



City of Seattle

Gregory J. Nickels, Mayor

Department of Planning and Development

D.M. Sugimura, Director

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Application Number: 3003858
Applicant Name: Brent Schweikl
Address of Proposal: 5911 21st Avenue SW

SUMMARY OF PROPOSED ACTIONS

Land Use Application to recover development credit for proposed clustered housing in an environmentally critical area and allow three new single-family residences.

The following approvals are required:

Environmentally Critical Areas Conditional Use - to allow recovery of development credit in an environmentally critical area and Single-Family zone. SMC 25.09.260.

SEPA - Environmental Determination - SMC Chapter 25.05.

SEPA DETERMINATION: Exempt DNS MDNS EIS
 DNS with conditions
 DNS involving non-exempt grading or demolition or involving another agency with jurisdiction.

BACKGROUND DATA

Site and Vicinity Description

The subject site is a 23,424 square foot trapezoidal shaped lot containing extensive *ECA steep slope* areas in its western two-thirds. The parcel's western boundary fronts on Croft Place SW, although access is from 21st Avenue SW across an approximately 143 foot long, 12-foot wide easement on the parcel to the east addressed as 5915 21st Avenue SW. (The subject site is Parcel "B" from short plat MUP # 9301995. The easement is on Parcel "C" from that same short plat.) The subject site and surrounding neighborhood is zoned Single-Family 5000 (SF 5000).

The subject site contains approximately 18, 431 square feet of *ECA steep slope* and associated *buffer* (hereafter jointly referred to as “*steep slopes*”). The entire site, including the off-site access easement, slopes upward to the east from Croft Place SW. *ECA steep slopes* extend across the Croft Place SW property frontage and extend uphill to the east in five locations. Because of the size, configuration and dispersion of the *steep slope* areas the parcel can be characterized as being predominately *steep slope*. The eastern one-third of the parcel, which is sloped at approximately 24 percent, is the proposed building site. The eastern property boundary contains a small band of *steep slope* that extends onto the neighboring property. The structures on the adjacent properties to the east and facing 21st Avenue SW are sited at an elevation approximately 12 feet further up-hill from the eastern property boundary.

The surrounding neighborhood lots are a variety of sizes. Twenty-first Avenue SW forms the spine of a ridge that runs parallel to the valley of Delridge Way SW to the west. Many of the surrounding lots contain *steep slope* areas. Development in the vicinity is almost exclusively single-family residences of a variety of ages and sizes.

Proposal

The proposal is to utilize the Land Use Code Administrative Conditional Use process to recover development credit on single-family lots containing *Environmentally Critical Areas* and construct three “clustered” single-family structures on the single existing lot. This ACU process allows up to the number of dwelling units that would be allowed by subdividing a property of a similar area and allows flexibility in certain development standards to minimize intrusion by the development in any *ECA* areas. The proposed structures would be three-stories on their west (driveway) side and two-stories on their east (rear) side. To minimize the intrusion and impact on the *steep slope* and *steep slope buffer* areas the three structures and common access driveway are proposed on the eastern portion of the lot.

The vehicular and pedestrian access from 21st Avenue SW and across the existing easement on the adjacent lot would enter the subject lot’s northeast corner and curve southward to where it runs north to south approximately 55 feet west of the east property boundary. Pedestrian and vehicular access to each structure would extend eastward from this north to south driveway. The rear of Building #1 on the north would be approximately 10 feet from the eastern property line. Buildings #2 and #3 would be approximately 13 feet from this property line. Total lot coverage of the three proposed structures would be approximately 3,811 square feet, or 16 percent of the site (SF 5000 zoning for non-*ECA* lots allows 35 percent lot coverage).

Unit Lot Subdivision through SMC 23.24.045 (under a separate MUP application) is planned to allow the fee-simple sale of each building.

Public Comment

Two comment e-mails and associated phone calls were received during the public comment period that ended May 31, 2006. Comments regarded slides alleged to have occurred on the west (Croft Place SW) side of the property, alleged encroachment of excavation and grading equipment from the subject site onto one writer’s property in 2005, a concern about building any housing on an *ECA* property, that three structures would not be compatible with the neighborhood, and that the driveway / easement is inadequate for the expected vehicular access.

