



## Staff Report to Hearing Examiner

Exhibit 1

### Development Services Department

425-489-2754 • 17301 133<sup>rd</sup> Avenue NE • Woodinville, WA 98072

Desk Hours • Monday – Thursday 7:30am – 5:00pm • Friday 7:30am – 4:00pm

**PROJECT NAME:** Asko Processing Reasonable Use Permit

**FILE NUMBER:** RUP12001/SEP12024

**PROJECT DESCRIPTION:** Reasonable use permit to establish a building pad for a 75,000 square foot warehouse with an additional 15,000 square feet of office, with associated parking improvements, on two properties zoned Industrial. There is an existing class 3 wetland on the site that, along with the associated buffer, covers 75% of the site. A portion of the southern area of the existing wetland is proposed to be filled, and wetland creation and buffer enhancement is proposed adjacent to the northern area of the existing wetland. The reasonable use permit will only establish the development pad; a separate land use approval will also be required for the project; at the time of land use approval, the applicant will be required to demonstrate that the project meets the City's development regulations within the development pad proposed. SEPA is required for this land use permit.

**DATE OF REPORT:** September 10, 2013

**DATE OF HEARING:** September 17, 2013

**APPLICANT/CONTACT:** Reid Shockey of Shockey Planning Group  
Address: 2716 Colby Avenue, Everett WA 98201  
Phone: 425-258-9308  
Email: [rshockey@shockeyplanning.com](mailto:rshockey@shockeyplanning.com)

**PROPERTY OWNER:** Asko Processing, Inc.  
434 N 35<sup>th</sup> Street  
Seattle, WA 98103

**LOCATION OF PROPOSAL:** 15801 & 15701 Woodinville Redmond Road

**ASSESSOR'S PARCEL NUMBER(S):** 1526059094 & 1526059095

**CURRENT USE:** Vacant

**PROPERTY SIZE:** 6.119 acres

**CURRENT ZONING:** Industrial with Tourist District Overlay

**COMPREHENSIVE PLAN DESIGNATION:** Industrial with Tourist District Overlay

**FIRE SERVICE:** Woodinville Fire and Rescue

**WATER/SEWER SERVICE:** Woodinville Water District

**SCHOOL DISTRICT:** Northshore School District

**STAFF RECOMMENDATION:** STAFF RECOMMENDS THAT THE HEARING EXAMINER APPROVE WITH CONDITIONS THE PROPOSED REASONABLE USE PERMIT

**STAFF CONTACT:** Erin Martindale, Senior Planner *EMM*  
425-877-2283  
[erinm@ci.woodinville.wa.us](mailto:erinm@ci.woodinville.wa.us)

