THURSTON COUNTY PLANNING COMMISSION

Minutes
July 6, 2005

1. Call to Order

Chair Kohlenberg called the July 6, 2005 regular meeting of the Thurston County Planning Commission to order at 7:00 p.m. Everyone provided self-introductions.

a. Attendance

Members Present: Chair Liz Kohlenberg, Commissioners Tom Cole, George Darkenwald (7:08 p.m.), Liz Lyman, Bob Musser, and Chris Lane
Members Absent: Craig Ottavelli and Joyce Roper
Staff Present: John Sonnen, Nancy Pritchett, and Valerie Gow, Recording Secretary, Puget Sound Meeting Services

b. Approval of Agenda

Commissioner Lyman moved, seconded by Commissioner Cole, to approve the agenda as presented. Motion carried.

There were no public comments.

Commissioner Darkenwald arrived at the meeting.

2. Public Hearing/Action: Open Space Application

Staff: Nancy Pritchett

Ms. Pritchett referred to the proposed open space application from Michelle and Danaher Dempsey and requested the Commission forward a request for approval to the Thurston County Board of Commissioners.

Commissioner Cole moved, seconded by Commissioner Lane, to recommend the County
Board of Commissioners approve the Open Space Application of Michelle and Danaher Dempsey. Motion carried.

3. **Public Communication Not Associated For Topics That Have Not Been Docketed As Quasi-Judicial**

There were no public comments.

4. **Approval of Minutes**

Approval of minutes and acceptance of tapes from June 15 2005.

Commissioner Lyman moved, seconded by Commissioner Cole to accept the tapes and approve the minutes of June 15, 2005.

The following corrections were requested to the minutes of June 15, 2005:

- On page 2, in the first paragraph, delete “asphalt plant” in the third sentence.
- On page 2, under Reclamation in the first paragraph in the fifth line, rephrase the sentence to read, “Sites have to be reclaimed under regulations when mined out.”
- On page 2, under Reclamation in the first paragraph, change the eighth sentence to read, “In the draft, the only way a mine can be permitted in a long-term forestry area is if it could be reasonably returned to forestry use.”
- On page 2, under Reclamation in the second paragraph, change the fifth sentence to read, “Anyone can mine material on their own site and use it on their own site without a mineral extraction special use permit.”
- On page 2, under Reclamation in the second paragraph, change the second sentence in the second to last line to read, “There is some uncertainty about the commercial …”
- On page 3, under the first full paragraph, change the last sentence to read, “The County does not any influence regarding reclamation as it is regulated by the state.”
- On page 3, in the second paragraph, change the first sentence to read, “Staff and members discussed the relationship between asphalt production and gravel mines.”
- On page 3, in the fourth full paragraph, delete the sentence stating, “In response to a question, Ms. Hayes replied the intent is that once the site is designated, that’s the use that is allowed on the property.”
- On page 4, in the first paragraph, delete “exclusionary” in the second line.
- On page 4, in the fifth paragraph, change “Members” to Commissioners.”
- On page 4, revise the last sentence in paragraph six to read, “The Planning Commission added the option of a 1,000-foot boundary as an alternative for consideration.”
- On page 5, revise the fourth sentence to read, “Commissioner Lyman state the extraction code does not address geologic hazards even though the draft Critical Areas Ordinance refers to the extraction code for restrictions.” Revise the next sentence in the same paragraph to read, “How to protect adjacent areas, not necessarily on the parcel’s critical areas, appears to be of concern to the Commission.”
• On page 5, in the third paragraph, delete the second sentence reading, “The Language adopted early for mineral lands was taken from the best available science (BAS) version of the Critical Areas Ordinance.
• On page 5, in the sentence before item 4 revise the sentence to read, “The Planning Commission requested alternative language to be shown in a “box” in the draft document.”

The motion carried as amended.

**Approval of Minutes and Acceptance of Tapes from June 22, 2005.**

Commissioner Lane moved, seconded by Commissioner Lyman, to accept the tapes and approve the minutes of June 22, 2005 as amended.

The following corrections were requested to the minutes of June 22, 2005.

