

Initial Project Review

Shoreline Substantial Development Permit, Shoreline Variance, and Land Use Variance: Stewart

Application Numbers: 974229, 974228, 974218
Parcel Numbers: 0121101007 and 0121101031

Gig Harbor Peninsula Advisory Commission (PAC) Public Meeting: February 23, 2022, at 6:30 p.m., Due to COVID-19 restrictions, this meeting will be held virtually. To participate, visit www.Zoom.com and click “Join a Meeting” or call 253-215-8782, then enter the Meeting ID: 948 5603 5962, and Passcode: 624487, or click on the following link: <https://piercecounitywa.zoom.us/j/94856035962?pwd=RW4vcDhhL2dSWDc4UHV0d2VLWSszUT09>
For additional questions regarding the virtual meeting process, contact Tiffany Aliment at 253-798-3226 or tiffany.aliment@piercecounitywa.gov.

Proposal: The applicants are proposing to demolish the existing 1,404-square foot residence located 37.5 feet from the bulkhead, and the existing 296-square foot garage/storage shed/living space located 47 feet, 8 inches from the bulkhead in order to:

- Construct a new 4,067-square foot single-family residence, utilize the existing footprint of the house, to be located at its closest point 41 feet, 10 inches from the existing bulkhead (measurement is from the foundation).
- Construct a 1,039-square foot patio adjacent to the proposed residence over the existing impervious area 25 feet, at its closest point, from the bulkhead (ranging from 25 feet to 43 feet, 8 inches).
- Construct a 476-square foot 2-car garage with a second story guest suite (not an ADU) 41 feet, 7 inches from the bulkhead (approximately 6 feet closer to the bulkhead than the existing garage).
- Remove 2,099 square feet of impervious surface area, within the shoreline buffer, resulting in a final 17.8% of impervious coverage area for the entire project.
- Reduce the required 25-foot front yard setback to 3 feet (including 2-foot overhang) along the west property line to construct the new larger single-family residence.
- Replace the existing on grade walkway steps leading to beach access stairs.
- Replace the existing on grade steps leading to the existing joint-use dock.
- Remove the existing 75-foot long (less than 4 feet tall) creosote timber retaining wall, located 20 feet from the bulkhead and near the existing dock.
- Remove the existing 25-foot long by 3-foot tall concrete retaining wall, adjacent to garage.
- Remove both the existing 45-foot long and 20-foot long (less than 4 feet tall) block retaining walls, located north of the garage.
- Install native vegetation to mitigate the disturbed area on the project site.
- Vacate the existing 40-foot x 50-foot dead-end right of way located at the end of Plant Drive NW that encroaches onto both parcels through the Pierce County Public Works Department.

The project site is located on two parcels for a total of 1.56 acres in size on the southeast shore of Henderson Bay.

Project Location: The site is in a Rural 10 (R10) zone classification, Residential Shoreline Environments, and Gig Harbor Peninsula Community Plan area, located at 7312 Plant Drive NW, Gig Harbor, WA, within the NE 1/4 of Section 10, T21N, R1E, W.M., in Council District #7.

Review Summary: The project, as proposed, cannot be approved; however, the proposed project can be modified, with conditions, to comply with all applicable policies and objectives of the Pierce County Code, Shoreline Regulations, Comprehensive Plan, and Gig Harbor Peninsula Community Plan area.

State Environmental Policy Act (SEPA): Pursuant to the State Environmental Policy Act and the Pierce County Environmental Regulations, Title 18E, the Pierce County Environmental Official designate has reviewed this project and determined that the project is exempt from SEPA provisions.

County Contact: Mojgan K. Carlson, Senior Planner, mojgan.carlson@piercecountywa.gov, 253-798-7234

Pierce County Online Permit Information:

<https://pals.piercecountywa.gov/palsonline/#/permitSearch/permit/departementStatus?applPermitId=974229>



Project Data

Complete Application Date: November 16, 2021

Initial Project Review Mailed: February 16, 2022

Applicant/Owner: John and Therese Stewart
7312 Plant Drive NW
Gig Harbor, WA 98335
stewartjiganti@gmail.com

Agent: Permit Granted
Attn: Terri Schultz
4810 Pt. Fosdick Drive NW
Gig Harbor 98103
Terri@permitgranted.com

