

**BEFORE THE HEARING EXAMINER
FOR THE CITY OF PORT ANGELES**

In the Matter of the Application of)	No. PZ 21-10
)	
Carol Marshall)	Marshall Shoreline Variance
)	
)	
)	
<u>For Approval of a Shoreline Variance</u>)	FINDINGS, CONCLUSIONS, AND DECISION

SUMMARY OF DECISION

The request for a shoreline variance authorizing the development of a 49 square foot deck off the upper floor of an existing single-family residence, within a vegetation conservation area of the “Shoreline Residential” environmental designation of Segment B of the Port Angeles Shoreline Master Program, at 620 Milwaukee Drive, is **APPROVED**. Conditions are necessary to address specific impacts of the proposal.

SUMMARY OF RECORD

Hearing Date:

The Hearing Examiner held an open record hearing on the request on May 28, 2021, using remote technology.

Testimony:

The following individuals presented testimony under oath at the open record hearing:

Ben Braudrick, City Associate Planner
Emma Bolin, City Community and Economic Development Manager
Carol Marshall, Applicant

Exhibits:

The following exhibits were admitted into the record:

1. Staff Report
2. Joint Aquatic Resources Permit Application (JARPA) Form, received March 24, 2021, with Attachments 1-10
3. Maps and Plans (12 pages)
4. Notice of Incomplete Application and Request for Additional Information, dated March 3, 2021; Determination of Completeness, dated March 26, 2021
5. Public Notice for Virtual Public Hearing; Classified Proof (#92381), *Peninsula Daily News*, dated March 26, 2021, for publication March 30, 2021; Affidavit of Notice, dated May 20, 2021; mailing labels

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6. SEPA Determination of Nonsignificance, dated May 10, 2021; SEPA Environmental Checklist, dated February 10, 2021
7. Staff PowerPoint Presentation

The Hearing Examiner enters the following findings and conclusions based upon the testimony and exhibits admitted at the open record hearing.

FINDINGS

Application and Notice

1. Carol Marshall (Applicant) requests approval of a shoreline variance authorizing the development of a 49 square foot deck that would be situated off the upper floor of an existing single-family residence located within the vegetation conservation area of the “Shoreline Residential” environmental designation of Segment B of the City Shoreline Master Program (City SMP). The proposed deck would be constructed at the rear of the residence, which overlooks the Strait of Juan de Fuca, and would neither be visible from the street nor impact the shoreline views of adjacent residences. The deck would be attached to the existing residential structure, approximately 10 feet above the ground, and would be located partially over an existing ground-level deck. The proposed deck would not require any contact with the ground for structural support. The property is located at 620 Milwaukee Drive.¹ *Exhibit 1, Staff Report, pages 1 and 3; Exhibit 2; Exhibit 3.*
2. The City of Port Angeles (City) determined that the application was complete on March 25, 2021. The next day, the City mailed notice of the application and associated open record hearing to property owners within 300 feet of the property and posted notice at the property and at designated City locations. The City published notice of the application and associated hearing in the *Peninsula Daily News* on March 30, 2021. The City’s notice materials explained that written comments on the proposal could be submitted prior to the start of the open record hearing scheduled for May 28, 2021. The City did not receive any comments from members of the public in response to its notice materials. *Exhibit 1, Staff Report, page 5; Exhibit 4; Exhibit 5.*

State Environmental Policy Act

3. The City acted as lead agency and analyzed the environmental impacts of the proposal as required by the State Environmental Policy Act (SEPA), Chapter 43.21C Revised Code of Washington (RCW). The City used the optional process provided for by Washington Administrative Code (WAC) 197-11-355, and provided notice of the SEPA comment period with the notice of application. The City’s notice materials stated that the City’s SEPA Responsible Official expected to issue a Determination of Nonsignificance (DNS) for the proposal and provided a SEPA comment deadline of April 29, 2021. The City did not receive any comments in response to its notice materials. Following the comment

¹ The property is identified as tax parcel number 0630-9910-4025. *Exhibit 1, Staff Report, page 2; Exhibit 2.*

period, the City reviewed the Applicant’s environmental checklist, and other information on file, and determined that the proposal would not have a probable significant adverse impact on the environment. Accordingly, the City issued a DNS on May 10, 2021, as expected, with an appeal deadline of May 26, 2021. The DNS was not appealed. *Exhibit 1, Staff Report, page 10; Exhibit 5; Exhibit 6.*