- Revise the first bulleted item on page 4 to read, “A preference that the County better control the density in buffers.
- Revise the second sentence in the third bulleted item on page 4 to read, “… Commission assumed the underlying density was one unit to five acres.”
- On page 3, in the last paragraph, second to the last sentence, revise the sentence to read, “It is not consistently applied within the UGAs by any of the cities.”
- On page 8, within the third paragraph, delete the last sentence stating, “All overlay designations is fine, and discrepancies are worked out by local development regulations.”
- On page 8, within the fourth paragraph, revise the last sentence to read, “Ms. Hayes advised that the question has not been an issue in the past.”
- On page 8, in paragraph six, delete the second sentence stating, “Chair Kohlenberg suggested Commissioners should consider the desired protection for critical areas in mineral lands.
- On page 8, revised the first sentence in paragraph seven to read, “Commissioners agreed at this time not to send…”
- On page 2, under Public Communications, “Commissioner Cole” within the first paragraph should be corrected to read, “Tom Cook.”
- On page 5, add a new bullet within the bulleted section to read, “Chair Kohlenberg pointed out that that this issue has an immediate, practical impact on the Nisqually area since the densities and their location in the Critical Areas Ordinance are part of recent Hearing Examiner decision.”

Commissioner Cole referred to the Request for Information Summary Sheet attached to the minutes and noted his request on January 26, 2005 about concerns for citizen and how they can find out if there are impediments as to what can be done with a piece of property has not been addressed by staff nor has staff been identified who will address the question. Mr. Sonnen confirmed staff will follow up on the request.

Motion carried as amended.

5. **Critical Areas Follow Up**
Mr. Sonnen provided a copy of a list of outstanding issues for the Commission to address. Issues were categorized as General, Important Habitat and Species, Geologic Hazards, Wetlands, Flooding and Channel Migration Hazards – Administrative Sections.

Mr. Sonnen reviewed four issues under General:

- Use of the term “Functions and values”
- Vegetative filter strips
- Relationship to Shoreline Master Program
- Approach for agriculture in light of the WEAN decision.

The term “function and values” has been addressed several times by the Commission as well as by staff who have expressed concerns about administering the term. The County is required by state law to provide for and protection of critical area functions and values. For example, a function of a critical aquifer recharge area would be the actual function of water infiltrating and replenishing the aquifer. The value might be the high value of the aquifer as the region may depend upon it entirely as a source of drinking water whereas some other jurisdiction that relies on a surface water body might consider the aquifer of lesser importance. Mr. Sonnen said he also discussed the issue with Commissioners Roper and Lyman. Staff recommends including within the “purpose statements” the County’s values for the community for protection of its water but not specifically to include the term “values” in the body of the ordinance. The concern centers on the inability to administer the term.

Mr. Sonnen said he spoke with Commissioner Roper earlier in the day about her concerns and she is interested in the values that involve the protection of water and the protection of small family farms, as an example, that should be reflected in the designation of critical areas and in the standards for the protection of critical areas. Mr. Sonnen asked members to advise staff of any other values that should be reflected in the purpose statements. Staff has tried to capture most of the values.

Commissioner Cole commented that there is the prospect of people having a different interpretation of “values,” which could cause some problems.

Mr. Sonnen addressed vegetative filter strips. Vegetative filter strips are basically some type of groundcover that is managed and what has been demonstrated to be effective in filtering sediments and pollutants. However, what has failed is the maintenance of vegetative filter strips, which can fill up with sediment and become useless. Everyone agrees that in a commercial, residential, or industrial application, vegetative filter strips would likely not be adequately maintained and therefore should not be use. However, some Commissioners believe they should be retained in an agriculture context.

Mr. Sonnen advised he spoke with Brian Thompson at the Thurston Conversation District. Vegetative filter strips are a standard best management practice in an agriculture context and are used frequently within the County. The failure rate, however, is 50%. An increase in success might be experienced if there was some regulatory enforcement and a monitoring process. The draft calls
for the approval authority to require vegetative filter strips as a means to mitigate impacts to bogs or natural heritage wetlands that are particularly sensitive to inputs. Vegetative filter strips are proposed as an add-on to mitigate impacts. The same applies for intense of uses. There is an option when someone is converting from a low standard agriculture use to a high intensity agriculture use, such as a turf farm or a diary, etc. to employ best management practices. Specific examples have been identified that include vegetative filter strips and fences. One provision in the draft calls for reduction of riparian width in the agriculture context if someone doesn’t manage a vegetative strip.