Legal and Public Notice

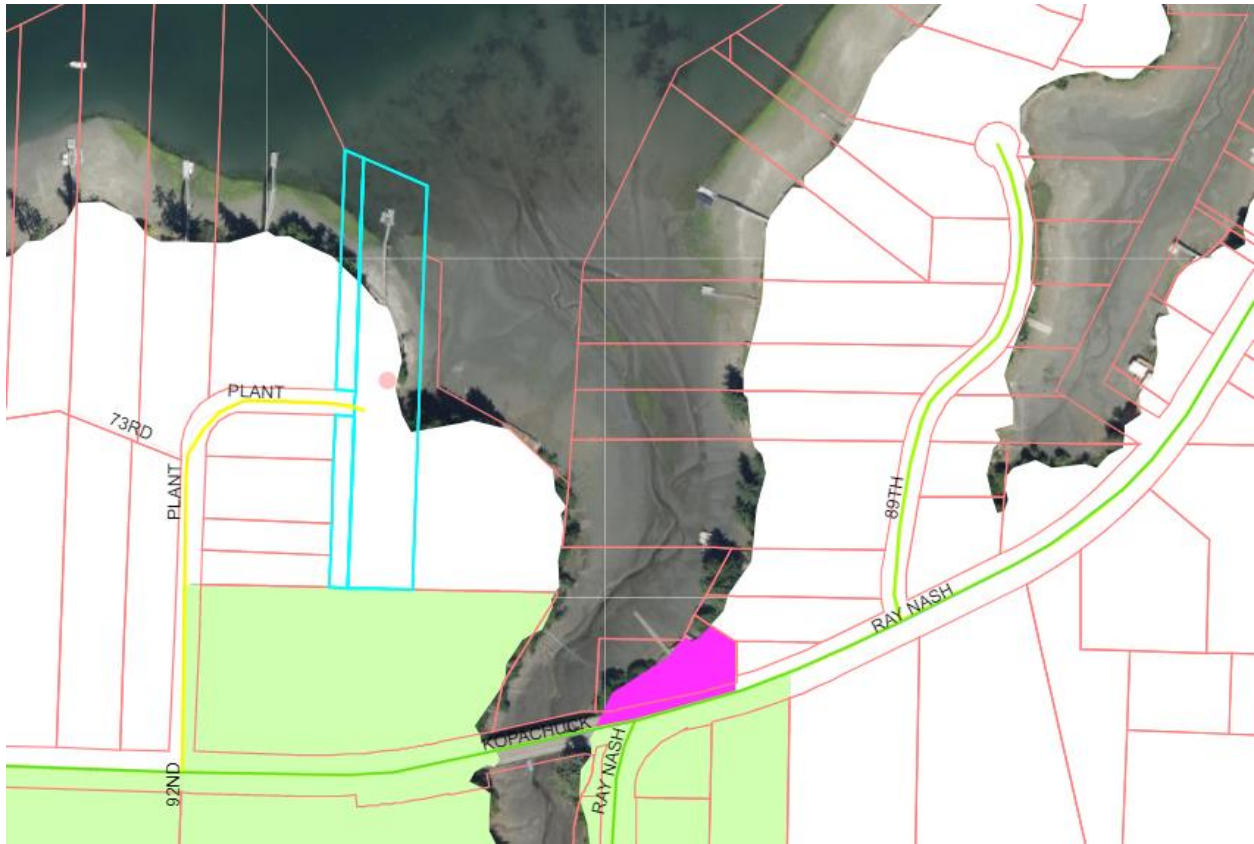
- *November 24, 2021:* Notice of Application (NOA) and Public Meeting Notice, including the Gig Harbor Peninsula Advisory Commission (PAC) public meeting information, was sent to property owners within a radius of 300 feet, but not less than two parcels deep, around the exterior boundaries of the subject property.
- *December 5, 2021:* Public Notice sign was posted on the site, confirmed with a Declaration of Posting

- *December 22, 2021:* A revised NOA was sent out correcting the PAC meeting date to 2022.
- *February 9, 2022:* Legal notice was published in the official County newspaper (*Tacoma News Tribune*), advertising the PAC public meeting.

