

NOVATO PLANNING COMMISSION

RESOLUTION NO. 2025-007

RESOLUTION OF THE NOVATO PLANNING COMMISSION FINDING THE 501 DAVIDSON SELF STORAGE PROJECT, LOCATED AT 501 DAVIDSON STREET (PORTION OF APN 153-250-11), AND ITS ASSOCIATED DESIGN REVIEW AND USE PERMIT ENTITLEMENTS TO BE EXEMPT FROM ADDITIONAL CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW PURSUANT TO CEQA GUIDELINES SECTION 15183 AND SECTION 15332

WHEREAS, the City of Novato (“City”) received applications submitted by Vero-West, LLC (the “Applicant”) for design review and use permit approval for a proposed self-storage project (“Project”) on a portion of real property located at 501 Davidson Street, APN 153-250-11 (“Project Site”), which is owned by the City of Novato (the “Property Owner”); and

WHEREAS, the Project is a self-storage facility that includes 597 storage units in three buildings that total 95,400 square feet and ancillary site improvements. Demolition of existing buildings and other site improvements is required to construct the Project; and

WHEREAS, the City determined the Project is subject to the environmental review requirements of the California Environmental Quality Act (CEQA) and its implementing regulations (CEQA Guidelines); and

WHEREAS, the City determined the Project is exempt from additional environmental review pursuant to CEQA Guidelines Sections 15183 and 15332, and the procedures for review set forth in the City of Novato Environmental Review Guidelines; and

WHEREAS, on October 27, 2020, the City Council, acting as lead agency, adopted Resolution 2020-068, approving the General Plan 2035 Final Environmental Impact Report (FEIR) in accordance with the California Environmental Quality Act (“CEQA”) and City of Novato Environmental Review Guidelines. Said FEIR analyzed the environmental impacts of development consistent with the Light Industrial Office (LIO) General Plan land use designation as applicable to the Project Site; and

WHEREAS, the Design Review Commission held a duly noticed public hearing on March 5, 2025, at which the Design Review Commission recommended the Planning Commission approve the design aspects of the Project; and

WHEREAS, a public hearing notice describing the Project and the City’s intent to exempt the Project from additional environmental review was sent to all affected property owners within 600 feet of the boundaries of the Project Site pursuant to Novato Municipal Code Section 19.58.020, all persons requesting notice, and published in the Marin Independent Journal, a newspaper of local circulation, on August 28, 2025; and

WHEREAS, the Planning Commission held a duly noticed public hearing on September 8, 2025, and considered all oral and written comments on the proposed Project, including the CEQA determinations at issue herein.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission hereby finds and determines as follows:

Section 1. Record

The Record of Proceedings (“Record”) upon which the Planning Commission bases its decision includes, but is not limited to: (1) the staff reports, City files and records and other documents, prepared for and/or submitted to the City relating the Project and the Project's associated development entitlement requests; (2) the evidence, facts, findings and other determinations set forth in this resolution; (3) the City of Novato 2035 General Plan, the General Plan 2035 Final Environmental Impact Report (FEIR); (4) the Novato Municipal Code; (5) all designs, plans, studies, data and correspondence submitted by the City in connection with the Project and the Project's associated development entitlement requests; (6) all documentary and oral evidence received at public workshops, meetings, and hearings or submitted to the City for the Project and the Project's associated development entitlement requests; (7) all other matters of common knowledge to the Planning Commission including, but not limited to, City, state, and federal laws, policies, rules, regulations, reports, records and projections related to development within the City and its surrounding areas.

The location and custodian of the records is the Novato Community Development Department, 922 Machin Avenue, Novato, California, 94945.

Section 2. Findings

The Project does not require further environmental review pursuant to CEQA Guidelines Sections 15183 and 15332. Section 15183 applies to projects that are consistent with the land use and development intensity established by a general plan for which an EIR was certified. Section 15332 applies to in-fill development projects meeting certain criteria.

