

WHATCOM COUNTY HEARING EXAMINER

RE: Zoning Variance) VAR2017-0007
Application for)
David and Roberta Bowne) FINDINGS OF FACT,
) CONCLUSIONS OF LAW,
) AND DECISION

SUMMARY OF APPLICATION AND DECISION

Application: The Applicant is requesting a Zoning Variance Permit to reduce the front yard setback from 25-ft to 5-ft in order to accommodate construction of a new garage.

Decision: The requested Zoning Variance Permit is approved, subject to conditions.

FINDINGS OF FACT

INTRODUCTION

The following Findings of Fact and Conclusions of Law are based upon consideration of the exhibits admitted and evidence presented at the public hearing.

I.

Applicants: David and Roberta Bowne

Property Address: 4377 Sucia Drive
Ferndale, Washington 98248

Assessor's Parcel Number: 380108 435399 0000

Zoning: Rural Residential [RR3]

Comprehensive Plan: Rural Residential [RR3]

Subarea: Lummi Reservation

Total Acreage: 4,000 square feet

Roads: Public

Water and Sewer Supply: Public

Fire Protection: Fire District No. 17

Law Enforcement: Whatcom County Sheriff's Office

Public Schools: School District No. 502

Vegetation: The site is nearly completely covered with impervious surfaces.

Adjacent Land Uses:

North:	Single-family Residential
East:	Sucia Drive
South:	Single-family Residential
West:	Strait of Juan de Fuca

Authorizing Codes, Policies, Plans, and Programs

Revised Code of Washington [RCW] Chapters 36.70A Growth Management and 58.17

Whatcom County Comprehensive Plan

Whatcom County Code, Title 2, Chapter 2.33-Permit Review Procedures

Whatcom County Code Chapter 12.08, Development Standards

Whatcom County Code Chapter 15, Building Code/Fire Code

State Environmental Policy Act (SEPA). Washington Administrative Code Chapter 197-11,

Whatcom County Environmental Policy Administration Chapter 16.08

Whatcom County Code Chapter 16.16, Environment - Critical Areas

Whatcom County Code, Title 14, Use of Natural Resources

Whatcom County Code Title 20, Official Whatcom County Zoning Ordinance

Whatcom County Code, Title 17, Flood Damage Prevention Code

Whatcom County Code, Title 23, Shoreline Management Program

Whatcom County Code Title 24, Health Regulations

Legal Notices: Posted – Notice of Public Hearing, April 17, 2018

Mailed – Notice of Application, February 5, 2018
Notice of Public Hearing, April 13, 2018

Published – Notice of Application, March 16, 2018
Notice of Public Hearing, April 19, 2018

Hearing Date: May 2, 2018

Parties of Record

David & Roberta Bowne
2719 South Ferdinand Street
Seattle, Washington 98108

James Talbot
8774 Oertel Drive
Blaine, Washington 98230

Charles Sullivan, Planner
Planning and Development Services

Exhibits

- 1 Zoning Variance Application, with attachments
 - 1-1 Technical Review Committee Routing Memo, January 30, 2018
 - 1-2 Variance Application Intake Checklist
 - 1-3 Fee Responsibility
 - 1-4 Agent Authorization
 - 1-5 Property Owners' Addresses
 - 1-6 Customer Receipt, October 27, 2017
 - 1-7 Preliminary Traffic & Concurrency Information
 - 1-8 Water Availability Form: Public Water System
 - 1-9 Endangered Species Act (ESA) Checklist for Development within Potential Impact Area
 - 1-10 Deed of Trust, Sept 17, 2012
 - 1-11 VAR Routing Checklist
- 2 Staff Report, dated April 23, 2018
- 3 Agency Comments:
 - * Engineering Technician, February 8, 2018
 - * Shorelines, February 9, 2018
 - * Environmental Health, February 8, 2018
 - * Wetlands and Habitat Conservation Areas, February 8, 2018
 - * Plans Examiner II – Building Services, February 6, 2018
- 4 Site Plan, October 16, 2017
- 5 Certificate of Mailing, Notice of Application, February 5, 2018
- 6 PDS Legal Notice with attached Comment Form Letter Notice of Application, March 16, 2018
- 7 Certificate of Mailing, Notice of Public Hearing, April 13, 2018
- 8 Posting Certificate, Notice of Public Hearing, April 17, 2018
- 9 Legal Notice of Public Hearing, April 19, 2018

II.