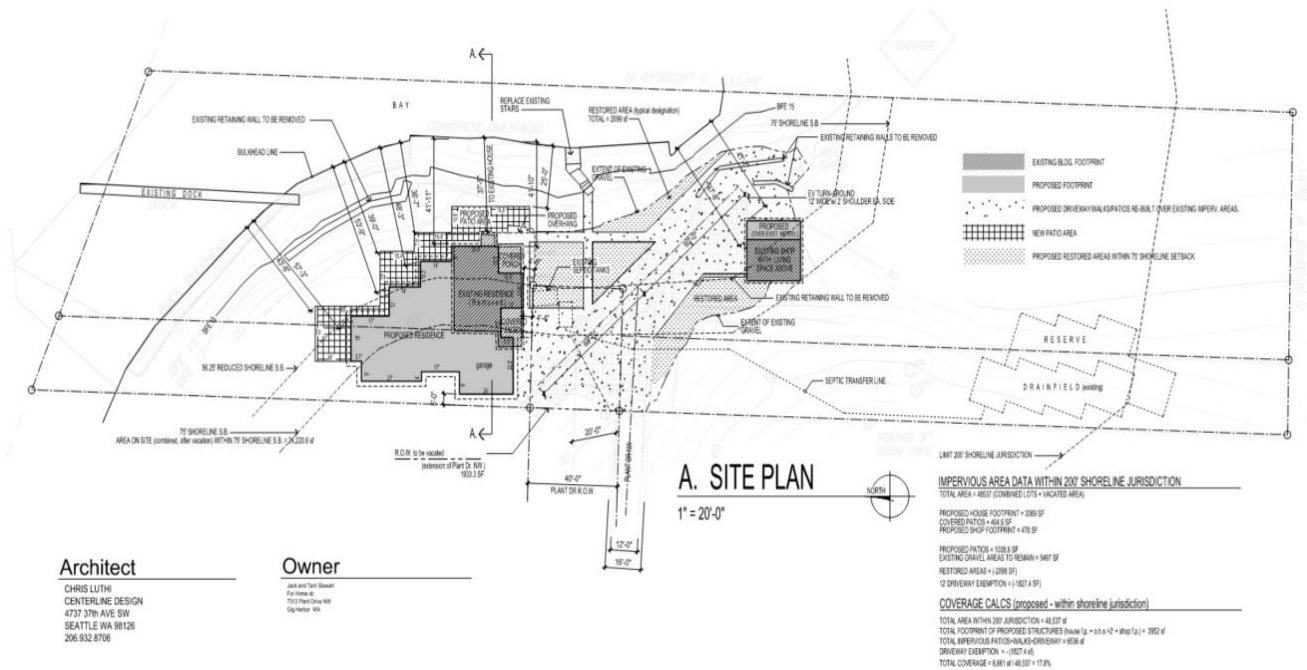
2020 Google Earth

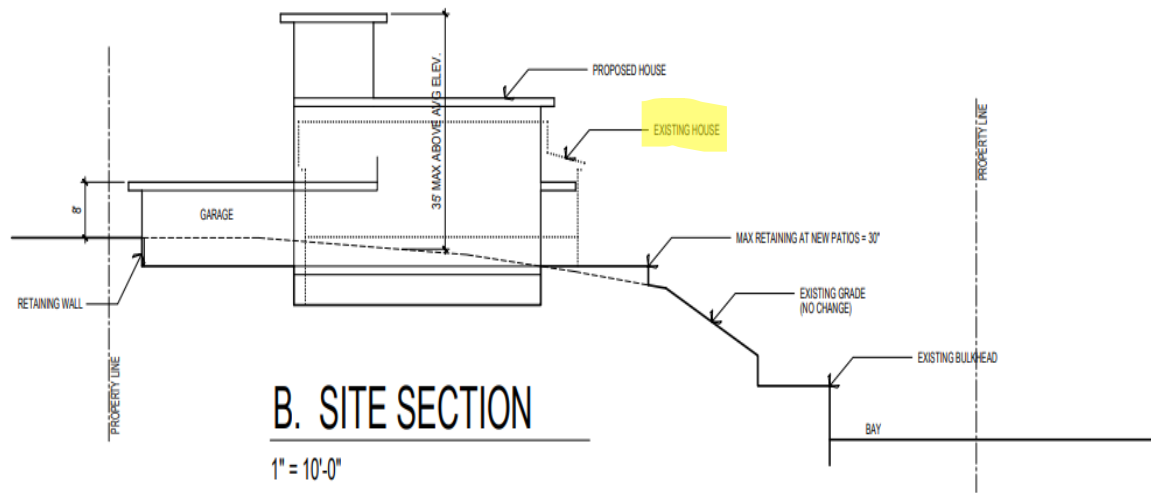


Zoning: R10



Site Plan and Cross Section View, dated February 10, 2022





Site Photos





Review Responsibility

The following list includes examples of jurisdictional areas for various County departments and divisions typically involved in the review and administration of this proposal:

A. Planning and Public Works (PPW):

- Current Planning verifies compliance with the Pierce County Comprehensive Plan, applicable community plans, and Development Regulations such as, but not limited to, zoning, critical areas, natural resource lands, shoreline management, design review, and potential environmental impacts.
- Development Engineering reviews for drainage, erosion control, site development, flood, survey, landslide and erosion hazard, lot dimensions, and road standards.
- Resource Management reviews for consistency with the County wetland and fish & wildlife regulations.