**PROJECT DESCRIPTION:**

<b>Location:</b>	<p><u>Northern Property:</u> 15801 Woodinville Redmond Road; Legally described as PARCEL 3 KCSP 1076043 REC AF #7805021040 SD PLAT DAF THAT POR OF SW 1/4 OF NW 1/4 LY WLY OF ST RD # 2 &amp; ELY OF BN RR BELT LN LESS SLY 7 AC OF THAT POR OF S 1/2 OF NW 1/4 LY WLY OF SIGN RT 522 &amp; ELY OF BN RR BELT LN R/W DAF-BEG AT NXN OF E/W C/L OF SD SEC &amp; WLY R/W LN OF SD SIGN RT 522 TH N 25-44-14 W ALG SD WLY R/W LN 440.27 FT TH N 26-49-28 W ALG SD WLY R/W LN 87.77 FT TH S 89-52-36 W PLW E/W C/L OF SD SEC 664.19 FT TO ELY R/W LN OF SD BN RR TH SLY ALG SD ELY RR R/W LN 560.46 FT TO E/W C/L OF SD SEC TH N 89-52-36 E ALG SD E/W C/L 598.13 FT TO TPOB, Woodinville, WA.</p> <p><u>Southern Property:</u> 15701 Woodinville Redmond Road; Legally described as PARCEL 4 KCSP 1076043 REC AF #7805021040 SD PLAT DAF - THAT POR OF SW 1/4 OF NW 1/4 LY WLY OF ST RD #2 &amp; ELY OF BN RR BELT LN LESS SLY 7 AC OF THAT POR OF S 1/2 OF NW 1/4 LY WLY OF SIGN RT 522 &amp; ELY OF BN RR BELT LN R/W DAF - BEG AT NXN OF E/W C/L OF SD SEC &amp; WLY R/W LN OF SD SIGN RT 522 TH N 25-44-14 W ALG SD WLY R/W LN 440.27 FT TH N 26-49-28 W ALG SD WLY R/W LN 87.77 FT TH S 89-52-36 W PLW E/W C/L OF SD SEC 664.19 FT TO ELY R/W LN OF SD BN RR TH SLY ALG SD ELY RR R/W LN 560.46 FT TO E/W C/L OF SD SEC TH N 89-52-36 E ALG SD E/W C/L 598.13 FT TO TPOB, Woodinville, WA.</p> <p>This property is located in the Valley Industrial neighborhood.</p>
<b>Parcel Size:</b>	<p>Northern Parcel: 3.059 acres  Southern Parcel: 3.059 acres  Total area: 6.119 acres</p>
<b>Site/Area Description:</b>	This site is currently vacant
<b>Utilities:</b>	<p>Available utilities include:</p> <p>Water: Woodinville Water District  Sewer: Woodinville Water District  Electricity: Puget Sound Energy  Natural Gas: Puget Sound Energy  Phone/Cable: Frontier, Comcast</p>
<b>Access/Street Improvements:</b>	The site is accessed from Woodinville-Redmond Road. As part of the future project approval and construction, the applicant would be required to install frontage improvements.
<b>Surrounding Land Uses/Zoning:</b>	<p>North: Commercial, Industrial uses / Industrial with Tourist District Overlay  South: Warehouse, Office Uses / Industrial with Tourist District Overlay  West: Railroad ROW, Open Space / Industrial with Tourist District Overlay, Park</p>

East: Industrial uses / Industrial

## **BACKGROUND:**

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The applicant submitted an application for SEPA Determination and Reasonable Use Permit on December 10, 2012. The application was vested on January 14, 2013. A Notice of Complete Application was sent on January 24, 2013. A Notice of Application issued on February 4, 2013; due to a noticing error, the Notice of Application was re-issued on February 11, 2013, with a comment period through February 26, 2013. A SEPA Determination of Nonsignificance was issued on August 26, 2013, with a comment period through September 9, 2013.

The applicant proposes to obtain approval, through the reasonable use process in WMC 21.24.080(2), for a development footprint that would accommodate a 2-story building that would include 75,000 square feet of industrial space and 15,000 square feet of office space. Parking for 123 cars would be provided on-site. As part of this approval, the development footprint is being proposed. A different sized building with a different configuration, that fits into the proposed development footprint while meeting all of the City's development standards, could be proposed as part of the land use project approval.

A critical area study was prepared for the project. The site has a wetland, Wetland A, on it that covers (either with wetland or buffer area) the northwest and southeast quarters of the property (connected by a ditch), as well as steep slopes on the southwest quarter. The remaining area in the northeast corner of the property does not provide sufficient area for reasonable use of the site.

Wetland A is approximately 1.0 acres in size (43,584 square feet). Per the Critical Areas Report, this wetland is a Class 3 wetland per Woodinville Municipal Code (WMC) 21.24.320, which has a standard buffer width under WMC 21.24.330 of 50 feet, measured from the delineated wetland edge. The buffer requirement is allowed under this same section of code to be administratively reduced to 25 feet with buffer enhancement.

In order to obtain the requested building, approximately 24,064 square feet of Wetland A would be required to be filled, including the eastern area and connecting ditch of Wetland A. A reasonable use permit is required for the proposed wetland fill, as there is no other permitted alteration in WMC 21.24.340 for direct impacts to wetlands by a private development.

The applicant submitted an application for SEPA Determination and Reasonable Use Permit on December 10, 2012. The application was vested on January 14, 2013. A Notice of Complete Application was sent on January 24, 2013. A Notice of Application issued on February 4, 2013; due to a noticing error, the Notice of Application was re-issued on February 11, 2013, with a comment period through February 26, 2013. A SEPA Determination of Nonsignificance was issued on August 26, 2013, with a comment period through September 9, 2013.

