

**CITY OF YUCAIPA
AGENDA REPORT**

TO: Honorable Mayor and City Council

FROM: Raymond A. Casey, City Manager 
Benjamin J. Matlock, Planning Manager/City Planner 

FOR: City Council Meeting of June 8, 2020

SUBJECT: Ratification of Executive Order related to Local Emergency Due to COVID-19

RECOMMENDATION:

That City Council ratify the City of Yucaipa Executive Order No. 20-02 regarding the suspension of certain parking requirements, and the establishment of temporary additional outdoor seating regulations for restaurants, breweries and wineries, approved and issued by the Director of Disaster Services on June 1, 2020.

BACKGROUND:

Governments worldwide are responding to an outbreak of respiratory disease caused by a novel (new) coronavirus that was first detected in China and which has now been detected in almost over 100 countries, including in the United States. The virus has been named “SARS-CoV-2” and the disease it causes has been named “Coronavirus Disease 2019” (abbreviated “COVID-19”).

COVID-19 is a disease that has killed over 337,900 people worldwide, with over 1,850,000 confirmed cases in the United States. On, March 10, 2020, the San Bernardino County Department of Public Health proclaimed a Public Health Emergency and the Board of Supervisors issued a Proclamation of Local Emergency due to COVID-19. On March 11, 2020, the World Health Organization declared the categorized disease as a global pandemic.

On Monday, March 16, 2020, the City Council held an Emergency Meeting to receive a status report regarding the COVID-19 Pandemic and directed staff to close the Scherer Community Center.

On Wednesday, March 18, 2020, the City Council held a second Emergency Meeting to adopt Resolution No. 2020-16, declaring a local emergency regarding the COVID-19 through April 6, 2020, and approved the closure of the Community Center, Performing Arts Center, as well as cancelling all park rentals, and modifying public access to City Hall until further notice.

On Monday, March 23, 2020, during regular session, City Council further approved closing fire stations and playgrounds/playground equipment at City parks until further notice, approved the Telecommuting Under the Pandemic Flu Policy for City employees, approved personnel policy revisions allowing sick time use consistent with the Families First Coronavirus Response Act (FFCRA), and had approved the staggering of shifts for City employees. City Council also approved extending the Emergency Declaration until Monday, April 13, 2020.

Pursuant to Yucaipa Municipal Code 8.36.160 and Section 8630 of the California Government Code, City Council shall review, at least every fourteen (14) days, until such local emergency is terminated. This 14-day period was waived during the April 13, 2020 City Council meeting for the remainder of the emergency, allowing the City's order to continue with the state and county efforts. Such declaration facilitates the City's response to combat perilous conditions by providing limited immunity for emergency actions of public employees and governing bodies, authorizing the issuance of orders and regulations to protect life and property, and activating pre-established local emergency provisions such as special purchasing and contracting procedures.

As cities have worked to "flatten the curve" regarding the number of outbreaks associated with COVID-19, the state and county have initiated the phased reopening of various business. These efforts have included the input from the Economic Recovery Committee established through the SBCTA City Managers Technical Advisory Committee, made up of San Bernardino County Executive Staff members and a subcommittee of City Managers throughout the County. The purpose of the Committee was to support the reopening the economy here in San Bernardino County at the appropriate time, and the City of Yucaipa has helped lead those efforts. One of the significant business sectors recently allowed to reopen in San Bernardino County was restaurants, wherein on May 23, 2020, the County of San Bernardino received approval from the California Department of Public Health (CDPH) to move forward on a Stage 2 reopening, which allowed restaurants to offer dine-in options with reduced seating capacity and additional protocols to allow "social distancing" between patrons.

However, the City recognizes that the ability for restaurants to be successful is directly tied to the number of seats they are able to provide for patrons, and the number of servers that can provide the necessary customer service. Therefore, the reduction of capacity may have economic consequences to those business owners and their staff, and creative options were pursued to give flexibility to those businesses while the reduced capacity remains in effect. Executive Order 20-02 was signed on June 1, 2020, which temporarily suspends the City's applicable parking requirements, and establishes additional outdoor seating requirements where a business owner can utilize parking spaces and other outdoor areas to increase the number of seats up to a pre-COVID-19 level. The approval process would be completed through an administrative COVID-19 Temporary Use Permit (COVID-19 TUP) application, reviewed and approved by the City Planner at no cost to the business, to review the proposed outdoor seating configuration.

