

ISLAND COUNTY HEARING EXAMINER

RE: Site Plan Review)	File No. SPR 238/09
Applicant: Peggy Berto)	FINDINGS OF FACT
)	CONCLUSIONS OF LAW
)	AND DECISION
)	

SUMMARY OF APPLICATION AND DECISION

APPLICATION: Site Plan Revision to increase the maximum density, manufactured homes, within the Misty Meadow Mobile Home Park from five (5) to seven (7) homes, an increase of two (2) homes. The property is located within a Critical Drainage Area.

DECISION: Site Plan Approval is granted subject to the conditions recommended by staff.

FINDINGS OF FACT

INTRODUCTION

The following Findings of Fact and Conclusions of Law are based upon consideration of the exhibits admitted herein and evidence presented at the public hearing on May 20, 2010.

I.

PRELIMINARY INFORMATION

Applicant: Peggy Berto

Property Location: 5814 Fish Road, in the NE 1/4 of Section 15, Township 29 North, Range 2 East W.M., Assessor’s Parcel R22915-291-2960.

Applicable Ordinances, Statutes and Regulations: Chapter 17.03, Zoning Ordinance; Chapter 17.02, Critical Areas, Chapter 16.15, Site Plan Review Ordinance; Chapter 16.19, Land Use Review Process, and Chapter 16.14C, County Environmental Policy.

SEPA: The applicant’s proposal is categorically exempt under WAC 197-11-800(1)(b)(i)

Publication: May 5, 2010

Mailing of Notice to Applicant: April 9, 2010

Sign Posted: November 18, 2009

Mailing of Staff Report: May 5, 2010

Date of Application: November 13, 2009

Hearing Date: May 20, 2010

Exhibit Log:

1. Staff Report / Site Plan Review, signed by Brandon Sweeza; dated 4/30/10
 - a. 8 sheets of color photos of Misty Meadows Mobile Home Park; pictures dated 3/25/09
2. Site Review Submittal Packet Letter of Transmittal for Misty Meadows Mobile Home Park submitted to Andrew Hicks from Jeffrey M. Tasoff; date received 10/22/09
 - a. Site Review Submittal Packet contents; date received 10/22/09
 - b. Master Land Development Permit Application; date received 10/22/09
 - c. Form C Application for Site Plan Review; date received 10/22/09
 - d. 11x17 site plan of Misty Meadows Mobile Home Park; date received 10/22/09
 - e. Topographic Survey map & Utility plan; date received 10/22/09
 - f. Existing Landscape Plan; date received 10/22/09
 - g. Appendix A – BSP 32/86; date received 10/22/09
 - h. Appendix B – Narrative; date received 10/22/09
 - i. Appendix C – Parcel Information; date received 10/22/09
 - j. Appendix D – Water System Approval Letter; date received 10/22/09
 - k. Appendix E – Soil Log Analysis; date received 10/22/09
 - l. Appendix F – Impervious Surfaces; date received 10/22/09
 - m. Appendix G – Certificate of Transportation Concurrency; date received 10/22/09
 - n. Appendix H – Waiver Correspondence; date received 10/22/09
 - o. Appendix I – Property owners within 300’ and Quarter Section Maps; date received 10/22/09
3. Water Availability Verification Form #211/2009; date received 10/13/09
4. Request for Comment & Site Data Information (account summary, parcel zoning/critical areas, Forest Practice permits, ¼ section maps & ARC Explorer color map); date received 10/22/09
5. Island County Building Permits List; date received 10/22/09
6. Letter of review comments from Aneta Hupfauer to Bobak Talebi; dated 11/18/09
7. Letter of review comments from Tamra Patterson to Bobak Talebi; dated 11/24/09
8. Letter of review comments from John Bertrand to Bobak Talebi; dated 12/16/09

