

Type III Development and Environmental Review Staff Report and Recommendation

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| Project Name: | OALC Brush Prairie Cemetery |
| Case Number(s): | PSR-2020-00100 |
| Request: | The applicant proposes a boundary line adjustment and to plat 1,496 cemetery plots next to an existing church facility on approximately 10.51 acres in the R-5 zone. |
| Address: | 16603 and 16709 NE 142 nd Avenue |
| Parcel number(s): | 195034-000, 195037-000, and 195034001 |
| Applicant: | Old Apostolic Lutheran Church (OALC) Howard Redinger, contact PO Box 760 Brush Prairie, WA 98606 redingerhoward@gmail.com |
| Owner: | Same as applicant |
| Contact Person: | AKS Engineering & Forestry Seth Halling, contact 9600 NE 126 th Avenue, Suite 2520 Vancouver, WWA 98682 360.882.0419 sethh@aks-eng.com |
| Staff contact: | Bryan Mattson, Planner II 564.397.5683 amy.wooten@clark.wa.gov |

Recommendation

Approved, Subject to Conditions

Land Use Review manager's initials:

Date issued: October 13, 2020

Revised 10/13/2020



Community Development
1300 Franklin Street, Vancouver, Washington
Phone: 564.397.2375 Fax: 360.397.2011
www.clark.wa.gov/development



For an alternate format,
contact the Clark County
ADA Compliance Office.
Phone: 564.397.2322
Relay: 711 or 800.833.6384
E-mail: ADA@clark.wa.gov

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| Public Hearing date: October 22, 2020 |
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County Review Staff

| | Name | Phone | Email Address |
|--|------------------------|--------------|--|
| Community Development | | | |
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| Concurrency Engineer | David Jardin | 564.397.4354 | david.jardin@clark.wa.gov |

Comp Plan Designation: Rural-5

Applicable Laws

Clark County Code: Title 15 (Fire Prevention), Chapter 40.200 (General Provisions), Section 40.210.020 (Rural Residential Zoning District), Chapter 40.320 (Landscaping), Chapter 40.340 (Parking & Loading), Chapter 40.350 (Transportation & Circulation), Section 40.350.020 (Transportation Concurrency), Chapter 40.370 (Sewer & Water), Chapter 40.386 (Storm Water & Erosion Control), Chapter 40.440 (Habitat Conservation), Chapter 40.450 (Wetland Protection), Chapters 40.500 and 40.510 (Procedures), Section 40.520.030 (Conditional Use Permits), Section 40.520.040 (Site Plan Review), Chapter 40.540 (Boundary Line Adjustments & Land Divisions), Chapter 40.570 (SEPA), Section 40.570.080 (SEPA Archaeological), Title 24 (Public Health), RCW 58.17, and RCW 68.

Neighborhood Association/Contact:

Greater Brush Prairie Neighborhood Association
 Rick DeNise, president
greaterbrushprairie@gmail.com

Vesting

An application is reviewed against the subdivision, zoning, transportation, stormwater and other land development codes in effect at the time a fully complete application for preliminary approval is submitted. If a pre-application conference is required, the application shall earlier

contingently vest on the date the fully complete pre-application is filed. Contingent vesting requires that a fully complete application for substantially the same proposal is filed within 180 calendar days of the date the county issues its pre-application conference report. Contingent vesting does not apply to stormwater or concurrency standards.

A pre-application conference on this matter was held on December 26th, 2019 and the preapplication conference report was issued January 6th, 2020. The pre-application was determined not contingently vested.

The fully complete application was submitted on July 15th, 2020 and determined to be fully complete on August 12th, 2020. Given these facts, the application is vested on July 15th, 2020. This vesting does not apply to stormwater standards.

There are no disputes regarding vesting.

Time Limits

The application was determined to be fully complete on August 12th, 2020. The application was on hold for 29 days. Therefore, the code requirement for issuing a decision within 92 days lapses on November 12th, 2020. The state requirement for issuing a decision within 120 calendar days, lapses on December 10th, 2020.

Public Notice

A Revised Notice of application and public hearing was mailed to the applicant, the Greater Brush Prairie Neighborhood Association and property owners within 500 feet of the site on September 21st, 2020. A sign was posted on the subject property on September 22nd, 2020.

Public Comments

Comment Submitted by

State of Washington Department of Ecology

PO Box 47775

Olympia, WA 98504

The Department of Ecology discussed solid waste management, toxics cleanup, and water quality (and listed construction activities that require coverage under the Department of Ecology Construction Stormwater General Permit), [See Exhibit 9].

Date Received

10/5/2020

Staff Response

Staff made Ecology's comments advisory conditions of approval. The applicant has been provided a copy of the Ecology letter, and will be required to obtain any permits required, (See Condition G-2).

Comment Submitted by

Southwest Clean Air Agency, (SWCAA)

11815 NE 99th Street, Ste. 1294

Vancouver, WA 98682

The SWCAA discussed requirements related to Demolition/Asbestos and Construction Dust, [See Exhibit 10].

Date Received

10/5/2020

Staff Response

Staff made SWCAA’s comments advisory conditions of approval. The applicant has been provided a copy of the SWCAA letter, and will be required to obtain any permits required, (See Condition G-4).

Project Overview

The applicant is proposing to the addition of 1,496 cemetery plots next to the existing Brush Prairie Old Apostolic Lutheran Church in 7 phases as described below:

- Phase 1 will include platting 166 adult grave plots and 66 infant grave plots.
- Phase 2 will include platting 205 adult grave plots.
- Phase 3 will include platting 166 adult grave plots and 66 infant grave plots.
- Phase 4 will include platting 151 adult grave plots.
- Phase 5 will include platting 65 adult grave plots and 88 infant grave plots.
- Phase 6 will include platting 219 adult grave plots and 91 infant grave plots.
- Phase 7 will include platting 213 adult grave plots.

The applicant is proposing a boundary line adjustment to incorporate parcel 195037-000 into the existing church site and adjust the parcels so that the cemetery plots are all located on the same parcel. The proposed cemetery will be a secondary use on the site, with the primary use being the OALC church facilities. The church building, classroom building, maintenance shed, parking lot, and stormwater facility will remain in use.

The site has frontage on NE 142nd Avenue along the westerly boundary, with access through two existing driveways. The site is generally flat with minimal slopes and the existing vegetation consists of evergreen and deciduous trees, shrubs and grass.