Section 15183 – Projects Consistent with a Community Plan or Zoning

CEQA Guidelines Section 15183 states that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

Novato General Plan 2035 (“General Plan 2035”) was adopted in October 2020 and applies citywide. The FEIR certified for General Plan 2035 analyzed the potential environmental effects of the land use designations and associated development assigned to parcels throughout Novato as depicted on General Plan Land Use Map - GP-1. The FEIR included a mitigation monitoring and reporting program specifying numerous mitigation measures that may be applicable to

individual projects and project sites depending on the particular components of the project and its location.

The City determined the following FEIR mitigation measures are applicable to the Project: BIO-2 (Biological Studies for New Development); BIO-3 (Biological Resources Inventory for New Development); BIO-4 (Nesting Bird Protection); CUL-1 (Historical Resources Study Program); CUL-2 (Archaeological Resources Study Program); and CUL-3 (Paleontological Resource Studies). The City requested, and the Applicant provided, a Biological Resources Assessment and Cultural Resources Study to satisfy the above-listed mitigation measures. These studies provide recommended measures, consistent with the FEIR mitigation measures, to avoid or minimize the potential environmental impacts addressed in the FEIR and relevant to the Project and Project Site. These recommended measures address pre-construction nesting bird and bat surveys, lighting design, and the accidental discovery of cultural resources and human remains. The recommended measures will be applied to the Project as conditions of approval.

General Plan Land Use & Development Intensity

The Project Site is assigned the Light Industrial Office (LIO) General Plan land use designation. This designation allows self-storage uses, including associated administrative office space. The LIO land use designation specifies a maximum floor area ratio (FAR) of 0.4, which is only applicable to the office space in the Project. The Project’s office space is 1,200 square feet, which equals an FAR of 0.016 FAR based on the 1.7-acre area of the Project Site. Accordingly, the Project is consistent with General Plan 2035 with respect to land use and development intensity.

Self-storage units are not subject to FAR because these units do not fall within the definition of FAR provided in the Novato Zoning Code as drafted to implement Novato General Plan 2035. The Planning Commission staff report prepared for the Project, dated September 8, 2025, explains why FAR is inapplicable to self-storage units. The staff report is included herein by reference and is part of the Record.

The City adopted *General Plan 2035* and its associated Final Environmental Impact Report (FEIR) on October 27, 2020. The Project has been reviewed to determine whether there are any significant environmental effects which are peculiar to the Project or the Project Site, as required under CEQA Guidelines subsection 15183(b)(1) through (b)(4), as detailed below:

1. There are no circumstances peculiar to the Project or Project Site indicating the potential for significant environmental effects. The Project is consistent with uses allowed on sites designated for light industrial and office use. The Project includes landscaping, vehicle circulation and parking, stormwater control and other site improvements typical of commercial and industrial sites, as required by the Novato Municipal Code (NMC).

The Project Site is fully paved, relatively flat (sloping generally from northeast to southwest), is developed with several buildings, and does not host any natural habitat features; the Site was most recently used as a construction equipment and materials yard for a telecommunications company.

A small portion of the Project Site, along the southerly property boundary, is within a FEMA Flood Zone (Zone AE), but buildings and other infrastructure are not proposed to be constructed in this area. Additionally, it is not uncommon for commercial and industrial sites to be located in flood zones, and the General Plan and Novato Municipal Code anticipated development in flood zones and have regulations regarding development and construction in these zones.

Based on the conditions above, there is nothing peculiar about the Project or Project Site indicating the potential for significant environmental impacts.

2. There is no evidence of circumstances indicating the potential for significant environmental impacts that are unique to the Project Site or Project that were not analyzed in the certified FEIR for General Plan 2035. The FEIR analyzed potential impacts to biological resources and cultural resources and included mitigation measures to require site specific studies based on site characteristics and project components. The City analyzed the Project to determine if any special site-specific studies were necessary to comply with the FEIR and its mitigation measures. In this case, the City determined that biological resource and cultural resources assessments were necessary to comply with the mitigation measures of the FEIR.

The Applicant submitted site specific biological and cultural resource assessments of the Project and Project Site. The reports indicate the Project would not adversely impact biological and cultural resources with implementation of recommended measures addressing the potential for nesting birds, roosting bats in buildings to be demolished, and unanticipated cultural resources and human remains. The City will adopt these recommended measures as conditions of approval to the Project by separate resolution.

