



City of Seattle

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: 3011693
Applicant Name: Kyle Griffith
Address of Proposal: 1301 Alaskan Way, Pier 57

SUMMARY OF PROPOSED ACTION

Shoreline Substantial Development Permit to allow a 175 high ferris wheel at the waterward end of Pier 57.

The following approvals are required:

Shoreline Substantial Development Permit – to allow a commercial entertainment use is an Urban Harborfront (UH) shoreline environment. (Section 23.60.660, Seattle Municipal Code)

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 waterfront lot located at 1301 Alaskan Way on the Seattle waterfront. The property is zoned Urban Harborfront. The Shoreline designation is also Urban Harborfront, as the zoning and shoreline designations for the central waterfront area are identical. The Comprehensive Plan designation is Urban Center Village, Commercial Core. The existing development is a pier that was built in 1902 as rail loading facility for a sawmill, and has since been renovated to become a historical site and recreational destination, including shops, restaurants, a game arcade and a functioning antique carousel. Historical exhibits are placed throughout the pier building.

Proposal Description

The Applicant proposes to install a sky wheel on the waterward end of the pier. The wheel foundation consists of eight legs radiating from a central axle. The wheel is approximately 175 feet in diameter and will be positioned in a generally perpendicular orientation to Alaskan Way. The structural legs will be mounted on steel plate foundations that tie into steel trusses mounted above the pier support. The wheel will support approximately 41 gondolas, which will be fully enclosed, and air conditioned, obviating the need for open able windows and preventing any falling objects. The waiting line will be managed using portable fencing. The Sky wheel expands existing recreational uses at the site.

Public Comment

The public comment period ended on November 19, 2010. Several comments were received, and most supported the installation of the project at this site.

ANALYSIS — SHORELINE SUBSTANTIAL DEVELOPMENT PERMIT

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.

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 contemplates protecting against effects to public health, the land use and its vegetation and wild life, and the waters of the state and their aquatic life, while protecting public right to navigation and corollary incidental rights. Permitted uses in the shoreline shall be designed and conducted in a manner to minimize, insofar as possible, 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 insuring compliance with the policy and provisions of the Act. As a result of this Act, the City of Seattle and other jurisdictions with shorelines, 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.

The proposal is subject to the Shoreline Policies of SMC 23.60.004 because the site is located within the shoreline district and the cost of the project exceeds \$5,780. The proposed development has been designed to ensure minimum impact to the public health, land and waters of the state, and their aquatic life. The location of the proposed work on the shoreland will not interfere with the public rights of navigation and corollary rights, thus providing for the management of the shorelines by planning for and fostering all reasonable and appropriate uses. Therefore, the subject application is consistent with the procedures outlined in RCW 90.58.

A. THE REGULATIONS OF CHAPTER 23.60

Chapter 23.60 of the Seattle Municipal Code is known as the “Seattle Shoreline Master Program.” In evaluating requests for substantial development permits, the Director must determine that a proposed use meets the approval criteria set forth in SMC 23.60.030 (cited above). Development standards of the shoreline environment and underlying zone must be considered, and a determination made as to any special requirements (shoreline conditional use, shoreline variance, or shoreline special requirements use permit) or conditioning that is necessary to protect and enhance the shorelines area (SMC 23.60.064).

Pursuant to SMC 23.60.064C, in evaluating whether a development which requires a substantial development permit, conditional use permit, variance permit or special use authorization meets the applicable criteria, the Director shall determine that the proposed use: 1) is not prohibited in the shoreline environment and the underlying zone and; 2) meets all applicable development standards of both the shoreline environment and underlying zone and; 3) satisfies the criteria for a shoreline variance, conditional use, and/or special use permits, if required.

SMC 23.60.004 - Shoreline Policies

The Shoreline Goals and Policies which are part of the Seattle Comprehensive Plan’s Land Use Element and the purpose and locational criteria for each shoreline environment designation contained in SMC 23.60.220 must be considered in making all discretionary decisions in the shoreline district. The purpose of the Urban Harborfront (UH) environment as set forth in Section 23.60.220.C.8 is to “encourage economically viable water-dependent uses to meet the needs of waterborne commerce, facilitate the revitalization of Downtown's waterfront, provide opportunities for public access and recreational enjoyment of the shoreline, preserve and enhance elements of historic and cultural significance and preserve views of Elliott Bay and the land forms beyond.”