9. Notice of Complete Application Letter from Andreana Richardson to Jeff Tasoff; dated 11/13/09
10. Affidavit of Mailing the Notice of Complete Application for Peggy Berto; dated 11/20/09
11. Affidavit of Mailing the Notice of Complete Application for Jeff Tasoff; dated 11/20/09
12. Notice of Complete Application; date of Notice of Application 11/25/09
13. Affidavit of Posting the Public Notice Sign; date received 11/24/09
14. Affidavit of Publication In the Matter of Notice of Application: 281/09 SPR in the Whidbey News-Times/South Whidbey Record; date received 11/30/09
15. Notification of Hearing date letter from Paula Bradshaw to Peggy Berto; dated 4/9/10
16. Affidavit of Mailing the Notification of the Hearing date; dated 4/9/10
17. Letter of Notification of mailing the staff report from Paula Bradshaw to Jeff Tasoff and cc: Peggy Berto; dated 5/5/10
18. Affidavit of Mailing a copy of the staff report; dated 5/5/10
19. Memo from Bobak Talebi to Peggy Berto, RE: Signed affidavit as per requested; dated 12/18/09
20. Email correspondence between Bob Pederson, Keith Higman, Bobak Talebi, Susan Wagner, Helen Price-Johnson, Aaron Henderson, John Dean, Angie Homola, Commissioner secretaries, RE: Peggy Berto; dates sent 12/15/09-3/17/10
21. Affidavit of Publication in the WNT/SW Record of hearing, dated 5/10/10

HEARING TESTIMONY

Brandon Sweeza
 Island County Planning & Community Development
 P.O. Box 5000
 Coupeville, WA 98239

Peggy Berto
 5814 Fish Rd. # 17
 Freeland, WA 98249

Minnie Gordon
 225 NE Ernst St.
 Oak Harbor, WA 98277

II

The Island County Planning Department has recommended approval subject to conditions. The findings of the Planning Department are set forth in the Staff Report, Exhibit No.1 in the Hearing Examiner file. The applicant does not agree with all of Planning's findings,

conclusions, and conditions. However the findings made by staff are supported by the record as a whole, including documentary evidence showing the history of development approvals for the site along with evidence of code violations. The factual findings of staff are hereby adopted by the Hearing Examiner as Findings of Fact herein. A copy of the Staff Report is attached hereto.

III

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.

Subject to the conditions of approval set forth in the Staff Report the proposed expansion of the Misty Meadow Mobile Home Park meets the requirements for Site Plan Approval and the application should be approved.

II

There is clear evidence of probable code violations on this site. The conditions recommending the owner/applicant verify compliance with the applicable ordinances as part of this application are appropriate.

III

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

Preliminary Site Plan Approval is hereby granted subject to the conditions of approval set forth in the attached Staff Report.

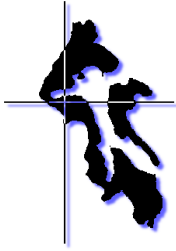
Entered this 2nd day of June, 2010, pursuant to authority granted under the laws of the State of Washington and Island County.

MICHAEL BOBBINK
Island County Hearing Examiner

APPEAL PROCESS:

SPR

This decision of the Hearing Examiner shall be a final and conclusive decision unless within fourteen (14) days following the mailing of such decision a written statement of appeal is filed with the Island County Board of Commissioners by the applicant, a Department of the County, or Party of Record, who is also an Aggrieved Person. Said statement shall set forth any alleged errors and/or the basis for appeal and shall be accompanied by a fee pursuant to the fee schedule adopted by the Board; provided that such appeal fee shall not be charged to a department of the County or to other than the first appellant ICC 16.13.100.b; ICC 16.19.190.



ISLAND COUNTY PLANNING & COMMUNITY DEVELOPMENT

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ISLAND COUNTY PLANNING & COMMUNITY DEVELOPMENT STAFF REPORT

SITE PLAN REVIEW

Summary

Application No: SPR 283/09

Applicant: Peggy Berto

Assessor's Parcel Number: R22915-291-2960

Abbreviated Application Description: Minor expansion of an existing manufactured home park

Recommendation. Approve with conditions.

Property Owner: Peggy Berto, 5814 Fish Rd #17, Freeland, WA 98249

Property Location: 5814 Fish Road, in the NE 1/4 of Section 15, Township 29 North, Range 2 East W.M., Assessor's Parcel R22915-291-2960.

Applicable Island County Ordinances: Chapter 17.03, Zoning Ordinance; Chapter 17.02, Critical Areas, Chapter 16.15, Site Plan Review Ordinance; Chapter 16.19, Land Use Review Process, and Chapter 16.14C, County Environmental Policy.

