



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:** 3007280  
**Applicant Name:** Eric Hogeboom for Phil and Karla Boshaw  
**Address of Proposal:** 2466 Westlake Ave N #17

**SUMMARY OF PROPOSED ACTION**

Shoreline Substantial Development Permit to allow a new two story floating home on existing log float (houseboat #17). No change in parking. Existing floating home to be demolished.

The following approvals are required:

**Shoreline Substantial Development Permit** - to allow replacement of a floating home in the Urban Stable (US) and the Conservancy Navigation (CN) shoreline environments (Section [23.60.196](#), Seattle Municipal Code).

**SEPA - Environmental Determination** (Chapter [25.05](#), Seattle Municipal Code).

**SEPA DETERMINATION:**  Exempt  DNS  MDNS  EIS  
 DNS with conditions  
 DNS involving non-exempt grading, or demolition, or involving another agency with jurisdiction.<sup>1</sup>

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<sup>1</sup> DPD published early notice of DNS on August 16, 2007.

## **BACKGROUND DATA**

### Site Description

The property is located in a Commercial 2 zone with a 40-foot base height limit (C2-40) and in an Urban Stable (US) shoreline environment. The site is submerged and located along the west shoreline of Lake Union at its northwest corner. The site is associated with the Nesika Chuck cooperative. A portion of the mooring extends beyond the Seattle Construction Limit Line, which is also the zone edge shown in Figure 2. This particular site is located at slip #17, the second home on the south side of the dock. Pedestrian access, vehicle access and parking are from a spur road, Westlake East Roadway Avenue North. The existing #17 float is approximately 1400 square feet.

The floating home is in a portion of the moorage considered to be conforming. Floating homes are allowed subject to Administrative Conditional Use review in a C2 zone. The expansion of the floating home does not require ACU review (DPD letter from Andy McKim dated July 31, 2007: "Project 6117998, 2466 Westlake Ave N").

### Area Development

The surrounding development along the shoreline, east and west, consists of a mix of floating homes, vessel moorage, and marine related commercial uses. Upland lots to the southwest of Westlake Avenue North are steeply sloped: some are developed with lowrise apartment buildings, and several are public lands. The City has designated Westlake Avenue North as a scenic route, which does not affect this application.

Shoreline property on either side of the subject site is zoned Commercial 2 with a 40-foot height limit (C2-40, see Figure 2). Properties across Westlake Avenue North are zoned residential Lowrise 2.



Figure 1, Aerial photo.



Figure 2, Vicinity zoning

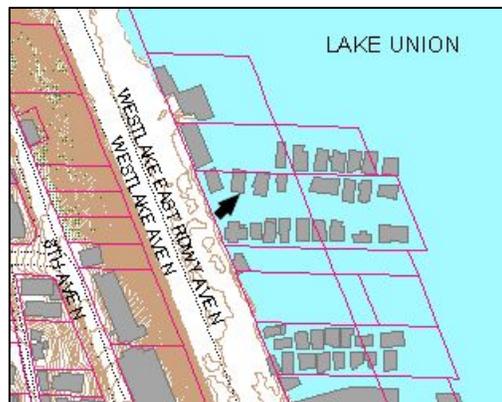


Figure 3, Vicinity topography

### Proposal

The proposal is to demolish and rebuild a floating home on the existing moorage. The applicant has provided evidence that the floating home is established. The applicant proposes to demolish the existing home, 1,011 square feet, and replace it with a 1,745 square-foot home on the existing float. which will remain intact and unchanged. The total height of the structure will be 21 feet from the water with no roof vents or other features shown above the roof, excepting a substantially open railing. No parking information is provided on plans.

### Public Comment

The project elicited no comment letters during the comment period which ended September 5, 2007. DPD's land use file contains no comments from other agencies.

## **ANALYSIS - SHORELINE SUBSTANTIAL DEVELOPMENT**

Section [23.60.030](#) of the Seattle Municipal Code provides criteria for review of a shoreline substantial development permit and reads: *A substantial development permit shall be issued only when the development proposed is consistent with:*

- A. *The policies and procedures of Chapter [90.58](#) RCW;*
- B. *The regulations of this Chapter; and*
- C. *The provisions of Chapter [173-27](#) WAC*

Conditions may be attached to the approval of a permit as necessary to assure consistency of the proposed development with the Seattle Shoreline Master Program and the Shoreline Management Act.