This approach recognizes two key elements for restaurants and similar establishments. One is that as the COVID-19 threat remains, individuals may be concerned with dining within the interior of a restaurant building, and the outdoor seating would help alleviate those concerns by providing more options for social distancing, and where the open air would further limit the potential spreading of the illness. Further, as COVID-19 remains as a threat, the number of shoppers within commercial areas may be reduced, reducing the overall parking demand with the City's commercial centers. These spaces could therefore be utilized to help address the reduced capacity issues for restaurants and similar establishments.

The COVID-19 TUP approval process has been designed to be simple and easy to complete, with a focus of developing a plan for the seating configuration within the outdoor spaces in a commercial center, and to ensure that both the business owner and property owner have approved the layout. Further, Exhibit A to the Executive Order establishes guidelines on the

additional outdoor seating configuration to ensure that the proposed spaces do not block drive aisles, handicap spaces, or create any other potential conflicts onsite.

As an additional option to support small businesses, including restaurants, breweries, and wineries, the City Council approved the use of the \$202,897 from the City's share of the Community Development Block Grant (CDBG-CV) to be allocated for the Small Business Resiliency Grant Program. The grant application will soon be available for local businesses on a first-come, first-served basis and may be used by restaurants, breweries, and wineries to support implementing the proposed outdoor dining areas under their COVID-19 TUP, if they so choose.

FISCAL IMPACT:

The review of the COVID-19 TUP applications will be a soft cost to the General Fund associated with the Planning Divisions review of those applications.

Attachments: June 1, 2020 City of Yucaipa Executive Order No. 2020-02 with attachments

CITY OF YUCAIPA EXECUTIVE ORDER NO. 20-02

AN EXECUTIVE ORDER OF THE DIRECTOR OF DISASTER SERVICES OF THE CITY OF YUCAIPA REGARDING EMERGENCY ADDITIONAL OUTDOOR SEATING PERMITTING IN THE CITY OF YUCAIPA

I. Recitals.

A. International, national, state, and local health and governmental authorities are responding to an outbreak of respiratory disease caused by a novel coronavirus named “coronavirus disease 2019,” abbreviated COVID-19, (“COVID-19”); and

B. On March 4, 2020, the Governor of the State of California declared a state of emergency to make additional resources available, formalize emergency actions already underway across multiple state agencies and departments, and help the state prepare for broader spread of COVID-19; and

C. On March 13, 2020, the President of the United States of America declared a national emergency and announced that the federal government would make emergency funding available to assist state and local governments in preventing the spread of and addressing the effects of COVID-19; and

D. On March 17, 2020, the Health Officer of the County of San Bernardino adopted a new order that placed a prohibition on certain types of public gatherings; and

E. On March 18, 2020, the City Council adopted Resolution No. 2020-16 proclaiming the existence of a local emergency pursuant to Government Code Section 8630 to set forth applicable powers, functions and duties of the City’s Director of Disaster Services (the City Manager), and the City’s Disaster Council to ensure an effective response to the COVID-19; and

F. On March 19, 2020, the Governor issued Executive Order N-33-20 to implement directives developed by the State Public Health Officer that require all individuals living in the State of California to stay at their place of residence except as needed to maintain continuity of operations of the federal critical infrastructure and other essential sectors; and,.

G. The Centers for Disease Control and Prevention, the California Department of Public Health, and the San Bernardino County Health Officer had all issued recommendations and/or orders including but not limited to social distancing, staying home if sick, canceling or postponing large group events, working from home, and other precautions to protect public health and prevent transmission of this communicable virus; and

H. On May 12, 2020, the Governor issued guidance for the reopening of restaurants in counties certified as meeting state benchmarks in addressing the COVID-19 pandemic, and had effectively “flattened the curve” for outbreaks; and

I. On May 23, 2020, the County of San Bernardino received approval from the California Department of Public Health (CDPH) to move forward on a Stage 2 reopening, which allows restaurants to offer dine-in options with reduced seating capacity and additional protocols to allow “social distancing” between patrons; and

J. Government Code Section 8634 empowers the City and the Director of Disaster Services to promulgate orders and regulations necessary for the preservation of life and property during the Local Emergency, and in the case of certain dining establishments, the density of patrons has a direct effect on the safety of the establishment’s personnel, while the economic viability of such establishments is increased by additional service areas such as the outdoors, and also reflects the reduced overall parking demand that will remain until the reopening process is completed and the combined emergency declarations have officially ended; and

K. In the interest of public peace, health, and safety, as affected by the emergency caused by the spread of COVID-19, it is necessary to modify regulations applicable to the parking requirements to allow for additional outdoor seating options for restaurants, and once permitted by the County to also reopen, wineries and breweries, during the duration of the City’s proclaimed COVID-19 emergency to further the protection of the public peace, health, and safety.