ANALYSIS - ECA ADMINISTRATIVE CONDITIONAL USE (ACU) TO RECOVER DEVELOPMENT CREDIT AND PERMIT CLUSTERED DEVELOPMENT

Environmentally Critical Areas Regulations

Seattle Municipal Code (SMC) Sections 25.09.015 and 25.09.060 establish applicability and standards that for development within designated *Environmentally Critical Areas*. SMC Section 25.09.180 provides specific standards for all development on *steep slopes* and *steep slope buffers* on existing lots, including the general requirement that development shall be avoided in *steep slope* areas. The General requirements and standards described in Section 25.09.335 include the recording of ***Conditions of Approval*** and of the identified ECA areas in a permanent covenant with the property, as well as specific construction methods and procedures.

SMC Section 25.09.260 provides a process for DPD to authorize the recovery of development credit in a single-family zone through an Administrative Conditional Use review. This process allows flexibility in certain development standards (such as clustering of structures) to allow up to the same number of units on the lot as would be allowed if there were no *ECA* areas and minimizes impacts on and intrusions into the *ECA* areas. The Director may approve, condition, or deny an application based upon a determination of whether the proposed recovery of development credit on the site meets the applicable criteria. The Director may approve, deny, or approve with conditions smaller than required lot sizes and yards and / or more than one dwelling unit per lot if the proposal meets the applicable ACU criteria. An ECA Administrative Conditional Use decision is a Type II decision, subject to the provisions of SMC 23.76, and is appealable to the City Hearing Examiner.

SMC 25.09.260.A. *When the applicant demonstrates it is not practicable to comply with the requirements of Section 25.09.240.B considering the parcel as a whole, the applicant may apply for an administrative conditional use permit, authorized under Section 23.42.042, under this section to allow the Director to count environmentally critical areas and their buffers that would otherwise be excluded in calculating the maximum number of lots and units allowed on the parcel under Section 25.09.240.E.*

The subject site contains approximately 18, 431 square feet of *steep slope and buffer* areas, which is approximately 79 percent of the site. The minimum lot size in this zone is 5,000 square feet. The non-*ECA* area remaining would allow the construction of one structure, although the overall lot area, if not *ECA*, is sufficient to allow five lots.

B. Standards. *The Director may approve an administrative conditional use for smaller than required lot sizes and yards, and/or more than one (1) dwelling unit per lot if the applicant demonstrates that the proposal meets the following standards:*

1. Environmental Impacts on Critical Areas.

c. No development is on a steep slope area or its buffer unless the property being divided is predominantly characterized by steep slope areas, or unless approved by the Director under Section 25.09.180.B.2.a, b or c.

The site's 18, 431 square feet of *steep slopes* and *buffers* are 79 percent of the lot. Additionally, the steep slope areas are disbursed across the site in six locations. Four of these are on the western three-quarters of the site. A small linear area of steep slope spans the eastern property boundary. Another is located just north of the south property boundary. In combination with their associated buffers, these four *steep slopes* and the *buffers* result in the western three-quarters of the site being virtually all *steep slope* and *buffer*. The more level and buildable eastern one-quarter of the site contains small areas of *steep slope*. These smaller *steep slope* areas are a constraint on the location of any proposed structures and their access. Consequently, the site can reasonably be considered predominately characterized by *steep slope* areas.

(1) The preference is to cluster units away from steep slope areas and buffers.

The proposal is to cluster three single-family dwelling units on the eastern one-quarter of the site with vehicular and pedestrian access substantially out of the steep slope areas. This proposal requires intrusion of a portion of the access road and a portion of the rear of all structures and their graded rear yards to extend into 7,051 square feet of three *steep slope* and *buffer* areas. Two of these areas are small and isolated on the eastern portion of the site. The third is the eastern most end of a larger *steep slope* and *buffer* area extending from the middle of the site to the north property boundary.

Intrusion into these small areas of *steep slope* and *buffer* is unavoidable considering the distribution of steep slope areas and the topography of the site. The common access driveway location is precluded from Croft Place SW by the full *steep slope* frontage along that street and is therefore required across the 21st Avenue SW easement. The topography of the 21st Avenue SW access easement requires the on-site access road, once it leaves the easement, to extend westerly into a steep slope area before it can turn south in order to not exceed the maximum allowed driveway slope.