B. Gig Harbor Peninsula Advisory Commission (PAC):

The PAC's role in the review process for a land use proposal includes the following:

- Review the proposal for consistency with the goals and policies in the Community Plan.
- Provide a local perspective that includes input from the community and insights of which PPW staff or the Hearing Examiner may not be aware.
- Offer recommendations for project design to fit with the community's vision while remaining consistent with the Community Plan.

PCC Chapter 2.45 Land Use Advisory Commissions provides regulations that apply to the PAC. Per PCC 2.45.130, Land Use Advisory Commission (LUAC) recommendations on a land use application shall be to approve, modify and approve, deny, or make no recommendation. The LUAC may recommend the Hearing Examiner continue a scheduled public hearing to obtain additional information or LUAC recommendations.

Review Criteria

The following regulations and policies shall be used during the review process including, but not limited to:

- A. Pierce County development regulations and construction and infrastructure regulations;
- B. Pierce County Comprehensive Plan and Gig Harbor Peninsula Community Plan;
- C. Applicable state statutes; and
- D. All applicable notes on related previously recorded County documents.

Site Characteristics

Staff conducted a site visit on November 17, 2021. and observed the following:

- The project site is on the northwest portion of two parcels abutting the southeast shore of Henderson Bay, across the body of water from the southeast end of Raft Island.
- The long axis of the parcels is oriented in a north-south direction. The topography of the parcels is generally rolling with steep slopes of approximately 25% towards the water, on the east side of the project site, where the location of the new house is proposed.
- The County Assessor list the easterly parcel (0121101007) as 1.19-acre in size and the westerly parcel (0121101031) as .37-acre in size (including the abutting tidelands).
- The easterly parcel curves to the south and extends along the west shoreline of Ray Nash Creek inlet that marks the mouth of Ray Nash Creek.
- The project site is improved with a single-family residence, attached garage, and a detached shop/storage with a living space above it and few, less than 4 feet tall, retaining walls (timber, concrete and blocks). All listed structures are located within the required shoreline buffer area and proposed to be removed.
- Based on the submitted Joint Aquatic Resources Permit Application (JARPA) and submitted revised site plan on February 10, 2022, the existing residence is located 37.5 feet from the easterly shoreline of the site.
- The shoreline of the site is improved with a manmade bulkhead (rock and concrete) with inset concrete stairs and a 150-foot long dock with an attached boatlift (stairs are proposed to be replaced).
- The dock and boatlift were approved by the Pierce County Hearing Examiner on December 15, 2010, under case number SD36-09. This dock is located entirely on parcel number 0121101007; but it was approved as a joint-use dock between the easterly parcel and the immediate adjoining parcel to the east of it (parcel number 0121101029). The joint-use agreement was recorded under AFN 2012061904170.
- The applicants purchased both parcels in 2021 with all the existing improvements on the site.
- Both immediate adjoining parcels to the east and west are improved with larger single-family residences (2,296 square feet in size to the west and 5,155 square feet in size to the east). Also, the primary use on most of the parcels in the vicinity of the site is single-family residential.
- The access to the site is via a driveway off Plant Drive NW, which is located to the west of the site. A portion of the road (Plant Drive NW) bisects the westerly parcel (0121101031). Per an email from the Pierce County Right-Of-Way & Utilities Section of PPW, the applicants need to apply for a road vacation of the area east of the west line of parcel 0121101031.

Surrounding Land Use / Shoreline / Zoning Designation

	LAND USE	SHORELINE	ZONING
North	Henderson Bay	Residential	N/A
South	Out building	Conservancy	Rural 10 (R10)
East	Single-family residence	Residential	R10
West	Single-family residence, Vacant land and Plant Drive NW	Residential	R10

Google Earth 2021



Note:

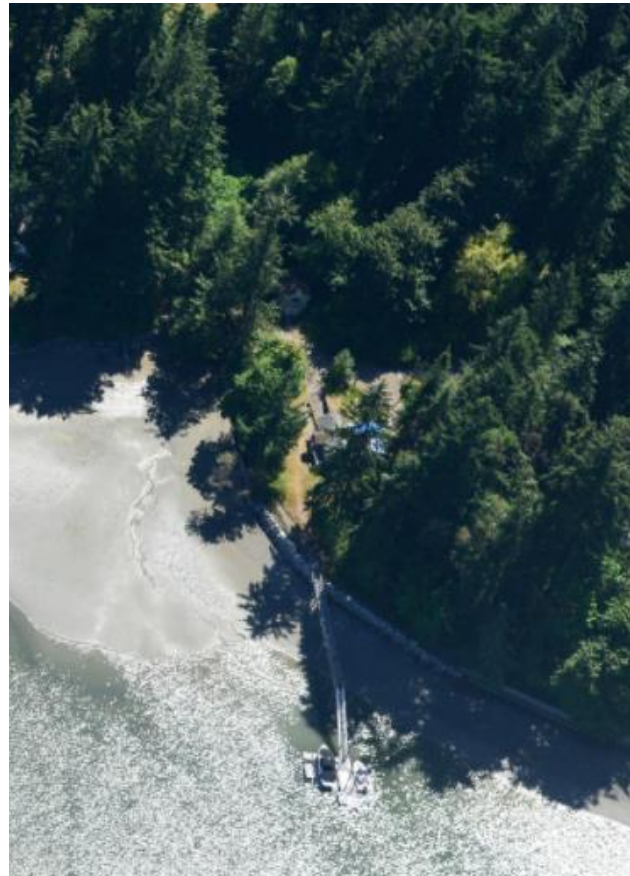
1. Per PCC Section 18.25.030 "Lot area" means the total area within the lot lines of a lot, excluding any public or private right-of-way and access easements. For the purposes of this regulation, any portion of a lot lying below the ordinary high water mark or lawfully constructed bulkhead may not be included in a lot area calculation. Based on the submitted site plan on February 10, 2022, if the project is approved, the impervious coverage within 200 feet of shoreline will increase by 3% from 7,175.6 square feet (14.8%) to 8,661 square feet (17.8%) which is less than maximum allowed of 33.3% of the portion of the site located within 200 feet of shoreline jurisdiction. A condition of approval will address this issue.
2. Per PCC Section 18S.30.030 E.5.b "Expansion of Existing Development within Standard Shoreline Buffer", Development may be allowed in-line with existing development, parallel to the shoreline and no closer than the existing structure, when on existing impervious surfaces and when there is no loss of existing vegetation (emphasis added). In this case the expansion is not parallel to the shoreline. The proposed expansion would extend closer to the shoreline. A condition of approval will address this issue.

- 3 Per PCC, Section 18S.30.060.D. Height Limits, structure height is measured from the average pre-developed grade level to the highest point of a structure; provided, that television antennas, chimneys, and similar appurtenances shall not be used in calculating height, except where such appurtenances obstruct the view of the shoreline of a substantial number of residences on areas adjoining such shorelines; provided further, that temporary construction equipment is excluded from this calculation. (emphasis added)
 1. Residential structures shall not exceed a height of 35 feet. A condition of approval will address this issue.

Ecology Shoreline Photo August 11, 2006



Ecology Shoreline Photo August 4, 2016



Comments from the Public and Agencies

The proposed project has been routed to interested departments and agencies for review and comment. Comments received on this proposal may be found by accessing the online permit information referenced on page 2.

- No written comments were received from the general public.
- No adverse comments were received from reviewing agencies within the County and state.
- On December 8, 2021, Department of Archaeology and Historic Preservation (DAHP) sent a letter indicating the site is located in a high-risk archeologic area and requested a professional archaeological survey of the project site prior to any ground disturbing activities.

- Both Squaxin Island Tribe and Nisqually Tribe of Indians indicated the project site is located in an area with a high likelihood of cultural resources. A condition of approval will require the applicants to provide a professional archaeological survey of the site prior to any ground disturbing activities.
- Per submitted “Wetland Single-family Certification” on November 9, 2021, Scott Sissons (County Environmental Biologists) stated no regulated wetlands is located within 315 feet of the site.

Initial Planning and Public Works Staff Review for Consistency with Regulations and Policies:

Pierce County Code Title Development Regulations – Zoning (PCC, Title 18A):

Per Pierce County Code, Section 18A.15.040, the required setbacks in R10 zone are as follow:

- Front 25 feet, Side 10 feet and Rear 30 feet
- Maximum height is limited to 35 feet due to Shoreline Jurisdiction.
- A setback is measured from the edge of a road right-of-way, easement or tract that provides vehicular access, or future road right-of-way as identified by the most recently adopted official control to the closest point of the vertical foundations.