Comprehensive Plan and Zoning

4. The City Comprehensive Plan incorporates a land use map “to show general uses to be located in generalized areas of the City.” *Comprehensive Plan, Chapter 1, page 5.* The land use designations shown on the map are not “specifically bounded by streets, parcel lines, or other political boundaries,” and are “separated by what is referred to as ‘imprecise margins.’^[2]” *Comprehensive Plan, Chapter 1, page 5.* City staff determined that the property is within the Open Space designation of the Comprehensive Plan and, in addition, within the imprecise margin between the Low Density Residential and Open Space designations. The Open Space designation specifies areas of the city with unique or significant physical open spaces, such as marine shorelines, and is intended to minimize degradation of natural open space areas. The Low Density Residential designation is intended to primarily accommodate single-family homes, with accessory residential units and duplexes allowed in accordance with zoning regulations. *Comprehensive Plan, Chapter 3. Exhibit 1, Staff Report, page 2.*
5. The property and surrounding properties are zoned “R9, Residential, Low Density” (R9). The R9 zone is intended “to create and preserve urban residential neighborhoods consisting of predominantly single-family homes on larger than historic townsite-size lots.” *Port Angeles Municipal Code (PAMC) 17.11.010.* The R9 zone allows uses that are compatible with, and functionally related to, a single-family residential environment, with few nonresidential uses allowed. *PAMC 17.11.010.* A residential deck is allowed in the R9 zone as an accessory use. *PAMC 17.11.030.* City staff determined that the proposed deck would comply with dimensional requirements applicable to development in the R9 zone. *PAMC 17.11.050. Exhibit 1, Staff Report, page 8; Exhibit 3; Testimony of Ben Braudrick.*

Existing Property and Critical Areas

6. The approximately 19,470 square foot property is accessed from Milwaukee Drive to the south and abuts the shoreline of the Strait of Juan de Fuca to the north, with the northern half of the property located below a marine bluff. The existing residential structure on the property is nonconforming with current setback requirements for the R9 zone and

² The City Comprehensive Plan defines the *Imprecise Margin* as follows:

The area between land use designations is called an imprecise margin. The margin is used to provide flexibility in determining the boundary between various zones. When determining appropriate zoning designations for an area near a margin, the goals, policies and objectives of the Land Use Element should take precedence.

Comprehensive Plan, Appendix B – Definitions, page 5.

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extends 10 to 15 feet into a vegetation conservation area (VCA) associated with the on-site marine bluff. As discussed in more detail below, a shoreline variance is required for the project, under the City's Shoreline Master Program, because the proposed deck would be constructed within the VCA. *Exhibit 1, Staff Report, pages 1, and 6 through 11; Exhibit 2; Exhibit 3; Exhibit 7.*

7. The property contains a designated environmentally sensitive area under the City's critical areas ordinances, in the form of a geologically hazardous high marine bluff. *PAMC 15.20.030.E.* The proposed deck would not physically impact the environmentally sensitive area associated with the geologically hazardous marine bluff but would be located within its airspace. Accordingly, City staff determined that, under *PAMC 15.20.080.A.2*, the proposal is exempt from development restrictions in the City's critical areas ordinances applicable to environmentally sensitive areas, like the marine bluff, because it would involve a minor addition to an existing structure. *Exhibit 1, Staff Report, pages 7 and 8.*

Shoreline Management Act and City Shoreline Master Program

8. The State Shoreline Management Act (SMA), Chapter 90.58 RCW, SMA regulations, and the City SMP govern development within 200 feet landward of the ordinary high water mark of the Strait of Juan de Fuca. *RCW 90.58.140(2); PAMC 15.08.040, Chapter 1.C.* The primary goal of the SMA is to protect the public interest in the state's shorelines through a coordinated development process. The SMA contemplates protecting against adverse effects to the public health, land, vegetation, wildlife, and waters, and preserving the public's opportunity to enjoy the physical and aesthetic qualities of the natural shoreline to the greatest extent feasible. Under the SMA, permitted uses in shorelines must be designed and conducted in a manner to minimize damage to the ecology and environment of the shoreline area and to minimize any interference with the public's use of the water. *RCW 90.58.020. Exhibit 1, Staff Report, pages 1, 9, and 10.*
9. The City SMP designates the property as within the Shoreline Residential environment. The purpose of the Shoreline Residential environment is "to allow residential development, uses and redevelopment while ensuring that existing ecological functions are not diminished and avoiding foreseeable risk to residential structures from hazardous geological conditions." *PAMC 15.08.040, Chapter 2.B.7.a.* City staff identified the following management policies as applicable to the Shoreline Residential environment:
 - Development standards in the Shoreline Residential Environment should protect shoreline ecological functions, taking into account the environmental limitations and sensitivity of the shoreline area, the level of infrastructure and services available, and other comprehensive planning considerations.