The applicant is only requesting the Reasonable Use Permit at this time. If the Reasonable Use Permit is approved by the Hearing Examiner as conditioned, the applicant would be required to go through the land use project approval process in order to receive approval for a specific use, and meet of all of the development standards in place at the time of a complete application of that land use permit. The Reasonable Use Permit only designates the footprint in which the development is allowed to be completed, and does not allow the applicant to obtain any construction permits as a result of the Reasonable Use Permit approval.

A reasonable use permit is required to be processed per WMC 2.30, Appeal Procedures. Per WMC 21.24.380, the Hearing Examiner holds a closed record hearing to review the recommendation from the Development Services Director on reasonable use permit. A public notice is not provided; the applicant and any appellants are informed of the meeting date. There are no appellants for this application, and the applicant was informed of the meeting date.

**COMPREHENSIVE PLAN:**

The reasonable use permit proposal, with conditions, complies with the following applicable Comprehensive Plan Goals and Policies. The following goals are stated with the appropriate policies that apply to this development.

Land Use GOAL LU-4: To establish land use patterns that encourage a variety of commercial services and employment opportunities.

Policy LU-4.3 Allow for appropriate development in the Tourist District that attracts tourists and still allows for uses in the underlying zoning.

Policy LU-4.8 Accommodate a wide variety of industrial land uses consistent with responsible environmental practices.

Environmental GOAL ENV-8: Explore innovative opportunities for environmental protection, maintenance and enhancement objectives as a part of all city planning and development review.

Policy ENV-8.1 Promote environmentally friendly and economically viable design.

**ZONING CODE:**

In accordance with the consistency test outlined in the Growth Management Act (RCW 36.70B.040), prior to making a decision or recommendation on an application, the City must consider whether a project meets the adopted development regulations and/or Comprehensive Plan policies. The subject property is located in the Industrial Zone with a Tourist District Overlay and the following standards apply:

Regulation	Requirement	Submitted
Land Use:	Comply with the permitted use tables in Chapter 21.08 WMC	The applicant has indicated that any number of uses may be proposed on this site. As part of the land use project approval, and/or building permit process, the uses proposed will be evaluated for compliance with the City's requirements.
Setbacks:	Street: 25 feet Interior: 5 feet	Setbacks shown at 30 feet from the street, 15 feet from the west interior property line, 20 feet to the south interior property line, and 30 feet from the north interior property line.
Building Height	Maximum: 45 feet in Tourist District	Plans show approximately 90,000 square feet of building area, which equates to a 1/0.34 floor to area ratio.
Floor to Area Ratio	Maximum: 3/1	
Impervious Surface:	Maximum: 85% in Tourist District	
		The site plan shows the impervious surface at approximately 153,237 square feet, or 57.5% of the site.
		Setbacks, building height, floor to area ratio, impervious surface will be evaluated



		for compliance with the City's requirements as part of the land use project approval, and/or building permit process.
Tree Retention & Landscaping	<p>Street Frontage Landscaping: 10' per design standards of landscaping or pedestrian oriented space                      Interior Lot Line Landscaping: 5' Type II                      Parking Lot Landscaping: 15% of the parking area in Type IV</p> <p>Tree Retention required: 6.119 acres x 60 tree credits per acre = 367.14 tree credits required</p>	<p>The landscaping proposal will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.</p> <p>An arborist report was submitted as part of the Reasonable Use Permit application. The current site does not comply with the tree credit requirements, and supplemental plantings will be required. A Tree Plan II, including a planting plan to comply with the tree density requirements, will be required to be submitted, and the tree retention requirements will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.</p>
Parking off-street:	<p>Ratio:                      Manufacturing/Warehouse – 0.9 space per 1,000 square feet                      Office/retail – 1 space per 300 square feet                      Tasting with no manufacturing – 1 per 75sf                      Tasting with manufacturing – 1 per 50sf</p>	<p>The site plan shows 75,000 square feet of manufacturing/warehouse and 15,000 square feet of office:</p> <p>75,000x.9/1,000 = 68 spaces                      15,000/300= 50 spaces                      Total spaces required (on development plan shown): 118 spaces                      Total spaces provided on site plan: 123 spaces</p> <p>Parking will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.</p>
Fire:	Meet the Fire Code requirements (vehicle access, roadway configuration, building access, building size, hydrants, fire flow, sprinklers)	The proposal will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.
Drainage:	Comply with the City's adopted drainage requirements per Chapter 14.09 WMC.	A drainage report will be required to be submitted, and drainage analysis and improvement requirements will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.