The proposed use at this location is consistent with the existing retail and entertainment-type uses on Pier 57. The proposed wheel will facilitate the revitalization of Downtown's waterfront and provide opportunities for public access and recreational enjoyment of the shoreline, and therefore is supported by the policies of the UH shoreline environment.

Development Standards

The proposal is a permitted commercial use under SMC 23.60.660 governing the UH shoreline environment and is therefore subject to:

1. *the general development standards for all shoreline environments (SMC 23.60.152);and*
2. *the development standards for uses in the UH environment (SMC 23.60.660).*

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

All uses and developments shall be subject to the following general development standards:

- A. *The location, design, construction and management of all shoreline developments and uses shall protect the quality and quantity of surface and ground water on and adjacent to the lot and shall adhere to the guidelines, policies, standards and regulations of applicable water quality management programs and regulatory agencies. Best Management Practices such as paving and berming of drum storage areas, fugitive dust controls and other good housekeeping measures to prevent contamination of land or water shall be required.*
- B. *Solid and liquid wastes and untreated effluents shall not enter any bodies of water or be discharged onto the land.*
- C. *Facilities, equipment and established procedures for the containment, recovery and mitigation of spilled petroleum products shall be provided at recreational marinas, commercial moorage, vessel repair facilities, marine service stations and any use regularly servicing vessels.*
- D. *The release of oil, chemicals or other hazardous materials onto or into the water shall be prohibited. Equipment for the transportation, storage, handling or application of such materials shall be maintained in a safe and leak proof condition. If there is evidence of leakage, the further use of such equipment shall be suspended until the deficiency has been satisfactorily corrected.*
- E. *All shoreline developments and uses shall minimize any increases in surface runoff, and control, treat and release surface water runoff so that receiving water quality and shore properties and features are not adversely affected. Control measures may include, but are not limited to, dikes, catch basins or settling ponds, interceptor drains and planted buffers.*
- F. *All shoreline developments and uses shall utilize permeable surfacing where practicable to minimize surface water accumulation and runoff.*
- G. *All shoreline developments and uses shall control erosion during project construction and operation.*

- 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. All shoreline developments and uses shall be located, designed, constructed and managed in a manner that minimizes adverse impacts to surrounding land and water uses and is compatible with the affected area.*
- K. Land clearing, grading, filling and alteration of natural drainage features and landforms shall be limited to the minimum necessary for development. Surfaces cleared of vegetation and not to be developed shall be replanted. Surface drainage systems or substantial earth modifications shall be professionally designed to prevent maintenance problems or adverse impacts on shoreline features.*
- L. All shoreline development shall be located, constructed and operated so as not to be a hazard to public health and safety.*
- M. All development activities shall be located and designed to minimize or prevent the need for shoreline defense and stabilization measures and flood protection works such as bulkheads, other bank stabilization, landfills, levees, dikes, groins, jetties or substantial site regrades.*
- N. All debris, overburden and other waste materials from construction shall be disposed of in such a way as to prevent their entry by erosion from drainage, high water or other means into any water body.*
- O. Navigation channels shall be kept free of hazardous or obstructing development or uses.*
- P. No pier shall extend beyond the outer harbor or pierhead line except in Lake Union where piers shall not extend beyond the Construction Limit Line as shown in the Official Land Use Map, Chapter 23.32, or except where authorized by this chapter and by the State Department of Natural Resources and the U.S. Army Corps of Engineers.*

The Stormwater, Grading and Drainage Control Code (SMC 22.800) places considerable emphasis on protecting water quality. This generally takes the form of best management practices being required on building permits. This measure will be adequate to ensure protection of the shoreline from the construction that is proposed. The potential impacts to water quality resulting from this project are construction-related; there are no significant long-term operational impacts. Turbidity during pile-driving activities will be localized and temporary in nature.

Concrete will be poured into steel piles using a tremie hose, which delivers concrete from the bottom up to prevent splashing or any other misplacement of concrete outside the pile. No uncured concrete will be allowed to contact the water. Installation of the wheel will occur above the pier deck and will not impact the water surface below.

2. Development Standards for UH Shoreline Environment (SMC 23.60.690)

The development standards set forth in the Urban Harborfront (UH) Shoreline Environment relate to critical habitat protection, height, lot coverage, view corridors, setbacks, water-related uses on waterfront lots and public access. The proposal conforms to all applicable development standards for the UH environment.