Mr. Sonnen asked the Commission to provide input about its intent for requiring vegetation filter strips. Commissioner Cole expressed concerns about creating another set of rules that is not enforced. Mr. Sonnen advised that it is likely staff would have to create a tickler file for vegetative filter strip inspections along with establishing a fee to cover the time involved in inspecting.

It was noted the Commission discussed the utility of the vegetative filter strip and conveyed that when not maintained they become a source of increased pollutants. Mr. Sonnen said the issue is not intended to be a part of the mitigation plan, rather if there is an existing use that is documented to be a contaminant source for a bog or a Category 1 wetland, that in addition to a buffer, there would be the ability to require a vegetative filter strip to help mitigate the impacts. Commissioner Cole offered that any method of enforcement should be the responsibility of the property owner rather than having the burden imposed on staff.

Discussion followed about the issue of enforcement, expectations by the applicant if a special fee is involved in obtaining a permit, lack of County resources to follow through on inspections, and other alternatives to protect wetlands. Mr. Sonnen said any other alternative would likely be less effective. Several Commissioners agreed if no provision is included, the county could lose the 50% that are maintaining the filter strips. Commissioners discussed the effectiveness of the filter strips when maintained and the ineffectiveness and even detriment to sensitive areas when the strips are not maintained. Commissioners generally agreed it’s important to include some provisions regardless of enforcement action to ensure the community is aware of the need to protect sensitive areas. Mr. Sonnen cited a farm plan as an example and that there would be greater success if there was a regulation with some enforcement ability along with a monitoring process. Including a provision would provide a regulation as well as providing funding for monitoring.

Mr. Sonnen referred members to the specific section about intense of uses. Commissioners agreed to address each section separately.

Mr. Sonnen reviewed the example pertaining to wetlands. In those instances involving a bog where natural heritage wetlands are sensitive to input from sediment and nutrients, the approval authority has the ability, where demonstrated that the use is contaminating the wetland, to require use of vegetative filter strips. After additional discussion, the majority of the Commission agreed to include a provision for requiring a vegetative filter strip and that the main concern, knowing that some filter strips fail, is having some enforcement ability for the county to enforce maintenance requirements.

Mr. Sonnen said another situation is including a long list of possible best management practices and
techniques that can be used to mitigate the impacts of an intensive use and that staff can take whatever tool is appropriate to mitigate the impact from the use. Vegetative filter strips could be included in the list. The Commission agreed with staff’s recommendation.

Mr. Sonnen advised the next issue is the relationship of critical areas to the Shoreline Management Program, which includes much overlap between the Shoreline Master Program and critical areas because the shoreline program includes all large streams, critical areas, marine shorelines, lakes, and ponds. Mr. Sonnen distributed additional information. The Shoreline Master Program is not necessarily a habitat protection document and tries to accommodate water dependent uses that have no other regulations. He referred the Commission to information about Water-Dependent Uses that include elements that are common along a shoreline, such as aquaculture, boat launch facilities, ferry terminals, marinas, etc. Additionally, there are water-related uses that have a relationship but don’t necessarily need to be located on or near the water. There are also water-enjoyment uses, such as recreational uses and restaurants, etc. that benefit from the view. He said he would like to confirm the intent and apply consistently the understanding that the critical areas regulations allow the category of uses for Water-Dependent Use, provided they comply with the standards and avoid or minimize the impacts. Basically, they are another use but would be limited to only Water-Dependent Uses, and not to Water-Related or Water-Enjoyment Uses. The Commission agreed with staff’s proposal.

Mr. Sonnen referred to the county’s approach to agriculture use in light of the WEAN decision. Early in the discussions about how to approach existing uses and critical areas, there was a general theme was to allow existing agriculture uses to continue but with a requirement for best management practices to mitigate any impacts. In discussions about intensive uses, if an intense use such as a dairy or industrial use occurs, then the County would require measures to mitigate impacts. The WEAN case involving Island County exempted agriculture from the critical areas regulations if it complied with best management practices. There was an exercise in crafting best management practices that were specific to Island County. The case went to the State Court of Appeals and was rejected that there is no evidence to support the need to exempt agriculture in order to protect continued agriculture and that there was no record how much land was farmed and what its cumulative impacts would be on critical areas. Several Commissioners were concerned that Island County exempts agriculture subject to best management practices, whereas Thurston County does not exempt it but does require the use to comply with best management practices. The question is whether the approach will hold up if it were challenged.

