

# Initial Project Review

## Shoreline Substantial Development Permit (SD) / Shoreline Administrative Conditional Use Permit (ACP): Colvos Heights Stormwater Drainage Improvements

**Application Numbers: 980049 (SD), 980050 (CP), 980057 (SEPA), 981766 (Wetlands), 977838 (Erosion Hazards), 930752 (Landslide Hazards), 902275 (Site Development Permit)**

**Parcel Numbers: 3162000250 (Private Road), 3162000100 (Vacant Lot 10), 0222164023 (PenMet Parks), 0222164017 (Pierce County Tideland Parcel)**

**Gig Harbor Peninsula Advisory Commission (PAC) Public Meeting: April 27, 2022, at 6:30 p.m.**, Due to COVID-19 restrictions, this meeting will be held virtually. To participate, visit [www.Zoom.com](http://www.Zoom.com) and click “Join a Meeting” or call 253-215-8782, then enter the Meeting ID: 933 4801 4219, and Passcode: 931964, or follow this link: <https://piercecountywa.zoom.us/j/93348014219?pwd=OGJnd0VJTUVlcWxtTXk4SnBPVkJzUT09> For additional questions regarding the virtual meeting process, contact Danica Williams at 253-798-7156 or [danica.williams@piercecountywa.gov](mailto:danica.williams@piercecountywa.gov).

**Proposal:** The Applicant proposes a storm drainage line to convey stormwater flows from an existing storm system (constructed within 143rd Street NW) to Colvos Passage (Puget Sound). The road is owned and maintained by the Colvos Heights Homeowners Association. Colvos Heights is a single-family subdivision, recorded in 1966, which does not immediately abut Puget Sound but is located 150 feet away. The proposed conveyance system would be a combination of in-ground and on-grade pipes. The conveyance path would be from a low point at the end of 143rd Street NW and conveyed in-ground to the northeast about 350 linear feet. The pipe would connect with a new catch basin structure and turn east at which point the system would be conveyed ongrade and overbank for about 250 linear feet to a proposed outfall energy dissipator. About 200 linear feet of the system is located within the 200-foot Shoreline Management zone from the Puget Sound. Part of the system will be located in easements on parcel 3162000100 (lot within the subdivision) and 0222164023 (abutting parcel north of the subdivision owned by PenMet Parks). Conveyed flows would discharge to an outfall energy dissipator located along the toe of the slope on the shoreline. The outfall dissipator will be landward of the ordinary highwater mark (OHWM). Some limbing of trees and shrubs may be required but, overall, vegetation disturbance will be minimal given the installation strategy and concern for slope stability. Current road drainage infrastructure was installed as an afterthought for the community and is inefficient and ineffective. Overland flow has resulted in erosion and bank instability threatening down-gradient parcels and shoreline habitat. Cut and fill activities will be related to trenching for the stormwater conveyance lines described above and could exceed 400 to 500 cubic yards.

**Project Location:** The site is located at the end of 143rd Street Northwest, on the west shoreline of Colvos Passage (Puget Sound), in a Rural 10 (R10) zone classification, Aquatic Marine (water), Shoreline Conservancy and Natural (uplands), and in the Gig Harbor Peninsula Community Plan area, within Section 16, T22N, R2E, W.M., in Council District #7.

**Review Summary:** Staff has reviewed this proposal for compliance with applicable policies and regulations. The proposal appears to meet applicable requirements. It would serve an existing subdivision, approved in the 1960s, that did not provide appropriate storm water drainage facilities. Since then, an unpermitted system has been installed which this proposal would resolve. However, as development is proposed within the required shoreline buffer(s), a Shoreline Variance may also be required. This will require further discussion with the Washington State Department of Ecology.

**State Environmental Policy Act (SEPA):** A SEPA checklist was submitted for this application. SEPA (environmental review) appears to be required pursuant to the State Environmental Policy Act (Washington Administrative Code, Chapter 197-11) and the Pierce County Environmental Regulations (Pierce County Code, Title 18D). It appears required because the proposal involves more than 500 cubic yards of grading, filling, and/or excavation...as well as potentially occurring on lands covered by water. The Department has reviewed the proposal and determined that the County is likely to issue a Determination of Nonsignificance (DNS). Issuance of a DNS means that the County has determined the proposal is not likely to result in any probable significant adverse environmental impacts.