### **A. The policies and procedures of Chapter [90.58](#) RCW**

Chapter [90.58](#) RCW is known as the Shoreline Management Act of 1971. It is the policy of the state to provide for the management of the shorelines of the state by planning for and fostering all reasonable and appropriate uses. This policy seeks to protect against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life, while protecting generally public rights of navigation and corollary incidental rights. Permitted uses in the shorelines shall be designed and conducted in a manner to minimize, insofar as practical, any resultant damage to the ecology and environment of the shoreline area and any interference with the public's use of the water.

The Shoreline Management Act provides definitions and concepts, and gives primary responsibility for initiating and administering the regulatory program of the Act to local governments. The Department of Ecology is to primarily act in a supportive and review capacity, with primary emphasis on ensuring compliance with the policy and provisions of the

Act. As a result of this Act, the City of Seattle adopted a local shoreline master program, codified in the Seattle Municipal Code at Chapter [23.60](#). Development on the shorelines of the state is not to be undertaken unless it is consistent with the policies and provisions of the Act, and with the local master program. The Act sets out procedures, such as public notice and appeal requirements, and penalties for violating its provisions. As the following analysis will demonstrate, the subject proposal is consistent with the procedures outlined in RCW [90.58](#).

**B. The regulations of SMC Chapter [23.60](#)**

The regulations of SMC [23.60.064](#) require that the proposed use 1) conforms to all applicable development standards of both the shoreline environment and underlying zoning; 2) is permitted in the shoreline environment and the underlying zoning district and 3) satisfies the criteria of shoreline variance, conditional use, and/or special use permits as may be required.

SMC [23.60.004](#), Shoreline Policies

In making all discretionary decisions in the shoreline district, DPD must consider the shoreline goals and policies of Seattle's Comprehensive Plan and the purpose and locational criteria for the shoreline environment contained in SMC [23.60.220](#).

The policies support and encourage the establishment of water dependent uses. Due to the historic role of floating homes in Seattle, the shoreline code designates them as a water dependent use; but the increase of floating home moorages or the increase in use of the shoreline or water area by floating homes is not necessarily encouraged. The intent is to recognize the existing floating home community in Lake Union and Portage Bay, while protecting natural areas, preserving public access to the shoreline, and preventing the displacement of water dependent commercial and manufacturing uses by floating homes. Areas with substantial concentrations of existing floating homes are designated to preserve residential uses. The subject site is located in an area designated as Urban Stable. This designation is listed in the Seattle Municipal Code and referenced in the Comprehensive Plan and is intended to provide opportunities for a variety of water-dependent recreational uses and allow some non-water dependent commercial uses. Floating home moorage is allowed as a conditional use meeting certain conditions. The proposal is to replace an existing floating home at an existing floating home moorage location. Therefore, the proposed project would conform to the policies of the comprehensive plan and would be consistent with the purpose of the US designation.

Development Standards

The applicant proposes to demolish the existing home and build an expanded home on the existing float. This activity is permitted outright in SMC [23.60.600](#) governing the US shoreline environment. The proposed action is therefore subject to:

1. *General development standards for all shoreline environments (SMC [23.60.152](#));*
2. *Development standards for conforming floating home moorages (SMC [23.60.196B](#));*
3. *Development standards for uses in the US environment (SMC [23.60.600](#));*
4. *Development standards for commercial zones (SMC [23.47A](#)).*

1. General Development Standards for all Shoreline Environments (SMC 23.60.152)

There are 18 general development standards that apply to all development and uses in all shoreline environments. They require that all shoreline activity be designed, constructed, and operated in an environmentally sound manner consistent with the Shoreline Master Program and with best management practices for the specific use or activity. These measures are required to prevent degradation of land and water. These general development standards state, in part, that all shoreline development and uses must:

- D) not release oil, chemicals or other hazardous materials onto or into the water;*
- E) minimize and control any increase in surface water runoff so that receiving water quality and shoreline properties are not adversely affected;*
- H) All shoreline developments and uses shall be located, designed, constructed and managed to avoid disturbance, minimize adverse impacts and protect fish and wildlife habitat conservation areas including, but not limited to, spawning, nesting, rearing and habitat areas, commercial and recreational shellfish areas, kelp and eel grass beds, and migratory routes. Where avoidance of adverse impacts is not practicable, project mitigation measures relating the type, quantity and extent of mitigation to the protection of species and habitat functions may be approved by the Director in consultation with state resource management agencies and federally recognized tribes;*
- I) All shoreline developments and uses shall be located, designed, constructed and managed to minimize interference with or adverse impacts to beneficial natural shoreline processes such as water circulation, littoral drift, sand movement, erosion and accretion;*
- J) be located, designed, constructed, and managed in a manner that minimizes adverse impact to surrounding land and water uses and is compatible with the affected area; and*
- L) be located, constructed, and operated so as not to be a hazard to public health and safety.*

Construction material such as wood used in the aquatic environment poses a risk of introducing toxins into the environment through the leaching of chemicals used to preserve the material. Common chemicals used to preserve wood are copper, zinc, and arsenic. In high levels copper can negatively impact aquatic organisms. Additionally, an inherent risk that exists when humans live over the water is the potential for debris and other deleterious material to enter the aquatic environment. Therefore to ensure conformance with these general development standards, no treated wood shall be allowed in decking material, if treated wood is used in other structural elements of the floating home it shall meet or exceed the Western Wood Preservers Standards for use of treated wood in the aquatic environment and best management practices shall be required of the owners living in the new houseboat that prevent debris and other deleterious material from entering the water.

The proposal is to construct on the existing float and does not involve replacement of the float with a basement level. In several recent instances, proposed floating home replacements have included construction of concrete floats exhibiting characteristics that vary from those of more

traditional floats. In those instances, DPD has conditioned its approval to address possible salmonid impacts associated with heating, water circulation, and light within the water column. This review does not consider inclusion of submerged living space or other usable space within the structure, and provision of such space would require further shoreline review.

The proposal would replace a smaller home with a larger one. While the applicant proposes to build on the existing float, the additional weight of the larger home must be supported by additional new flotation. The applicant indicates that new flotation is likely to consist of sealed, air-filled plastic vessels (barrels). Such increased underwater volume would appear to constitute an impact to the lake environment, as it displaces a portion of the water column and diminishes the overall space available to protected lacustrine species.

The applicant estimates the net difference between the weights of the existing and proposed floating homes to be 44,050 pounds. Assuming that the level of the existing float deck remains constant, this increased weight corresponds to 706 cubic feet (26 cubic yards) of additional flotation. Proportionate, related, effective mitigation would be to remove an equal volume of submerged material in the Lake Union vicinity. This underwater material should consist of artificial waste materials, preferably materials located higher in the water column (*e.g.* waterlogged detritus beneath nearby floats), and preferably materials unencumbered by any potentially contaminated sediments. DPD considers such removal to be appropriate mitigation for the identified impact and therefore conditions the project accordingly. The condition also requires photo documentation of the achieved mitigation and subsequent disposal at an appropriate upland facility. See condition 5.

The proposed onsite demolition and construction of the floating home are consistent with the general standards for development within the shoreline area. General development standards (SMC [23.60.152](#)) state that Best Management Practices shall be followed for any development in the shoreline environment. These measures are required to prevent contamination of land or water. The Stormwater, Drainage and Erosion Control Code (SMC [22.802](#)) places considerable emphasis on improving water quality. To ensure conformance with the standards in SMC [23.60.152](#), the proponent will be required to notify contractors and subcontractors of these requirements (see condition 2).

2. Development Standards for Conforming Floating Home Moorages (SMC [23.60.196](#))

There are two sets of development standards for floating homes: conforming and nonconforming moorages. The subject moorage is considered conforming, per a letter from Andy McKim of DPD (July 31, 2007, "Project No. 6117998, 2466 Westlake Avenue North").

The remodeling, replacement, or rebuilding of a conforming floating home moorage is permitted subject to the provisions set forth in SMC [23.60.196B](#). The floating home moorage is located on privately owned/controlled premises. The existing views of the water from other moorage tenants will not be blocked, subject to conditions listed below (SMC [23.60.196 A3](#)). This floating home moorage site is considered pre-existing for the purposes of the Seattle Shoreline Master Program because the float has an assigned King County Assessor's No. (KCA #536).