The driveway location therefore sets the parameters of the site's buildable area to the east. In order to provide individual driveway access to each structure's garage and vehicle and emergency turn-around capability for exiting the site, each structure would be located 18 feet from the common access road. The structures are proposed to be approximately 35 feet in depth resulting in a 10-foot rear yard for Building 1 and 13-foot rear yard for Buildings 2 and 3.

The submitted geotechnical report by Zipper Zeman Associates, Inc (dated April 5, 2006) and subsequent additional information (amended report) concluded that intrusion into the proposed amounts of steep slope and buffer is geotechnically feasible and will have no adverse impact on adjacent properties provided the report's recommendations are followed. DPD's geotechnical engineer reviewed these reports and conditionally concurred with their recommendations.

2. General Environmental Impacts and Site Characteristics.

a. The proposal keeps potential negative effects of the development on the undeveloped portion of the site to a minimum and preserves topographic features.

Approximately the western three-quarters of the site will remain undeveloped following the completion of this proposal. This area is wooded and contains approximately 28 trees, as shown on the submitted survey, and is densely covered with shrubs and lower ground cover.

The project proposes to construct an approximately 140-foot long north to south retaining wall and a smaller east to west retaining wall at the south end of this longer wall to support the parallel common access driveway and establish a relatively level building area. Both walls will vary in height depending on the grade below; the east to west wall will be approximately 7 feet in height and the north to south wall will range from 7 feet at its south end to a maximum of 12 feet in the center of the property before it diminishes to 3-4 feet at the north property boundary. This wall will effectively divide the developed portion of the site from the remaining non-disturbance area to the west. A permanent covenant prohibiting development and disturbance in this area will be recorded as a part of project approval per SMC 25.09.335.

The project proposes to build on the site's eastern one-quarter, which is an existing slightly sloping bench as described above. To create the necessary mostly level areas for driveways, walkways, and outside activity areas / yards the bench area will be stepped in three levels, first at the north to south common driveway retaining wall, then in the side yards between the structures, and finally behind Buildings 2 and 3 approximately 5 feet from the rear property line. No change to the topography will be made west of the north to south common driveway retaining wall.

The proposed terracing is necessary for usable driveways, walkways, and outside activity areas / yards. It will be stepped in keeping with the existing slope and is common for sloped lots. In this regard, the proposal meets this criterion.

b. The proposal retains and protects vegetation on designated non-disturbance areas, protects stands of mature trees, keeps tree removal to a minimum, removes noxious weeds and protects the visual continuity of vegetated areas and tree canopy.

The proposed development will occur on the largely tree-less bench described above. This area was apparently cleared of trees sometime prior to project application. The bench now contains largely successionist noxious weed species. These will be removed during grading and for construction.

The proposal protects and retains vegetation and stands of mature trees on the non-developed portion of the site and the visual continuity of the area's tree canopy. The original proposal was for the essentially north to south oriented wall to veer to the east approximately 5 feet beginning approximately 40 feet from the north property boundary to avoid three trees (20" Madrone, 13" Cedar, 8" Fir). However, the proposed wall's proximity to these trees would likely still result in damage to their root zone, and possibly their trunks and canopy, during excavation and wall construction. In the interest of reducing these negative effects the proposal was revised to move this angled wall section to the east so it will meet the north property boundary approximately 18 feet further to the east. In order to avoid harmful construction impacts to these trees, other trees within 20 feet of the proposed wall, and the 30-inch cedar off site to the east, but whose critical root zone extends onto the subject site, the applicant sought tree protection guidance from a certified arborist. The arborist report determined that the proposed location of retaining walls and proximity of expected excavation will be adequate to protect the trees in question. It directed the placement of a tree protection fencing around each tree (or group of trees, if more effective) no closer than the drip line of the trees or a distance of one foot (from the trunk at ground level) for every inch of trunk diameter. Consequently, the project is **Conditioned** to

install and maintain tree protection fences in the above manner around the above listed trees beginning at site excavation and grading and lasting for the life of the construction project (until Certificate of Occupancy).