There are three wetlands on or adjacent to the site as well as an unnamed stream. Wetland “A” is located immediately off site, along NE 142nd Avenue, west of the existing storm facility. Wetland “B” is located along the south property line, southwest of the church building and continues off site to the southeast. Wetland “C” is in the northeast corner of the site. The unnamed stream is in the southwest corner of the site and runs through a culvert from the south property line to the northwest, daylighting into Wetland “A” along NE 142nd Avenue. According to Clark County Geographic Information Services (GIS), the archaeological predictive for the site is moderate-high to high and there are no mapping indicators for archaeological site buffers. The site is within a Category 2 Critical Aquifer Recharge Area (CARA).

County GIS systems identify the site as being served by Fire District 3, Clark Public Utilities water and electricity, and private on-site septic systems.

Comprehensive Plan, Zoning and Current Land Use

| Compass | Comp Plan | Zoning | Current Land Use |
|---------|-----------|--------|---------------------------|
| Site | R-5 | R-5 | OALC Brush Prairie Church |
| North | R-5 | R-5 | Single family residences |

| | | | |
|-------|-----|-----|--|
| East | R-5 | R-5 | RR right-of-way & Single-family residences |
| South | R-5 | R-5 | Single family residences |
| West | R-5 | R-5 | Single family residences |

Staff Analysis

Staff first analyzed the proposal in light of the 16 topics from the Environmental Checklist (see list below). The purpose of this analysis was to identify any potential adverse environmental impacts that may occur without the benefit of protection found within existing ordinances.

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|---------------------------------|--|
| 1. Earth | 9. Housing |
| 2. Air | 10. Aesthetics |
| 3. Water | 11. Light and Glare |
| 4. Plants | 12. Recreation |
| 5. Animals | 13. Historic and Cultural Preservation |
| 6. Energy and Natural Resources | 14. Transportation |
| 7. Environmental Health | 15. Public Services |
| 8. Land and Shoreline Use | 16. Utilities |

Staff then reviewed the proposal for compliance with applicable code criteria and standards in order to determine whether all potential impacts could be mitigated by the requirements of the code.

Staff's analysis also reflects review of agency and public comments received during the comment period, and knowledge gained through a site visit.

Major Issues

Only the major issues, errors in the development proposal, and/or justification for any conditions of approval are discussed below. Staff finds that all other aspects of this proposal not discussed below comply with the applicable code requirements.

Finding 1 – Boundary Line Adjustment

The Fully Complete review includes a determination as to whether the subject parcels (195034000 [tax lot 57] & 195037000 [tax lot 60]) meet all zoning and platting laws that were in place when the parcels were originally created. Staff determined that the subject parcels Tax Lot 60 (0.95 acres), and Tax Lot 57 (9.56 acres) are two (2) legal lots of record.

Through the proposed adjustment, tax lot 60 will be increased in area from .95 acres to 2.79 acres and the lot width will remain unchanged. Because this lot will not become more non-conforming in regard to R-5 standards of area or lot width, staff can recognize the proposed adjustment as being in compliance with zoning standards. Tax lot 57 will be reduced in area from 9.56 acres to 7.72 acres and the lot width will remain unchanged. Because tax lot 57 will not become non-conforming in regard to R-5 standards of area or width, staff can recognize the proposed adjustment as being in compliance with zoning standards.

The proposed adjustment does not create additional lots, tracts or parcels and will not cause any utilities to become separated from the lot they serve. Clark County can therefore recognize the proposed adjustment as in compliance with state platting law as well as Clark County zoning requirements.

Finding 2 - Uses

According to Table 40.210.020-1, cemeteries are permitted by Conditional Use Permit in the R-5 zone.

Finding 3 – Conditional Use Permits

In order to make a recommendation for approval of the proposed CUP, staff must find that the establishment, maintenance or operation of the use applied for will not be significantly detrimental to the health, safety or general welfare of persons residing or working in the neighborhood of the proposed use or be detrimental or injurious to the property and improvements in the neighborhood or to the general welfare of the county; and, may do so through the imposition of additional conditions. These additional conditions include:

- a. Increasing the required lot size or setback dimensions;
- b. Increasing street widths;
- c. Controlling the location and number of vehicular access points to the property;
- d. Increasing the number of off-street parking or loading spaces required;
- e. Limiting the number of signs;
- f. Limiting the lot coverage or height of buildings because of obstructions to view and reduction of light and air to adjacent property;
- g. Limiting building area and intensity of the use;
- h. Limiting or prohibiting openings in sides of buildings or structures or requiring screening and landscaping where necessary to reduce noise and glare and maintain the property in a character in keeping with the surrounding area;
- i. Establishing hours of operation;
- j. Establishing maintenance standards; and
- k. Establishing standards under which any future enlargement or alteration of the use shall be reviewed by the county and new conditions imposed.

The project will not obstruct any views or cast light or glare onto neighboring properties, does not propose any new signage, and any impacts from additional traffic or new impervious surfaces are addressed through the application of the county’s development standards (see additional transportation and concurrency findings below). However, because of the residential character of the abutting lots, a 5’ wide landscape buffer complying with the L3 standard shall be required along the northerly property line to screen the cemetery plots from the abutting residential parcel, (See Condition A-6 and Land use Finding 5).

Finding 4 - Setbacks

Setbacks to structures are put forth in Table 40.210.020-3, as follows:

| R-5 Zone Setbacks, Lot Coverage and Building Height Standards | | | | | |
|--|---------------|-----------------|-------------|-----------------------------|--------------------------------|
| Minimum Setbacks (feet) | | | | Maximum Lot Coverage | Maximum Building Height |
| Front | Side | | Rear | | |
| | Street | Interior | | | |
| 50 | 25 | 20 | 20 | 50% | 50 feet |

There are no new structures proposed with this application. Therefore, no new setback conditions are warranted.

Finding 5 - Landscaping

Pursuant to Table 40.320.010-1, landscape buffers are not required for this project based on the zoning, but per 40.320.010.C.4, the county may require an applicant to provide landscaping and screening that differs from the standards in Table 40.320.010-1 where necessary to comply with the other applicable standards of the use or development. In this case staff have determined that a 5' wide landscape buffer complying with the L3 standard shall be required along the northerly property line to screen the cemetery plots from the abutting residential parcel, (*See Condition A-6 and Land use Finding 3*).

The L3 standard provides physical and visual separation between uses or development principally using screening. It is used where such separation is warranted by a proposed development, notwithstanding loss of direct views. This standard requires enough high shrubs to form a screen six (6) feet high and ninety-five percent (95%) opaque year-round. In addition, one (1) tree is required per thirty (30) lineal feet of landscaped area or as appropriate to provide a tree canopy over the landscaped area. Groundcover plants must fully cover the remainder of the landscaped area with the exception of energy dissipation points at the locations of stormwater inlets. LID bioretention facility plantings may be used in combination with perimeter shrubs, provided a continuous screen six (6) feet high and ninety-five percent (95%) opaque year-round can be achieved within two (2) years of planting. A six (6) foot high wall or fence that complies with the F2 standard (Figure 40.320.010-7) with or without a berm may be substituted for shrubs, but the trees and groundcover plants are still required. When applied along street lot lines, the screen or wall is to be placed along the interior side of the landscaped area.