<p>Public Street Improvements:</p>	<p>Design (for right-of-way width, roadway width, pedestrian improvements, turnarounds, lighting, etc) per public street standards as described in 1999 Transportation Infrastructure Standards and Specifications and Municipal Code.</p>	<p>Preliminary Civil Construction Plans will be required to be submitted, and will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.</p> <p>Final construction plans will be subject to review and approval prior to issuance of any development permits.</p>
<p>Traffic Impacts:</p>	<p>Meet level of service requirements per Chapter 21.28 WMC</p>	<p>A traffic report will be required to be submitted, and level of service requirements will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.</p>
<p>Critical areas:</p>	<p>Protect critical areas, including wetlands, streams, steep slopes, and fish and wildlife habitat areas.</p> <p>Wetland A is approximately 1.0 acres in size (43,584 square feet). Wetland A is a Class 3 wetland, which has a standard buffer width under WMC 21.24.330 of 50 feet. The buffer requirement is allowed under this same section of code to be administratively reduced to 25 feet with buffer enhancement.</p> <p>In order to obtain the requested development permit, approximately 24,064 square feet of Wetland A would be required to be filled, including the eastern area and connecting ditch of Wetland A. A reasonable use permit is required for the proposed wetland fill, as there is no other permitted alteration in WMC 21.24.340 for direct impacts to wetlands by a private development. See the section below on reasonable use permits where there are impacts to a wetland for private development projects.</p>	<p>Wetland impacts are proposed as part of this project.</p> <p>Per the Critical Area Report, there will be approximately 24,064 square feet of wetland area impacted as part of this project. The wetland area proposed to be impacted is degraded and provides little functional benefit.</p> <p>Mitigation is proposed to be completed on-site. Wetland creation, at a ratio fo 1.5:1 is proposed, and would be located in the northwest portion of the site. A final mitigation plan would be required to be submitted, and evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.</p>
<p>Reasonable Use Permit</p>	<p>WMC 21.24.080(2) requires a reasonable use permit to met the following criteria:</p> <p>(i) The application of this chapter would deny all reasonable use of the property;</p> <p>(ii) There is no other reasonable use with less impact on the sensitive area;</p> <p>(iii) The proposed development does not pose an unreasonable threat to the public</p>	<ul style="list-style-type: none"> <li>• Approximately 75% of the 6.119 acre site is encumbered by critical areas (wetland, wetland buffer, and/or steep slopes).</li> <li>• The site has remained undeveloped due to the constraints on the site.</li> <li>• The applicant provided analysis showing what comprise "reasonable</li> </ul>