3. Based on the record, there is no evidence of circumstances indicating the potential for significant off-site impacts or cumulative impacts that are unique to the Project Site or the Project which were not discussed in the certified FEIR for General Plan 2035.

The Project Site is adjacent to wetlands. However, this circumstance is not peculiar or unique because there are numerous waterways and wetlands throughout Novato. Further, the FEIR anticipated that sites near wetlands and waterways would be developed, and mitigation measures were adopted to address potential impacts these biological features. Finally, as detailed above, the Project Site is currently developed and was actively used as an equipment and construction materials yard. As such, development features and human activity have long been present near the wetlands adjacent to the Project Site. Nevertheless, the Project has been designed and will be conditioned to ensure the nearby wetlands will not be significantly impacted.

The Biological Resources Assessment for the Project recommends lighting design features to avoid disturbing off-site wildlife in the West Deer Island area south of the site and for nesting bird surveys of areas adjacent to the project work area. The recommendations are consistent with the FEIR's mitigation measures to protect biological resources. The City hired W-Trans,

a traffic engineering firm, to determine the anticipated traffic generated by the Project. W-Trans estimates 107 daily trips and determined that these trips will not require any off-site improvements to comply with General Plan policies. Additionally, these trips will not result in significant off-site or cumulative impacts that are unique to Project Site or Project.

4. There is no new information that was not known when the FEIR for General Plan 2035 was certified indicating that any potentially significant effect identified therein would be more severe than discussed in the FEIR. Generally, the circumstances under which the FEIR for General Plan 2035 was prepared have not changed, including the condition of the Project Site and its surroundings. Furthermore, there have been no recent development related studies, including CEQA analyses, indicating that potentially significant impacts addressed in the FEIR for General Plan 2035 would be more severe than anticipated.

The Project is subject to complying with all applicable mitigation measures adopted pursuant to the Mitigation Monitoring and Reporting Program (MMRP) for General Plan 2035, all uniformly applicable development standards of the Novato Municipal Code, and the measures (conditions of approval) recommended in the biological and cultural resources studies referenced above. The combination of applicable mitigation measures, uniform standards, and conditions of approval avoid or reduce all potentially significant impacts to a less than significant level. This finding is consistent with those of the Final EIR.

Based on the facts above, CEQA Guidelines Section 15183 applies to the Project since the proposal is consistent with General Plan 2035 and its certified FEIR as required by the criteria of Guidelines subsection 15183(d)(1), including the criteria stipulated under subsections (d)(1)(C) and (d)(2). Therefore, no further environmental review is required for the Project.

Section 15332 – Infill Development Projects

The Project is categorically exempt from further CEQA review pursuant to CEQA Guidelines Section 15332 (In-fill Development) based on the criteria and supporting facts below:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The Project Site has a General Plan Land Use designation of Light Industrial Office (LIO) and a Zoning District classification of Light Industrial Office (LIO). The LIO land use designation is applied to areas appropriate for light industrial and manufacturing uses, including warehousing, office, retail, live-work and utility uses that will not create objectional noise, smoke, odor, dust, and other nuisances. The proposed self-storage facility is considered a light industrial use that is consistent with the LIO land use description. The LIO land use includes a maximum floor area ratio (FAR) of 0.4, with some additional allowances for certain uses. *General Plan 2035* does not include a definition of FAR, although the text of the document does include a reference and general description of FAR (Page 2-16). The *General Plan 2035* reference to FAR includes the statement “The Zoning Ordinance contains detailed descriptions of land uses permitted in each designation, as well as development standards that implement the General Plan.” Given this

statement, the City relies on the detailed definition of FAR found in the Novato Zoning Code to apply FAR to proposed development.

The LIO zoning district allows *Storage Facilities – Indoor* with the approval of a use permit. The Project is consistent with the *Storage Facilities – Indoor* land use classification. The LIO zoning district includes numerous development standards, such as building setbacks, building height, lot coverage, and FAR. The City has reviewed the Project for consistency with the applicable development standards and finds the Project is consistent with said standards. The table below details the project consistency with applicable standards.