II. Order.

The Director of Disaster Services of the City of Yucaipa does order as follows:

SECTION 1. Suspension of Certain Restrictions on Parking to Accommodate Outdoor Seating. Notwithstanding the provisions of Yucaipa Municipal Code Sections 87.0601(a) and 87.0615(o), and applicable conditions of approval for existing restaurant, winery, and brewery businesses, and subject to the minimum requirements set forth in Section 2 below and as attached as Exhibit A to this order, parking lot facilities within existing commercial areas can be used for the purpose of providing outdoor seating accommodations for restaurant, winery, and brewery businesses during periods of reduced interior occupancy requirements as a result of COVID-19. This order is not intended to allow outdoor seating on City streets, alleys, or on commercial driveways or ADA accessibility spaces or walkways.

SECTION 2. Additional Outdoor Seating Permitting. The City has established guidelines and requirements to permit and safely implement Additional Outdoor Seating opportunities, attached as Exhibit A. Businesses that wish to incorporate Additional Outdoor Seating opportunities during the periods of reduced occupancy requirements would be subject to a COVID-19 Outdoor Seating Temporary Use Permit (COVID-19 TUP) approved by the City Planner. The COVID-19 TUP would be reviewed and approved at no charge, and all businesses availing themselves of the activities permitted in Exhibit A must follow all of the provisions therein. Further, establishments must continue to follow all applicable state laws, orders and regulations, including but not limited to orders and regulations of the Governor of the State of California, the Department of Alcoholic Beverage Control (ABC), and the County of San Bernardino.

SECTION 3. Sidewalk Dining within Uptown area. Additionally, the City will expedite the review of encroachment permits submitted for sidewalk dining within the Uptown Business District Specific Plan area in order to facilitate additional outdoor seating opportunities where there are no parking lot areas.

SECTION 4. Violations.

This Order shall be punishable as set forth in Government Code Section 8665 and Chapter 1.12 of the Yucaipa Municipal Code.

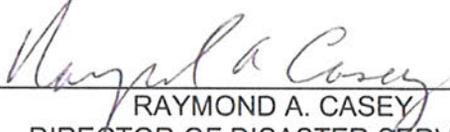
SECTION 5. Term. This Order shall remain in effect for the period of local emergency declared in response to COVID-19 within the City.

SECTION 6. Effective Date. This Order is issued for the immediate preservation of the public peace, health and safety and therefore shall be effective immediately upon its issuance.

SECTION 7. Severability. The Director of Disaster Services declares that, should any section, subsection, subdivision, sentence, clause, phrase, or portion of this Order for any reason be held invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this Order. The Director of Disaster Services hereby declares that it would have adopted this Order and each section, subsection, subdivision, sentence, clause, phrase, or portion thereof, irrespective of the fact that any one or more sections, subsections, subdivisions, sentences, clauses, phrases, or portions thereof be declared invalid or unconstitutional.

SECTION 8. Publication. The City Clerk shall cause notice of this Order to be disseminated to the public and be given widespread publicity and notice.

APPROVED AND ISSUED this 1st day of June, 2020.



RAYMOND A. CASEY
DIRECTOR OF DISASTER SERVICES

Exhibit A

Additional Outdoor Seating Regulations

Introduction:

The City of Yucaipa is committed to supporting its local businesses and ensuring the health, safety, and welfare of its citizens. As part of the phased approach of reopening of businesses, the state and County of San Bernardino has permitted restaurants to resume operations, but with reduced occupancy requirement. Further, California's COVID-19 Industry Guidance: Dine-in Restaurants (Guidance) has provided information to support a safe and clean environment for workers and customers. Compliance with the Guidance, and the state and county orders, could result in a reduction of tables that may financially impact a restaurant in which it is not cost effective to operate. Further, as additional types of businesses reopen, including wineries and breweries, similar occupancy limitations may be required that also impact their operations.

