

**STAFF REPORT  
ROTHAUS/CYPHERS/BUNDY DOCK & BOATLIFTS**

TO: Douglas County Hearing Examiner  
FROM: Douglas County Land Services Staff  
RE: SP-16-04  
DATE: July 11, 2016

**I. GENERAL INFORMATION**

Requested Action: An application for a shoreline substantial development permit for a residential joint-use dock and two ground-based boatlifts on the Columbia River.

Location: The dock and boatlifts will serve 15 and 19 New Horizon Drive and 14 Van Winkle Road, Orondo. The properties are described as Lots 1, 3 and 4 of the New Horizon Estates Short Plat, located within the SW Quarter of Section 21, Township 26N, Range 21E., W.M., Douglas County, Washington. The Douglas County Assessor's Parcel Numbers are: 26212130015, 26212130017 and 26212130018

**II. SITE INFORMATION**

Site Characteristics: Currently, the properties consist of a developed terraced shoreline. The upper portion of the two downriver properties consists of flat lawn grass leading to a moderately sloped shoreline, which contains small retaining walls, rocks trials, and flat benches. The mowed and maintained lawn grass slope transitions to an armored shoreline. The armored shoreline consists of rounded river rock that was pushed towards the river as part of the historic orchard use of the properties. The only native riparian vegetation present on the subject properties is mitigation plantings that were installed as part of the resolution of the riparian buffer violation on the Rothaus property. Other vegetation consists of weeping willow, ponderosa pine, and Russian elm, which are primarily located above the initial slope from the shoreline. The upriver property (Bundy property) contains similar slopes to the downriver properties: however, this property has primarily been unaltered following the cessation of orchard activities. The entire gradually sloped portion of the shoreline zone consists of upland grasses and weedy species. Along the top of the bank, vegetation consists of a single row of Lombardi poplars. Waterward of the Lombardi poplars the shoreline is steeply sloped and vegetation consists of upland grasses and weedy species. Like the downriver properties, there is a strip of round river rock immediately landward of the OHWM (from historic orchard use). The landward portion of the Bundy property (outside of the shoreline zone) consists of an active orchard.

There are currently single family residences on all three properties. There is a detached garage on the Cyphers property and an outbuilding on the Rothaus property. The single family residence, along with several outbuildings, on the Bundy property is located at the landward end of the property, just off Van Winkle Road.

Project Proposal: The applicants propose to construct a permanent joint-use dock and install two (2) ground based boatlifts on the property line between the Rothaus and Cyphers properties. The proposed dock would consist of three separate sections: a 4ft x 38ft grated pier, a 4ft x 36ft grated gangway, and two 8ft x 20ft floats (or a single 8ft x

40ft floats). The proposed dock would be a total of approximately 612 sq ft and would result in approximately 549 sq ft of new overwater coverage, although 100 percent of the structure would be a grated surface that allows over 60% light transference.

The ground-based boatlifts would be installed on the landward side of the floats, approximately 46 ft from the OHWM in a water depth of approximately 11 ft below the OHWM. Each boatlift would have a maximum footprint of 125 sq ft although the boatlifts consist of open steel framing. The piles used to anchor the float may be used to help anchor the boatlifts as well.

The project will be accessed by a trail that will be contained in an easement across all three lots. The easement will be completed and recorded prior to issuance of the building permit, as recommended in the Conditions of Approval.

Zoning and Development Standards: The subject property is located within the Rural Resource 5 (RR-5) Zoning District. The purpose of Rural Resource 5 zoning is to provide an area for a variety of rural lifestyles, hobby farms, densities and open space, while protecting the rural and resource characteristics in the vicinity. This designation provides opportunities for compatible rural land uses, is sensitive to the site's physical characteristics and may serve as an urban transition area adjacent to urban growth boundaries. Areas may be located adjacent to urban growth areas or existing development of higher densities and where appropriate, may serve as a transition and buffer area between commercial agricultural areas and other land uses. Areas may be located where there currently is a range of rural densities or land parcel sizes generally less than twenty acres in size, including along the Columbia River and in areas that have adequate rural levels of services available such as roads, schools, and fire protection.