The applicant submitted a moorage plan, which is on file with the Department of Planning and Development (SMC [23.60.196 A6](#)).

DPD has conducted a zoning review of the project, and has issued a correction notice dated August 21, 2007. As updated, the project must meet all development standards of SMC [23.60.196](#).

The proposed project is consistent with the development standards for new conforming structures in the US shoreline environment. Therefore, the proposed project is consistent with the standards for the US shoreline environment.

3. Development Standards for US Shoreline Environments (SMC 23.60.600 – 23.60.642)

The development standards set forth in the Urban Stable shoreline environment relate to height, maximum size of uses, lot coverage, view corridors, public access, and permitted areas of development. The subject site is conforming and therefore subject to the development standards set forth in the specific floating home standards for conforming floating home moorages. Please refer to the previous section for these requirements.

4. General Development Standards for Commercial Zone Uses (SMC 23.47A)

[Chart A](#) in SMC [23.47A.004](#) states that residential uses are permitted as an Administrative Conditional Use in C2 zones. The letter from Andy McKim has clarified that no Administrative Conditional Use Permit is required to expand the size of this existing floating home (letter from Andy McKim of DPD July 31, 2007, RE: “Project No. 6117998, 2466 Westlake Avenue North”). Therefore, the floating home is considered an existing conforming use and the expanded residence is not required to meet the development standards of Commercial zone code requirements in SMC [23.47A](#).

The existing floating homes at this moorage do not have designated required off-street parking spaces. No additional floating homes are proposed at this moorage. Therefore, no off-street parking will be required for this project.

**C. The provisions of Chapter 173-27 WAC**

Chapter [173-27](#) WAC, sets forth permit requirements for development in shoreline environments and gives the authority for administering the permit system to local governments. The State acts in a review capacity. The Seattle Municipal Code Section [23.60](#) (Shoreline Development) and the RCW [90.58](#) incorporates the policies of the WAC by reference. These policies have been addressed in the foregoing analysis and have fulfilled the intent of WAC [173-27](#).

Summary

In conclusion, no additional adverse impacts to the lakebed or water quality are expected, subject to the conditions listed below. The proposed addition and alterations at this moorage site will be consistent with the provisions set forth by [90.58 RCW](#), [173-27](#) WAC, and Chapter [23.60](#) SMC also known as the Seattle Shoreline Master Program (SSMP), subject to the conditions listed at the end of this report.

## **DECISION - SHORELINE SUBSTANTIAL DEVELOPMENT**

The Shoreline Substantial Development Permit is **CONDITIONALLY GRANTED** subject to the conditions listed at the end of this report.

## **ANALYSIS - SEPA**

Environmental review resulting in a Threshold Determination is required pursuant to the State Environmental Policy Act (SEPA), WAC [197-11](#) , and the Seattle SEPA Ordinance (Seattle Municipal Code Chapter [25.05](#)).

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant dated June 11, 2007. The information in the checklist and the experience of the lead agency with review of similar projects form the basis for this analysis and decision.

The Department of Planning and Development has analyzed and annotated the environmental checklist submitted by the project applicant; reviewed the project plans and any additional information in the file. As indicated in the annotated checklist, this action will result in adverse impacts to the environment. However, due to their temporary nature and limited effects, the impacts are not expected to be significant.

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 substantive SEPA authority.

The Overview Policy states, in part: “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 some limitations. Under such limitations/circumstances (SMC [25.05.665 D](#)) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate.

**Air and Environmental Health.** Given the age of the existing structure, it may contain asbestos or other hazardous materials, which could be released into the air during demolition. The [Puget Sound Clean Air Agency](#), the Washington Department of Labor and Industry, and EPA regulations provide for the safe removal and disposal of asbestos. In addition, federal law requires the filing of a demolition permit with PSCAA prior to demolition. Pursuant to SMC Sections [25.05.675 A](#) and [F](#), to mitigate potential adverse air quality and environmental health impacts, project approval will be conditioned upon submission of a copy of the PSCAA Notice of Intent to Demolish prior to issuance of a demolition permit (Condition #1). So conditioned, the project’s anticipated adverse air and environmental health impacts will be adequately mitigated.