- Passive water-oriented recreational uses and public access should be allowed where feasible and where they do not cause significant ecological impacts.
- Standards for new residential use, development, and redevelopment should protect human safety and ensure that new development will not require structural shoreline stabilization or flood protection during the projected lifetime of the development.

Exhibit 1, Staff Report, pages 1, 5, 9, and 10.

10. In addition, City staff reviewed the proposal for consistency with the management policies listed above and determined:

- The proposal does not include an increase in the number of available units or an increase in the interior living space of the existing residence. The deck is considered an appurtenant structure to the residence, contributing to a one to two percent increase in lot and site coverage, and would not physically alter the VCA environment. The proposal would not impact levels of service for any City utility or transportation service. A building permit would be required prior to construction to ensure adequate public and environmental safety. The proposal would be exempt from environmentally sensitive areas regulations under the City's critical areas ordinances as a minor addition to, and modification of, an existing structure.
- The application is for a single, private residential deck. Although the proposed deck would provide a private, passive water-oriented recreational use, public access requirements are not applicable to the project.
- The proposal would mitigate any environmental impact and disturbance by using the existing residence as the structural support for the deck. A geotechnical report for the subdivision the property, published on November 21, 1978, determined that the soil material on-site is highly permeable and is excellent for homesites.

Exhibit 1, Staff Report, pages 9 and 10.

11. As noted above, the proposed deck would be located within a VCA associated with an on-site marine bluff. The SMP defines a VCA as "an area within shoreline jurisdiction where vegetation, especially native vegetation, contributing to the ecological function of shoreline areas must be protected and where it has been removed or destroyed, should be restored." *PAMC 15.08.040, Chapter 3, Section 12.* VCAs on properties located within the Shoreline Residential environment of Segment B of the City SMP consist of the marine bluff plus 50 feet landward of the edge of the marine bluff. *PAMC 15.08.040, Chapter 2, Section B.7.* Because the proposed deck would be located within the VCA, a shoreline variance is required for the project. *PAMC 15.08.040, Chapter 3, Section 12; Chapter 7, Section D. Exhibit 1, Staff Report, pages 1, and 7 through 10.*

Shoreline Variance

12. The purpose of a shoreline variance is:
strictly limited to granting relief to specific bulk, dimensional, or performance standards set forth in the [City SMP] when there are extraordinary or unique circumstances relating to the physical character or configuration of the property such that the strict implementation of the [City SMP] would impose unnecessary hardships on the applicant or thwart the policies set forth in the SMA.
PAMC 15.08.040, Chapter 7, Section D.2. Exhibit 1, Staff Report, page 7.
13. PAMC 15.08.040, Chapter 7, Section D.2.b provides the criteria for approval of a shoreline variance for development located landward of the ordinary high water mark. City staff reviewed the proposal for consistency with this criteria and determined:
- The existing primary structure is already located 10 feet into the VCA but 120 feet from the R9 zone rear setback due to the location of the marine bluff on the property. The buildable area of the subject lot is highly constrained by the Milwaukee Drive right-of-way to the south and the marine bluff to the north. The design of the proposed deck would allow it to use the existing structure for support, and no part of the deck would physically touch the VCA or geologically hazardous high marine bluff. A geologic investigation report performed on the property, dated November 21, 1978, found that the existing soils are permeable, and construction would not exacerbate bluff failure.
 - The proposal is requesting a reasonable use of the property by utilizing the existing structure as the deck's foundation and support. This proposed deck design would limit the environmental impact of the proposal to an absolute minimum. Strict application of the City SMA standards applicable to development within a VCA would interfere with Applicant's reasonable use of the property.
 - The majority of the property is located below the marine bluff. Zoning setback requirements and the VCA have created a unique situation of a very small building envelope. The existing structure is currently not meeting Shoreline Residential environment VCA or R9 zoning setback requirements.
 - City staff conducted a visual inventory, which demonstrated that a majority of adjacent residences on the north side of the 600 block of Milwaukee Drive have decks and primary structures within VCAs. The requested shoreline variance to construct a comparatively modest 49 square foot deck is the minimum necessary to afford relief from VCA development restrictions.
 - The proposal would not result in any significant adverse environmental or visual impacts. The proposed deck would be located at the center of the rear of the residence and would not be visible from the street, nor would it impact the shoreline views from adjacent residences.
 - The proposed deck would be located landward of the ordinary high water mark of the Strait of Juan de Fuca.