	<p>health, safety or welfare on or off the development proposal site and is consistent with the general purposes of this chapter and the public interest; and</p> <p>(iv) Any alterations permitted to the sensitive area shall be the minimum necessary to allow for reasonable use of the property; and</p> <p>This section also requires the following:</p> <p>(c) Any authorized alteration of a sensitive area under this subsection shall be subject to conditions established by the Hearing Examiner including, but not limited to, mitigation under an approved mitigation plan.</p>	<p>use” in this neighborhood. Of the 35 developed properties along the SR 202 corridor where this property is located, the range of “lot coverage”, or the percentage of the lot within the development footprint, was between 4.51% and 114.33%. The average for these properties is 42.81%. The analysis also states that these numbers are based on code requirements and King County records, and are likely conservative estimates, meaning that the actual size of the developments are likely higher.</p> <ul style="list-style-type: none"> <li>• The proposed development pad at the subject property would cover 59.7% of the site (per the site plan).</li> <li>• As an alternative to the proposed site plan, the applicant submitted an “Option B” that would include a 2-story, 40,000 square foot building. To meet the City’s parking requirements for this building, a drive aisle across the wetland would be required. There would potentially be impacts to the hydrological connection between the two wetland areas due to this plan, and it would not avoid impacts to the wetland.</li> <li>• The existing wetland is degraded. Per the critical area report, there is low to moderate potential for water quality, hydrology and habitat functions, with no to moderate opportunity to provide those functions.</li> <li>• The proposed wetland fill, and wetland creation, will be required to be obtain final approval by the City, as well as state and federal agencies, showing the mitigation sequencing required by law (avoid, minimize, rectify, reduce, compensate), at the time of project approval. As stated in the critical area report and additional analysis provided by the applicant, filling the poor quality wetland area in the southeast portion of the site, and creating wetland in the northwest portion of the site, minimizes the</li> </ul>
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		<p>impact to the wetland, while at the same time creating a reasonable development pad.</p> <ul style="list-style-type: none"> <li>• The proposed wetland creation and buffer enhancement will improve the functions and values of the wetland, for water quality, hydrology and habitat.</li> <li>• The development pad is the minimum necessary to spur development of the site to occur. A smaller pad would likely not result in development and the site would remain vacant.</li> <li>• The development pad is in line with the development of the industrial land within the SR 202 corridor adjacent to this property.</li> <li>• The development of this property as an industrial or tourist-oriented user would implement the comprehensive plan and purposes of the zoning code.</li> <li>• The conceptual mitigation plan provided includes:             <ul style="list-style-type: none"> <li>▪ Wetland creation at a ratio of 1.5:1 of the area filled, or 35,140 square feet.</li> <li>▪ Wetland enhancement, including invasive species removal and planting of native species within the wetland, of 19,520 square feet (the entire wetland area)</li> <li>▪ Buffer enhancement, including invasive species removal and planting of native species within the buffer area, of 32,003 square feet (the entire buffer area)</li> </ul> </li> </ul>
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**AGENCY REVIEW:**

**Environmental Review:** As the lead agency the City of Woodinville issued a Determination of Nonsignificance under Washington Administrative Code 197-11-340(2) on August 26, 2013. No appeals were filed and the Determination stands as issued.

**Notice:** Notice of this application has been provided in accordance with the provisions of WMC Title 17. This project was circulated for review and comment on February 11, 2013, by publishing the Notice of Application in the newspaper of record; mailing a copy of the Notice to property owners within 500 feet of the project and interested agencies; and posting the Notice at the site and at the official locations for City Notices.

## Agency Comments:

## Agencies with no comments:

- Woodinville Public Works Department
- Woodinville Police Department
- Frontier Communications

## Agencies with comments:

- Woodinville Building Department
- Woodinville Fire and Rescue
- Stillaguamish Tribe of Indians
- Snoqualmie Indian Tribe
- Department of Ecology
- Woodinville Water District
- Muckleshoot Indian Tribe Fisheries Division
- Washington State Department of Archaeology & Historic Preservation

Agency comments have either been made conditions of approval, or were resolved with the agency during the review process. No agency comments were received subsequent to the issuance of the SEPA Determination.

## Public Comment:

No written public comment letters have been received in regard to this project.

**DETERMINATION OF CONSISTENCY:**

Revised Code of Washington 36.70B.040 – Determination of Consistency and WMC 17.13.100 requires that a proposed project shall be reviewed for consistency with a local government’s development regulations during project review by consideration of:

1. Type of land use;
2. Level of development, such as units per acre or other measures of density;
3. Infrastructure, including public facilities and services needed to serve the development; and
4. The characteristics of the development, such as development standards.

Based on the above analysis, and with the proposed conditions listed below, staff finds that the Asko Processing Reasonable Use Permit has met the requirements of the City of Woodinville 1999 Infrastructure Standards, Comprehensive Plan, and Woodinville Municipal Code.

**STAFF RECOMMENDATION:**

The proposed project was found to be consistent with and meet the intent of the Woodinville Comprehensive Plan and applicable development regulations; therefore, staff recommends **APPROVAL** of the Asko Processing Reasonable Use Permit (RUP12001/SEP12024), subject to the following conditions:

1. The reasonable use permit, pursuant to WMC 21.24.080(2), is approved, and includes a development footprint that would accommodate a 2-story building that could include 75,000 square feet of industrial space, 15,000 square feet of office space, and parking for 123 cars, as shown in Exhibit 3. As part of this approval, only the development footprint is approved. A different sized building with a different configuration, that fits into the proposed development footprint while meeting all of the City’s development standards, could be proposed as part of the land use project approval. The applicant is only

requesting the Reasonable Use Permit at this time. Prior to issuance of any construction permits, the applicant shall apply for an a land use project approval in order to receive approval for a specific use/project, and meet of all of the development standards in place at the time of a complete application of that land use permit.