A landscape plan has been submitted that include extensive screening and general ground cover landscaping. A variety of sizes and types of plants will be added in front of the proposed north to south retaining wall for visual screening of this large concrete structure and maintain the visual continuity of the vegetated areas otherwise interrupted by the retaining wall. To assure the successful establishment of the screening plants following their installation and sale of the individual structures (unit lot subdivision is anticipated) the MUP is **Conditioned** to include a landscape maintenance covenant that requires the irrigation and maintenance of the wall landscape screening on the parent lot or future individual lot, or if the area with the subject screening landscaping west of the north to south retaining wall is in a collectively owned tract (or similar ownership arrangement of the landscaped area) the irrigation and maintenance of this landscaping will be the collective responsibility of all tract owners.

3. Neighborhood Compatibility.

a. The total number of lots permitted on-site shall not be increased beyond that permitted by the underlying single-family zone.

The underlying SF 5000 zoning would allow five lots to be created from the 23, 424 square foot site, and hence 5 single-family structures. This proposal is for 3 single-family structures.

c. The development is reasonably compatible with and keeps the negative impact on the surrounding neighborhood to a minimum. This includes, but is not limited to, concerns such as neighborhood character, land use, design, height, bulk, scale, yards, pedestrian environment, and preservation of the tree canopy and other vegetation.

The development proposes three single-family structures of a size and design typical for this style of building in similar single-family zones. Each two and one-half to three story structure would conform to the height restrictions of the SF 5000 zone. Two-car garages are provided. Front, side and rear yards for resident outside activity and separation between structures is also provided. The project initially proposed 10 foot rear yards for all buildings to minimize development intrusion into the *steep slope* areas and provide adequate room for the shared access driveway, individual driveways, and an emergency vehicle turn-around. The grade difference between the building locations and the buildable areas and existing buildings on the abutting parcels to the east assures that the proposed reduced rear yards are compatible with the neighborhood development patterns. However, to further reduce the amount of driveway impervious surface and create more usable rear yards, the project was revised to move Buildings 2 and 3 two feet to the west, thereby reducing the driveways to 18 feet from 20 feet and increasing the rear yards from 10 feet to 12 feet and the pavement for the vehicle turn-around area will be a pervious material (“Grass-Crete”) as shown on the approved plans. Because of area restraints from the driveway retaining wall facing Building 1, this building was not relocated. Pedestrian access will be provided on the proposed access driveway. As designed, the structures will be compatible with the eclectic variety of existing single-family structures in the surrounding neighborhood. No negative impacts on neighborhood character are anticipated from this proposal.

C. Conditions.

1. In authorizing an administrative conditional use, the Director may mitigate adverse negative impacts by imposing requirements and conditions necessary to protect riparian corridors, wetlands and their buffers, shoreline habitats and their buffers, and steep slope areas and their buffers, and to protect other properties in the zone or vicinity in which the property is located.

The project and accompanying geo-technical report were reviewed by DPD's geotechnical engineer and, following the submittal of additional information, found to not have adverse impacts on the site's *steep slopes* and *buffers* or other properties in the surrounding zone or vicinity. Other project **Conditions**, as outlined in this document, have been imposed to minimize impacts into the *steep slope* and *buffer* areas, protect vegetation and assure neighborhood compatibility.

2. In addition to any conditions imposed under subsection 1, the following conditions apply to all administrative conditional uses approved under this subsection:

a. Replacement and establishment of native vegetation shall be required where it is not possible to save trees or vegetation.

The proposed siting of all buildings, access roads, and retaining walls maximizes the retention of trees and vegetation. The proposed site plan does, however, require the removal of ten (10) trees. Tree species and amount are: Madrone (4), Douglas fir (4), Western Red Cedar (1), and Big Leaf Maple (1). None of the trees by size are considered *Exceptional*, as defined in DPD Director's Rule 6-2001. The Madones are not considered *Exceptional* due to their poor health, as determined by the submitted tree report by Stonehedge Tree Experts, Inc, and dated April 21, 2006. According to this report, the Madrones on site are in poor health due to a fungus blight complex that is common in the area. The report projects that these trees would be dead within 10 years due to this blight. Most ground cover vegetation (other than trees) is invasive weeds, although a minimal amount of native vegetation may be slated for removal by this proposal.