- Appurtenant structures to single-family residences are allowed in the Shoreline Residential environment of Segment B of the City’s SMP.
- City staff reviewed records for prior permits in the vicinity of the proposal. Many of the properties in the vicinity contain buildings that do not meet current zoning and environmental setbacks or that are within the Shoreline Residential VCA. The proposed deck size would be consistent with other decks in the neighborhood and would avoid any net loss to the shoreline environment because it would not be attached to the ground and would preserve existing shoreline views. The proposal would have little to no cumulative impact on the shoreline.

Exhibit 1, Staff Report, pages 7 through 9.

Testimony

14. City Associate Planner Ben Braudrick testified generally about the proposal and how it would meet the requirements for a shoreline variance. He explained that the Comprehensive Plan provides a map showing generalized areas for designated land uses, which are not precisely separated by specific streets or lot lines and, instead, are separated by areas known as imprecise margins. Mr. Braudrick stated that the subject property is located within the Open Space designation and, also, within the imprecise margin between the Open Space and Low Density Residential designations. He noted that the developable area of the property is highly constrained by the Milwaukee Drive right-of-way to the south and a marine bluff to the north, with a majority of the property located north of and below the marine bluff. Mr. Braudrick explained that a shoreline variance is required for the project because the proposed deck would be within a VCA. He noted that a portion of the existing residential structure on the property is already located within the VCA and that the Applicant seeks to install a modest-sized deck that would be attached to the existing residential structure. Mr. Braudrick stressed that the proposed deck would not be visible from Milwaukee Drive, would not impact shoreline views from neighboring properties, and would not result in a loss of shoreline function. He explained that the proposal would be subject to final approval by the Washington State Department of Ecology. Mr. Braudrick detailed how the proposal would meet all development standards for the R9 zone, would be compatible with other permitted activities in the area, would not adversely impact adjacent properties, and would meet the criteria for a shoreline variance. *Testimony of Mr. Braudrick.*
15. City Community and Economic Development Manager Emma Bolin testified that the proposal is not subject to City SMP regulations applicable to shorelines of state significance because those regulations are triggered only when work occurs waterward of the ordinary high water mark of such shorelines and, here, all work would take place landward of the ordinary high water mark of the Strait of Juan de Fuca. *Testimony of Ms. Bolin.*
16. Applicant Carol Marshall testified that she agrees with City staff’s analysis as detailed in the staff report. *Testimony of Ms. Marshall.*

Staff Recommendation

17. Mr. Braudrick testified that the City recommends approval of the shoreline variance, with conditions. Ms. Marshall testified that she understands and would comply with City staff's recommended conditions. *Exhibit 1, Staff Report, pages 10 and 11; Testimony of Mr. Braudrick; Testimony of Ms. Marshall.*

CONCLUSIONS

Jurisdiction

The Hearing Examiner has authority to hear and approve, approve with conditions, or deny requests for shoreline variances *PAMC 2.18.060.4.c; PAMC 15.08.040; PAMC 15.08.070; PAMC 15.08.090.*