2. All development shall proceed in accordance with the recommendations listed in the Critical Areas Report and Conceptual Mitigation Plan prepared by Shockey Planning Group, Inc. dated July 2, 2013 and any further addendums as accepted by the Planning Director.
  - a. The proposed wetland alteration, to fill 24,064 square feet of wetland, per the critical area report, is approved as described in the Critical Area Report, and subject to the conceptual mitigation plan. As part of and prior to approval of the land use project approval and final construction drawings, a final mitigation plan shall be submitted to, and reviewed and approved by the City.
  - b. The proposed buffer reduction, of varying widths but to a minimum of 25 feet wide, per the critical area report, is approved as described in the Critical Area Report, and subject to the conceptual mitigation plan. As part of and prior to approval of the land use project approval and final construction drawings, a final mitigation plan shall be submitted to, and reviewed and approved by the City.
3. All required state, federal and other permits shall be obtained prior to beginning construction.
4. The State Department of Archaeology & Historic Preservation, as well as the Stillaguamish and Snoqualmie tribes, requested an archaeological survey be completed on this site. The applicant shall submit, as part of the land use project approval application, a professional archaeological survey and an inadvertent discovery plan of the project area. The applicant shall coordinate with the tribes and state agencies on the content of these reports, as well as the request for tribal monitors to be present during ground disturbance.
5. The following development regulations shall be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process:
  - a. Setbacks, building height, floor to area ratio, and impervious surface.
  - b. Landscaping, and parking.
  - c. Fire code and other life-safety requirements.
  - d. An arborist report was submitted as part of the Reasonable Use Permit application. The current site does not comply with the tree credit requirements, and supplemental plantings will be required. A Tree Plan II, including a planting plan to comply with the tree density requirements, will be required to be submitted, and the tree retention requirements will be evaluated for compliance.
6. Preliminary Civil Construction Plans will be required to be submitted, and will be evaluated for compliance with the City's infrastructure requirements as part of the land use project approval, and/or building permit process. Final construction plans will be subject to review and approval prior to issuance of any development permits.
7. A drainage report will be required to be submitted, and drainage analysis and improvement requirements will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.
8. A traffic report will be required to be submitted, and level of service requirements will be evaluated for compliance with the City's requirements as part of the land use project approval, and/or building permit process.

#### **EXHIBIT LIST:**

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| Exhibit 1 | Staff Report  |
| Exhibit 2 | Application forms received December 10, 2012                                  |
| Exhibit 3 | Site Plan, Option A, prepared by Shockey Planning Group, received May 2, 2013 |

- Exhibit 4 Letter of Complete Application issued January 24, 2013
- Exhibit 5 Notice of Application issued February 4, 2013
- Exhibit 6 Re-Issued Notice of Application issued February 11, 2013
- Exhibit 7 Geotechnical Engineering Evaluation prepared by Nelson Geotechnical Associates, Inc. received December 10, 2013
- Exhibit 8 Critical Area Report and Conceptual Mitigation Plan prepared by Shockey Planning Group, dated July 2, 2013
- Exhibit 9 Agency Comments Received
- Exhibit 10 Arborist Report prepared by International Forestry Consultants, Inc. dated January 10, 2013
- Exhibit 11 Alternative Site Plan, Option B, prepared by Shockey Planning Group, received May 2, 2013
- Exhibit 12 Comment Response Letter, prepared by Shockey Planning Group, received May 2, 2013
- Exhibit 13 Comment Response Letter, prepared by Shockey Planning Group, received July 18, 2013
- Exhibit 14 SEPA Determination of Nonsignificance issued August 26, 2013, and SEPA Checklist dated January 4, 2013
- Exhibit 15 Email from City Attorney on Critical Area Exception Process dated June 17, 2010