The Applicant is seeking a Zoning Variance to reduce the front yard setback from the required 25-ft to 5-ft in order to allow the construction of a new 480-sq ft garage, which will be located over existing paved surface. The proposal will also require a shoreline exemption permit.

III.

The Land Use Services Division of Whatcom County Planning and Development Services recommended approval of the requested Zoning Variance Permit in the Staff Report, Exhibit 2, dated April 23, 2018, subject to conditions. The Findings of Fact and Conclusions of Law set forth in the Staff Report, Exhibit No. 2, a copy of which is attached hereto, are incorporated herein by this reference. The Applicant has indicated that there are no factual inaccuracies in Staff's factual findings and no objection to the Conditions of Approval requested by Staff. There was no public comment on the application at the public hearing.

The Findings of Fact in the Staff Report are hereby adopted by the Hearing Examiner as the Findings of Fact herein.

IV.

Any Conclusion of Law which is deemed a Finding of Fact is hereby adopted as such. Based on the foregoing Findings of Fact, now are entered the following

CONCLUSIONS OF LAW

I.

The request to reduce the front yard setback from 25-feet to 5-feet for the construction of a garage can be granted only if the request is consistent with the Zoning Variance Criteria of WCC 20.84.120 (1 through 3). Subject to Conditions of Approval, this Zoning Variance will be consistent with the applicable Variance Criteria. The requested Variance should be granted subject to conditions.

II.

Any Finding of Fact deemed to be a Conclusion of Law is hereby adopted as such. Based on the foregoing Findings of Fact and Conclusions of Law, now is entered the following

DECISION

A Zoning Variance Permit is hereby granted to David and Roberta Bowne to reduce the front yard setback from 25-feet to 5-feet to accommodate the construction of a garage, located on Assessor's Parcel No.380108 435399, addressed as 4377 Sucia Drive, Ferndale, Washington, subject to the following conditions:

1. The use and location on site shall not be modified or changed in any way without further approval of the Whatcom County Hearing Examiner.
2. Whatcom County Planning and Development Services must issue a building permit prior to the commencement of construction activities.
3. The Applicant shall ensure that all development complies with Whatcom County Development Standards (WCDS), Chapter 12.08.
4. The Applicant shall not extend structural overhangs further than 18-inches into the side and rear yard setbacks.
5. Inadvertent Discovery: If archaeological materials (bone, shell midden, cobble tools, etc.) are observed during site work, work in the area of discovery shall cease and the Whatcom County SEPA Administrator (676-6907) LNTHPO (384-2280) and Washington State Office of Archaeology and Historic Preservation (360-586-3065) shall be contacted immediately to determine the significance of the discovery. If human remains are observed, the Whatcom County Sheriff (911) and Lummi Sche'lan'en Department (384-2312) shall be contacted immediately. Compliance with all other applicable laws pertaining to archaeological resources is required.
6. Building Permit inspection: An inspection locating the existing concrete pad is required prior to replacing or repairing it for the proposed new structure. No foundation or structure is to extend westerly of the existing concrete.
7. Shorelines: Prior to construction of any structure within shoreline jurisdiction the landowner must first obtain approval of the appropriate shoreline permit.

8. Critical Areas: All erosion control methods shall be properly installed and available prior to the onset of land disturbance.
9. Critical Areas: Any change in site plan shall be routed to Habitat Conservation Area Staff for review.
10. Critical Areas: A Notice on Title for Critical Areas shall be submitted with the building permit application.
11. Public Works Engineering: An encroachment permit shall be required at the time of building permit.

NOTICE

This Approval is subject to all of the above-stated conditions. Failure to comply with them may be cause for its revocation. Complaints regarding a violation of the conditions of this permit should be filed with Whatcom County Planning and Development Services. The Hearing Examiner may not take any action to revoke this approval without further public hearing. Violations of this title shall constitute Class I civil infractions pursuant to RCW 7.80.120. The maximum penalty and the default amount for such violations shall be consistent with Chapter 7.80.RCW.

NOTICE OF APPEAL PROCEDURES FROM FINAL DECISIONS OF THE WHATCOM COUNTY HEARING EXAMINER

This action of the Hearing Examiner is Final. The following review procedure is available from this Decision and may be taken by the Applicant, any Party of Record, or any County Department.