SMC 23.60.660 – Uses Permitted Outright in the UH Environment

The proposed entertainment use does not change the current use of the property as a commercial destination and is consistent with allowed uses in the Urban Harborfront environment. The wheel is a permitted use in the UH environment in which it is located. The wheel has been authorized by easement by the Washington State Department of Natural Resources (DNR) pursuant to Authorization No. 51-087695, subject to the condition that the operation of the wheel may not interfere with navigation or commerce. Navigational aids will be placed on the wheel in accordance with U.S. Coast Guard approval dated January 26, 2011. The federal and state authorities with jurisdiction over the proposal have fully approved such use.

In addition, during project review, following development standards were considered:

SMC 23.60.692 – Height in the UH Environment

The site is located in the Historic Character District of the UH Environment; as a result, the typical height limit is 50 feet. The proposed entertainment use does not change the current use of the property as a commercial destination and is consistent with allowed uses in the Urban Harborfront environment. SMC 23.60.692.C.1 provides:

Cranes, gantries, mobile conveyors and similar equipment necessary for the functions of marinas, marine manufacturing, permitted commercial, industrial or port activities and servicing of vessels are exempt, provided such structures shall be designed to minimize view obstruction.

The wheel exceeds the height of 50 feet, with a height of approximately 200 feet; but the wheel is a permitted commercial use at the project site, and the additional height is necessary for the functions of the use. As noted below, measures have been adopted (such as the orientation of the wheel) to minimize view obstruction. The proposed height is consistent with this development standard.

SMC 23.60.694 – Lot Coverage in the UH Environment

The proposed wheel does not affect the existing lot coverage on the project site.

SMC 23.60.698 – View Corridors in the UH Environment. This section states additional standards for view corridors, including what types of structures are permitted and what types are not. The Applicant is not changing the view corridor from existing conditions. SMC 23.60.698 requires all waterfront lots in the Urban Harborfront Environment to provide a view corridor of not less than 30 percent of the width of the lot, measured at Alaskan Way, or two view corridors with a minimum width of 20 feet.

Existing conditions on the site do not meet the standards in SMC 23.60.698. The pier building on Pier 57 occupies most of the Alaskan Way frontage, with the exception of a 7-foot area to the south, and a 33.25-foot area to the north containing a driveway that leads to the end of the pier. A ramp and stair tower extend over the driveway. The 33.25-foot area does not technically qualify as a “view corridor” because the view of Puget Sound from Alaskan Way is almost substantially obstructed by the ramp and stair tower. If the 33.25-foot area were considered a view corridor, the total view corridor on the site would equal 27.15 percent of the lot width, which is less than the 30 percent required by City Code.

The southern view corridor allows for inclusion of one half the submerged adjacent right-of-way. This results in a 51-foot wide corridor (24.75 percent of lot width). The total view corridor area of 83.25 feet is 40.41 percent of the lot width.

The proposed wheel will not alter the existing condition. The wheel itself will be located entirely behind the existing building on Pier 57, so it will have no impact on existing views from Alaskan Way to Puget Sound (views are currently blocked). Although the wheel footings do extend slightly into the 33.25-foot area, the view of Puget Sound from Alaskan Way will not be impacted because the footings blend into the existing ramp/tower structure, which currently obstruct views to the water. The wheel will not impact the existing condition with respect to view corridors.

SMC 23.60.700 Moorage requirements in the UH Environment. Pier 57 already meets moorage requirements by leasing a float on the south side of the pier to Argosy Tours, located on the adjacent pier. No modification to this existing moorage is proposed in connection with this project.

23.60.702 Public Access requirements. The project does not alter or reduce public access at Pier 57.

23.60.704 Historic Character Area review criteria. The proposal has completed review by the Department of Neighborhoods under this section. The proposal will not alter the identified historic elements of the pier and so satisfies these review criteria.

Shoreline Mitigation

The proposed increase in seafloor coverage requires mitigation. The steel piles for the Sky Wheel project will result in a net increase in seafloor coverage of 277.5 square feet. To offset this increase, 230 of the existing creosote-treated timber piles will be removed, resulting in a net reduction in seafloor coverage of 138.5 square feet. An additional benefit of this mitigation is removal of creosote from the aquatic environment.