**Construction Noise.** Due to the close proximity of residential uses, the limitations of the Noise Ordinance are likely to be inadequate to mitigate potential noise impacts. Pursuant to SEPA policies in SMC Section [25.05.675 B](#), the hours of all work not conducted entirely within an enclosed structure (e.g. excavation, foundation installation, framing and roofing activity) shall be limited as detailed at the end of this report. See Condition #3 and Table 1, below.

**Height, Bulk and Scale.** The full height of the second story at 21 feet will be the maximum allowed from the water's surface. Side setbacks are provided on both sides of the floating home so air and light will not be impaired to the adjoining residences. There are a number of existing floating homes in the vicinity that are of a size and scale similar to this proposed structure. For these reasons, the proposed new structure will not be out of scale with other floating homes in the vicinity, and no adverse impacts are expected related to bulk and scale.

**Plants and Animals.** Assessing environmental impacts of the project for purposes of possible SEPA conditioning requires comparison to the existing on-site conditions. The proposal involves demolition and construction of only the floating home, leaving the existing float relatively intact. In several recent instances, proposed floating home replacements have included construction of concrete floats exhibiting characteristics that vary from those of more traditional floats. In those instances, DPD has conditioned its approval to address possible salmonid impacts associated with heating, water circulation, and light within the water column. This review does not consider inclusion of submerged living space or other usable space within the structure, and provision of such space would require further shoreline and SEPA review.

Chinook salmon, a species listed as threatened under the Endangered Species Act (ESA) in March 1999, are known to inhabit Lake Union including the proposed project area. Under the City of Seattle's Environmental Policies and Procedures 25.05.675 N (2) it states in part: A high priority shall also be given to meeting the needs of state and federal threatened, endangered, and sensitive species of both plants and animals.

This project is proposed to occur in the aquatic environment of Lake Union, which is habitat of chinook salmon. The project site serves as a migration corridor as well as rearing area for juvenile chinook salmon from the Cedar River and other water bodies in Water Resource Inventory Area 8. Additionally, predators of juvenile chinook are known to inhabit areas under float structures and may use these areas as cover while preying on juvenile chinook. Chinook salmon also use under float areas as refuge from avian predators. Therefore the additional in water structure may interfere with Chinook juveniles ability to avoid predators.

The proposal involves no increase in over-water structure, and limited increase in in-water structure, comprising a negligible effect on the amount and quality of natural habitat of juvenile chinook salmon, and providing no net change in habitat for introduced predator species of juvenile chinook. No further conditioning is warranted in this regard.

**Water Quality.** No disturbance of the lakebed sediments is expected since all work will be done above water. There is the potential for construction debris to enter the water during construction; therefore the project will be conditioned to include best management practices (BMPs) to be employed during the removal and replacement of the floating home structure. In addition, residents should adhere to Best Management Practices for the life of the project. See Conditions #4 and 6.

## **DECISION - SEPA**

The responsible official made this decision after review 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 [43.21C](#)), including the requirement to inform the public of agency decisions pursuant to SEPA.

- [X] Determination of Non-Significance with conditions. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW [43.21.030\(2\)\(c\)](#).

## **SEPA AND SHORELINE CONDITIONS**

### *Prior to Issuance of Any Permit to Demolish or Construct*

1. The owner(s) and/or responsible party(ies) shall submit to DPD a copy of the PSCAA Notice of Intent to Demolish prior to issuance of a demolition permit.
2. The proponent(s) and/or responsible party(ies) shall notify in writing all contractors and sub-contractors of the general requirements of the Shoreline Master Program (SMC [23.60.152](#)), including the requirements set forth by condition #4 below.

### *Conditions of Approval During Construction*

The following condition to be enforced during construction shall be posted at the site in a location on or near the property line that is visible and accessible to the public and to construction personnel from adjoining street right-of-way(s). The conditions will be affixed to placards prepared by DPD, to be issued along with the building permit set of plans. The placards shall remain posted on-site for the duration of the construction.