Staff Comment: Based on the submitted site plan, the height of proposed single-family residence will be more than the existing house; however, it will be limited to the maximum of 35 feet. Additional information is needed as to how the height of the new residence was determined. (Need to show the average pre-developed grade level.)

According to the submitted site plan, the main residence will be, at its closest point, 3 feet from both the required 25-foot front yard and required 10-foot side yard setbacks (including 2-foot overhang). Therefore, approval of both a front and side yard variance application is needed from the west property line. Currently, the only variance is to the front yard and not the side yard.

As noted previously, the applicants need to apply for a road vacation of the area east of the west line of parcel 0121101031 in order to avoid a front yard variance for the south portion of the proposed single-family residence. A condition of approval will require approval of the road vacation prior to approval of any building permit on the site.

18A.75.040 Variances.

The purpose of this Section is to provide a means of deviating from the requirements of Title 18A Pierce County Code in specific instances where strict application of these requirements would prevent property from being utilized in a similar manner as other properties in the same zone classification because of special features or constraints unique to the property involved.

In this project the requested variance (to the front yard setback) is more than 20%; therefore, this proposal will be subject to a public hearing and approval by the Pierce County Hearing Examiner.

Before any variance may be granted, it shall be shown that:

1. There are special circumstances applicable to the subject property or to the intended use such as shape, topography, location, or surroundings that do not apply generally to the other property or class of use in the same vicinity and zone;

2. Such variance is necessary for the preservation and enjoyment of a substantial property right or use possessed by other property in the same vicinity and zone but which because of special circumstances is denied to the property in question;
3. The granting of such variance will not be materially detrimental to the public welfare or injurious to the property or improvement in such vicinity and zone in which the subject property is located;
4. The granting of such variance is consistent with the Comprehensive Plan including any applicable Community Plan; and
5. No significant adverse environmental impact will be caused as a result of the variance approval.

Staff Comment: There do not appear to be any special circumstances applicable to the subject site in terms of size, slope, or useable property to make approval of the variance for the front and side yard setbacks to be reduced at its closest point to 3 feet; though the site location is unique as it is in the northeast inlet of the Henderson Bay with existing septic tanks on the center of the easterly/larger parcel. However, these do not constitute special circumstances for the site as a smaller house or perhaps a two-story residence can be constructed on the site while using a smaller footprint than what is being proposed.

Moreover, per County's data, the combined lots will be over one acre in size with a widest depth of 107 feet at the proposed location for the new residence. This property already contains a single-family residence which, per County's Ortho Photo and Google Earth's, currently meets the measurements for the required 25-foot front yard setback from the road and 10-foot side yard setback from the west property lines (the existing residence is located 37.5 feet from the shoreline of the site, within the within the required 75-foot shoreline buffer).

Staff has not seen evidence that granting of the variance would be materially detrimental to the public welfare or injurious to the property or improvement in such vicinity and zone as the new residence will be located within the area that is devoid of any vegetation. However, staff believes that there is no substantial property right or use possessed by other properties in the area that the subject property does not already possess or can achieve. In addition, if the Land Use Variance is granted, the house will be constructed closer to the shoreline as well as to the road. Construction of the residence to the road may make it more challenging for emergency vehicles to access and/or turn around in this area.

As noted earlier, staff believes the applicants can reduce the footprint of the new house in order to eliminate the need for the variance to the front and side yard setbacks.

Gig Harbor Peninsula Community Plan

The Plan was adopted as part of the County Comprehensive Plan under Appendix E (Title 19A) with the most recently amended date of October 1, 2021:

GH D-12.2 Require that setback areas be retained in natural vegetation where feasible and supplemented by planted native species where natural vegetation is sparse or nonexistent.

GOAL GH ENV-2 Development standards along shorelines should ensure the preservation of native vegetation and wildlife habitat and protect water quality and natural shoreline processes.

GH ENV-2.1 Consider implementing low impact development tools. These include reducing the amount of impervious surfaces on each site, minimizing soil disturbance and erosion, disconnecting constructed drainage courses, and utilizing micro-detention facilities on each lot, (provided such facilities would not contribute to landslide hazards or slope failures) where feasible, rather than one facility at the end of a conveyance system

GH ENV-2.2.1 Discourage lawn areas that extend to the edge of slopes, bluffs, or beaches. Encourage retention of native vegetation immediately adjacent to the waterbody in any required setback.