The applicant has proposed a solid 6-foot wall along the west half of the north property line and a solid 3-foot wall along the west property line along NE 142nd Avenue to provide screening to the neighboring properties and the street. The east half of the north property line has a dense existing arborvitae hedge that will remain and serve as the buffer. This application also proposes to boundary line adjust the cemetery parcel, moving the east property line to abut the Chelatchie Prairie Railroad right-of-way. No buffer is required along the east boundary due to the existing railroad grade. The south boundary of the cemetery parcel will be between the church and the cemetery and is not required to have a buffer as the cemetery is a secondary use to the church and a buffer between the two properties would interfere with the church use of the cemetery. Parking for the cemetery will utilize a portion of the church parking lot and buffering would serve no purpose. Staff agrees that the applicant's proposal meets landscaping requirements as conditioned.

Prior to the development of each phase, the applicant shall submit a Landscape Certification consistent with the approved preliminary landscape plan and 40.320, (*See Condition A-10*).

Maintenance of landscaped areas is the ongoing responsibility of the property owner. Required landscaping must be continuously maintained in a healthy manner. Plants that die must be replaced with in-kind materials unless otherwise authorized by the responsible official. Vegetation shall be controlled by pruning, trimming or otherwise so that it will not interfere

with the maintenance or repair of any public utility, restrict pedestrian or vehicular access, or obstruct sight distance at intersections as provided in Section [40.320.020](#), (*See Condition H-3*).

Finding 6 - Parking

An existing parking lot serves the existing church that will serve the proposed cemetery plat. No new parking is proposed with this application. Currently, the parking lot accesses are gated near the street and with this application, the gate on the north access will be shifted east of the first drive aisle. Additional fencing will be added around a portion of the first drive aisle, with another gate added to provide parking access for cemetery visitors when the church is not open. None of the existing parking is located in any setback.

Previous Conditional Use approval for the Church shows an occupancy of 603, requiring 151 parking spaces for the site and one space per four seats. The existing parking lot provides 391 parking spaces. No spaces are required for the cemetery as an accessory use; however, as part of the application, fencing will be adjusted as described above to allow 14 parking spaces to be used by the cemetery during hours the church is closed. Any funeral service for the cemetery will use the full church parking lot, as funeral service and standard church services will occur separately. The cemetery will be on a separate parcel from the parking lot and a shared parking agreement for the parcels will be provided prior to final approval, (*See Condition A-11*). A boundary line adjustment will occur as part of this proposal, but all parking will remain on the church property. Parking for the cemetery will be within 300 feet.

A parking lot that provides between 301 and 400 parking spaces is required to provide a minimum of 8 ADA accessible parking spaces. The applicant's plan does not propose any new ADA spaces, however, the 9 ADA spaces near the church building that were approved with the original development ND will remain. Additionally, for every six or fraction of six accessible parking spaces, at least one shall be a van-accessible parking space. Currently, the applicant is proposing to gate a portion of the parking area for use for the cemetery. One van-accessible space may be required if the parking is gated. Due to this requirement, the applicant may choose to modify the plan or provide an additional ADA space. (*See Condition A-14*)

Pursuant to Section 40.340.010(A)(11), required parking and loading spaces and associated access and maneuvering drives shall be maintained in good repair at all times. (*See Condition H-2*)

Finding 7 – Solid Waste and Recycling

There is an existing trash enclosure located on site, near the southwest corner of the church building. The cemetery portion of the site is not anticipated to be heavily used other than for services and will be maintained by the church. When the cemetery is in use for a service, which will be the heaviest use, there will be access to the church trash facilities. Therefore, no additional trash facilities are proposed at this time. Staff agree with the applicant's proposal; therefore, no additional conditions are warranted.

Finding 8 – Platting

Pursuant to Section 40.540.020(B)(4)(a), cemeteries and burial plots are exempt from platting law under Title 40 Unified Development Code as well as RCW58.17.

Finding 9 – RCW Title 68 Cemeteries, Morgues, and Human Remains

Per 68.05.400, a Cemetery Certificate of Authority is required except for nonprofit cemeteries which are owned or operated by any recognized religious denomination which qualifies for an exemption from real estate taxation under RCW 84.36.020. Because the OALC meets this qualification, this Certificate is not required.

Per RCW 68.20.010, private cemeteries are required to be incorporated. The OALC is a Washington nonprofit corporation that will own and operate the cemetery; therefore this standard is met.

Per RCW 68.40.010, A cemetery authority shall deposit in an endowment care fund not less than the following amounts for plots or interment rights sold: Ten percent of the gross sales price for each grave, niche, or crypt. Because the applicant's narrative indicates that no plot will be sold, this standard is inapplicable.

Conclusion (Land Use)

Staff concludes that the proposed preliminary plan, subject to conditions contained herein, meets land use requirements of the Clark County Code.

Archaeology**Finding 1 - Applicability**

The development site is located within a moderate-high to high probability area for the discovery of archaeological resources, as designated on the Archaeological Predictive Model Map of the Clark County. Therefore, an Archaeological Predetermination is required.

Finding 2 - Pre-determination

The Department of Archaeology confirmed receipt of an archaeological pre-determination to on April 16, 2020. The DAHP was mailed the public notice and a copy of the SEPA checklist and has not provided comment. A note on the final grading plans will require that if resources are discovered during construction, work shall stop and DAHP and the county will be contacted. A note on the final plans will require that if resources are discovered during construction, work shall stop and DAHP and the county will be contacted, (*See Condition A-7.a*).

Habitat & Wetlands**Finding 1 - Applicability**

A wetland permit was issued for parcel 195034-000 for the overall site plan review for the Brush Prairie OALC church (PSR-2017-00001; WHR-2017-00015) which indicated the presence of three wetlands onsite. The locations of the wetlands and the ratings are still vested. There are two Category III wetlands onsite (one on the north and one on the south side of the parcel) and one Category IV wetland by the road.