Mr. Sonnen distributed information about how the County approaches regulations pertaining to existing agriculture uses.

Currently, agriculture status can be lost if the use is inactive for five years. Under the proposal, if converting from an agricultural use to an intense agricultural use, it will trigger all standard requirements including the buffers. Commissioner Lyman has offered an alternative that would trigger best management practices that would mitigate the impacts of the more intense use. The County is also requiring monitoring and no expansion of existing agriculture in critical areas. Staff reviewed each critical area category and how the County addresses general types of impacts caused by agriculture uses. He cited examples. The County’s legal counsel believes the County has
included sufficient differences in how it treats existing agriculture uses that the approach will be fine with respect to the WEAN decision. However, legal counsel has suggested giving consideration to existing impacts per the WEAN decision. Where any of the impacts are detrimental to critical areas, the regulations require some action to mitigate the impact. If it concerns water quality, the county’s regulations are particularly strong to protect the county’s water supply.

Discussion ensued about what constitutes the abandonment of a ditch if not used in five years. Mr. Sonnen reviewed what constitutes an active ditch. Abandoning the use of a ditch causes the loss of the existing and ongoing status as a ditch. The intent of the regulations is to eliminate some of the problems associated with agriculture use. Commissioner Lyman said her concern is not the issue of allowing existing agriculture in a widened buffer because urban uses are also allowed to continue in the widened buffer. She indicated her concern was that the court appears to be fixated on agriculture uses. She asked whether the county has sufficiently recorded that it has substantively looked at the issues about the impact of existing agriculture on critical areas to pass muster if the county were to be challenged.

Mr. Sonnen said the main distinction in how the county is approaching the issue aside from best management practices, is through the loss of existing and ongoing status as an agriculture use if the activity ceases for five years whereby the full buffers will take effect. Conversion of agriculture to an intensive use will also result in the loss of the land use status and the buffers apply.

Commissioner Lyman noted her concerns about the WEAN decision was the appearance of a distinction between farms that are in long-term agriculture use and other farms not similarly zoned, and that the other farms were more scrutinized. Approximately 70% of the farms in Thurston County are not in long-term agriculture use, which is her concern. She asked whether legal counsel has indicated the county needs to scrutinize the farms to the same level as the WEAN decision. Mr. Sonnen indicated the WEAN decision reflected Island County exempted the use without adequately analyzing the impact of the exemption. It may not necessarily follow that if the county doesn’t exempt the use and adheres to best management practices that the County would be held to the same standard.

Mr. Sonnen offered to review the draft section with legal counsel prior to releasing the draft for a public hearing. However, legal counsel has also indicated the draft as written is sufficient and adequately protects the County. Mr. Sonnen suggested the approach could entail that the Commission is comfortable with the draft to the level of the County’s understanding but that a more thorough analysis may be needed to address all the issues prior to the Commission’s deliberations on the public hearing draft. The Commission agreed with the statement.

Commissioners and staff reviewed outstanding issues under Important Habitat and Species. Mr. Sonnen directed Commissioners to the purpose statements included in the draft dated 5/18/05. No changes were recommended to the purpose statements.

Commissioner Cole departed from the meeting due to illness.

Mr. Sonnen displayed an aerial photo of a river and outlined the riparian habitat area and riparian
management zones as well as channel migration zones. Under one proposal, the riparian management zone would extend 100 feet beyond the 100-year channel migration zone, and within the buffer, retention of 65% of the tree cover is required. The second proposal that is recommended by some resource agencies is to require the full width of the riparian habitat area, such as 200 feet, to also extend beyond the 100-year channel migration zone. Another option includes extending the riparian management zone to the outer boundary of the 100-year floodplain. Staff recommended dropping the last option. However, Commissioner Roper has asked staff to reconsider after reviewing whether the floodplain regulations address all concerns.