**Contact:** Ty Booth, Planner, [ty.booth@piercecounitywa.gov](mailto:ty.booth@piercecounitywa.gov), 253-798-3727

**Pierce County Online Permit Information:**

<https://pals.piercecounitywa.gov/palsonline/#/permitSearch/permit/departementStatus?applPermitId=980049>



**Project Data**

Complete Application Date: January 27, 2022 (SD, CP, and SEPA)

Initial Project Review Sent: April 21, 2022

Applicant: Colvos Heights Homeowners Assoc.  
Attn: Thomas Reardon, President  
PO Box 1331  
Gig Harbor, WA 98332  
[reardont@comcast.net](mailto:reardont@comcast.net)

Applicants' Agents: Contour Engineering LLC  
Attn: Stephen Bridgeford  
PO Box 949  
Gig Harbor, WA 98335  
[stephen.b@contourengineeringllc.com](mailto:stephen.b@contourengineeringllc.com)

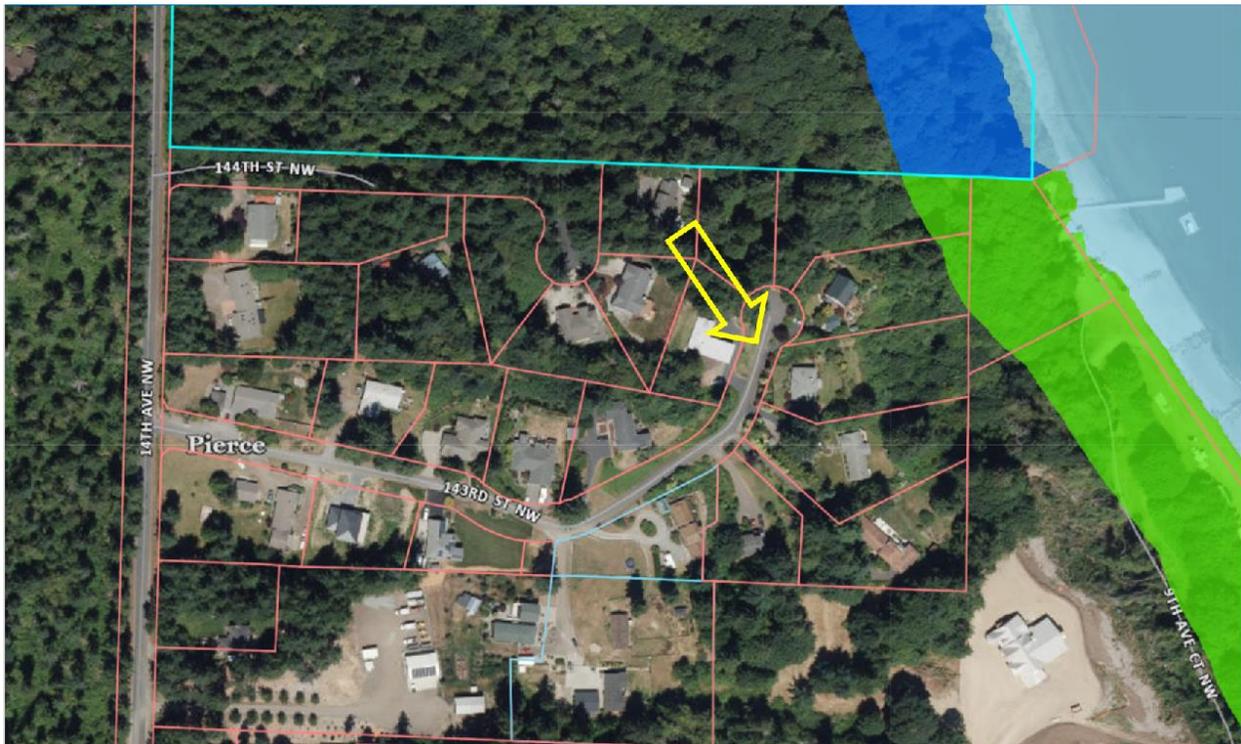
Soundview Consultants, LLC  
Attn: Ben Wright  
2907 Harborview Dr.  
Gig Harbor, WA 98332  
[ben@soundviewconsultants.com](mailto:ben@soundviewconsultants.com)

## Legal and Public Notice

- *February 23, 2022:* Notice of Application (including the Gig Harbor Peninsula Advisory Commission (PAC) meeting date, time, location) was sent to the following:
  - Property owners within a radius of 300 feet, but not less than two parcels deep, around the exterior boundaries of the site.
  - Applicable governmental agencies
- *March 1, 2022:* Public Notice sign was posted on the site by the Applicant or Agent, confirmed with a Declaration of Posting.
- *April 13, 2022:* Legal notice was published in the official County newspaper (*Tacoma News Tribune*), advertising the PAC public meeting.