Finding 2 – Avoidance

Per the Wetland Protection Ordinance, wetland buffers are established based on the quality of the wetland and the type of impact proposed. This development proposes cemetery lots on some of the remaining ground on parcels 195034-000 and 195034-001. This type of development would be a Low Intensity Use. Only the northern wetland (Wetland C) is close to the proposed development. This wetland had a habitat score of 4. Per the wetland ordinance,

a Category III wetland with a habitat score of 4 would have a Low Intensity Use buffer of 40 feet, except where portions of the wetland buffer were functionally isolated by existing parking. This buffer was codified with the conservation covenant recorded for WET2017-00015 (Auditor #5654016).

Based on the plans provided, the proposed cemetery lots appear to avoid the wetland buffer for Wetland C, therefore no further wetland review is required. In the event that the plans change in the future and any potential impacts occur within the wetland buffer then a wetland review would be required, including potential permitting and mitigation, (*See Conditions A-7.b, A-8, and Conditions G-5.a through G-5.e*).

Conclusion (Habitat & Wetlands)

Environmental Services concludes that the proposed preliminary plan, subject to conditions identified in their attached report, meets habitat requirements of the Clark County Code.

Transportation

Finding 1 - Roads

Road improvements and design are required to comply with CCC 40.350.030(B) and Table 40.350.030-2.

NE 142nd Avenue

NE 142nd Avenue is classified as a Rural Major Collector. Frontage improvements are not required in rural areas outside of Rural Centers; however, half-width right-of-way dedication is required if found to be substandard and must be 30 feet measured from the historic centerline per Standard Detail Drawing #19. The existing condition plan shows that the current half-width right-of-way is 30 feet. A 30-foot half-width right-of-way shall be dedicated to the county with the final site plan, (*See Condition A-1*).

Finding 2 – Sight Distance

The approval criteria for sight distances are found in CCC 40.350.030(B)(8). This section establishes minimum sight distances at intersections and driveways. Additional building setbacks may be required for corner lots in order to maintain adequate sight distance. The final engineering plans shall show sight distance triangles for driveways that are proposed to remain. Landscaping, trees, utility poles, and miscellaneous structures will not be allowed to impede required sight distance requirements at all proposed driveway approaches and intersections.

The applicant did not submit a sight distance certification letter verifying that the existing sight distance meets code.

The applicant will need to submit drawings for review and approval. These plans will need to show sight distance triangles at the intersection of NE 142nd Avenue with the private driveways. The plans will also need to show objects that are within the sight distance triangle. Notes on the plans shall indicate the vegetation within the sight distance triangle that needs to be maintained, trimmed, or removed, (*See Condition A-2*).

Conclusion (Transportation)

Staff concludes that the proposed preliminary plan, subject to the conditions above, meets the transportation requirements of the Clark County code.

Transportation Concurrency

Finding 1 – Trip Accounting

This proposed development is not expected to generate more than 10 new peak hour trips; therefore, additional conditions of approval are not required.

Conclusion (Concurrency)

Transportation Concurrency staff concludes that the proposed preliminary plan, subject to conditions identified in their attached report, meets transportation concurrency requirements of the Clark County Code.

Stormwater

Finding 1 - Applicability

The provisions of Clark County Code Chapter 40.386 shall apply to all new development, redevelopment, land disturbing activities and drainage projects consistent with the Stormwater Management Manual for Western Washington (SMMWW) and the Clark County Stormwater Manual (2015). The project will disturb more than 7,000 square feet of land, however all the grading is associated with excavation of the cemetery grave sites and are exempt from grading permits and only trigger stormwater Minimum Requirements #1 through #5, (*See Condition A-3*).

No new development shall be allowed to materially increase or concentrate stormwater runoff onto an adjacent property or block existing drainage from adjacent lots.

Finding 2 - Stormwater Proposal

The site consists of a church and associated infrastructure, with lawn and landscaped areas covering the undeveloped portion of the site. The site gently slopes to the southwest. Mapped soil types include Dollar Loam (DoB), which have a hydrologic soil group classification of “C” and a Clark County WWHM Soil Group classification of “SG-3”, Hillsboro Sandy Loam (HLB), which have a hydrologic soil group classification of “B” and a Clark County WWHM Soil Group classification of “SG-2”, Hockinson Sandy Loam (HtA), which have a hydrologic soil group classification of “D” and a Clark County WWHM Soil Group classification of “SG-4”, and Hillsboro Sandy Loam (HLA), which have a hydrologic soil group classification of “B” and a Clark County WWHM Soil Group classification of “SG-2”.

The applicant provided a Preliminary Technical Information Report prepared by AKS Engineering & Forestry, LLC dated June 8th, 2020. Proposed site improvements include 1,496 cemetery plots. This proposal will not result in any new hard surface and only disturbs 1.25 acres of land.

On-site Stormwater Management (MR#5) will be met by implementing Post-Construction Soil Quality and Depth (BMP T5.13) for all land disturbing activities.

Finding 3 - Stormwater Phasing

The applicant has proposed 7 phases. The applicant is responsible for providing all necessary stormwater mitigation improvements required for each individual phase. The required stormwater mitigation improvements for each proposed phase will be reviewed during final engineering review.

Conclusion (Stormwater)

Staff concludes that the proposed preliminary stormwater plan is feasible subject to the conditions. Therefore, the requirements of the preliminary plan review criteria are satisfied.

Fire Protection**Finding 1 - Gates**

The proposal includes a request to move a driveway gate accessing NE 142nd Avenue. A gate permit and Fire Marshal approval will be required, (*See Condition A-12*).

Conclusion (Fire Protection)

Staff finds that the proposed preliminary plan, subject to conditions identified above, meets the fire protection requirements of the Clark County Code.

Public Health**Finding 1 – On-site Sewage Treatment Systems**

The church facility on parcel 195034000 is served by an existing on-site sewage system (OSS), ON30180. The OSS was inspected in July of 2019. At the time of final approval, the OSS will need a current, passing operation and maintenance inspection, (*See Condition A-13.a*). Parcel 195037000 was previously served by an OSS (ON39409), which was decommissioned in January of 2019.

The proposed cemetery plots do not appear to interfere or otherwise encroach on the existing drainfield or reserve area serving parcel 195034000. All OSS components must be protected during any future construction and provisions shall be made to prevent flow or accumulation of surface water over the area where an on-site sewage system is located.

Finding 2 – Water Systems

The application indicates that Clark Public Utilities is serving this project. This property must continue to be served by an approved public water supply as the drinking water source.

Two wells are present on parcel 195034000 and located on the improvement plan. The west well (WP11198) is proposed for irrigation. The east well is used for geothermal heating according to the improvement plan. An irrigation-only well approval for the west well must be obtained from Public Health prior to final site plan approval, (*See Condition A-13.b*). A notice to title is required as part of this approval process and staff proposes to add mention of the second well being used for geothermal heating to this notice to title. (*See Condition A-13.c*). The well (WP12133) that previously served parcel 195037000 was decommissioned in March of 2019.