Mr. Sonnen said the intent is to ensure the existence of a vegetation area beyond the outer edge of the channel migration zone, which is not currently required. The opinion is that a riparian area is required when the stream eventually relocates. It also keeps structures and other infrastructure out of harms way. The key issue is whether to go beyond the boundary and include the 100-year floodplain.

Mr. Sonnen reviewed the functions of the floodplain and how the regulations address them. He asked Commissioners to consider whether it is warranted to keep the proposed requirement of the floodplain included in the riparian management zone. He noted he was not aware of any benefit for requiring the floodplain in the riparian management zone. Commissioner Lyman noted the reason for including the floodplain was due to the lack of mapping of the channel migration zones and that most of the channel migration zones are located in the floodplain. Until the county can map the channel migration zones, the requirement was a fallback position to regulate it. Mr. Sonnen said that at this point, the option of including the floodplain is no longer needed since the County is using Lidar photo technology and requiring studies for any development activity proposed within the historic channel migration. The Commission agreed that with the County’s ability to map and screen development proposals, the option should be eliminated.

Mr. Sonnen referred to the issue of buffer widths for small streams (page 4, Table 8-1). He reviewed the different stream types and where they drain. Staff recommends requiring 100-foot buffers to maintain water quality for streams draining directly to Puget Sound and also for Category I-III wetlands, ponds, and lakes.

Commissioner Darkenwald remarked that the proposed buffer widths exclude much land for development. Mr. Sonnen responded staff is undertaking some analysis to determine the amount of buildable lands that will be impacted. Much of the property is located in the floodplain where building is limited.

Mr. Sonnen asked the Commission if it is reasonable to require 100-foot buffers on small streams except where there are low intensity uses that are not likely to pollute the stream. Chair Kohlenberg added 100 feet is the minimum buffer to protect water quality. There are wider buffers that are required for other streams for protection for various reasons. She agreed 100-foot buffers are the minimum that are necessary to protect water quality.

Mr. Sonnen reviewed an option for inclusion in the draft that provides for adaptive management options to reduce buffers. Legal counsel has recommended excluding the option while
Commissioner Lyman has recommended retaining the option. Mr. Sonnen said legal counsel’s rationale for excluding the option is because the County can amend regulations at any time unlike comprehensive plan amendments. Anytime a study is completed that suggests something different than the regulation, the County can propose an amendment. Commissioner Darkenwald commented that one buffer width does not fit every situation. Mr. Sonnen said the issue is likely to be controversial when the Commission undertakes its deliberations. Commissioners agreed to retain the Option as noted on page 4 of the Important Wildlife Habitats and Species draft for the public hearing.

Mr. Sonnen referred to page 6 of the draft and noted Commissioner Lyman has requested removing the components of the restoration plan and including them in the reports requirements. The recommendation is of an organizational nature only. The Commission agreed.

Mr. Sonnen referred to page 10 and to additional text from the Department of Ecology (DOE) for wetland buffers. Enhancements cannot be required for degraded buffer(s). However, additional buffer width can be required, according to legal counsel, if the deteriorated condition of the buffer provides inadequate levels of filtration. Mr. Sonnen reported that if the Commission retains the provisions recommended by DOE, the language should be clarified to direct the reader that any type of habitat restoration would need to go above and beyond the requirements of the section. The Commission agreed that in order to obtain a buffer reduction from the standard buffer, the restoration that is required includes improving all habitat and functions (water quality, wildlife habitat, etc.). However, if it only pertains to water quality, restoration would be in lieu of expansion of the buffer. The Commission agreed.