Table 1. Development Standards

Development Feature	Code Requirement	Project	Notes
Front Setback	0 Feet (none required)	25+ Feet	
Side Setback	6 Feet	20+ Feet (to fence line)	
Rear Setback	10 Feet	60+ Feet	
Building Height*	35 Feet	35 Feet	
Building Coverage	60 Percent	54.5 Percent of Lease Area	
Floor Area Ratio	0.40	0.016	The 1,200 square-foot office area is the only floor area subject to FAR.
Parking	68	7	See below regarding parking.

* A small portion of Building C has a parapet wall height of 37 feet, as shown on plan set Sheet A5 and the two elevator overruns have a peak height of 40 feet, within the range permitted by NMC Section 19.20.070 C. 1. Roof access will be via ladders and hatches, so there are no stairwell penthouses that exceed the primary roof height. Additionally, roof-top screening may be required to adequately screen mechanical equipment.

Parking Reduction

NMC Division 19.30 details the required parking ratio for various land uses and also includes allowances for adjustments to parking requirements based on certain criteria. The codified parking ratio for *Personal storage facilities* (i.e. self-storage) is one space for each 1,500 square feet plus two spaces for manager office/residence (see NMC Section 19.30.040, Table 3-7). The Project would need to include 68 parking spaces based on the noted ratio. NMC Section 19.30.050, subsection B (Reduction of Parking) states that the review authority for a land use or development permit application may reduce the number of required parking spaces based on quantitative information provided by the applicant that documents the need for fewer spaces.

The Applicant has provided documentation indicating that the codified parking ratio is excessive for the Project and anticipated demand will be satisfied by seven (7) spaces. Additionally, the City hired W-Trans, a traffic engineering consultant, to complete a focused traffic study of the proposed use. The W-Trans study estimates that the peak hour trip generation is 10 trips, which

is equal to 5 vehicles entering and exiting the site during the peak PM hour and estimates a total daily trip generation of 107 trips, equal to approximately 54 vehicles per day. The Project includes four parking spaces in front of the office and outside of the gated and secure storage area. Three parking spaces are proposed adjacent to the entrance of Building C, which is the multi-story building that has interior hallway access to storage units. Ninety-two of the 597 proposed units have exterior access. It is likely that unit lessees will park their vehicle directly in front of their individual unit. The remaining 505 units would be accessed from interior corridors within Building C.

The Applicant provided self-storage demand information to justify the proposed parking count. According to the Self Storage Association *Demand Study* (2020), approximately 65 percent of tenants visit their unit less than once per week, with 17.5 percent visiting more than one per week, and 17.5 percent visiting about once per week. Based on the trip data provided by W-Trans and the Applicant's documentation, the Planning Commission accepts the Applicant's justification for fewer spaces and finds that seven (7) parking spaces are adequate for the Project.

Building Height

The LIO zoning district has a maximum height allowance of 35-feet. However, NMC Section 19.20.070 (Height Limits and Exceptions) offers the potential to increase this height limit by 20% through Design Review. In this instance, Building C has two parapet walls extending to 37-feet. The Applicant is requesting a height increase to allow the additional 2-feet of parapet wall height.

The Design Review Commission considered the increased height of the two parapet walls and recommended approval of Building C's design as proposed. The height increase is considered to be nominal, while providing the benefit of helping to screen views of rooftop mount mechanical equipment. Additionally, these particular parapet walls are located toward the center of Building C and are well separated from nearby residences to the west. Based on these observations, the Planning Commission accepts the additional height of the two parapet walls.

Screening Between Land Uses

The Applicant is proposing to install a 6-foot wood fence topped with 2-feet of lattice along the western boundary of the Project, a location where a 6-foot masonry wall is otherwise required by the Zoning Ordinance. The Zoning Ordinance allows a review authority (e.g., Planning Commission) to accept an alternative screening (fencing) method.

The wood fencing alternative is proposed, in part, on the undulating topography along the existing fence line, which makes installing a masonry wall difficult. Generally, a masonry wall is required for its durability and potential to provide greater sound attenuation between commercial and residential land uses. However, in this instance there won't be activities, such as materials storage or commercial vehicle movements, in close proximity to this fence line that would require the durability of a masonry wall or additional noise buffering. Finally, a wood fence would be more in keeping with the type of fencing commonly found in a residential

neighborhood. As such, a wood fence is a more suitable and practical method of providing separation between the storage facility and adjoining residences.