### **III. COMPREHENSIVE PLAN:**

The Douglas County Countywide Comprehensive Plan designates this property as Rural Resource 5 (RR-5). The following goals and policies set forth in the comprehensive plan are relevant to this development:

#### RURAL DEVELOPMENT:

POLICY RD-4: Development and recreational opportunities in rural shoreline and other rural areas shall minimize potential adverse impacts to water quality, slope stability, vegetation, wildlife and aquatic life.

POLICY RD-7: Rural developments should consider and comply with the spirit, intent and requirements of all the chapters and sections of the comprehensive plan, including but not limited to, the Resource Lands Element and Resource and Critical Areas Conservation Element.

#### CRITICAL AREAS – FISH AND WILDLIFE HABITAT CONSERVATION AREAS

GOAL 1: Protect fish and wildlife habitat areas as an important natural resource for Douglas County, particularly in regard to their economic, aesthetic and quality of life values.

POLICY CA-14: Impacts of new development on the quality of land, wildlife and vegetative resources will be considered as part of the environmental review process and require any

appropriate mitigating measures. Such mitigation may involve the retention and/or enhancement of habitats.

POLICY CA-15: The maximum amount of vegetation should be maintained in its natural state and be disturbed only as minimally necessary for the development. Disturbed areas should be re-vegetated with native vegetation as soon as possible. Re-vegetation will be maintained in good growing conditions, as well as being kept free of noxious weeds.

POLICY CA 16: If a development proposal is located in or near a habitat conservation area shown on the reference maps, a consultation and subsequent mitigation measures, if needed, should be encouraged from the WDFW or other appropriate agency.

POLICY CA-19: Proper riparian management that maintains existing riparian habitat and is consistent with best agricultural management practices should be encouraged.

POLICY CA-20: Ensure that land uses adjacent to naturally occurring wetlands and other fish and wildlife habitat areas will not negatively impact the habitat areas. If a change in land use occurs, adequate buffers will be provided to the habitat areas.

POLICY CA-21: Activities allowed in fish and wildlife habitat conservation areas and open space will be consistent with the species located there, including all applicable state and federal regulations and/or best management practices for the activity regarding that species.

#### **IV. SHORELINE MASTER PROGRAM**

The Douglas County Regional Shoreline Master Program classifies this reach of the Columbia River shoreline as Rural Conservancy. The purpose of the Rural Conservancy environment is to protect ecological functions, conserve existing natural resources and valuable historic and cultural areas in order to provide for sustained resource use, achieve natural flood plain processes, and provide recreational opportunities. Examples of appropriate uses include but are not limited to low impact outdoor recreation uses, agricultural uses, aquaculture, low intensity residential development, and other natural resource based low intensity uses.

A listing of the applicable policies and regulations are found in the analysis section of this staff report.

#### WASHINGTON ADMINISTRATIVE CODE (WAC)

WAC 173-27 provides updated rules for administering the Shoreline Management Act (RCW 90.58) and the local master program. WAC 173-27-150 establishes minimum review criteria for substantial development permits. The criteria states that a substantial development permit shall be granted only when the proposed development is consistent with:

- The policies and procedures of the Act;
- The provisions of these regulations; and
- The applicable master program adopted or approved for the area.

#### **V. ENVIRONMENTAL REVIEW**

Douglas County issued a Determination of Non-significance on July 1, 2016 in accordance with WAC 197-11-355 (Optional DNS).

#### **VI. AGENCY AND PUBLIC COMMENTS:**

Applicable agencies have been given the opportunity to review this proposal. The following agencies have been sent copies of the proposal and have commented as indicated below:

<b>Agency Notified</b>	<b>Response Received</b>	<b>Agency Notified</b>	<b>Response Received</b>
WA Department of Ecology	N/R	WA Dept. of Fish & Wildlife	N/R
WA Department of Ecology - Shorelines	N/R	Army Corps of Engineers	N/R
Chelan County PUD	N/R	Yakama Nation	N/R
Dept. of Natural Resources – Rivers Dist.	N/R		

\* N/R = No Reply

No agency or public comments were received at the writing of this staff report.