Appeal to County Council. Within ten business days of the date of the Decision a written Notice of Appeal may be filed with, and all required filing fees paid to, the Whatcom County Council, Courthouse - 1st Floor, 311 Grand Avenue, Bellingham, WA 98225. The Appeal Notice must state either:

- 1) The specific error of law which is alleged, or
- 2) How the decision is clearly erroneous on the entire record.

More detailed information about Appeal Procedures is contained in the Official Zoning Ordinance at Section 20.92.600-.830. A copy of this document is available for review at the County Council Office. After an Appeal has been filed and the Council Office has received the Hearing record and transcript of the public hearing, the Parties will be notified of the time and date to file written arguments.

DATED this 3rd day of May 2018.



Michael Bobbink, Hearing Examiner

WHATCOM COUNTY
Planning & Development Services
5280 Northwest Drive
Bellingham, WA 98226-9097
360-778-5900, TTY 800-833-6384
360-778-5901 Fax



Mark Personius, AICP
Interim Director

EXHIBIT

#2

WHATCOM COUNTY PLANNING AND DEVELOPMENT SERVICES
STAFF REPORT
Date: April 23, 2018
Hearing Date: May 2, 2018

The application of David and Roberta Browne for a Zoning Variance	VAR2017-00007 FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS
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I. SUMMARY OF APPLICATION AND RECOMMENDATIONS

Summary: The applicants are requesting a variance to reduce the required 25 foot front yard setback from Sucia Drive for the construction of a 480 square foot detached garage.

Recommendation: The Technical Review Committee recommends approval based on the following report.

II. PRELIMINARY INFORMATION

A. BACKGROUND INFORMATION

Applicant/Agent: James Talbot
8774 Oertel Drive
Blaine, WA 98230

Owner: David & Roberta Browne
4377 Sucia Drive
Ferndale, WA 98248

Site Location/Address: 4377 Sucia Drive
Ferndale WA, 98248

Legal Description: Bolster's Sandy Point Tracts Lot 7

Assessor's Parcel Number: 380108435399

Zoning: Rural Residential (RR3)

Comprehensive Plan: Rural Residential (RR3)

Subarea: Lummi Reservation

Lot Size: 4,000 square feet

Roads: Public

<u>Water & Sewer Supply:</u>	Public
<u>Fire Protection:</u>	Fire District #17
<u>Law Enforcement:</u>	Whatcom County Sheriff's Office
<u>Public Schools:</u>	School District # 502
<u>Topography:</u>	The subject site is relatively flat.
<u>Vegetation:</u>	The subject site is nearly completely covered with impervious surfaces.
<u>Adjacent Land Uses:</u>	North: RR3 - Single-Family Residences East: RR3 – Sucia Drive South: RR3 - Single-family Residences West: RR3 – Strait of Juan de Fuca

B. AUTHORIZING CODES, POLICIES, PLANS, AND PROGRAMS:

1. Revised Code of Washington (RCW) Chapter 36.70
2. Revised Code of Washington (RCW) Chapter 58.17
3. Whatcom County Comprehensive Plan
4. Whatcom County Code, Title 2, Chapter 2.33 – Permit Review Procedures
5. Whatcom County Code, Title 20, Official Whatcom County Zoning Ordinance
6. Whatcom County Code, Title 14, Use of Natural Resources
7. Whatcom County Code Chapter 12.08, Development Standards
8. Whatcom County Code Chapter 15, Building Code/Fire Code
9. State Environmental Policy Act (SEPA); Washington Administrative Code Chapter 197-11, Whatcom County Environmental Policy Administration Chapter 16.08
10. Whatcom County Code Chapter 16.16, Critical Areas
11. Whatcom County Code, Title 17 – Flood Damage Prevention Code
12. Whatcom County Code, Title 23 – Shoreline Management Program
13. Whatcom County Code Title 24, Health Regulations

III. APPLICATION PROPOSAL

The Applicant, David and Roberta Browne, are requesting a reduction in the front yard setback from 25' to 5' to construct a 480 square foot detached garage. The setback is required due to the small lot size and site constraints including the shoreline setback. The proposed garage will be located over existing paved surface. The proposal will also require a shoreline exemption permit.