By issuing a *COVID-19 Temporary Use Permit (COVID-19 TUP)*, the City is permitting and giving flexibility to restaurants, breweries, and wineries to temporarily expand their footprint into parking lots and other common areas to accommodate dine-in service at, or near, their pre-COVID-19 levels. The City is also providing additional social distancing opportunities to increase safety of restaurant personnel and patrons, consistent with the state and county orders. These regulations provided below and implemented through the newly created COVID-19 TUP application, and give the necessary guidance for restaurants and other similar establishments to follow while the limitations of occupancy remain to ensure that potential conflicts with the proposed Additional Outdoor Seating and the existing commercial site design do not occur.

Relevant Agency Requirements:

To be issued a COVID-19 TUP, restaurants must remain in compliance with the following:

- COVID-19 Industry Guidance: Dine-in Restaurants document
- County of San Bernardino COVID-19 related Orders.
- County of San Bernardino Environmental Health regulations.
- California Alcohol Beverage Control (ABC) regulations.
- Yucaipa Municipal Code.

General Requirements:

The following provides a brief outline of the requirements and general limitations of the Additional Outdoor Seating area process:

- A COVID-19 TUP shall be approved by the City Planner to authorize the additional outdoor seating areas, and shall remain in effect while the businesses are required to operate at reduced seating capacities.
- A COVID-19 TUP cannot authorize a combined capacity (indoor and the proposed outdoor capacity) beyond what was the original indoor capacity that had been permitted prior to the COVID-19 emergency declaration.
- No fees are required with the submittal of the COVID-19 TUP.

- ADA accessibility shall be maintained at all times, and cannot be impacted by the additional outdoor seating areas.
- A letter of permission from the property owner must be submitted with the COVID-19 TUP.
- Where applicable and possible, commercial centers with more than one restaurant shall cooperate in preparing their COVID-19 applications to reduce potential dining conflicts and should work to create a centralized seating area.
- Social distancing must also be maintained to individuals in a public sidewalk or from anyone that may be standing in line for seating or take out.
- Restaurants that have a previously-approved alcoholic beverage license may continue to sell alcoholic beverages in accordance with the ABC Fourth Notice of Regulatory Relief (or any successor Notice) within the additional outdoor seating areas and all other applicable ABC requirements. It is the applicant's responsibility to ensure compliance with ABC requirements or permits needed for the additional outdoor seating area.
- All dining areas must be maintained, and shall be kept clean of litter.
- Areas subject to COVID-19 TUP are for dine-in serving of food only and shall not be used for live entertainment.
- Additional outdoor seating areas shall not be used from the hours of 10:00pm to 6:00am.
- The City reserves the right to modify the layout of the additional outdoor seating to address any conflicts observed.

Outdoor Seating Areas Guidelines:

Outdoor areas adjacent to a restaurant, winery, or brewery may be used to expand their footprint under the following guidelines:

- Outdoor seating areas may include parking lots and unused patio areas, and in some cases, may include sidewalk areas, provided pedestrian access and ADA requirements are met.
- The allowable number of parking spaces to be utilized for outdoor seating will be the minimum necessary, but shall be determined on a case-by-case basis.
- Outdoor seating areas cannot block any drive aisles, driveways, or ADA-designated spaces within a parking lot.
- If use of public sidewalks are being proposed, City authorization must be obtained via issuance of an encroachment permit. Proof of insurance may be required naming the City as additional insured in addition to all encroachment permit requirements.
- Outdoor seating areas cannot interfere with deliveries. If space is limited, the restaurant can provide alternative hours for deliveries that are outside of normal operating hours.
- Tents and canopies are allowed subject to compliance with all required Fire and Building codes. If the seating area will include any tents or canopies, obtain copies of the flame resistance certificate(s) from the tent manufacturer or rental company.
- Seating cannot be expanded into unimproved properties or areas identified as open space, drainage or detention areas of the site.

Buffering Requirements:

- Depending on the location, temporary buffers between the additional outdoor seating areas and any adjacent drive aisles may be necessary. Subject to City approval, buffers may consist of the following:
 - Planters
 - Railing
 - Cabling
 - Other mechanisms deemed appropriate by the City.
- Reflective elements must be installed at the outdoor dining area corners.
- Buffers should be attractive in design.