## **VII. PROJECT ANALYSIS**

Upon review of the application materials, site plans, agency comments, the Douglas County Countywide Comprehensive Plan, the Douglas County Regional Shoreline Master Program and other applicable codes and requirements, planning staff offers the following analysis and recommendations for the subject application:

### Comprehensive Plan consistency:

Residential development and recreational opportunities in shoreline areas of the Rural Resource 5 land use designation can be considered when potential adverse impacts to water quality, slope stability, vegetation, wildlife and aquatic life have been sufficiently addressed. Critical area policies place preference on the protection of and preservation of wetlands over the alteration and mitigation of impacts to wetlands. The proposal is consistent with the goals and policies of the Douglas County Countywide Comprehensive Plan.

### Consistency with the Douglas County Shoreline Master Program

*Joint-use docks and watercraft lifts are permitted uses in the Rural Conservancy shoreline designation.*

## 4.1 ECOLOGICAL PROTECTION AND CRITICAL AREAS

**POLICY 1:** Shoreline use and development should occur in a manner that assures no net loss of existing ecological functions and processes and protects critical areas. Uses should be designed and conducted to avoid, minimize, or to fully mitigate in so far as practical, any damage to the ecology and environment.

*The project cannot avoid damage to the aquatic environments, and the applicant states the project will not affect water quality, water supply, recreation or aesthetics of the Columbia River. The project has been designed to minimize damage and to fully*

*mitigate per the standards set forth by the United States Army Corp of Engineers, Washington Department of Fish & Wildlife and County adopted mitigation ratios.*

**REGULATION 1:** Mitigation sequencing – applicants shall demonstrate all reasonable efforts have been taken to mitigate potential adverse impacts in the following prioritized order:

- a. Avoiding the impact altogether by not taking a certain action or parts of an action;

*The project is located in the riparian and aquatic environments and therefore cannot avoid impacts.*

- b. Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps, such as project redesign, relocation, or timing, to avoid or reduce impacts;

*The project is designed to minimize impacts by utilizing current state and federal dock, boatlift and shoreline-access design.*

- c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment to the conditions existing at the time of the initiation of the project;

*The project includes only new structures to be placed in the riparian and aquatic environments, therefore rectifying the impact is not possible. The new dock and boatlifts have been designed following mitigation sequencing. The application states that the 4-foot access trail and easement will not require mitigation since the existing buffer is mowed and maintained as lawn grass.*

- d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;

*The project includes new structures to be placed in the riparian and aquatic environments, therefore reducing or eliminating the impact over time via this permit is not possible. The possibility does exist that future designs would reduce impacts however implementation of that new design would require a future permit and analysis.*

- e. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and

*The project is proposing mitigation per the USACE and NMFS mitigation ratios that will compensate for the impacts. Suggested conditions of approval require installation of mitigation per the approved plan.*

- f. Monitoring the impact and the compensation projects and taking appropriate corrective measures.

*Suggested conditions of approval require that the mitigation measures be monitored for 5 years after installation to determine survivability and corrective measures be taken if survivability is not achieved.*

#### 4.2 WATER QUALITY

**REGULATION 5:** All building materials that may come in contact with water shall be constructed of untreated wood, cured concrete or steel. Materials used for decking or other structural components shall be approved by applicable state agencies for contact with water to avoid discharge of pollutants. Wood treated with creosote, arsenate compounds, copper chromium arsenic or pentachlorophenol is prohibited in shoreline water bodies.

*The dock, boatlifts and any structural component materials shall be of a type approved by state agencies to avoid discharge of pollutants.*

#### 4.3 VEGETATION CONSERVATION

**REGULATION 2:** Where impacts to buffers are permitted under Section 4.1, Ecological Protection and Critical Areas, new developments shall be required to develop and implement a management and mitigation plan. When required, management and mitigation plans shall be prepared by a qualified biologist and shall be consistent with the requirements of Appendix H. Management and mitigation plans shall describe actions that will ensure no net loss of ecological functions. Vegetation shall be maintained over the life of the use and/or development by means of a conservation easement or similar legal instrument recorded with the County Auditor.

*A Fish & Wildlife Management and Mitigation Plan prepared by Grette Associates was submitted in the application materials.*

**REGULATION 4:** Native vegetation clearing shall be limited to the minimum necessary to accommodate approved shoreline development.

*Above the OHWM the project will affect approximately 83 sq. ft. of the riparian buffer, but it will not affect any existing native vegetation. The application states that the 4-foot access trail and easement will not require mitigation since the existing buffer is mowed and maintained as lawn grass.*

#### 4.7 RESTORATION

**POLICY 2:** Mitigation associated with shoreline development projects shall be designed to achieve no net loss of ecological function.