In order to install the steel piles, it is necessary to remove at least two additional timber piles in order to make room for the larger piles. The actual number of piles removed may be greater than 230. The total number of timber piles removed will be reported to the Washington Department of Fish and Wildlife after construction as part of the Hydraulic Project Approval agreement and to DPD.

Public access and queuing at the end of the pier may create greater instances of litter and an increased potential for objects to enter the water. Therefore, a litter control program will be put in place by the wheel operators.

B. THE PROVISIONS OF CHAPTER 90.58 RCW

RCW 90.58.320 provides:

No permit shall be issued pursuant to this chapter for any new or expanded building or structure of more than thirty-five feet above average grade level on shorelines of the state that will obstruct the view of a substantial number of residences on areas adjoining such shorelines except where a master program does not prohibit the same and then only when overriding considerations of the public interest will be served.

Seattle's Shoreline Master Program establishes a height limitation of 50 feet in this portion of the Urban Harborfront environment, but it provides as exception for equipment associated with permitted commercial uses. In those cases, the height limit may be exceeded, provided that structures "shall be designed to minimize view obstruction." SMC 23.60.692.

The wheel will exceed 50 feet in height, but it has been designed to minimize view obstruction. The Wheel is an open structure that does not obstruct visibility. When the wheel is constructed and operating, upland residents will be able to see through it to the Puget Sound and the Olympic Mountains. Furthermore, it will be oriented east-west to minimize view impacts to condominium residents inland from the pier. Inland residents looking west towards the wheel will see the narrowest side, which is approximately 10 feet wide. This is a minor alteration of the existing view; the wheel will not obstruct views of a substantial number of residences in areas adjoining the subject shoreline.

C. THE PROVISIONS OF CHAPTER 173-27 WAC

WAC 173-27 establishes basic rules for the permit system to be adopted by local governments, pursuant to the language of RCW 90.58. It provides the framework for permits to be administered by local governments, including time requirements of permits, revisions to permits, notice of application, formats for permits, and provisions for review by the state's Department of Ecology (DOE). As the Seattle Shoreline Master Program has been approved by DOE, consistency with the criteria and procedures of the SMC Chapter 23.60 is also consistency with WAC 173-27 and RCW 90.58.

Summary

Development requiring a Shoreline Substantial Development Permit can only be approved if it conforms to the policies and procedures of the WAC and RCW and with the regulations of Chapter 23.60 of the Seattle Shoreline Master Program.

The project as proposed meets the specific standards for development in the UH environment. It also conforms to the general development standards, as well as the requirements of the underlying zone. During the project review, the Applicant was also asked to demonstrate consistency with the following code subsections: SMC 23.60.160, 23.60.162, 23.60.679 and 23.60.702. This was satisfactorily done and documents are on record.

The Director's authority under Seattle's Shoreline Master Program is to ensure that development proposals are consistent those policies and procedures, and conforms to specific development standards of the underlying zones.

DECISION - SHORELINE SUBSTANTIAL DEVELOPMENT PERMIT

The Shoreline Substantial Development Permit is **CONDITIONALLY GRANTED.**

CONDITIONS – SHORELINE SUBSTANTIAL DEVELOPMENT PERMIT

(Noted at the end of this document)

SEPA ANALYSIS

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant. 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 SEPA Overview Policy (SMC 25.05.554D) 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 D1-7) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate.

Short-term Impacts

The following temporary construction-related impacts are expected: 1) temporary and localized turbidity during pile removal and installation activities; 2) noise impacts affecting fish and marine mammals, which will be minimal given the small number of replacement piles proposed; 3) potential for uncured concrete to contact the water, which has been avoided to the extent possible through the use of state-of-the-art construction techniques; and 4) increased coverage of the seafloor due to the foundation piles, which will be mitigated by the removal of existing timber piles.

In addition, the project will provide shoreline mitigation, as described above.

Greenhouse Gas

Construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery; and the movement of vehicles — themselves result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project.

Long-term Impacts

The Ferris wheel will be visible from many vantage points near the waterfront. A view analysis has been performed by the applicant with more than 25 simulations and the wheel is visible but unobtrusive at most locations. The wheel has been designed so as not to occlude existing views. People who ride the wheel will be provided with greatly enhanced views.