Additional water wells may be discovered during development. Any other water wells identified during development must be properly decommissioned by a Washington licensed well driller

per WAC 173-160-381 with written verification provided to Public Health and the location marked on the final site plan, (*See Condition C-1*)

Conclusion (Public Health): Staff finds that the proposed preliminary plan, subject to conditions identified above, meets Public Health requirements of the Clark County Code.

SEPA Determination

As lead agency under the State Environmental Policy Act (SEPA) Rules [Chapter 197-11, Washington Administrative Code (WAC)], Clark County must determine if there are possible significant adverse environmental impacts associated with this proposal. The options include the following:

- **DS = Determination of Significance** - The impacts cannot be mitigated through conditions of approval and, therefore, require the preparation of an Environmental Impact Statement (EIS);
- **MDNS = Mitigated Determination of Non-Significance** - The impacts can be addressed through conditions of approval; or,
- **DNS = Determination of Non-Significance** - The impacts can be addressed by applying the Clark County Code.

The likely SEPA Determination of Non-Significance (DNS) in the *Revised Notice of Development Review Application* issued on September 21st, 2020 is hereby final.

SEPA Appeal Process

An appeal of this SEPA determination and any required mitigations, must be filed with the Department of Community Development within fourteen (14) calendar days from the date this notice.

The hearing examiner shall hear appeals in a public hearing. Notice of the appeal hearing shall be mailed to parties of record but shall not be posted or published.

A **procedural SEPA appeal** is an appeal of the determination (i.e., determination of significance, determination of non-significance, or mitigated determination of non-significance).

A **substantive SEPA appeal** is an appeal of the conditions required to mitigate for probable significant issues not adequately addressed by existing Clark County Code or other law.

Issues of compliance with existing approval standards and criteria can still be addressed in the public hearing without an appeal of this SEPA determination.

A **procedural or substantive appeal** must be filed within fourteen (14) calendar days of this determination, together with the appeal fee. Such appeals will be considered at a scheduled public hearing and decided by the Hearing Examiner in a subsequent written decision.

Appeals must be in writing and should contain the following information:

- Case number designated by the county
- Name of the applicant
- Name of each petitioner
- Signature of each petitioner or his or her duly authorized representative
- A statement showing the following:
 - That each petitioner is entitled to file the appeal as an interested party in accordance with CCC 40.510.020(H) or 40.510.030(H)
 - The reasons why the SEPA determination is in error
- The appeal fee

Refer to the *Appeals* handout for more information and fees.

The decision of the Hearing Examiner is final unless:

- A motion for reconsideration is filed within fourteen (14) days of written notice of the decision, as provided under Clark County Code, Section 2.51.160; or,
- An appeal is filed with Clark County Superior Court.

Staff Contact Person: Bryan Mattson, 564.397.4319

Responsible Official: Dan Young, Community Development Director

Recommendation

Based upon the proposed plan known as Exhibit 1 Tab 8, and the findings and conclusions stated above, staff recommends the Hearing Examiner **APPROVES** this request, subject to the understanding that the application is required to adhere to all applicable codes and laws, and is subject to the following conditions of approval.

Conditions of Approval

| | |
|----------|--|
| A | Final Construction/Site Plan Review Review and Approval Authority: Development Engineering & Land Use |
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Prior to construction, a Final Grading Plan shall be submitted for review and approval consistent with the approved preliminary plan and prior to final site plan approval, the applicant shall comply with the following conditions of approval:

- A-1 Right-of-way** - The required half-width right-of-way along NE 142nd Avenue fronting the development must be conveyed to the county with the final site plan, (*See Transportation Finding 1*).
- A-2 Sight Distance** - The applicant shall provide documentation, from an engineer licensed in the state of Washington, indicating that the required sight distance is available at the sites existing access to NE 142nd Avenue, (*See Transportation Finding 2*).

- A-3 Stormwater** - The applicant shall submit final construction plans and a final Technical Information Report (TIR) that addresses Minimum Requirements #1 through #5, (See *Stormwater Finding 1*).
- A-4 Erosion Control Plan** - The applicant shall submit and obtain County approval of a final erosion control plan designed in accordance with CCC 40.386.
- A-5 Excavation and Grading** - Excavation/grading shall be performed in compliance with CCC14.07.
- A-6 Final Landscape Plan** - A landscape plan shall be included with the Final Site Plan that indicates a 5' wide landscape buffer complying with the L3 standard along the northerly property line, and that indicates substantial conformity with the proposed preliminary landscape plan. (See *Land Use Findings 3 and 5*).
- A-7 Final Grading and Final Site Plan:** - The applicant shall submit and obtain county approval of a final site and grading plans with the following notes:
- a. **Archaeology:** "If any cultural resources and/or human remains are discovered in the course of undertaking the development activity, the Department of Archaeology and Historic Preservation in Olympia shall be notified. Failure to comply with these state requirements may constitute a Class C Felony, subject to imprisonment and/or fines."
 - b. **Wetland Covenants:** "Clark County Wetland Protection Ordinance (Clark County Code Chapter 40.450) requires wetlands and wetland buffers to be maintained in a natural state. Refer to the Conservation Covenant recorded under Auditor's File Number #5654016 for limitations on the maintenance and use of the wetland and wetland buffer areas identified on the face of this site plan."
- A-8 Wetlands** - The wetland and mitigated buffer boundaries shall be delineated on the Final Grading and Final Site Plans.
- A-9 Public Health Review** - Submittal of a *Public Health Evaluation Letter* is required as part of the Final Grading and Final Site Plan Reviews. If the evaluation letter specifies that certain actions are required, the evaluation letter will specify the timing of when those activities must be completed, such as prior to Final Construction Plan Review, construction, Provisional Acceptance, Final Plat Review, building permit issuance, or occupancy, and approved by Public Health.
- A-10 Verification of the Installation of Required Landscape** - Prior to final site plan approval, the applicant shall provide verification in accordance with CCC 40.320.030(B) that the required landscaping has been installed for Phase 1 in accordance with the approved landscape plan, (See *Land Use Finding 5*).
- A-11 Shared Parking Agreement** - A shared parking agreement for the church and cemetery will be provided prior to final approval, (See *Land Use Finding 6*).

A-12 Vehicular Gates – If a new gate is installed, a gate permit and Fire Marshal approval will be required, *(See Fire Protection Finding 1)*.