IV. SITE DESCRIPTION

The subject site is an approximately 4,000 square foot parcel located at 4377 Sucia Drive, Ferndale, WA Section 08, Township 38 North, Range 1 West W.M., Whatcom County, WA. It currently has a 904 square foot house with a 1208 square foot deck on it. The site is entirely covered in impervious surface in the area where the garage is proposed. The western portion of the lot is a sandy beach that overlooks the Strait of Juan de Fuca.

The property is accessed off of Sucia Drive. The access encompasses the entirety of the road frontage. There is ample parking. The surrounding properties are zoned RR3 and are similar lots in size. The surrounding use is single family residential.

V. PUBLIC NOTICE AND COMMENT

Requirements for public notice are contained in Chapter 2.33 WCC.

Notice of Application: The Notice of Application for this proposal was published and mailed to property owners within 1,000 feet of the subject property on March 16, 2018. The fifteen (15) day comment period ended on March 31, 2018.

Notice of Public Hearing: The Notice of Public Hearing for this application was published in a one-time newspaper publication in the Bellingham Herald.

Public Comment: During the public comment period for the Notice of Application, Whatcom County Planning & Development Services Department received no comments

No public comment in opposition to the project was submitted to staff.

VI. STATE ENVIRONMENTAL POLICY ACT (SEPA)

The State Environmental Policy Act (SEPA) requires applicants to disclose potential impacts to the environment unless the proposal is categorically exempt from SEPA threshold review.

Pursuant to WCC 16.08 and WAC 197-11-800 (6)(b), minor land use decisions such as the granting of variances based on special circumstances, not including economic hardship, applicable to the subject property, such as size, shape, topography, location and/or surrounding are categorically exempt.

VII. CONSISTENCY WITH REGULATIONS, FINDINGS OF FACT

Zoning Variance - Applicable Policies and Regulations

In order for a variance to be approved it must satisfy the criteria of WCC 20.84.120 (1) through (3). In summary, these criteria state that any variance granted shall not constitute a grant of special privilege, be based upon reasons of hardship caused by previous actions of the property owner, nor be granted for pecuniary reasons alone, but be granted because of special circumstances applicable to the subject property, including size, shape, topography, location or surrounding, and when the strict application of the zoning ordinance is found to cause a hardship and deprive the subject property of a use or improvement otherwise allowed in the identical zoning classification.

Aesthetic considerations or design preferences without reference to restrictions based upon the physical characteristics of the property do not constitute sufficient hardship under this section, and the granting of this variance shall not be materially detrimental to the public welfare, or injurious to the property or improvement in the vicinity and zone in which the subject is situated.

The following circumstances, pursuant to WCC 20.84.120 (1)-(3), shall be found to apply in order to grant a variance:

- 1. That any variance granted shall not constitute a grant of special privilege, be based upon reasons of hardship caused by previous actions of the property owner, nor be granted for pecuniary reasons alone.**

Staff has no reason to believe that this variance has been requested for financial reasons, is based upon reasons of hardship caused by previous actions or is for pecuniary reasons. The proposed garage requires a variance in order to build due to the small size of the lot and the lots location within shoreline jurisdiction.

2. **Because of special circumstances applicable to the subject property, including size, shape, topography, location or surrounding, the strict application of the zoning ordinance is found to cause a hardship and deprive the subject property of a use or improvement otherwise allowed in the identical zone classification. Aesthetic considerations or design preferences without reference to restrictions based upon the physical characteristics of the property do not constitute sufficient hardship under this section.**

The subject parcel is approximately 4,000 square feet in size. Additionally, it is within shoreline jurisdiction and limited by shoreline code. Variances are regularly granted along Sucia Drive for the construction of garages and single family residences due to the same site constraints.

3. **The granting of the variance will not be materially detrimental to the public welfare, or injurious to the property or improvements in the vicinity and zone in which the subject is situated.**

The granting of the variance will not be detrimental to the public welfare or injurious to the property or improvements in the vicinity. During the public comment period, staff received no public comments. The access has been reviewed by Joseph Giannetto Whatcom County public works who stated the following: "Based on conversation with ROW inspectors the new structure does not appear to affect the clear vision area required for entering Sucia Drive. Based on these findings, I recommend approval of the requested variance."

The Technical Review Committee finds that the requested variance meets all of the three requirements of WCC 20.84.120.