Mr. Sonnen referred to page 11, section 17.15.830 Important Marine Habitats. Historically, critical areas did not include anything in the marine environment. The GMA requires jurisdictions identify and protect certain marine habitats. They include such things as kelp and eelgrass beds, intertidal areas, supporting surf smelt and sand lance spawning, and commercial and recreational shellfish harvest areas. To protect the areas, the County is minimizing bulkheads. Beyond that, in the upland areas, the County wants to minimize negative impacts that come from upland sources that will be detrimental to marine habitats. A key protection is water quality. Consequently, staff recommends establishing upland areas that maintain water quality. Shading is another issue, which is created by overhanging trees. There is also value in large woody debris. The state is drafting guidance, due within a year. The state’s recommendation for protecting marine habitat is a requirement of a 150-foot buffer along all marine shorelines. However, there is no science that suggests the marine environment responds similarly as the freshwater environment responds to buffers, overhanging trees, and large woody debris. Mr. Sonnen said there are studies that document that most benefits occur within 70 to 100 feet. The subcommittee proposes 100-foot buffers to protect water quality. Mr. Sonnen added there is very little science applicable to the marine environment. Mr. Sonnen said the agencies are arguing that the science is applicable and that it is the same science that is used for riparian buffers. If the Commission decides to provide for a terrestrial component, the challenge is determining the appropriate name – either a “buffer” or “habitat.” Staff requests the Commission consider two questions – what functions should be protected and the size of the buffer for water quality protection.
Commissioner Lyman provided information about the subcommittee’s recommendation for marine habitat.

6. **Calendar**

*Who will not attend the following upcoming Planning Commission meetings?*

- **July 13, 2005** – *Briefing: Continue Critical Area Follow Up (Commissioner Darkenwald unable to attend)*
- **July 20, 2005** – *Briefing: Mineral Lands (Commissioner Cole unable to attend)*
- **August 3, 2005** – *(Commissioner Kohlenberg unable to attend)*

Commissioners discussed the importance of staying focused and completing the review. Time for deliberations will be available during the Commission’s worksessions after the public hearing.

Commissioners were asked to bring their copy of the Geologic Hazards chapter to the July 13 meeting.

**NOTE:** No additional Parking Lot issues were added during the meeting.

7. **Adjourn**

Chair Kohlenberg adjourned the meeting at 9:45 p.m.

Liz Kohlenberg, Chair  
Tom Cole, Vice Chair

Prepared by Valerie Gow, Recording Secretary, Amended September 21, 2005  
Puget Sound Meeting Services
## REQUEST FOR INFORMATION
### SUMMARY SHEET

<table>
<thead>
<tr>
<th>DATE OF REQUEST</th>
<th>ISSUE/REQUEST</th>
<th>AUTHOR</th>
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<tbody>
<tr>
<td>1/26/05</td>
<td>Field Trip when begin working on Development Code Docket or at least comprehensive maps</td>
<td>Chair Kohlenberg</td>
<td>Advanced Planning Staff/N. Pritchett</td>
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<td>1/26/05</td>
<td>Commissioner Cole has concerns for citizens and how they can find out if there are impediments as to what can be done with a piece of property</td>
<td>Commissioner Cole</td>
<td>Nancy Pritchett</td>
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<tr>
<td>2/16/05</td>
<td>TCPC participate in the CFP process or comments</td>
<td>Commissioner Lyman</td>
<td>John Sonnen/Mark Swartout</td>
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<tr>
<td>2/16/05</td>
<td>Balancing GMA goals with the WEAN decision</td>
<td>TCPC</td>
<td>J. Sonnen</td>
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<tr>
<td>2/16/05</td>
<td>Requested advice on whether legal counsel should be present at public hearing</td>
<td>TCPC</td>
<td>J. Sonnen</td>
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<tr>
<td>2/16/05</td>
<td>Revised Draft Work Plan for Advance Planning</td>
<td>Commissioner Kohlenberg</td>
<td>J Sonnen</td>
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<tr>
<td>5/18/05</td>
<td>Establishment of a subcommittee to study cumulative impacts of development on steep slopes</td>
<td>Staff</td>
<td>J Sonnen</td>
</tr>
<tr>
<td>6/15/05</td>
<td>Staff is to provide the following information at the Commission’s next briefing.</td>
<td>TCPC</td>
<td>Staff</td>
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- The number of mine sites that are currently less than five acres in size.
- Data from the state related to the timeframe an applicant has to complete the reclamation process.

A countywide map showing available land for mineral purposes after taking critical areas and other overlays into consideration.
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<th>Date</th>
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<tr>
<td>6/15/05</td>
<td>Staff will present examples of how the test has been applied, and rework the language to clarify how it is measured at the next briefing on Mineral Lands</td>
<td>TCPC</td>
<td>Staff</td>
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<tr>
<td>6/15/05</td>
<td>The Planning Commission agreed to send the final draft to the task force for review</td>
<td>TCPC</td>
<td>Staff</td>
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