A-13 Health Department Requirements:

a. **O & M Inspection:** At the time of final approval, the OSS will need a current, passing operation and maintenance inspection, *(See Public Health Finding 1)*.

b. **Irrigation Well:** An irrigation-only well approval for the west well must be obtained from Public Health prior to final site plan approval.

c. A notice to title for the second well being used for geothermal heating is required. *(See Public Health Finding 2)*.

A-14 The applicant shall modify the proposed parking plan to comply with ADA requirements.

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| B | Prior to Construction of Development Review and Approval Authority: Development Inspection |
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Prior to construction, the following conditions shall be met:

B-1 Pre-Construction Conference - Prior to construction or issuance of any grading or building permits, a pre-construction conference shall be held with the county; and,

a. Prior to construction, demarcation of existing septic and water well systems, and underground tanks shall be established.

B-2 Erosion Control - Prior to construction, erosion/sediment controls shall be in place. Sediment control facilities shall be installed that will prevent any silt from entering infiltration systems. Sediment controls shall be in place during construction and until all disturbed areas are stabilized and any erosion potential no longer exists.

B-3 Erosion Control - Erosion control facilities shall **not** be removed without County approval.

B-4 Prior to the development of the proposed development, the applicant shall submit a Landscape Certification consistent with the approved preliminary landscape plan and 40.320, *(See Land Use Finding 5)*.

B-5 Driveway Gate - A gate permit and Fire Marshal approval will be required, *(See Fire Protection Finding 1)*.

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| C | Provisional Acceptance of Development Review and Approval Authority: Development Inspection |
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Prior to provisional acceptance of development improvements, construction shall be completed consistent with the approved final construction / land division plan and the following conditions of approval:

- C-1 Wells** - Any other water wells identified during development must be properly decommissioned by a Washington licensed well driller per WAC 173-160-381 with written verification provided to Public Health and the location marked on the final site plan, *(See Public Health Finding 2)*.

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| D | Final Plat Review & Recording Review and Approval Authority: Development Engineering |
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Prior to final plat approval and recording, the following conditions shall be met:

- D-1 None**

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| E | Building Permits Review and Approval Authority: Permit Services |
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Prior to issuance of a building permit, the following conditions shall be met:

- E-1 None**

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| F | Occupancy Permits Review and Approval Authority: Building Safety |
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Prior to issuance of an occupancy permit, the following conditions shall be met:

- F-1 None**

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| G | Development Review Timelines & Advisory Information Review and Approval Authority: None - Advisory to Applicant |
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- G-1 Site Plans and other land use approvals** - Within five (5) years of preliminary plan approval, a Fully Complete application for a Grading permit shall be submitted.

- G-2 Department of Ecology Permit for Construction Stormwater** - A permit from the Department of Ecology (ECY) is required if:

- The construction project disturbs one or more acres of land through clearing, grading, excavating, or stockpiling of fill material; **AND**
- There is a possibility that stormwater could run off the development site during construction and into surface waters or conveyance systems leading to surface waters of the state.

The cumulative acreage of the entire project whether in a single or in a multiphase project will count toward the one acre threshold. This applies even if the applicant is responsible for only a small portion (less than one acre) of the larger project planned over time. **The applicant shall contact ECY for further information.**

Solid Waste Management - Derek Rockett (360) 407-6287

All grading and filling of land must utilize only clean fill. All other materials may be

considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department for proper management of these materials.

Toxics Cleanup: Craig Rankine (360) 690-4795

There are known contaminated site(s) within approximately half-a-mile of the proposed SEPA action. The site(s) include, but may not be limited to following, see Ecology Facility Site ID No's, site name and project manager:

- 14787 Brodie Property (no project manager assigned, contact Craig Rankine [360] 690-4795)

If environmental contamination is discovered at the site of the proposed action, it must be reported to Ecology's Southwest Regional Office by contacting the Environmental Report Tracking System Coordinator at (360) 407-6300. For assistance regarding cleanup information on sites listed above contact the Ecology project manager. The applicant should make sure only clean soil is used as fill. Provisions and equipment should be on hand to contain and cleanup a release of oil or fuel from heavy equipment operation.

WATER QUALITY/WATERSHED RESOURCES UNIT: Greg Bengé (360) 690-4787

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Section A #10 of the SEPA checklist does not reflect the need for coverage under the Construction Stormwater General Permit (CSWGP), which may be required for the proposed project. If construction stormwater leaves the site (common examples include bioretention facility overflows and/or turbid stormwater created by trackout entering inlets) and discharges to Waters of the State, a CSWGP is required. Coverage under the CSWGP is highly recommended if there's any chance of discharge occurring.

- G-3 Building and Fire Safety** - Building and fire, life, and safety requirements must be addressed through specific approvals and permits. This decision may reference general and specific items related to structures and fire, life, and safety conditions, but they are only for reference in regard to land use conditions. It is the responsibility of the owner, agent, tenant, or applicant to ensure that Building and Fire Marshal requirements are in

compliance or brought into compliance. Land use decisions do not waive any building or fire code requirements.

G-4 SWCAA Requirements:

Construction Dust [SWCAA 400: General Regulations for Air Pollution Sources]:

- Construction and earthmoving activities have the potential to generate excessive dust emissions if reasonable control measures are not implemented. SWCAA Regulation 400-040(2) requires that “no person shall cause or permit the emission of particulate matter from any stationary source to be deposited beyond the property under direct control of the owner or operator of the stationary source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited”. Furthermore, SWCAA Regulation 400-040(8)(a) requires that “the owner or operator of any source of fugitive dust shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions”.
- Common control measures to mitigate the emission of dust from construction and earthmoving activities include: application of water before and during earthmoving operations, application of water to disturbed surface areas (including access roads and staging areas) after earthmoving operations, application of chemical dust control products and/or surfactants, limiting access to open/disturbed areas, reducing equipment/vehicle speeds, establishing vegetative cover on inactive areas and ceasing operations altogether during high wind events.
- Violations of SWCAA Regulation 400-040 may result in civil penalties being assessed against the project operator and/or property owner.

The proponent of this project may contact SWCAA at 360-574-3058 for more information regarding the agency’s requirements. Notification forms, permit applications, air quality regulations and other information are available on the internet at <http://www.swcleanair.org>.

G-5 General Habitat Conditions:

- a. The applicant shall only impact areas indicated on the provided plans during construction of this project. Any clearing or disturbance beyond that indicated on the site plans, mitigation plan, and narrative provided would require additional wetland review by County staff and may include additional permit and mitigation requirements.
- b. The applicant shall utilize best management practices to control erosion and prevent sediment from entering adjacent wetlands, and wetland buffers.
- c. The applicant shall grade any incidental temporary impacts to wetland buffers to pre-disturbance grades. These areas shall be replanted with native vegetation to maintain and enhance habitat ecological function.