3. All construction activities are subject to the limitations of the Noise Ordinance. Construction activities (including but not limited to demolition, deliveries, framing, roofing, and painting) shall be limited to non-holiday weekdays<sup>2</sup> from 7am to 6pm. Interior work that involves mechanical equipment, including compressors and generators, may be allowed on Saturdays between 9am and 6pm once the shell of the structure is completely enclosed, provided windows and doors remain closed. Non-noisy activities, such as monitoring and weather protection shall not be limited by this condition.

Construction activities outside the above-stated restrictions may be authorized by the Land Use Planner when necessitated by unforeseen construction or safety related situations. Requests for extended construction hours or weekend days must be submitted to the Land Use Planner at least three (3) days in advance of the requested dates in order to allow DPD to evaluate the request.

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<sup>2</sup> Holidays recognized by the City of Seattle are listed on the City website, <http://www.seattle.gov/personnel/services/holidays.asp>

Non-holiday work hours							
	Sun	Mon	Tues	Wed	Thurs	Fri	Sat
7:00 am							
8:00							
9:00							
10:00							
11:00							
12:00 pm							
1:00							
2:00							
3:00							
4:00							
5:00							
6:00							
7:00							
8:00							

**Table 1. Non-holiday work hours.** Unshaded work hours shown above are permitted outright. For certain work, it is possible to request DPD approval for additional hours shaded in gray.

4. The following Best Management Practices shall be employed during the proposed over-water work:
  - a. Dispose of all construction debris in appropriate upland facilities.
  - b. Prior to commencing construction, a floating boom to contain debris shall be installed around the proposed float. A skimming net shall be kept on site. If floating debris enters the water during the proposed work, this debris shall be removed immediately and stored until it can be disposed of at an appropriate upland facility. If heavy (sinking) debris enters the water during the proposed work, the location of the debris shall be documented. When construction is complete a diver shall retrieve all debris that has entered the water and sunk during the proposed work.
  - c. Equipment using oil, gasoline, or diesel used on site shall be checked for evidence of leakage. If evidence of leakage is found, the further use of such equipment shall be suspended until the deficiency has been satisfactorily corrected.
  - d. Equipment for the transportation, storage, handling and application of oil, chemicals, or other hazardous materials shall be maintained in a safe and leak-proof condition to prevent release of this material into the water. If there is any evidence of leakage, the further use of such equipment shall be suspended until the deficiency has been satisfactorily corrected.
  - e. Prior to commencing construction, an emergency containment plan and procedures for all toxic material that will be kept on site shall be in place. Equipment for containment and cleanup of this toxic material shall be stocked on the site. During construction, a sufficient number of personnel trained in the proper implementation of this plan and equipment shall be on site at all times.
  - f. No treated wood shall be used in any decking material. If treated wood is proposed for other structures, this wood shall be professionally treated using the least toxic treatment available and completely cured using the best management practices developed by the Western Wood Preservers Institute ([www.wwpinstitute.org](http://www.wwpinstitute.org)) before this wood is used for this project. The use of wood treated with [creosote](#) or [pentachlorophenol](#) is prohibited.
  - g. Flotation used in any of the over water structure shall be enclosed and contained to prevent the breakup or loss of the floatation material into the water.

5. The proponent(s) and/or responsible party(ies) shall remove from the shoreline environment of Lake Union a volume of submerged detritus equal to the volume of new material to be introduced for added flotation (706 cubic feet in this case). Mitigation identified in this condition does not include any construction debris recovered as part of condition 4.b. This underwater material should consist of artificial waste materials, preferably materials located higher in the water column (*e.g.* waterlogged detritus beneath nearby floats), and preferably materials unencumbered by any potentially contaminated sediments. The responsible party(ies) must submit to DPD photo documentation of the achieved mitigation (contact Scott Ringgold, 233-3856) and subsequently dispose of the material an appropriate upland facility.

*For the Life of the Project*

6. Standard best management practices (BMPs) shall be used to ensure that no petroleum products, other toxic substances, including household chemicals, herbicides pesticides, chemical fertilizers, miscellaneous debris and/or other deleterious materials are allowed to enter or leach into the water.
7. Construction shall occur on the float to minimize adverse impacts and protect the fish and wildlife habitat conservation areas

Signature: \_\_\_\_\_ (signature on file)  
Scott A. Ringgold, Land Use Planner  
Department of Planning and Development

Date: April 24, 2008