The Design Review Commission did not have concerns about this request and understood the Applicant will work with neighboring home owners to determine if they want the existing cyclone fence with vines replaced with the proposed wood fencing.

Based on the observations above, the Planning Commission accepts the wood fence alternative proposed by the Applicant.

- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The Project Site is located within the Novato city limits. The Site is a 1.7-acre lease area of a 3.2-acre lot. The Project Site is bordered by low-density residential development on the westerly side of the Site, the City's Corp Yard on the east/northeasterly side of the site, Davidson Street and Novato Sanitary District-owned (NSD) property on the northerly side of the site and unimproved tidal marsh and stormwater control lands owned by the Marin County Flood Control and Water Conservation District. The Project Site has historically been used for industrial uses, is within the city limits and urban growth boundary (UGB) and is substantially (over 50 percent) surrounded by urban uses. Based on a review of historic aerial images, the site was first developed in 1961 or earlier. The NSD property on the north side of Davidson Street which may appear to be undeveloped has been altered from its natural state due to grading and recontouring and includes concrete v-ditches for stormwater control. Based on a review of topographic maps, historic aerial images, and Google Street View, the property was altered after 2006 and between 2008 and 2010 the area was used as a construction staging area for the expansion of the Novato Sanitary District wastewater treatment plant.

- (c) The project site has no value as habitat for endangered, rare or threatened species.

The Applicant submitted a biological resources assessment (BRA) for the Project Site to comply with FEIR mitigation measures BIO-2 (Biological Studies for New Development), BIO-3 (Biological Resources Inventory for New Development), and BIO-6 (Biological Studies for Wildlife Movement Corridors). The BRA determined the Project Site does not have natural feature habitats that are of value to endangered, rare, or threatened species. However, there are existing structures at the Project Site that have the potential to host nesting birds and bats. Consistent with the FEIR mitigation measures, the BRA includes recommended measures to protect nesting birds that may occupy the Project Site, a requirement for a preconstruction bat survey, and post-construction lighting recommendations associated with the open space area south of the Project Site. Compliance with the recommended pre-construction studies and post-construction lighting provisions will ensure the Project is consistent with General Plan 2035 and its certified FEIR.

- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

The Project has been reviewed for potential significant effects regarding traffic, noise, air quality, and water quality. The City hired W-Trans, a traffic engineering firm, to complete a focused traffic study. The study estimates that new trips associated with the Project will be 107 trips per day. The study determined these vehicle trips would be within the limits of the General Plan's level of service thresholds for signalized intersections. This finding is consistent with the FEIR's analysis of level of service. Further, a project adding fewer than 110 vehicle trips is presumed to not have a significant impact on vehicle miles travelled ("VMT").

The Project is required to comply with the uniform noise standards detailed in *General Plan 2035* and NMC Section 19.22.070 (Noise and Construction Hours). The Project is considered to be a low-intensity land use and is not anticipated to create noise above acceptable levels at the boundaries of the Project Site. Nevertheless, a condition of approval will be adopted for the Project to ensure construction detail drawings provide sufficient detail regarding mechanical equipment to confirm compliance with the applicable noise requirements of NMC Section 19.22.070.

The Project will not exceed any air quality threshold based on Bay Area Air Quality Management District standards. The screening level for the warehouse land use category (most closely aligned with a self-storage use) is 452,000 square feet during site construction and 1,423,000 square feet during business operations. The Project is less than 100,000 square feet, which is significantly below the noted thresholds.

The Applicant has submitted a hydrology report and preliminary stormwater control plan to the City Engineer for review. The City Engineer has reviewed the reports and has not identified any significant deficiencies. Prior to issuance of a building permit, the City Engineer will review a final stormwater control plan to ensure the Project's design accommodates on-site stormwater drainage and will not result in a significant effect on water quality. Conditions of approval will be applied to the Project to ensure compliance with uniform stormwater control standards prior to issuance of a building permit.

(e) The site can be adequately served by all required utilities and public services.