The potential impact of lighting from the wheel was also evaluated. The low-intensity LED light package has been used on waterfront Ferris wheels in other US and international cities, and has not been found to produce levels of light sufficient to penetrate below the water surface and affect marine life. This low-intensity light package makes the wheel visible from a distance, yet the light does not spill over into the surrounding area like conventional incandescent flood lighting. The wheel will not contribute to the haze of light that hovers over the city in the night sky, nor will light from the wheel create greater illumination at or inside the windows of buildings across Alaskan Way.

Some waterfront users may drive downtown and to the waterfront with the sky wheel as their destination, and they will use existing parking lots and metered spaces along Alaskan Way. The majority of waterfront users arrive on foot from other parts of downtown Seattle, or will also be there to use other features of the waterfront. Parking ramps set back from the waterfront already serve those users. Significant additional traffic over existing levels is not expected to occur in the vicinity of the proposed wheel and in the waterfront area.

Compatibility with Existing Land Use

The existing uses at Pier 57 are classified as a “commercial uses” according to the Seattle Municipal Code. The wheel is an “entertainment use,” which is a “commercial use in which recreational, entertainment, athletic and/or cultural opportunities are provided for the general public, either as participants or spectators.”

No land use impacts are expected to be created with the addition of the wheel to Pier 57. The central waterfront is characterized by commercial uses of various kinds. No impacts to land use have been identified and no mitigation measures are required.

Greenhouse Gas

The Seattle waterfront is well served by public transit and the majority of visitors park in ramps a few blocks away and walk to the site. People visit a variety of sites when they come to the waterfront and it would be difficult to attribute any vehicle trips directly to the Ferris wheel. The wheel itself runs on electricity and does not emit any greenhouse gases on its own. The rate structure from Seattle City Light includes funding for mitigation projects to offset the effects of electrical generation.

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).

CONDITIONS – Shoreline Substantial Development Permit

For Life of Project:

Prior to opening the Wheel for business, the applicant shall submit to DPD for approval a litter control plan, which shall identify reasonable measures to be implemented by the Applicant to prevent litter associated with Wheel operations from entering the aquatic environment and to clean up such litter from the aquatic environment where reasonably feasible. The litter control plan may include optional alternative methods for implementation if initial litter control efforts are not successful. Compliance with the approved litter control plan shall be a condition for the life of the project.

During Construction:

- Refer to any applicable Hydraulic Project Approval and Army Corps permit for allowable in-water work timing.
- Appropriate Best Management Practices (BMPs) shall be employed to prevent deleterious material from entering the aquatic environment during proposed pile repair.
- If floating debris enters the water, the debris shall be removed from the water immediately, stored on-site, and be disposed of at an appropriate upland facility.

- If heaving (sinking) debris enters the water during the proposed work, the location of this debris shall be documented in a log that is kept on site for the duration of the project. When the proposed work is completed, all sunken debris that has entered the water during construction shall be retrieved and be disposed of in an appropriate upland facility.
- If toxic material such as any petroleum product enters the water, this material shall be reported to the Department of Ecology, and shall be immediately contained using the appropriate equipment and material.
- Appropriate equipment and material for hazardous material clean up shall be kept at the site during construction.
- Piling to be removed shall be completely removed using a vibratory pile driving device. Any depressions in the substrate created by the removal of the piling shall be filled with clean native substrate that is of the same size and type of the existing substrate. Piling that breaks shall be cut 2-ft below the mudline.
- Any creosote material, pile stubs, and associated sediments, if any, shall be disposed of in a landfill that meets the liner and leachate standards of the Minimum Functional Standards, Chapter 173-304 WAC.

CONDITIONS - SEPA

During Construction:

1. To reduce the noise impact of construction on nearby properties, construction activities other than that taking place totally within enclosed floors will be limited to non-holiday weekdays between 7:00 AM and 6:00 PM, and Saturdays from 9:00 AM to 5:00 PM. Any changes to these limitations must be approved at least three working days in advance by the Land Use Planner, Cliff Portman, (206-684-5593, or email: cliff.portman@seattle.gov).
2. To offset the increase in seafloor coverage by the Ferris wheel foundation piles, a minimum of 230 creosote-treated timber piles will be removed to provide a net decrease in seafloor coverage of approximately 138.5 square feet. An additional benefit of this mitigation is removal of creosote from the aquatic environment.

Signature: (signature on file)
Cliff Portman, Principal Land Use Planner
Department of Planning and Development

Date: November 17, 2011