Signage:

- Each business is permitted to have one temporary free-standing (12 square foot maximum) sign that advertises the additional outdoor seating area. The free-standing sign can be placed within the additional outdoor seating area, facing the path of travel.
- Directional and safety signs are exempt from this requirement.

TUP-COVID-19 Application:

To provide for the review of any proposed additional outdoor seating area, applicants are required to complete and submit a COVID-19 TUP application (separate attachment). The COVID-19 TUP application provides details on what elements are required, and includes the following:

- Letter of permission from property owner acknowledging authorization of the restaurant expansion.
- Text and square footages of promotional signs if any are to be used
- Indicate originally-approved occupancy, and occupancy with additional outdoor seating areas
- Indicate the number of parking spaces to be used
- A site plan showing the proposed additional outdoor seating area and its relationship to the site and the place of business. Details of the seating configuration, seating area access, site buffering, and methods to minimize conflicts with the rest of the commercial site shall be included.

Cancellation:

A COVID-19 TUP shall be cancelled for any of the following reasons:

- Upon the termination of the local emergency by the City Council.
- Failure to comply with the COVID-19 Industry Guidance: Dine-in Restaurants.
- Failure to remain in compliance with applicable regulations.
- Failure to comply with the COVID-19 TUP permit.
- For disturbance of the quiet enjoyment of nearby residents and businesses.



COVID-19 TEMPORARY USE PERMIT APPLICATION
DEVELOPMENT SERVICES DEPARTMENT

Applications must be completed legibly and in entirety.

34272 Yucaipa Blvd.
Yucaipa, CA 92399
TEL 909/797-2489
FAX 909/790-9203

www.yucaipa.org

The purpose of the COVID-19 Temporary Use Permit (TUP) Application is to provide the flexibility for restaurants, breweries, and wineries to temporarily expand their footprint into parking lots or other common areas to accommodate dine-in services while also implementing safe social distancing guidelines. The processing time for a COVID-19 TUP is typically one (1) to two (2) business days.

BUSINESS NAME: _____ **BUSINESS PHONE:** _____

MAILING ADDRESS: (for licenses and notices)

_____ Street Address _____ City _____ State _____ Zip Code

BUSINESS LOCATION ADDRESS: (PO Boxes / commercial mailboxes not valid)

_____ Street Address _____ City _____ State _____ Zip Code

WEBSITE: _____ **EMAIL:** _____

BUSINESS OWNER NAME: _____ **BUSINESS OWNER PHONE:** _____

PROPERTY OWNER NAME: _____ **PROPERTY OWNER PHONE:** _____

PROPERTY OWNER ADDRESS: (Residence of owner if sole proprietorship; headquarter location if corporation)

_____ Street Address _____ City _____ State _____ Zip Code

LAND USE DESIGNATION: _____ **HOURS OF OPERATION:** (Include peak hours) _____

OCCUPANCY/SEATING INFORMATION:

How many square feet is the building/suite your business is located? _____
How many seats is this restaurant, winery, or brewery approved for? _____
What is the total number of indoor seating with reduced capacity? _____
What is the total number of seats to be used for outdoor dining? _____
What is the total number of seats proposed for both indoor and outdoor seating? _____

PARKING INFORMATION:

How many parking spaces are provided on the entire site? _____
How many parking spaces are required for your business? _____
How many parking spaces will be used for Additional Outdoor Seating? _____

ABC LICENSE INFORMATION:

Does the business have an existing ABC License? _____ Type: _____ Is it proposed in the outdoor seating? _____

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct

_____ **Print Name** _____ **Signature of Owner or Designated Representative** _____ **Date** _____

Please Note: All businesses must comply with all applicable City, County, State, and Federal laws and regulations. The business owner/operator is responsible for obtaining all necessary permits, licenses, or approvals.

PART A: TEMPORARY USE PERMIT SUBMITTAL CHECKLIST

+ ALL ITEMS MUST BE INCLUDED AT THE TIME OF FILING +

PLEASE RETURN THIS CHECKLIST WITH APPLICATION PACKET UPON SUBMITTAL. ONLY USE CITY FORMS. IF MORE SPACE IS NEEDED, USE ATTACHMENTS. COMPUTER GENERATED APPLICATIONS ARE NOT ACCEPTABLE.