The Project Site is served by the North Marin Water District for potable water service, the Novato Sanitary District for sewer service and solid waste and recyclable materials collection, and the Novato Fire Protection District for emergency services. The Project plans were referred to these agencies for review and comment. These agencies have requested conditions of approval to ensure the Project's design is consistent with their development standards, but none of these agencies indicated that serving the Project and Project Site would be infeasible or that service would be inadequate.

The City also analyzed the Project to determine if any of the exceptions listed in CEQA Guidelines Section 15300.2 are applicable to the Project Site, which would exclude the use of a categorical exemption. The City did not identify any cumulative or significant impacts associated with the Project, the Project Site is not near any scenic highways and does not include any historical resources. The City reviewed State databases to determine if the site is included on any

list compiled pursuant to Government Code Section 65962.5 (Cortese List). The Project Site is not on any Cortese List.

Based on the facts above, the Project meets the criteria of CEQA Guidelines Section 15332 and is exempt further environmental review.

Section 3. Indemnity and Time Limitations

- a. The Applicant or any successor in interest, whether in whole or in part, to either of them, shall defend, indemnify, and hold harmless the City and its agents, officers, attorneys, and employees from any claim, action, or proceeding brought against the City or its agents, officers, attorneys, or employees to attack, set aside, void, or annul the Planning Commission's decision at issue herein. This indemnification shall include damages or fees awarded against the City and/or its agents, officers, attorneys, or employees, if any, costs of suit, attorney's fees, and any other costs and expenses incurred in connection with such action whether incurred by the developer, the City, and/or parties initiating or bringing such claim, action, or proceeding.
- b. The Applicant or any successor in interest, whether in whole or in part, to either of them, shall defend, indemnify, and hold harmless the City and its agents, officers, attorneys, and employees for all costs incurred in additional investigation of or study of, or for supplementing, preparing, redrafting, revising, or amending any document, if made necessary or advisable by said claim, action, or proceeding and the Applicant desires to pursue securing such approvals, after initiation of such, which are conditioned on the approval of such documents in a form and under conditions approved by the City Attorney.
- c. In the event that a claim, action, or proceeding described in subparagraphs a. or b. above is brought, the City shall promptly notify the Applicant of the existence of the claim, action, or proceeding, and the City will cooperate fully in the defense of such claim, action, or proceeding. Nothing herein shall prohibit the City from participating in the defense of any claim, action, or proceeding; the City shall retain the right to (i) approve the counsel to so defend the City, (ii) approve all significant decisions concerning the manner in which the defense is conducted, and (iii) approve any and all settlements, which approval shall not be unreasonably withheld. The City shall also have the right not to participate in said defense, except that the City agrees to cooperate with the Applicant a in the defense of said claim, action, or proceeding. If the City chooses to have counsel of its own defend any claim, action, or proceeding where the Applicant has already retained counsel to defend the City in such matters, the fees and expenses of the counsel selected by the City shall be paid by the Applicant as appropriate.
- d. The Applicant or any successor in interest, whether in whole or in part, to either of them, indemnifies the City for all the City's costs, fees, and damages which the City incurs in enforcing the above indemnification provisions.

- e. Unless a shorter limitation period applies, the time within which judicial review of this decision must be sought is governed by California Code of Civil Procedure, Section 1094.6.
- f. The conditions of project approval set forth herein include certain fees, dedication requirements, reservation requirements, and other exactions. Pursuant to California Government Code Section 66020(d)(1), the conditions constitute written notice of a statement of the amount of such fees and a description of dedications, reservations, and other exactions. You are hereby further notified that the 90-day approval period in which you may protest these fees, dedications, reservations, and other exactions pursuant to California Government Code Section 66020(a), has begun. If you fail to file a protest within this 90-day period complying with all of the requirements of California Government Code Section 66020, you will be legally barred from later challenging such exactions.

Passed and adopted at a regular meeting of the Planning Commission of the City of Novato held on the 8th day of September 2025, by the following vote:

AYES: Commissioners Crockett, Derby, Havel, Griggy, Roche, Stuckenbroker, and Tiernan

NOES: None

ABSTAIN: None

ABSENT: None

I HEREBY CERTIFY that the foregoing is a full, true and correct copy of the resolution, which was adopted by the Planning Commission, City of Novato, County of Marin, State of California, on the 8th day of September 2025.

Justin Derby

Justin Derby, Chair