Criteria for Review

Shoreline Management Act

A request for a shoreline variance must be reviewed under the state Shoreline Management Act. The Shoreline Management Act is codified at Chapter 90.58 RCW. In promulgating the Shoreline Management Act of 1971, the legislature recognized that “ever increasing pressures of additional uses are being placed on the shorelines necessitating increased coordination in the management and development” of the state’s shorelines. *RCW 90.58.020.* The legislature also determined that “unrestricted construction on the privately owned or publicly owned shorelines of the state is not in the best public interest.” *RCW 90.58.020.* Applicable policies of the Shoreline Management Act (SMA) under *RCW 90.58.020* include those to foster “all reasonable and appropriate uses”; protect against adverse effects to the public health, the land, vegetation, and wildlife; and give priority to single-family residences and appurtenant structures in authorizing alterations to the natural condition of the shoreline. Permitted shoreline uses must be designed to “minimize, insofar as practical, any resultant damage to the ecology and environment of the shoreline area and any interference with the public’s use of the water.” *RCW 90.58.020.* Nonetheless, “private property rights are ‘secondary to the SMA’s primary purpose, which is to protect the state shorelines as fully as possible.’” *Samson v. City of Bainbridge Island*, 149 Wn. App. 33, 49, 202 P.3d 334 (2009) (internal quotation marks omitted) (quoting *Lund v. Dep’t of Ecology*, 93 Wn. App. 329, 336-37, 969 P.2d 1072 (1998)). The Shoreline Management Act requires local governments to develop a master program to regulate shoreline uses consistent with its guidelines. *RCW 90.58.080(1).*

The Department of Ecology adopted regulations to implement the Act. Chapter 173-27 of the Washington Administrative Code (WAC) establishes criteria for shoreline variance review. The purpose of a shoreline variance permit is strictly limited to granting relief from specific bulk, dimensional, or performance standards set forth in the applicable master program where there are extraordinary circumstances relating to the physical character or configuration of property such that the strict implementation of the master program will impose unnecessary hardships on an applicant or thwart the policies set forth in *RCW 90.58.020.* *WAC 173-27-170.*

Construction authorized by a shoreline variance may not begin except as provided in Chapter 173-27 WAC. The Department of Ecology is the final approving authority for shoreline variances, and no decision is final until twenty-one (21) days after the Department of Ecology issues its decision, as provided in RCW 90.58.140(6), RCW 90.58.140(10), and RCW 90.58.180.

City Shoreline Master Program

The Hearing Examiner must also review the relevant City Shoreline Master Program (City SMP) goals and policies and general regulations when reviewing a shoreline variance application. The City SMP, PAMC 15.08.040, Chapter 7, Section D.2, provides shoreline variance criteria applicable to development located landward of the ordinary high water mark and states in relevant part:

The purpose of a variance is strictly limited to granting relief to specific bulk, dimensional, or performance standards set forth in the master program when there are extraordinary or unique circumstances relating to the physical character or configuration of the property such that the strict implementation of the master program would impose unnecessary hardships on the applicant or thwart the policies set forth in the SMA. The criteria for granting variances shall be consistent with WAC 173-27-170 and include the following:

- a. Variances should be granted in a circumstance where denial of the permit would result in a thwarting of the policy enumerated in RCW 90.58.020. In all instances, extraordinary circumstances must be shown, and the public interest shall suffer no substantial detrimental effect.
- b. Variances for development that will be located landward of the ordinary high- water mark and/or landward of any wetland may be authorized provided the applicant can demonstrate all of the following:
 1. The strict application of the bulk, dimensional, or performance standards as set forth in the master program preclude or significantly interfere with reasonable use of the property;
 2. The hardship is specifically related to the property and is the result of unique conditions, such as irregular lot shape, size, or natural features, in the application of the master program and not, for example, from deed restrictions or the applicant's own actions;
 3. The design of the project will be compatible with other permitted activities in the area Chapter 7 – Administrative Provisions Page 140 and will not cause adverse effects to adjacent properties or the shoreline environment;

4. The variance does not constitute a grant of special privilege not enjoyed by other properties in the area, and will be the minimum necessary to afford relief; and
5. The public interest will suffer no substantial detrimental effect.

- ...
- d. Uses which are specifically prohibited by the master program may not be authorized as a variance.
 - e. In granting of all variances, consideration shall be given to the cumulative impact of additional requests or like actions in the area.
 - f. All shoreline variances issued by the City must be submitted to the Department of Ecology for its approval or disapproval in accordance with RCW 90.58.140 (10). Appeals of Ecology decisions on shoreline variances shall be made to the Shoreline Hearings Board.