*A Fish & Wildlife Management and Mitigation Plan prepared by Grette Associates was submitted in the application materials. The plan identifies that the project will result in no net loss of ecological function through proper mitigation.*

#### 5.10 MOORAGE: DOCKS, PIERS, WATERCRAFT LIFTS, MOORING BUOYS, FLOATS

POLICY 4: Moorage should be spaced and oriented in a manner that minimizes hazards and obstructions to navigation and other water-oriented activities such as fishing, swimming and pleasure boating, as well as property rights of adjacent land owners.

*The proposed joint-use dock will have a maximum footprint of approximately 612 sq ft and be constructed of open aluminum framing. The addition of the dock will not pose a hazard to navigation.*

*The proposed two ground-based boatlifts will have a maximum footprint of approximately 125 sq ft each and be constructed of open steel framing. The addition of the two boatlifts will not pose a hazard to navigation.*

POLICY 5: Moorage should be restricted to the minimum size necessary to meet the needs of the proposed water-dependent use. The length, width and height of piers and docks should be no greater than necessary for safety and functional use.

*The project proposes a dock and two boat lift structures that are the minimum sizes necessary for safety and requirements established by the USACE.*

REGULATION 7: Moorage facilities shall be the minimum size necessary to meet the needs of the proposed water-dependent use and shall observe the following criteria:

- d. Moorage shall be designed to avoid the need for maintenance dredging. The moorage of a boat larger than provided for in the original moorage design shall not be grounds for approval of dredging.

*The location does not indicate the need for maintenance dredging.*

REGULATION 15: Moorage facilities shall be marked with reflectors, or shall be otherwise identified to prevent unnecessarily hazardous conditions for water surface users during day or night. Exterior finish shall be generally non-reflective.

*Suggested conditions of approval require that the dock and boatlifts be marked with reflectors or otherwise identified.*

REGULATION 16: Moorage facilities shall be constructed and maintained so that no part of a facility creates hazardous conditions nor damages other shore property or natural features during predictable flood conditions. Floats shall be securely anchored.

*The dock and boatlifts are designed and secured so that they will not damage shoreline property or natural features.*

REGULATION 21: All moorage facilities must permanently mark all of the components with name, address, telephone number and date of installation.

*Suggested conditions of approval require that the dock and boatlifts be permanently marked for identification.*

REGULATION 23: Moorage facilities shall avoid locations that will adversely impact shoreline ecological functions or processes.

*The dock is proposed to be located in the most appropriate shoreline location on the subject property and will be positioned to minimize shadows cast over shallow waters and the boatlifts will be placed adjacent to the dock at a depth required by the USACE.*

#### Appendix H, Chapter 3: Critical Areas – Fish and Wildlife Habitat Conservation Areas

The Fish & Wildlife Habitat Management and Mitigation Plan has determined that the riparian buffer will not be adversely affected by the installation of the pier and gangway above the OHWM and the dock and ground-based boatlifts below the OHWM.

The installation of a dock and two boatlifts will impact the aquatic environment. A Fish & Wildlife Habitat Management and Mitigation Plan has determined that there will be approximately 862 square feet of impact from the dock and boatlifts to the riparian and aquatic environments. The plan proposes approximately 1,891 square feet of riparian vegetation plantings to meet the mitigation for disturbance of the project. In order to compensate for the placement of the proposed boatlifts in a water depth greater than 11 feet, the proposed project will require the installation of a 610 sq. ft. mitigation planting area. The 610 square foot mitigation planting area will entail the installation of native riparian trees and shrubs, based on the USACE mitigation ratio for boatlifts (2.44:1) proposed to be installed at a water depth of greater than 11 feet. The proposed boatlifts will be installed at approximately 11 feet below OHWM.

The dock will require the installation of approximately 1,218 sq. ft. of native riparian plantings. The 1,218 sq. ft. mitigation planting area will entail the installation of native riparian trees and shrubs, based on the USACE and NMFS mitigation ratios for a joint-use dock (2.22:1).