To replace the trees and lower vegetation to be removed by this project a Landscape Plan was submitted that proposes to plant 222 trees, shrubs, and ground cover plants, 127 of which will be drought tolerant and the majority of which will be native. This includes: Madrone (2), Douglas fir (4), and Western Red Cedar (4). Plantings will be along the north to south retaining wall for wall screening and throughout the site to the east of the wall for general ground cover, soil retention, and neighborhood visual compatibility. The maintenance of the approved Landscape Plan to effectuate the screening of the north to south retaining wall is a **Condition** of ACU approval.

b. Where new lots are created, the provisions of Section 23.22.062, Unit lot subdivisions, or Section 23.24.045, Unit lot subdivisions, apply, regardless of whether the proposal is a unit lot subdivision, so that subsequent development on a single lot does not result in the development standards of this chapter being exceeded for the short subdivision or subdivision as a whole.

Unit lot subdivision for the separate sale of the proposed three building is anticipated. Because a maximum of four lots could be proposed (three unit lots and a non-disturbance tract, although the non-disturbance area could be a part of each unit lot, resulting in three unit lots) provisions of SMC 23.24.045 would apply. This section notes that the unit lot subdivision of a lot approved and in conformance with development standards at the time of the (building) permit application (and in conformance with any applicable MUP approvals, such as this ACU application) may become nonconforming based on an analysis of the subsequent individual unit lot, and therefore any subsequent platting actions, additions, or modifications to the structures may not create or increase any nonconformity of the parent lot. Further this section requires a note on the recorded plat stating that the unit lots are not separate buildable lots, and that additional development of the individual unit lots may be limited as a result of the application of the development standards to the parent lot. However, any development of any non-disturbance tract (if created) will be prohibited by the terms of the *ECA* permanent covenant as required by SMC 25.09.335 and noted above.

DECISION – ADMINISTRATIVE CONDITIONAL USE

The proposal to recover development credit is **CONDITIONALLY APPROVED.**

ANALYSIS - SEPA

The initial disclosure of the potential impacts from this project was made in the environmental checklist dated April 18, 2006. This information, along with the experience of the lead agency in similar situations, forms the basis for this analysis and decision. Short- and long-term adverse impacts are anticipated from the proposal.

The SEPA Overview Policy (SMC 25.05.665.D) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans and other policies explicitly referenced may serve as the basis for exercising SEPA authority. The Overview Policy states “where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation,” subject to limitations. Further, under SMC Section 25.05.908 B, the scope of environmental review within critical areas is limited to documenting that the proposal is consistent with *ECA* regulations, SMC Chapter 25.09, and to evaluating potentially significant impacts on the environmentally critical areas resources not adequately addressed in the *ECA* Policies or the requirements of Chapter 25.09.

The proposal, as conditioned by this decision, is determined to be consistent with *ECA* regulations. In addition, several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: the Stormwater, Grading and Drainage Control Code (soil erosion); and Building Code (construction standards for retaining walls and

foundations in *steep slope* areas). Compliance with these codes and ordinances will be adequate to achieve sufficient mitigation of identified adverse impacts. However, under certain limitations or circumstances mitigation can be considered (SMC 25.05.665.d); therefore, a more detailed discussion of some of the impacts is appropriate.

Short-term Impacts

The following temporary or construction-related impacts are expected: slope stability, increased soil erosion during general site work and increased runoff. Due to the temporary nature and limited scope of these impacts, they are not considered significant (SMC Section 25.05.794).

Earth (slope stability) and erosion

There is a potential for erosion during grading and excavation for the proposed retaining walls and buildings. The applicant will follow recommendations from the soils engineer and provide subsurface walls and retaining walls to address soils stability issues. Pursuant to these proposals, and by complying with the requirements of Director's Rule 3-93 and 16-00 (the latter for implementation of Best Management Practices) and Environmentally Critical Areas requirements, no additional mitigation is necessary.