A. WCC Chapter 12.08 – Roads and Bridges

WCC Chapter 12.08 adopts and gives authorization for development standards for development within Whatcom County. Whatcom County shall establish uniform, comprehensive and distinct requirements which shall be applied to all developments. These requirements shall be established as "Whatcom County development standards" and shall exist to provide clear development guidelines for all construction activity within the county. These standards shall establish administrative and technical requirements for the implementation of land use regulations and shall provide the basis by which developments are evaluated to ensure compliance with county regulations.

The Whatcom County Public Works Department Division of Engineering reviewed the proposal and submitted a revised memo dated February 8, 2018 recommending approval with conditions.

The Technical Review Committee has determined that the proposed variance meets the requirements of WCC Chapter 12.08.

B. WCC Title 15 – Buildings & Construction

Building Code: WCC Title 15 adopts and amends the applicable building and fire codes. The Building Official is authorized to promulgate such rules, policies and/or procedures as deemed necessary for the efficient operation of the permit process as administered by the department of building safety, designated in IBC Section 103.1, and hereby referred to as the building services division of the Whatcom County Planning and Development Services Department.

On February 6, 2018 Ron Booth of the Building Services Division wrote a memo recommending approval with conditions.

The Technical Review Committee has determined that as conditioned, the variance would meet the requirements of WCC Title 15.

C. WCC Title 16 – Whatcom County Critical Areas Ordinance

The above zoning variance and shoreline exemption has been routed to Erin Page for review with WCC 16.16.100 – Purpose and Intent, WCC 16.16.200 – Administrative Provisions, WCC 16.16.600 – Wetlands, and WCC 16.16.700 – Habitat Conservation Areas under the 2005 Critical Areas Ordinance (ORD2005-068).

According to submitted materials, the applicant is proposing to construct a detached garage landward of an existing single family residence, on a non-conforming lot within Shoreline Jurisdiction.

The following critical areas are known to be within the vicinity of the proposed development:

- Shoreline Habitat Conservation Areas (WCC 16.16.710(10)(b))
- Frequently Flooded Areas (WCC 16.16.410)
- Several ESA and PHS listed species
- Deep water habitats - Marine intertidal unconsolidated shore and subtidal unconsolidated bottom
- Wetlands (WCC 16.16.600) – Estuarine intertidal emergent wetland and unconsolidated shore

Although the proposed building is within the 150 foot Marine Shoreline Habitat Conservation Area buffer, the proposed detached garage is proposed over existing impervious surface. Staff has verified that the driveway has been developed to its current length and width as far back as 1976, which pre-dates the first critical areas ordinance as well as the Shoreline Management Act.

As such, staff recommends approval of this variance and shoreline exemption with conformance with conditions:

The Technical Review Committee has determined that the proposed variance will meet the requirements of WCC Chapter 16.16.

D. WCC Title 23 – Shoreline Management Program

The proposed variance was sent routed to Andrew Hicks, shoreline administrator. On February 9, 2018 he responded with conditions of approval and the following comments:

The variance request referenced above has been reviewed for consistency with the Shoreline Management Program (SMP). Staff has no objections to approval and no additional conditions to add to any decision.

The Technical Review Committee has determined that as conditioned the proposed variance will meet the requirements of WCC Chapter 23.

**E. WCC Title 20 – Official Whatcom County Zoning Ordinance
WCC 20.32.400 – Building Setback Criteria:**

Building setbacks shall be administered pursuant to WCC 20.80.200 and 20.80.230 (3).

WCC 20.80.210 (R) states minimum building setbacks of 25 feet from the front property line and 5 feet from the rear and side property lines. For corner lots, the owner/builder has the option of selecting the front yard setback if both roads are classified as Local Access streets. Yards on the other flanking streets may be considered side yards; pursuant to WCC 20.80.230 (3).

Discussion: The subject variance is for a reduction of the 25 foot setback from the property line fronting Sucia Drive to 5 feet. Site constraints including small lot size and shoreline jurisdiction are applicable. Granting a front yard setback variance will allow construction of a garage on the site while maintaining the habitat conservation are associated with the shoreline.

The Technical Review Committee finds that the proposed development, besides the reduction in the front yard setback, will conform to the applicable building setback requirements.

WCC 20.32.400 – Height Limitations:

Maximum height shall be limited to 35 feet. Height of structures shall also conform, where applicable, to the general requirements of WCC 20.80.675.