All mitigation for the dock would be divided equally between the three properties (427 sq. ft. of native riparian vegetation per property) and the boatlift mitigation will be divided equally between the two downriver properties (305 sq. ft. of mitigation planting per property). In total, approximately 732 sq. ft. of mitigation will be installed on each of the two downriver properties (Rothaus & Cyphers properties) while only 427 sq. ft. will be installed on the upriver property (Bundy property).

The Douglas County Regional Shoreline Master Program requires a minimum mitigation ratio of 1:1 for development within aquatic habitat. The more restrictive mitigation ratios determined by the USACE and NMFS are used for this project. A planting plan is proposed on sheet 6 of 6 of the diagrams in the Fish & Wildlife Habitat Management and Mitigation Plan Sheets.

As conditioned, the proposal is consistent with this section.

#### Consistency with WAC 173-27 and RCW 90.58:

As conditioned below, the project appears consistent with the requirements and criteria of the Shoreline Management and Enforcement Procedures, and the Shoreline Management Act.

## VIII. RECOMMENDATION

As conditioned below, this application does not appear to be detrimental to the general public health, safety or welfare and meets the basic intent and criteria associated with Title 18 and 19 of the Douglas County Code, the Douglas County Countywide Comprehensive Plan, and the Douglas County Regional Shoreline Master Program. Staff recommends approval of SP-16-04, subject to the following findings of fact and conditions:

### Suggested Findings of Fact:

1. The applicant is Dennis Rothaus, 19 New Horizon Dr., Orondo, WA 98843.
2. The applicant's agent is: Larry Lehman, Grette Associates LLC, 151 S. Worthen St. Ste. 101, Wenatchee, WA 98801
3. General Description: An application for a shoreline substantial development permit for a joint-use dock and two ground-based boatlifts.
4. The dock and boatlifts will serve 14 Van Winkle Road, 15 New Horizon Drive and 19 New Horizon Drive, Orondo, WA. The properties are described as being Lots 1, 3 and 4 of the New Horizon Estates short plat. The properties are further described as being located within the SW Quarter of Section 21, Township 26N, Range 21E., W.M., Douglas County, Washington. The Douglas County Assessor's Parcel Numbers are: 26212130015, 26212130017 and 26212130018.
5. The Comprehensive Plan Designation is Rural Resource 5.
6. The subject property is located in the Rural Resource 5 (RR-5) zoning district.
7. The Columbia River Shoreline section of the subject property is designated as "Rural
8. Conservancy" by the Douglas County Regional Shoreline Master Program.
9. WAC 173-27-150 establishes minimum review criteria for Shoreline Management Substantial Development Permits. This criteria states that a substantial development permit shall be granted only when the development proposed is consistent with the policies and procedures of the Act; the provisions of this regulation; and the applicable master program adopted or approved for the area.
10. A Fish & Wildlife Habitat Management and Mitigation Plan dated January 2016 was performed for the project by Grette Associates.
11. The installation of the dock and boatlifts will impact the aquatic and riparian environments. A Fish & Wildlife Habitat Management and Mitigation Plan has determined that a total of 862 square feet of aquatic and riparian habitat will be disturbed by the dock and boatlifts.
12. The application proposes 1,891 square feet of mitigation. A planting plan is proposed on sheet 6 of 6 of the diagrams in the Fish & Wildlife Habitat Management and Mitigation Plan.
13. The mitigation proposed in the Fish & Wildlife Management and Mitigation Plan meets the requirements of the Douglas County Regional Shoreline Master Program.
14. Douglas County issued a Determination of Non-Significance on July 1, 2016 in accordance with WAC 197-11-355 (Optional DNS).
15. No comments have been received from public agencies or private citizens.
16. Surrounding property owners were given the opportunity to comment on the proposals, can request a copy of the decision, and can appeal the decision subject to the requirements outlined in DCC Title 14.
17. Proper legal requirements were met and surrounding property owners were given the opportunity to comment on the proposal at a public hearing.

18. WAC 173-27-090 requires that construction must be commenced within 2 years of the effective date of the shoreline permit and that authorization for construction shall terminate 5 years after the effective date of the shoreline permit.
19. As conditioned, the development will not adversely affect the general public, health, safety and general welfare.