SEPA: The applicant's proposal is categorically exempt under WAC 197-11-800(1)(b)(i)

Procedural Requirements:

Decision Type: Type III (Site Plan)

Community Meeting Date: Waived per October 20, 2009 correspondence from Planning Director Jeff Tate.

Pre-Application Conference Date: Waived per October 20, 2009 correspondence from Planning Director Jeff Tate.

Notice of Complete Application: November 13, 2009

Notice of Application:

Sign Posted: November 18, 2009

South Whidbey Record: November 25, 2009

Public Comment Period: November 25 – December 9, 2009

Notice of Hearing in South Whidbey Record: May 5, 2010

Hearing Date: May 20, 2010

**ISLAND COUNTY PLANNING & COMMUNITY DEVELOPMENT
STAFF REPORT**

**Site Plan Review
Proposal, Findings, Analysis,
Conclusions and Recommendations**

Application No: SPR 283/09

Applicant: Peggy Berto

Assessor's Parcel Number: R22915-291-2960

Proposal

Site Plan Revision to increase the maximum density, manufactured homes, within the Misty Meadow Mobile Home Park from five (5) to seven (7) homes, an increase of two (2) homes. The property is located within a Critical Drainage Area.

Findings and Analysis

- I. **Project and Parcel History:** The subject property is 10.24 acres and is zoned Rural. The landowner, Peggy Berto, currently has a site plan approved under BSP 32/86 as of May 7, 1986 allowing for a multifamily complex in excess of (4) homes.

During review of the proposed expansion, staff determined that the existing use and proposed expansion is inconsistent with the definition for Multi-family use. Multi-family Use is defined in ICC 17.03.040 as:

“Multi-family: Five (5) or more residential Dwelling Units in one (1) Building or in Building(s) joined by common walls. Multi-family housing does not include attached Dwelling Units in a PRD, Duplexes, Triplexes or Fourplexes”.

The applicant's existing use, and proposed expansion, is not joined by a common wall. The proposed expansion does meet the definition established for Mobile/Manufactured Home Parks as:

“Mobile/Manufactured Home Park: A Tract of land under the Ownership or management of one (1) Person, firm or corporation where three (3) or more spaces are provided solely for the placement of Mobile/Manufactured Homes for residential purposes. A Mobile/Manufactured Home Park shall not include PRDs or subdivisions, Recreational Vehicle parks or the placement of Mobile/Manufactured Homes as authorized through a Temporary Use Permit.”

Staff has determined that the existing use and proposed expansion meets the definition of a Mobile Manufactured Home Park as the property is owned and managed by one person, provides for more than three spaces for the placement of manufactured homes for residential purposes and is not excluded from the definition provided in the 17.03 ICC.

Land Use permits associate with this site are:

- BSP 32/86 – Existing Site Plan referenced above.

- ENV 203/98 – SEPA determination of non-significance issued for after the fact placement of between 500-2000 cubic yard of material on an isolated portion of the site.

A pending Violation is open on the property:

- COV 255/09 – Open code enforcement case regarding the occupation of multiple recreational vehicles (RV) outside of an approved campground and location of manufactured homes outside of those approved by the County. The purpose of this site plan amendment is the permit expansion of the existing site plan to come into conformance. The COV notes that RV’s may not be used as dwelling units.

No public comments were received.

II. Site Description

- a. Location: 5814 Fish Road, in the NE 1/4 of Section 15, Township 29 North, Range 2 East W.M., Assessor’s Parcel R22915-291-2960.
- b. Size and Condition: The site is currently developed with six (6) manufactured homes, several storage accessory structures, and several motor homes. Parcel is mostly manicured grass with evergreen trees and rhododendrons on the northern, eastern, and southern portions of the property. The western line of the property fully exposed to the neighboring parcel.
- c. Zoning/Type of Land Use Permitted: The subject parcel is zoned Rural (R). The original site plan approval, BSP 32/86, indicates that the use is not a Mobile/Manufactured Home Park and is defined as a Multi family Use consisting of 4 dwelling units or more. Multi family use is not listed as a permitted, conditional, or prohibited use in the Rural zone. Mobile/Manufactured Home Parks are listed as a Conditional Use in the Rural zone and are allowed pursuant to an approved Type III Site Plan Review.
- d. Access: The subject parcel gains access from both Fish Road from the eastern line and Woodard Avenue from the northern line. Access is gained via Access Permit APW09-0114.
- e. Surrounding Zoning: The southwest corner of the property is bordered by Rural Residential zoned parcels. The rest of the parcel is surrounded by Rural zoned parcels.
- f. Natural Features: There is a wetland mapped in the County’s database on the adjacent parcel to the east. The existing and proposed uses are outside of any buffer areas from the wetland and stream. No endangered plants or animals were found or are known to exist on the subject site. According to the USDA Soil Survey for Island County - 1958, the predominant soil type found on this parcel is Keystone loamy sand (Kc) with 5 to 15% slopes, and Hoypus gravelly loamy sand (Hf) with 5-15% slopes. The FEMA flood zone designation is X (areas of minimal flooding). The parcel is within a Critical Drainage Area.