The criteria for review adopted by the City Council are designed to implement the requirement of Chapter 36.70B RCW to enact the Growth Management Act. In particular, RCW 36.70B.040 mandates that local jurisdictions review proposed development to ensure consistency with City development regulations, considering the type of land use, the level of development, infrastructure, and the characteristics of development. *RCW 36.70B.040.*

Conclusions Based on Findings

1. **With conditions, the proposal would be consistent with the policies of the City's Shoreline Master Program (City SMP) and would meet the specific requirements for a shoreline variance under Chapter 7, Section D.2 of the City SMP.** The proposal would involve construction of a 49 square foot deck that would be attached to an existing single-family residence located within the Shoreline Residential environment of Segment B of the City SMP. A shoreline variance is required for the project because the proposed deck would be located in a vegetation conservation area (VCA) that, for the Shoreline Residential environment of Segment B, consists of the marine bluff plus 50 feet landward of the marine bluff edge. Although the proposed deck would enter the airspace of the VCA, it would not require any contact with the ground because it would be supported entirely by the existing residence, which is located partially within the VCA.

The City provided reasonable notice and opportunity to comment on the proposal. The City did not receive any comments in response to its notice materials. The City analyzed the environmental impacts of the proposal as required under SEPA, determined that the proposal would not have a probable significant adverse impact on the environment, and issued a Determination of Nonsignificance, which was not appealed. City staff reviewed the proposal and determined that the deck design would comply with all development regulations applicable to the R9 zoning district. City staff also determined that, with a condition requiring approval of a building permit prior to construction, the proposal

would be consistent with management policies applicable to the Shoreline Residential environment, including policies designed to protect shoreline ecological functions, to protect human safety, and to ensure that new development would not require structure shoreline stabilization or flood protection. The Hearing Examiner concurs with City staff's determination. The proposed deck would be attached to the existing residence, partially over an existing ground-level deck, and would not physically alter the VCA environment.

A deck is an accessory residential use allowed in the R9 zone and within the Shoreline Residential environment, and strict application of the City SMP's VCA development regulations would deny the Applicant a reasonable use of her property. The variance is necessary due to unique conditions of the property, which has a limited developable area due to a majority of the property being located below a marine bluff to the north of the existing residence and due to required setbacks from the Milwaukee Drive right-of-way to the south. The existing residential structure already extends into the VCA, and the proposed deck would use the existing residential structure for support, which would avoid any net loss to the shoreline environment. The size of the proposed deck would be a modest 49 square feet and would be consistent with other decks in the vicinity. The deck would not be visible from Milwaukee Drive and would not obscure shoreline views from adjacent properties. Similarly situated properties along the shoreline have homes and decks that extend within the VCA and, therefore, granting the requested shoreline variance would not constitute a grant of special privilege. The proposal would not have a substantial detrimental effect on the public interest and would have little to no cumulative impact on the shoreline. Conditions are necessary to ensure that the Applicant obtains all necessary permits and receives final shoreline variance permit approval from the Department of Ecology. *Findings 1 – 17.*

2. **With conditions, the proposal would be consistent with applicable shoreline regulations.** The Department of Ecology shoreline regulations are located in Chapters 173-26 and 173-27 of the Washington Administrative Code (WAC). Chapter 173-26 WAC sets forth procedures and guidelines for local adoption of shoreline master programs that are not applicable to the Applicant's permit request. Chapter 173-27 WAC sets forth permitting procedures and permit criteria. This proposal is being reviewed under the criteria set forth in WAC 173-27-170. These criteria are intended to implement the policies of the SMA, which require that all shoreline projects be consistent with an approved local shoreline master program. As noted above in Conclusion 1, conditions are necessary to ensure that the Applicant obtains all necessary permits and receives final shoreline variance permit approval from the Department of Ecology. *Findings 1 – 17.*

DECISION

Based on the preceding findings and conclusions, the requested shoreline variance authorizing the development of a 49 square foot deck on a residence within the vegetation conservation area of the "Shoreline Residential" environmental designation of Segment B of the Port Angeles

Shoreline Master Program at 620 Milwaukee Drive is **APPROVED**, with the following conditions:

1. Approval of this Shoreline Variance Permit does not preclude any permits that are required from any other City Division or Department.
2. A building permit application submission and approval shall be required prior to construction.
3. The Department of Ecology is the final authority for the approval of this shoreline variance permit application.

DECIDED this 14th day of June 2021.



ANDREW M. REEVES
Hearing Examiner
Sound Law Center