: This goal has been met by meeting and exceeding the Tigard Development Code notice requirements set forth in Section 18.390.060 (Type IV Procedures). Notices were sent by US Postal Service on December 16, 2015 to affected government agencies and the latest version of the City's interested parties list, and a copy of the same notice was emailed to a list of individuals who had previously expressed interest in the topic of marijuana regulations within Tigard. A notice was published in the Oregonian newspaper and the City published newsletter (Cityscape) prior to the hearing. Project information and documents were published to the City website prior to the public hearing. A minimum of two public hearings will be held (one before the Planning Commission and the second before the City Council) at which an opportunity for public input is provided. This policy is met.

Comprehensive Plan Goal 2: Land Use Planning

Policy 2.1.2: The City's land use regulations, related plans, and implementing actions shall be consistent with and implement its Comprehensive Plan.

FINDING: As demonstrated in this staff report, the proposed amendments to the Tigard Development Code are consistent with the Tigard Comprehensive Plan. This policy is satisfied.

Policy 2.1.3: The City shall coordinate the adoption, amendment, and implementation of its land use program with other potentially affected jurisdictions and agencies.

FINDING: Copies of the proposed text amendments were sent to affected agencies were invited to comment on the proposal, as required by Section 18.390.060 (Type IV Procedures) and discussed in Section VII of this report. Comments submitted by affected agencies have been incorporated into this report and the proposed amendments. This policy is met.

Policy 2.1.6: The City shall promote the development and maintenance of a range of land use types which are of sufficient economic value to fund needed services and advance the community's social and fiscal stability.

FINDING: The proposed text amendments will enable a new type of taxable economic activity to occur within the city. This policy is satisfied.

Policy 2.1.11: The City shall adopt regulations and standards to protect public safety and welfare from hazardous conditions related to land use activities.

FINDING: The proposed text amendments are intended to protect the public welfare by providing for appropriate distance buffer from residential areas and parks, and minimum design requirements, in order to prevent or reduce hazards associated with a cash only business, a product with a strong black market value, and the exposure of a controlled product to minors. This policy is satisfied.

Policy 2.1.21 The City shall require all development to conform to site design/development regulations.

FINDING: The proposed amendments will require all marijuana facilities requiring a state license or state registration to conform to site design and development regulations, even when there is no underlying change in land use classification. This policy is satisfied.

Policy 2.1.23 The City shall require new development, including public infrastructure, to minimize conflicts by addressing the need for compatibility between it and adjacent existing and future land uses.

FINDING: The proposed amendments include use regulations and development standards to ensure compatibility between marijuana facilities subject to state licensing or registration, and adjacent development and public facilities. This policy is met.

Policy 2.1.24: The City shall establish design standards to promote quality urban development and to enhance the community's value, livability, and attractiveness.

FINDING: The proposed amendments include design standards that will protect community livability by allowing the development of marijuana facilities within the City in a manner that is compatible with

surrounding land uses and public facilities. This policy is met.

Comprehensive Plan Goal 6: Environmental Quality

Policy 6.1.7: The City shall improve the Environmental Performance Standards to minimize impacts from noise and light pollution.

FINDING: The proposed amendments establish an environmental performance standard for marijuana related odors. This policy is satisfied.

Comprehensive Plan Goal 9: Economic Development

Policy 9.1.3 The City's land use and other regulatory practices shall be flexible and adaptive to promote economic development opportunities, provided that required infrastructure is made available.

FINDING: The proposed text amendments are intended to be flexible and adaptive to the new marijuana economy in Oregon, as investors try new and unknown business models and the state adopts new regulatory requirements. This flexibility and adaptability is grounded in the regulation of the license or regulation requirement, not the underlying land use classification, and a focus on minimum compliance standards rather than proscribed locations. This policy is met.

Policy 9.1.12 The City shall assure economic development promotes other community qualities, such as livability and environmental quality that are necessary for a sustainable economic future.

FINDING: As detailed in Attachment 1, the proposed text amendments are intended to create minimum compliance standards to prevent or mitigate potential community impacts that could result from marijuana related business activity. This policy is met.

Comprehensive Plan Goal 10: Housing

Policy 10.2.1: The City shall adopt measures to protect and enhance the quality and integrity of its residential neighborhoods.

Policy 10.2.8: The city shall require measures to mitigate the adverse impacts from differing, or more intense, land uses on residential living environments, such as:

- A. Orderly transitions from one residential density to another;**
- B. Protection of existing vegetation, natural resources and provision of open space areas; and**
- C. Installation of landscaping and effective buffering and screening.**

FINDING: The proposed text amendments include use regulations and development standards to prevent or mitigate adverse impacts to adjacent uses, for the purpose of protecting the quality and livability of residential neighborhoods within the city. Development standards include minimum distance buffers, limits on hours of operation, and odor standards. All marijuana facilities approved under the proposed standards will also be subject to all other provisions of the Tigard Development Code, including landscaping and buffering standards (Chapter 18.745), Sensitive Lands (Chapter 18.775), and Urban Forestry (18.790). These policies are met.