1. **Two* copies** of completed Land Use Application Questionnaire. **All owners** must sign the Application Certificate. The notarized power of attorney must contain the names of all owners.
2. **Two* copies** of the site plan and floor plan on separate sheets (do not attach them together) drawn at a scale to accurately delineate the project (**no larger than 11" x 17"**). Refer to the Site Plan Checklist for specific requirements.
3. **One copy** of a Letter of Authorization from the property owner addressed to the City of Yucaipa that provides their approval of the proposed temporary Outdoor Seating Area. This can be also be satisfied by having the property owner sign the application page.
4. If your business serves alcoholic beverages, submit **one copy** of the Alcoholic Beverage Control (ABC) License.
5. If your business proposes seating within the Public Right-Of-Way (ROW), submit **one copy** of the Proof of Liability Insurance naming the City of Yucaipa as additional insured. *Please note, seating within the ROW requires a separate Encroachment Permit through the Engineering Division.*
6. If your business proposes to use a tent, canopy, or other similar shading device, provide **one copy** of the flame resistance certificate(s) from the tent manufacturer or rental company.
7. If temporary signage is proposed, provide **one colored copy** of the proposed sign.

PART B: PLAN CHECKLIST FOR TEMPORARY USE PERMIT

SITE PLAN: A site plan is a detailed drawing, preferably to scale, on one (1) sheet of paper (**maximum 11" x 17"**) of the entire land parcel showing buildings, improvements, other physical site features, and all dimensions. Please make every effort to draw plans to scale, and ensure that plan details are legible to facilitate a more expeditious review.

All items listed below **must** be on the site plan. The application **will not** be taken in if any items are left off. **PLEASE RETURN THIS CHECKLIST WITH APPLICATION PACKET UPON SUBMITTAL.**

1. **Identification:** Indicate names, addresses, and telephone numbers of the Record Owner, Applicant, and the business name.
2. **Site Location:** Provide the address and suite number(s) for the business, and include the Assessor's Parcel Number (APN) for the property.
3. **North Point:** Indicate north point, date of drawing, and the scale. The direction of the "north" arrow should be shown pointing towards the **top or right hand side** of the site plan.
4. **Dimensions:** Indicate property lines and show dimensions.
5. **Roads:** Indicate the name, location, and width of all boundary streets or private road easements on the property.
6. **Drainage:** Indicate any drainage areas, including detentions basins, that are located on the property.
7. **Structures (Project Area):** Indicate all existing structures on the property, including but not limited to buildings, shading devices, walls, fences, signs, curbs, driveways, and sidewalks. For buildings, indicate their building footprint dimensions and square footage.
8. **Parking:** Show parking areas for the site project: To assist in the development of the proposed outdoor seating, include the following details:
 - a. Indicate locations of the parking stalls. Identify any handicap and/or compact spaces, as well as loading zones.
 - b. Show dimension/type of parking spaces, aisle/driveway widths and directional arrows indicating the flow of traffic.
9. **Outdoor Seating:** Show which areas within the Public Right-of-Way, shared common area, or parking lot that are to be designated for the Additional Outdoor Seating area. Include the following details:
 - a. If seating is proposed within a parking lot, identify the number and location of parking spaces that will be occupied by dining services.
 - b. Identify access that will be provided from the place of business to the outdoor seating

- area.
- c. Identify the location and number of tables and chairs to be used. Indicate the distances between each proposed table and any path of travel around the proposed seating area and entering/exiting the place of business.
 - d. If a screening barrier is proposed, identify the type and location of the proposed barrier.
 - e. Include a tally showing the total number of seats to be provided.
 - f. If a shading device is proposed, identify the type, square footage, height, and location of the proposed shading device. Provide one colored brochure or photo example of the proposed shading device.

FLOOR PLANS: On a separate sheet, provide floor plan diagrams of the existing (pre-COVID-19) and proposed COVID-19 TUP layout. A floor plan is a detailed drawing, shown as the view from above, that details the interior layout of the existing business. **The floor plan shall be printed on a separate 11” x 17” sheet and all details should be legible.** Indicate which seating areas shall continue to be used for dining services, and show the distances between each table/seat that are to be used. Show all paths of travel within the place of business.

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