GH ENV-2.3.3 Construct non-water-dependent structures (including single-family residences) along the shoreline at a sufficient distance from the shoreline to ensure that bulkheads are not necessary for the lifetime of the structure.

GH ENV-2.4 Base allowable uses along the shoreline on the Comprehensive Plan land use designation and SMP and permit them on a case by case basis.

GH ENV-2.4.3 Permit outright or administratively detached single-family residential homes and associated accessory structures when located outside of the defined shoreline setback.

GH ENV-2.6 Strictly control requests to obtain variances from development standards along the shoreline. Grant variances only in extraordinary circumstances relating to the physical character or configuration of the building lot.

GOAL GH ENV-4 Encourage shoreline restoration activities that increase the function and value of the nearshore environment.

GH ENV-4.1 Require a habitat restoration plan for shorelines on those sites that have existing shoreline violations prior to any permit approval.

GH ENV-4.2 Encourage the removal of bulkheads and other hard armoring along marine waters where it would improve fish habitat.

GH ENV-4.3 Promote the voluntary retention and replanting of native vegetation along lakes, streams, and marine waters.

Staff Comment: The proposal would not cause the removal of any vegetation from the site. On the contrary, the applicant's agent stated that upland vegetation would be planted landward of the bulkhead to restore the shoreline buffer and to provide intertidal beach habitat. A landscape plan was submitted on February 3, 2022. However, staff believes additional landscaping will be required to be submitted to address improvement to shoreline ecological function of the site.

The new County shoreline regulations require that proposals result in no net loss of shoreline function. The site is currently used as a single-family residence and the shoreline of this site is already improved with a bulkhead. The project, as proposed, with the patio adjacent to the house, encroaches farther into the required 75-foot shoreline buffer area; thus requiring approval of a Shoreline Variance (from 37.5 feet to 25 feet for the residence and from 47 feet, 8 inches to 41 feet, 7 inches for the garage).

Pierce County Development Policies and Regulations – Shorelines, (Title 18S)

Title 18S provides policies, and regulations for development on Pierce County shorelines. The proposal is located within the Residential and Aquatic Shoreline Environment Designations.

18S.20.050 - Residential Shoreline Environment Designation (SED).

The intent of the Residential SED is to accommodate residential development in areas that are already developed with or planned for residential development. The Residential SED may also include water-oriented commercial and recreation uses.

- Priority should be given to residential and water-oriented commercial development where such development can be accommodated with no net loss of shoreline ecological functions.
- Development should be designed to preserve and enhance the visual quality of the shoreline, including views over and through the development from the upland side, and views of the development from the water.

Staff Comment: The proposed project is to construct a larger single-family on the site. The proposed project, if reduced in size with conditions, will not adversely impact the view of surrounding single-family residences, both from the water and/or from the land.

Pierce County Shoreline Management Use Regulations (Pierce County Code, Title 18S)

18S.30.030 Ecological Protection.

The intent of the Ecological Protection policies and regulations is to ensure that shoreline development is established and managed in a manner that protects existing ecological functions and ecosystem-wide process and that mitigates adverse impacts to ecological functions.

Staff Comment: The proposed project, if approved, will even further interfere with the ecological function of the shoreline as the existing footprint of the house is smaller than the footprint of the proposed residence and it encroaches 12.6 feet lesser into the shoreline buffer than the proposed house with the patio (37.5 feet – 25 feet = 12.5 feet'). Based on the submitted site plan dated February 10, 2022, the existing house is located, at the closest point, 37.5 feet from the bulkhead, while the proposed house with the patio, if approved, will be over double the footprint of the existing house and it will be located, at the closest point, 25 feet from the bulkhead.

18S.40.100 Residential.

The intent of the Residential policies and regulations is to accommodate residential development and appurtenances. Single-family residences are a preferred use within the Conservancy and Residential Shoreline Environment Designations (SEDs) when consistent with control of pollution and prevention of damage to the natural environment. The Residential policies and regulations encourage sustainable residential development through restrictions on the scale of development, preservation of vegetation and topography, and minimization of impacts to fish and wildlife habitat.

- For residential development, not more than one third of the parcel within shoreline jurisdiction and landward of the ordinary high water mark shall be covered by effective impervious areas, except that new lots created in a Natural or Conservancy SED shall be limited to 10 percent effective impervious surfaces. The calculation for impervious surfaces shall include parking areas but may exclude a 12-foot-wide driveway. This restriction applies to both principal and accessory uses and structures.