- g. Accident Potential and/or Noise Zone: The parcel is not within an AICUZ Accident Potential or Noise Zone.
- h. Shoreline: The project does not lie within shoreline jurisdiction.
- i. Archaeological Sites: According to maps provided by the State Office of Archaeology and Historic Preservation, the project is not within the vicinity of cultural resources.
- j. Historic Sites: The project is not within the boundaries of a Historic District.

III. Land Use Controls - Chapter 17.03 Island County Code:

- a. Section 17.03, Rural Zone: The subject site is zoned Rural (R) and subject to the regulations listed in ICC 17.03.060.
- b. ICC Section 17.03.180, Land Use Standards - Subsection 17.03.180.O, Mobile/Manufactured Home Parks:

- 1. Maximum park density. Maximum density for Mobile/Manufactured Home Parks shall be one and one-half (1.5) dwelling units per acre.

The lot is 10.24 acres, allowing for fifteen (15) dwelling units. The applicants are proposing to add two (2) more dwelling units to their existing site plan, thereby allowing for a total of seven (7) dwelling units. The proposed density is well within that allowed by 17.03 ICC.

- 2. Roadways and Multi-modal access. All interior roadways shall be built in accordance with the provisions of Chapter 11.01 ICC and access and circulation requirements of ICC 17.03.180.Q.6.

The existing roadways meets all pertinent standards.

- 3. Setbacks. All Mobile/Manufactured Homes within a Park, together with their additions, appurtenant structures, accessory structures and other structures on the site, excluding fences, shall meet the roadway setback requirements of this Chapter and the structure separation criteria of 8.03A ICC, provided that carports, garages and/or personal storage units may abut a Mobile/Manufactured Home. The side and rear yard setback shall be fifty (50) feet from the exterior boundary of the Park and shall apply to all structures.

Rural (existing lot)	Front (Fish Road)	Front (WoodardAve)	Side	Rear
	50 feet	50 feet	50 feet	50 feet

Both proposed manufactured homes meet the 50 foot setback requirements. Two existing 120 foot storage structures were noted by staff as being located 30 feet and 40 feet from the western property line. One of the structures was included on the site plan approved by BSP 32/86. The setbacks listed in the approved site plan file were as follows:

- **30 feet from the Fish Road**
- **60 feet from Woodard Avenue, and**

- **10 feet from the north and western property line.**

Both structures meet the setbacks approved in BSP 32/86. Any future development or structures should be required to meet current setbacks as established above for Mobile/Manufactured Home Parks, as established in ICC 17.03.180.O.

4. Minimum space per mobile/manufactured home.
 - a) Single-wide units - 3,200 square feet
 - b) Double-wide units - 4,300 square feet
 - c) Triple-wide units - 5,400 square feet
5. Installation requirements. All homes sited in Mobile/Manufactured Home Parks shall meet the installation requirements of Chapter 14.01A ICC and the requirements of ICC 17.03.180.N.1.b) and 17.03.180.N.2.

ICC 17.03.180.N.1b – Mobile/Manufactured Homes shall be installed with full skirting which is compatible in material, color, and pattern with the siding of the Mobile/Manufactured Home or by using a perimeter masonry foundation. This condition shall be met within thirty (30) days of placement of the Mobile Manufactured Home on a Lot;

ICC 17.03.180.N.2 - Mobile/Manufactured Homes in all zones shall meet all of the standards and requirements of the State of Washington, Island County, and any other applicable government regulations in effect at the time of installation. The Mobile/ Manufactured Home shall bear an insignia issued by a State or federal regulatory agency indicating that the Mobile/Manufactured Home complies with all applicable construction standards of the U.S. Department of Housing and Urban Development or that it passed a State systems inspection at the time it was constructed or has since passed a State alteration/fire safety inspection.