Long-term Impacts

Long-term or use-related impacts are also anticipated from the proposal: increased surface water runoff from greater site coverage by increased impervious surfaces and possible soil instability. These long-term impacts are not expected to be significant.

The expected long-term impacts are typical of single family residential development and are expected to be mitigated by the City's adopted codes and/or ordinances. Specifically these applicable codes and ordinances are: Building Code requirements and ECA regulations (to ensure that proposed development will be constructed in a safe manner); and the Stormwater, Grading and Drainage Control Code (storm water runoff from additional site coverage by impervious surface). Other impacts not noted here are not sufficiently adverse to warrant further mitigation by conditioning.

DECISION - SEPA

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21.C), including the requirement to inform the public of agency decisions pursuant to SEPA.

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(C).
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(C).

**CONDITIONS - ECA CONDITIONAL USE TO RECOVER DEVELOPMENT CREDIT
AND PERMIT CLUSTERED DEVELOPMENT:**

Non-Appealable Conditions of Approval Prior to Issuance of a Master Use Permit

1. Record a covenant that restricts development to the area designated on the site plan for disturbance (the area east of the toe of the largely north to south retaining wall). The covenant shall show the location of permanent ECA markers and provide for their maintenance by the property owners or other responsible parties. The covenant shall be in the form given to the applicant by DPD. After completion and return to DPD, it will be recorded by DPD.
2. Permanent visible markers must be placed along the edge of the nondisturbance area as approved on the site plan. The markers shall be either reinforcing steel or metal pipe driven securely into the ground with a brass cap affixed to the top similar to survey monuments. The brass cap shall be visible at the ground surface and indicate the purpose of the marker. Markers shall be placed at all points along the edge of the nondisturbance line where the line changes direction. Markers must be in place before issuance of this Master Use Permit.
3. Any proposed changes to the site plan must be submitted to DPD for review and approval by the Land Use Planner (Art Pederson, 733-9074).
4. The project constructed shall comply with all images and text on the MUP drawings. This shall be verified by the DPD planner assigned to this project (Art Pederson, 733-9074), prior to the issuance of the Certificate of Occupancy. An appointment with the assigned Land Use Planner must be made at least three working days in advance of field inspection. The Land Use Planner will determine whether submission of revised plans is required to ensure that compliance has been achieved.
5. Embed all conditions in the cover sheet for the MUP permit and for all subsequent permits including updated MUP plans, and all building permit drawings.

Condition of Approval Prior to Issuance of MUP Permit

6. Submit a draft covenant requiring the current and any future owner(s) of the parcel, or future divided parcels containing the retaining wall landscaping, to maintain (watering and general care) the landscaping shown on the approved MUP plans to assure the healthy establishment of said landscaping. This covenant shall bind the current and any future owner(s) of the parcel, or future divided parcels containing the retaining wall landscaping, to maintain the landscaping in a form that effectuates the intended substantial visual screening of the retaining wall landscaping.

Condition of Approval Prior to Issuance of Any Construction Permits

7. The site and landscaping plans shown in the building permit plans must be reviewed and approved by the project planner to verify conformance with the approved MUP design. Record the landscape maintenance covenant after approval by the land use planner and submit a copy of the recorded document to the zoning planner to obtain zoning approval.

During Construction

8. Tree protection fences delineating tree protection areas must be installed around the trees to be retained shown on the site plan and/or discussed in this decision and the property facing side of the 30-inch cedar off site to the east. Each fence shall be placed at the drip line of the trees or a distance of one foot (from the trunk at ground level) for every inch of trunk diameter, at a minimum.

Prior to Building Permit Final

9. On-site verification of conformance with the approved site and landscape designs as shown in the building permit plans and conforming to the approved MUP design, or subsequently revised and approved by the DPD planner assigned to this project (Art Pederson, 733-9074) shall occur before issuance of the *Certificate of Occupancy*. An appointment with the assigned Land Use Planner must be made at least three working days in advance of field inspection. The Land Use Planner will determine whether submission of revised plans is required to ensure that compliance has been achieved.

CONDITIONS - SEPA

None.

Signature: _____ (signature on file)
Art Pederson, Land Use Planner
Department of Planning and Development

Date: December 28, 2006