- Retention of existing vegetation shall be a priority within the entire shoreline jurisdiction. Retention of existing trees is particularly important.
- Encourage sustainable residential development through restrictions on the scale of development, preservation of vegetation and topography, and preservation of views.
- Locate new residential structures with respect to views and with a height limit of 35 feet.
- Maintain, enhance, and/or restore shoreline features including vegetation.

Staff Comment: The proposed site for this development is appropriately suited for residential use and is currently in single-family use. The shoreline on this site is already hard armored with a bulkhead. The proposal (both house and patio) encroaches into the 75-foot buffer by more than 25%; therefore, it requires approval of a Shoreline Variance (SDV) application. The SDV will require approval by both the Pierce County Hearing Examiner and Washington State Department of Ecology (Ecology). Ecology has the final approval authority for the Shoreline Conditional Use Permit and Shoreline Variance, and will determine if the proposal satisfies the standards for the SDV application.

18S.60.070 Shoreline Variance.

The purpose of a Shoreline Variance is limited to granting relief from dimensional standards found in this Title (e.g., buffer, height, or lot coverage requirements) where there are extraordinary circumstances relating to the physical character or configuration of property such that the strict implementation of this Title will impose unnecessary hardship on the applicant or thwart the policies found in the Shoreline Management Act (Act).

- D. Decision Criteria – General. A Shoreline Variance shall not be granted unless the applicant demonstrates that denial of the permit would result in a thwarting of the policy enumerated in the Act due to extraordinary circumstances, and the public interest would suffer no substantial detrimental effect.
- E. Decision Criteria – Development Landward of Ordinary High Water Mark (OHWM). In addition to the General Decision Criteria in subsection D. of this Section, Shoreline Variances for development landward of the OHWM or landward of any wetland may be authorized provided the applicant can demonstrate all of the following:
1. The strict application of the bulk or dimensional standards precludes or significantly interferes with reasonable use of the property.
 2. The hardship described in subsection E.1. of this Section is specifically related to the property and is the result of unique conditions such as irregular lot shape, size, or natural features and the application of this Title and not, for example, from deed restrictions or the applicant's own actions.
 3. The design of the project is compatible with other authorized development within the area and with development planned for the area under the Comprehensive Plan and this Title, and will not cause adverse impacts to the shoreline environment.
 4. The Shoreline Variance will not constitute a grant of special privilege not enjoyed by the other properties in the area.
 5. The Shoreline Variance requested is the minimum necessary to afford relief.
- I. Decision Criteria – Cumulative Impact. In the granting of all Shoreline Variances, consideration shall be given to the cumulative impact of additional requests for like actions in the area. For example, if Shoreline Variances were granted to other development in the area where similar circumstances exist, the total of the Shoreline Variances shall also remain consistent with the policies of RCW 90.58.020 and shall not cause substantial adverse effects to the shoreline environment.

Staff Comment: Staff finds it difficult to recommend approval of the project as this proposal is not the minimum necessary to afford relief. The project, as proposed, necessitated the need for both the Land Use Variance and the Shoreline Variance approval.

The strict application of the dimension standards doesn't preclude the reasonable use of this property since there is already a house existing on this site. Approval of this proposal would likely be unique in the fact that its footprint of the new residence and the garage (with living space above) will be much larger and covers more impervious area by encroaching farther into the 25% maximum reduction of the shoreline buffer. In addition, as noted before, both expansion for the proposed residence and the garage are neither parallel to the existing structure nor above (house) or behind them (house and garage); but both expansions will make the new structures closer to the shoreline without appropriate justification or demonstration for approval of the shoreline variance.

Additionally, as noted earlier, staff has been informed by the Washington State Department of Archaeology and Historic Preservation (DAHP) that the project area has the potential to contain archaeological resources and, as proposed, would substantially impact the shoreline environment and thus would likely destroy any archaeological resources present on the site. Therefore, a condition of approval will require the applicants to provide a professional archaeological survey of the site prior to any activities.

Staff does not have any issue with removal of all retaining walls and replacement of the existing on grade walkway steps leading to beach access stairs and the joint-use dock as long as it remains along the same footprint of the existing walkway.

A condition of approval will require the applicants to obtain approval of road vacation of the dead-end right of way at the end of Plant Drive NW prior to any site disturbing of the site.

Question from Staff for the PAC:

Does the PAC believe that the applicant is meeting the SD/SDV/V requirements or have any comments or recommendations?

Stewart SD-SDV-V PAC IPR-MC.docx