Discussion: The proposed garage conforms to this requirement.

WCC 20.32.450 – Lot Coverage:

No structure or combination of structures, including accessory buildings, shall occupy or cover more than 5,000 square feet or 20 percent, whichever is greater of the total area.

Discussion: As conditioned, the total structural coverage will be less than the maximum allowable coverage.

WCC Chapter 20.78 Transportation Concurrency

WCC Chapter 20.78 gives authority to ensure adequate transportation facilities are available or provided concurrent with development.

Public Works Engineering Services reviewed the Preliminary Traffic and Concurrency information submitted at the time of application. Based on the information submitted, a

determination was made indicating that there are no further requirements for this proposal.

Discussion: The Technical Review Committee has determined that the proposal conforms to the requirements of WCC Chapter 20.78.

Fire Protection

WCC Title 15 adopts and amends the applicable building and fire codes. The Building Official is authorized to promulgate such rules, policies and/or procedures as deemed necessary for the efficient operation of the permit process as administered by the department of building safety, designated in IBC Section 103.1, and hereby referred to as the building services division of the Whatcom County Planning and Development Services Department.

The Whatcom County Fire Marshal's Office submitted a memo dated April 10, 2016 with the following comments:

Whatcom County Fire Marshal's Office has no comment or concerns at this time and is approving it as submitted as it pertains to our jurisdictional authority.

The Technical Review Committee has determined that as conditioned, the variance would meet the requirements of WCC Title 15

F. Health Code (Title 24)

The purpose of Title 24 is to provide minimum standards to safeguard public health and welfare.

The Whatcom County Health Department (WCHD) reviewed the application and had the following comments:

The Whatcom County Health Department (WCHD) has reviewed the proposed project referenced above in accordance with WCC 24.05 On-Site Sewage Regulations and WCC 24.11 Drinking Water. The applicant is proposing a new garage.

Sewage Disposal

The property appears to be connected to Lummi Tribal Sewer District.

Drinking Water

The property appears to be served by the Sandy Point Improvement Company.

Because of the scope and location of the project, sewer and water availability will not be required at the time of building permit application.

WCHD has no objections to the variance request.

The Technical Review Committee has determined that as conditioned the project meets the requirements of WCC Title 24.

VIII. RECOMMENDATION

The Technical Review Committee recommends that the Whatcom County Hearing Examiner **approve** the applicant's variance request to allow a reduction in the front yard setback from 25 feet to 5 feet.

IX. CONDITIONS OF APPROVAL

1. Permit Changes or Modifications: The use and location on site shall not be modified or changed in any way without further approval of the Whatcom County Hearing Examiner.
2. Building Permit: Whatcom County Planning and Development Services must issue a building permit prior to the commencement of construction activities.
3. Chapter 5 Development Standards: The development shall comply with the Whatcom County Development Standards.
4. Structural Overhangs: Structural overhangs may not extend further than 18 inches into the side and rear yard setbacks.
5. Inadvertent Discovery: If archaeological materials (bone, shell midden, cobble tools, etc.) are observed during site work, work in the area of discovery shall cease and the Whatcom County SEPA Administrator (676-6907) LNTHPO (384-2280) and Washington State Office of Archaeology and Historic Preservation (360-586-3065) shall be contacted immediately to determine the significance of the discovery. If human remains are observed, the Whatcom County Sheriff (911) and Lummi Sche'lan'en Department (384-2312) shall be contacted immediately. Compliance with all other applicable laws pertaining to archaeological resources is required.
6. Building Permit inspection: An inspection locating the existing concrete pad is required prior to replacing or repairing it for the proposed new structure. No foundation or structure is to extend westerly of the existing concrete.
7. Shorelines: Prior to construction of any structure within shoreline jurisdiction the land owner must first obtain approval of the appropriate shoreline permit.
8. Critical Areas: All erosion control methods shall be properly installed and available prior to the onset of land disturbance.
9. Critical Areas: Any change in site plan shall be routed to Habitat Conservation Area Staff for review.
10. Critical Areas: A notice on title for critical areas shall be submitted with the building permit application.
11. Public Works Engineering: An encroachment permit shall be required at the time of building permit.

Report prepared for the Technical Review Committee by:



Charles Sullivan
Planner II