Suggested Conclusions:

1. As conditioned, the development meets the goals, policies and implementation recommendations as set forth in the Douglas County Countywide Comprehensive Plan and the Douglas County Regional Shoreline Master Program.
2. As conditioned, this proposal is consistent with applicable federal and state laws and regulations.
3. As proposed, revised, and conditioned, potential impacts of the project can be mitigated.
4. Public interests will be served by approval of this proposal.
5. As conditioned, the proposal is consistent with Title 18 "Zoning" and Title 19 "Environment" of the Douglas County Code.

Suggested Conditions of Approval:

1. The project shall proceed in substantial conformance with the plans and application materials on file submitted on March 28, 2016 except as amended by the conditions herein.
2. The applicant shall comply with all applicable local, state and federal regulations.
3. A copy of this permit and attached conditions shall be kept on-site and provided to the contractor and all others working within the shoreline area at all times. The applicant, contractor, machinery operators and all others working within the shoreline area shall have read this permit and attached conditions and shall follow its conditions at all times.
4. The dock and boatlifts shall be marked with reflectors to prevent unnecessarily hazardous conditions for water surface users during day or night. Documentation shall be provided to the County.
5. The dock and boatlifts shall be permanently marked with name, address, telephone number and date of installation. Documentation shall be provided to the County.
6. The project application shall proceed consistent with the Fish & Wildlife Habitat Management and Mitigation Plan prepared by Grette Associates, dated January 2016.
7. Prior to issuance of the building permit for the joint-use dock, an access trail for all three lots must be completed and established in a recorded easement.
8. Where necessary, a permanent means of irrigation shall be installed for the mitigation plantings that are designed by a landscape architect or equivalent professional. Said design shall meet the specific needs of riparian and shrub steppe vegetation.
9. Mitigation planting as shown on the mitigation planting plan sheet 6 of 6, dated 6/25/2015 shall be planted upon completion of the project.
10. A five year monitoring period shall commence upon placement of the planting materials and irrigation system. A performance surety agreement in conformance with Title 14 Douglas County Code shall be entered into between the property owner and Douglas County Transportation and Land Services upon approval of the

shoreline permit. Douglas County must approve quotes for the cost of installation, delivery, plant material, soil amendments, irrigation, seed mix and necessary monitoring visits and reports by the biologist of record and Washington State sales tax.

11. The mitigation site shall be maintained to ensure the management and mitigation plan objectives are successful. Maintenance shall ensure 80% survival during the 5 year monitoring period and shall include corrective actions to rectify problems, include rigorous, as-needed elimination of undesirable plants; protection of shrubs and small trees from competition by grasses and herbaceous plants, and repair and replacement of any dead plants.
12. Onsite monitoring and monitoring reports shall be submitted to Douglas County Transportation and Land Services 1 year after mitigation installation; 3 years after mitigation installation; and 5 years after mitigation installation. Monitoring reports shall be submitted by a qualified biologist, as defined by Douglas County Code. The biologist must verify that the conditions of approval and provisions in the Habitat Management and Mitigation Plan submitted by Grette Associates, dated January 2016 have been satisfied.
13. Sequential release of funds associated with the surety agreement shall be reviewed for conformance with the conditions of approval and the management and mitigation plan. Release of funds may occur in increments of 1/3 for substantial conformance with the plan and conditions of approval. If the standards that are not met are only minimally out of compliance and contingency actions are actively being pursued by the property owner to bring the project into compliance, the County may choose to consider a partial release of the scheduled increment. Non-compliance can result in one or more of the following actions: carry-over of the surety amount to the next review period; use of funds to remedy the nonconformance; scheduling a hearing with the Douglas County Hearing Examiner to review conformance with the conditions of approval and to determine what actions may be appropriate.
14. Where a condition imposed herein may be found inconsistent with the requirements of the Washington State Department of Fish and Wildlife, HPA Permit, or permitting issued by the United States Army Corps of Engineers, the Douglas County Land Services Director shall have discretion to allow for project redesign consistent with the approvals granted by said agencies; if the redesign can be found consistent with the Douglas County Code, the Shoreline Master Program, and the Shoreline Management Act.
15. Prior to installation of the project, copies of approval from applicable agencies, including the Chelan County PUD, must be submitted to the County.
16. Construction of the project for which this permit has been granted must be commenced within two (2) years of the effective date of this permit. Authorization to conduct development activities granted by the permit shall terminate five (5) years from the filing date of the permit.

Respectfully Submitted,



Suzanne Austin  
Associate Planner