6. Landscaping/buffering/perimeter requirements. Landscaping in accordance with an approved detailed landscape plan shall include the following as necessary to assure visual compatibility with surrounding uses:
 - a) Berms for noise screening;
 - b) A minimum fifty (50) foot wide planting strip of evergreen trees and shrubs along the exterior site boundary;
 - c) Where abutting a County roadway, the planting strip shall be a minimum of fifty (50) feet wide, provided that a minimum twenty-five (25) foot strip may be considered sufficient when it can be demonstrated that, with earth sculpturing and recontouring, the development is adequately buffered;
 - d) Proposed interior plantings of native vegetative species;
 - e) Those areas to be preserved in their natural state; and
 - f) Proposed fencing.

Fifty (50) foot wide planting strips consisting of evergreen trees and shrubs should be installed to screen both proposed manufactured homes from view from

Woodard Avenue and Fish Road. Planting strips should be required to be installed prior to final building permit issuance.

7. Community recreation/Open Space. All Mobile/Manufactured Home Parks shall reserve a minimum of thirty-five percent (35%) of the site area for common, functional Open Space. The planting strips required in 6., above, shall not be counted as Open Space. Open Space may include community recreational areas and facilities such as playgrounds and swimming pools.

The current meets the Community recreation/Open Space requirement per the applicant's topographic survey.

8. Individual storage sheds. Individual storage units are encouraged in Mobile/Manufactured Home Parks. No outside storage of household item and equipment shall be permitted within a park. It shall be the responsibility of the park management to ensure compliance with this requirement.

Outside storage of household items and equipment was noticed during staff's visit. Prior to final building permit issuance, all outside storage of household items should be required to be removed and verified by staff for compliance.

9. Bulk storage and parking for RVs, boats, trailers, etc. A bulk storage/parking area shall be provided within a mobile/manufactured home park. A minimum of three-hundred (300) square feet of space, exclusive of driveways, shall be provided for every ten (10) home spaces. Said area shall be separated from all other parking facilities, shall be provided with some means of security and shall be visually screened with a vegetative buffer or fence. The requirements of this subsection may be waived by the Hearing Examiner when the Mobile/Manufactured Home Park developer/owner agrees to prohibit the storage of such items within the Park.

The two proposed manufactured homes will be required to be screened by fifty (50) foot wide planting strips consisting of evergreen trees and shrubs. Screening will also be required for any areas where bulk storage is designated to be located.

10. Laundry facilities. Such facilities shall be provided pursuant to ICC 8.03A.040.I.

Each manufactured home contains separate laundry facilities.

11. Parking requirements. Parking spaces shall be provided in compliance with the requirements of this Chapter, provided that off-street guest parking shall also be provided at the ratio of one (1) parking space for each four (4) Mobile/Manufactured Home spaces and shall be distributed for convenient access to all spaces. Such parking may be provided by a parking lane and/or separated parking areas.

Parking is provided for at each unit.

12. Lighting. Adequate lighting shall be provided to illuminate streets, driveways and walkways for the safe movement of pedestrians and vehicles.

No new lighting is proposed. All outdoor lighting is required to comply with Island County outdoor lighting standards contained within ICC 17.03.180.R.

13. Signage. All signs in a Mobile/Manufactured Home Park shall comply with the requirements of this Chapter.

No new signage is proposed.

14. Utilities. All water, sewer, electrical and communication service lines shall be located underground.
15. No Home Occupation or home industries shall be conducted within a Mobile/Manufactured Home Park.

c. Subsection 17.03.180.R, Signs and Lighting:

1. Signs: No new signage is proposed as part of this application.
2. Lighting: No new lighting is proposed as part of this application. All outdoor lighting meets the standards set forth in ICC 17.03.180.R.

d. Subsection 17.03.180.S, Site Coverage and Setbacks:

1. Site Coverage.

- i) The maximum building coverage for residential uses within the Rural zone is five (5) percent of the gross site area. The proposal, including all existing structures, is 9,300 square feet of building coverage, which is 2.15% of the gross site area.

c. Shoreline Designation. Not applicable to this parcel.

d. SEPA. The proposal is exempt from SEPA.

e. Agency Comments.