- d. Non-native vegetation and noxious weeds may be removed from wetland buffers and replanted with native vegetation (where encountered) within any temporarily disturbed areas.
- e. Any unforeseen disturbance to the indicated priority habitat not mentioned as a part of this permit shall be replanted with native vegetation. Wetland/Habitat Review shall be notified of any additional impacts and the replanted area shall be included with the permitted restoration areas and maintained and monitored accordingly.

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| H | Post Development Requirements Review and Approval Authority: As specified below |
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H-1 Outdoor Lighting - Exterior lighting shall be located, shielded, and directed to prevent significant off-site glare, in accordance with CCC 40.340.010(A)(7) and RCW 47.36.180.

H-2 Parking Lot Maintenance - Pursuant to Section 40.340.010(A)(11), required parking and loading spaces and associated access and maneuvering drives shall be maintained in good repair at all times. *(See Land Use Finding 6)*

H-3 Landscape Maintenance: Maintenance of landscaped areas is the ongoing responsibility of the property owner. Required landscaping must be continuously maintained in a healthy manner. Plants that die must be replaced with in-kind materials unless otherwise authorized by the responsible official. Vegetation shall be controlled by pruning, trimming or otherwise so that it will not interfere with the maintenance or repair of any public utility, restrict pedestrian or vehicular access, or obstruct sight distance at intersections as provided in Section 40.320.020, *(See Land Use Finding 5)*.

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| <p>Note: Any additional information submitted by the applicant within fourteen (14) calendar days prior to or after issuance of this report, may not be considered due to time constraints. In order for such additional information to be considered, the applicant may be required to request a “hearing extension” or “open record” and shall pay the associated fee.</p> |
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Hearing Examiner Decision and Appeal Process

This report to the Hearing Examiner is a recommendation from the Land Use Review program of Clark County, Washington.

The examiner may adopt, modify or reject this recommendation. The examiner will render a decision within 14 calendar days of closing the public hearing. Clark County will mail a copy of the decision to the applicant and neighborhood association within 7 days of receipt from the

Hearing Examiner. All parties of record will receive a notice of the final decision within 7 days of receipt from the Hearing Examiner.

Motion for Reconsideration

Any party of record to the proceeding before the Hearing Examiner may file with the responsible official a motion for reconsideration of an examiner's decision within fourteen (14) calendar days of written notice of the decision. A party of record includes the applicant and those individuals who signed the sign-in sheet or presented oral testimony at the public hearing, and/or submitted written testimony prior to or at the Public Hearing on this matter.

The motion must be accompanied by the applicable fee and identify the specific authority within the Clark County Code or other applicable laws, and/or specific evidence, in support of reconsideration. A motion may be granted for any one of the following causes that materially affects their rights of the moving party:

- Procedural irregularity or error, clarification, or scrivener's error, for which no fee will be charged;
- Newly discovered evidence, which the moving party could not with reasonable diligence have timely discovered and produced for consideration by the examiners;
- The decision is not supported by substantial evidence in the record; or,
- The decision is contrary to law.

Any party of record may file a written response to the motion if filed within fourteen (14) calendar days of filing a motion for reconsideration.

The examiner will issue a decision on the motion for reconsideration within twenty-eight (28) calendar days of filing of a motion for reconsideration.

Appeal Rights

Any party of record to the proceeding before the hearings examiner may appeal any aspect of the Hearing Examiner's decision, except the SEPA determination (i.e., procedural issues), to the Superior Court.

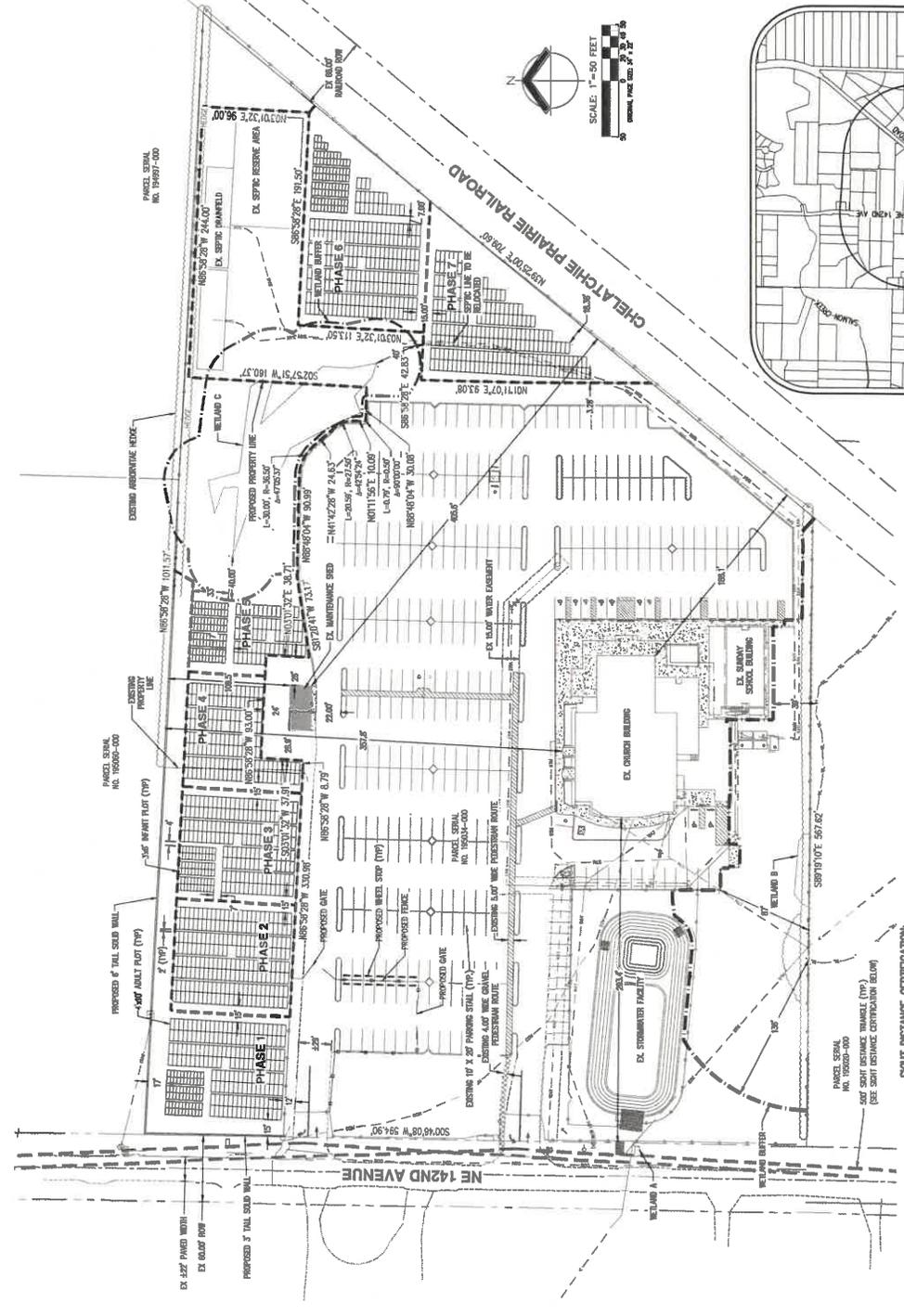
See the *Appeals* handout for more information and fees.