CONCLUSION: Based on the findings above, staff concludes that the proposed code text amendment is consistent with applicable provisions of the Tigard Comprehensive Plan.

APPLICABLE PROVISIONS OF THE TIGARD DEVELOPMENT CODE

Tigard Development Code Section 18.380.020, Legislative Amendments to this Title and Map, states that legislative zoning map and text amendments shall be undertaken by means of a Type IV procedure, as governed by Section 18.390.060G.

FINDING: The proposed text and map amendments are legislative in nature. Therefore, the amendment will be reviewed under the Type IV legislative procedure as set forth in the chapter. This procedure requires public hearings by both the Planning Commission and City Council. This standard is met.

Section 18.390.060.G establishes standard decision-making procedures for reviewing Type IV applications. The recommendation by the Commission and the decision by the Council shall be based on consideration of the following factors: 1) The Statewide Planning Goals and Guidelines adopted under Oregon Revised Statutes Chapter 197; 2) Any federal or state statutes or regulations found applicable; 3) Any applicable METRO regulations; 4) Any applicable comprehensive plan policies; and 5) Any applicable provisions of the City's implementing ordinances.

FINDING: Findings and conclusions are provided in this section for the applicable listed factors on which the recommendation by the Commission and the decision by the Council shall be based. This standard is met.

CONCLUSION: Based on the findings above, staff concludes that the proposed code text amendment is consistent with applicable provisions of the Tigard Development Code.

SUMMARY

CONCLUSION: As shown in the findings above, staff concludes that the proposed code text and map amendments are consistent with the applicable Statewide Planning Goals; the Oregon Medical Marijuana Act; the Control, Regulation, and Taxation of Marijuana and Industrial Hemp Act (Measure 91); applicable Comprehensive Plan goals and policies, and the applicable provisions of the City's implementing ordinances. No federal or Metro statutes or regulations were found to be applicable.

SECTION V. STAFF ANALYSIS

Staff analysis and commentary on the proposed text amendments are included as Attachment 1. Even-numbered pages contain commentary on the amendments, which are contained on the opposite (following) odd-numbered page. The commentary establishes, in part, the legislative intent in adopting these amendments.

SECTION VI. OTHER ALTERNATIVES

No Action – The code would remain unchanged. The Planning Commission could recommend no action be taken, and implement existing code when presented with a development application or land use compatibility statement for a medical marijuana facility. This course of action presents uncertainty due to conflicting local, state, and federal requirements.

- Existing Tigard Development Code (TDC) Subsection 18.210.030.A requires all development applications to be consistent with federal law.
- Continued federal classification of marijuana as a Schedule II drug may require the city to deny all land use applications for medical marijuana facilities as not being consistent with Federal law.
- Uncertainty will remain as some facilities may be able to open if no land use permits are required from the city (i.e. conversion of an existing retail space to a state licensed dispensary).
- The City could be at risk of legal action for imposing a possible moratorium, potentially in conflict with state requirements.

SECTION VII. AGENCY COMMENTS

City of Portland, City of Durham, City of Lake Oswego, City of Tualatin, City of King City, Washington County, METRO, ODOT, Oregon Department of Energy, DLCD, DEQ, ODFW, CWS, Beaverton School District, Tigard/Tualatin School District, Tri-Met, Tigard Water District, Tualatin Valley Water District, Tualatin Hills Parks and Rec District, Tualatin Valley Fire & Rescue, Tigard Public Works, and Tigard Building Division were notified of the proposed code text amendment but provided no comment.

The **City of Beaverton** was notified of the proposal and had no objections.

The **City of Tigard Police Department** reviewed the proposal and suggested text changes to increase the distance buffer to 1,000 feet from schools for regulatory consistency, and inclusion of career schools as a point of buffering. Suggested changes have been incorporated into the proposed text amendments in Attachment 1.

SECTION VIII. PUBLIC COMMENTS

No written comments were received as of the date of this staff report.

ATTACHMENTS:

- Attachments: 1. Draft Text Amendments.
2. Preliminary Location Maps
3. OLCC Liquor Stores by City (Last Updated 12/29/2014)

PREPARED BY: John Floyd
Associate Planner

January 5, 2015
DATE

APPROVED BY: Tom McGuire
Assistant Community Development Director

January 5, 2015
DATE