- i) Island County Public Health. Public Health has no objection to site plan approval as stated in the attached memorandums from Aneta Hupfauer dated November 18, 2009, following that the included conditions be met.
- ii) Island County Public Works. Public Works has no objection to site plan approval as stated in the attached memorandums from Bill Poss dated December 16, 2009 following that the included conditions are met.
- iii) Island County Building Division. The Building Division did not provide comments for this application. The applicant is required to obtain all required building permits prior locating the proposed manufactured homes.

f. Public Comments. No public comments were received.

Conclusions

1. The staff of Island County Health, Engineering, and Community Development evaluated the proposed project for compliance with Titles 11, 8, 13, and 17 and with Chapters 16.15, 16.14C, and 16.19 of the Island County Code according to the Type III Decision Process. Other county or state agencies were consulted as appropriate. Each agency issued

Determinations of Consistency according to ICC 16.19.120. The use that was evaluated was limited to the proposed expansion of the existing manufactured home park on a 10.24 acre parcel zoned Rural. No other uses or possible future expansions were evaluated for consistency with Island County Code, plans, or policies.

2. The proposed Site Plan will be consistent with the criteria for approval listed in ICC 17.02 (Critical Areas), ICC 17.03 (Zoning), and ICC 16.15 (Site Plan Review) if the recommendations described below are adopted as conditions of approval.
3. Several RV units were noted on-site that was surrounded by outdoor storage of household items. These units and associated storage of outdoor household items should be removed before approval of this application.
4. Compliance with the conditions of Public Health, Public Works, and Critical Areas should be made conditions of approval.

Recommendation

Based on the foregoing Findings, Analysis and Conclusions, the Community Development Division recommends that Site Plan Review application number SPR 283/09, submitted by Peggy Berto on Parcel R22915-291-2960, be approved with the following conditions:

1. The uses on the site shall be limited to the manufactured home park and accessory buildings. This site plan only allows for the establishment of up to seven (7) manufactured homes on the site.
2. All development shall be in conformance with the approved Site Plan Review and conditions of approval unless they are amended in conformance with Section 16.15.130 ICC. Any changes or expansions to the use of the buildings or site shall require the review of a site plan amendment that will include but not be limited to a new traffic analysis and parking plan.
3. Required fifty (50) foot setbacks from all property lines must be maintained.
4. All Recreational Vehicles (RV) must be disconnected from the sewage disposal and water supply systems and removed from the property. RV's may not be used as dwelling units and any future use of RV's on the property as a dwelling unit(s) will constitute a knowing and willing violation.
5. All outside storage of household materials and equipment must be removed prior to final building permit issuance. No outdoor storage of household materials or equipment is permitted.
6. Compliance with all conditions of Island County Public Works as specified in the memorandum dated December 16, 2009 from John Bertrand.
7. Compliance with all conditions of the Island County Public Health as specified in the memorandum dated November 18, 2009 from Aneta Hupfauer.
8. The applicant is required to obtain all required building permits prior to locating any manufactured homes on the site and in conformance with the approved site plan.

9. Both proposed manufactured homes, units F and G, are required to be screened from the northern property line and from Woodard Avenue by fifty (50) foot wide planting strips consisting of evergreen trees and shrubs. A landscape/screening plan must be received by the Planning and Community Development Department. All landscaping and screening must be maintained and any dead or dying vegetation must be replanted.
10. Future installation and extension of power to the site shall be underground.
11. Prior to occupancy of the building and Final Inspection, all on-site and off-site improvements required as a condition of SPR approval shall be completed.
12. The above requirements are subject to change if any other information provided by the applicant or their authorized representative proves inaccurate.

This staff report and recommendation was prepared by:

Brandon Sweeza, Associate Planner

Date:

enc:

Memorandum from Public Works dated December 16, 2009
Memorandum from Public Health dated November 18, 2009
Email from Public Health dated February 23, 2010
Site Plan

cc: Michael Bobbink, Hearing Examiner
Aneta Hupfauer, Island County Public Health
John Bertrand, Island County Public Works
File SPR 283/09