Attachments

- Proposed Preliminary Plan

PRELIMINARY DEVELOPMENT AND STORMWATER PLAN
 OLD APOSTOLIC LUTHERAN CHURCH
 CLARK COUNTY, WASHINGTON

- GENERAL NOTES**
- TOTAL SITE AREA IS 457,791 SF (10.51 AC)
 - THERE ARE NO NEW EXISTING PROPOSED WITH THIS DEVELOPMENT.
 - NO IMPROVEMENTS ARE PROPOSED FOR THE 142ND AVENUE.
 - NO RIGHT-OF-WAY REMOVAL IS PROPOSED WITH THIS DEVELOPMENT.
 - THERE ARE NO NEW FEDERAL TRAIL, TRAIL, OR BIOTRAIL IMPROVEMENTS PROPOSED WITH THIS DEVELOPMENT.
 - THERE ARE NO NEW STRUCTURES PROPOSED WITH THE DEVELOPMENT.
 - THERE ARE THREE EXISTING STRUCTURES ON SITE AS SHOWN:
 7.1. THE EXISTING CHURCH BUILDING IS A THREE-STORY WOOD-FRAMED/CONCRETE BLOCK STRUCTURE WITH HEIGHT, APPROXIMATELY 27.70' TO 35'.
 7.2. THE EXISTING STORMWATER FACILITY IS A ONE-STORY WOOD-FRAMED STRUCTURE, APPROXIMATELY 2,400 SF.
 7.3. THE EXISTING MAINTENANCE SHED BUILDING IS A ONE-STORY CONCRETE BLOCK STRUCTURE, APPROXIMATELY 800 SF.
 - PROPOSED LANDSCAPING IS NOT SHOWN FOR CLARITY. SEE SHEET P4.0 FOR THE LANDSCAPING PLAN.
 - NO NEW SEPTIC SYSTEMS ARE PROPOSED WITH THIS DEVELOPMENT.
 - THERE ARE NO NEW 8FT-DEEP TRENCHES OR LANDING AREAS PROPOSED WITH THIS DEVELOPMENT.
 - STORMWATER: ONLY MINIMUM REQUIREMENTS (P-4) APPLIES TO THE PROJECT SINCE THE PROJECT PROPOSES LESS THAN 2,000 SQUARE FEET OF LAND SURFACE. NO NEW PAVED AREAS ARE PROPOSED WITH THIS DEVELOPMENT. ALL NEW PAVED AREAS ARE PROPOSED WITH PERMEABLE PAVING IN ACCORDANCE WITH WAC 173.030. THIS IS PROPOSED IN THE EXISTING DISTURBED AREAS.
 - EXISTING UTILITIES WILL BE MAINTAINED AS THE PROJECT SPECIFIC STORMWATER POLLUTION PREVENTION PLAN.
 - ACCORDING TO C-1000 THERE ARE NO TRAIL STOPS OR ROUTES WITHIN A 1/4 MILE OF THE PROJECT SITE, AND THERE ARE NO NEW TRAIL STOPS OR ROUTES WITHIN A 1/4 MILE OF THE PROJECT SITE.
 - THE 142ND AVENUE IS A MAJOR ROAD AND HAS A SURFACE MATERIAL OF ASPHALT. RIGHT OF WAY WIDTH AND PAVED WIDTH ARE AS SHOWN.
 - THERE ARE NO EXISTING ROAD SUBSIDIES IN EXCESS OF 10% GRADE ON SITE OR WITHIN 500 FEET OF THE SITE, AND NO NEW ROAD SUBSIDIES ARE PROPOSED WITH THIS DEVELOPMENT.
 - THERE IS AN EXISTING 15" WPC WATER EXHIBENT ON SITE AS SHOWN. NO NEW EXHIBENTS ARE PROPOSED WITH THIS DEVELOPMENT.
 - NO ENVIRONMENTAL BUFFER/PROTECTED OR ENHANCEMENT AREAS ARE PROPOSED.
 - THERE ARE NO LANDSCAPING FEATURES PROPOSED.
 - THERE ARE NO NEW IMPROVEMENTS PROPOSED WITH THIS DEVELOPMENT.
 - NO SIGN OR OUTDOOR LIGHTING ARE PROPOSED WITH THIS DEVELOPMENT.
 - NO SOLID WASTE OR RECYCLING AREAS ARE PROPOSED WITH THIS DEVELOPMENT.



CONTACT
 AKS ENGINEERING & FORESTRY, LLC
 CONTACT: ETHI HALLAKI, P.E.
 9600 NE 127th Avenue, Suite 2500
 Wauwatosa, WI 53096
 TEL: 414-774-1100
 FAX: 414-774-1101
 E-MAIL: ETHI@AKS-ENG.COM

APPLICANT / OWNER
 OLD APOSTOLIC LUTHERAN CHURCH BISHOP PHASE
 CONTACT: HOWARD REISNER
 PO BOX 700
 WISCONSIN
 WI 53005
 TEL: 414-774-1100
 FAX: 414-774-1101
 E-MAIL: REISNER@OLDAPLUS.COM

SIGHT DISTANCE CERTIFICATION
 THE SIGHT DISTANCE CERTIFICATION IS BASED ON THE 2017 METERS OF EXCESS THE 500 FOOT SIGHT DISTANCE REQUIREMENT AS SHOWN IN CLARK COUNTY CODE SECTION 16.03.010(1)(b).

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STATISTICS PARCEL #185034-000 & 185037-000
 PROPOSED SITE AREA: 121,208 SF (2.79 AC)
 PROPOSED SITE AREA: 30,805 SF (0.71 AC)
 TOTAL SITE AREA: 152,013 SF (3.50 AC (667,278 SF))

STATISTICS PLOTS

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