## 2020 County Aerial Photo

Existing storm water catch basin is shown with arrow for reference purposes. The shoreline environment designations are shown in blue (Natural) and green (Conservancy):



**2016 Washington State Coastal Atlas**

Existing storm water catch basin shown with arrow:



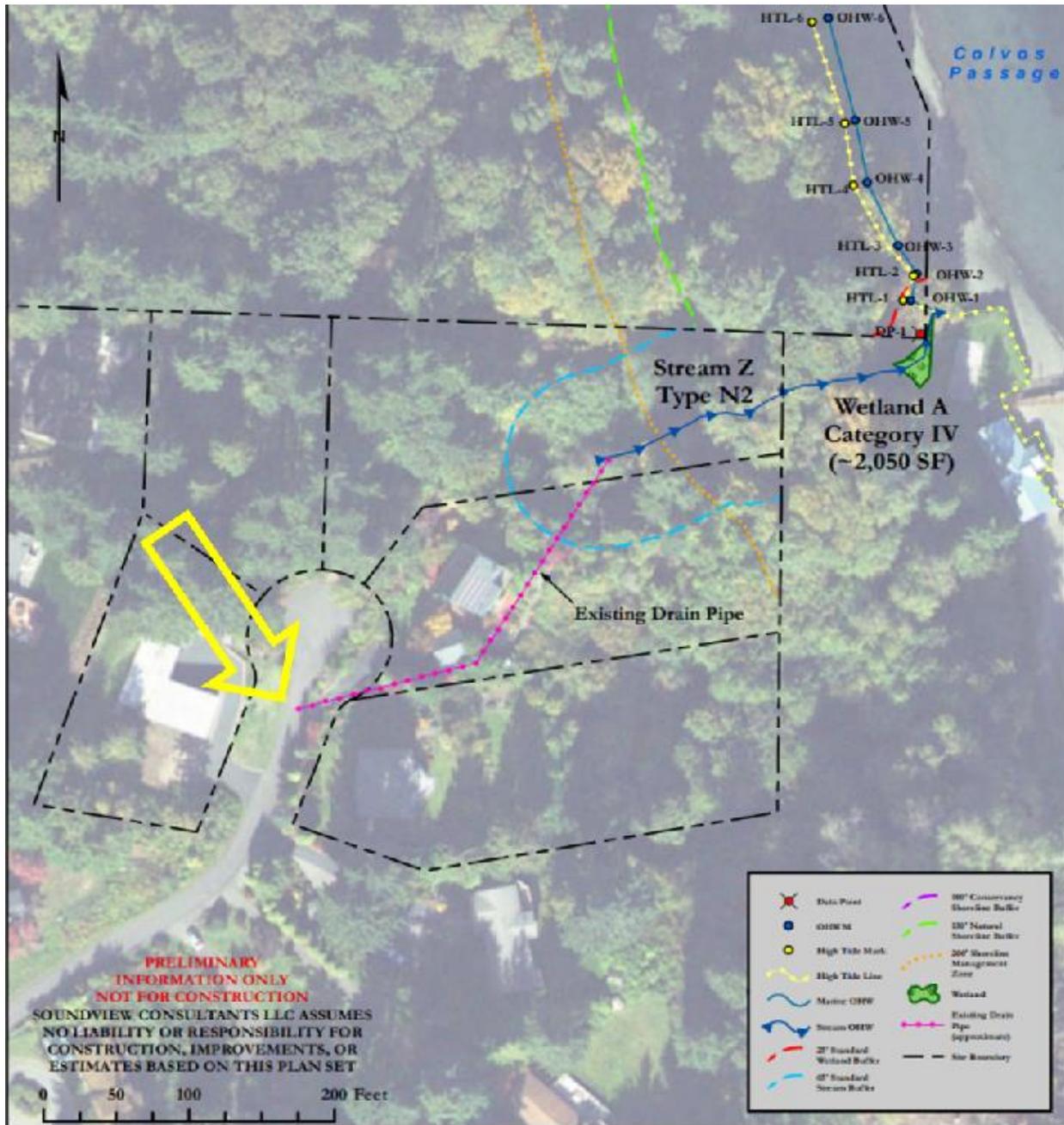
**2022 County Site Photo**

Arrow shows existing storm water catch basin:



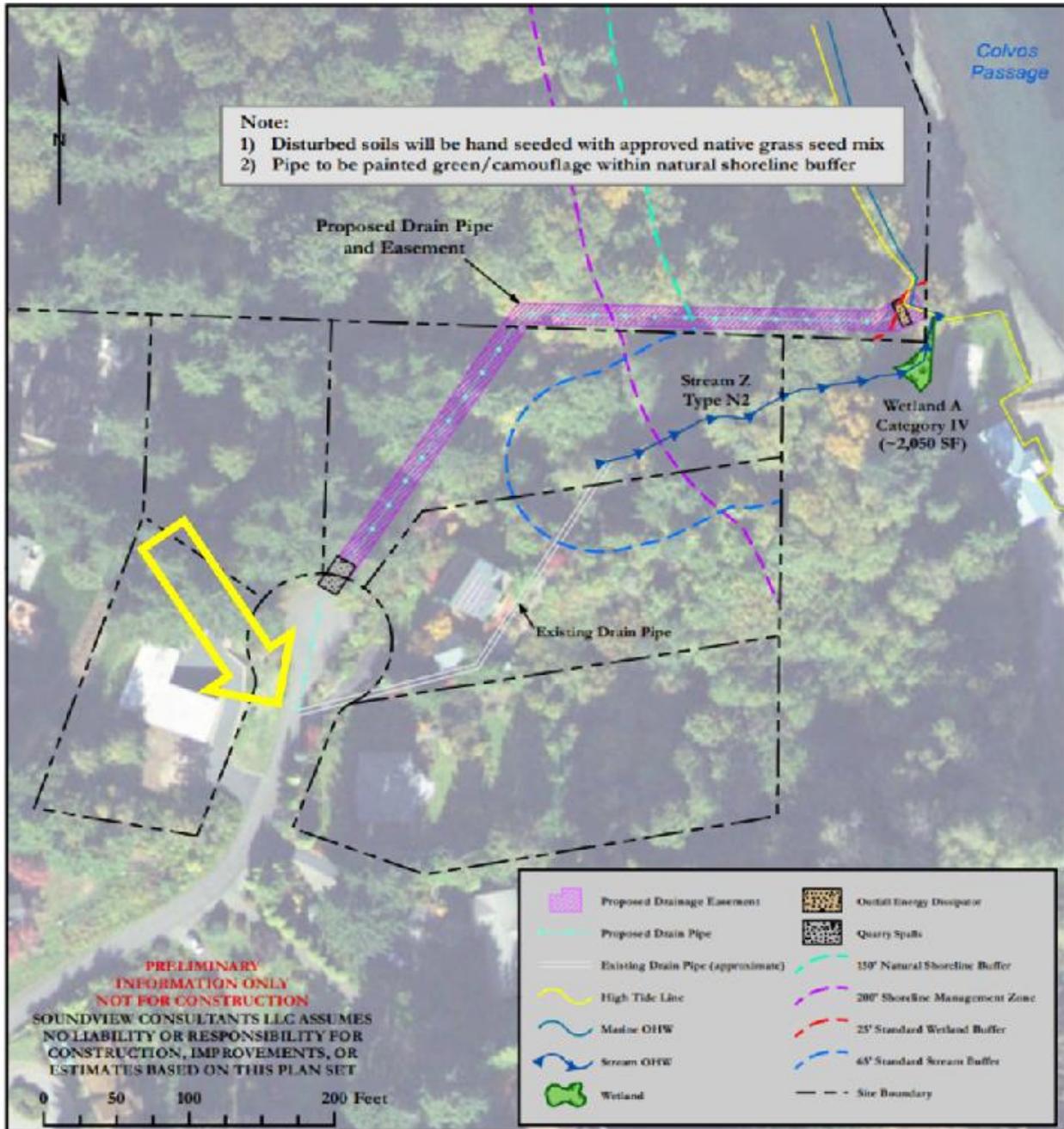
# Site Plan - Existing Conditions

County Staff added arrow to show existing storm water catch basin:



## Site Plan – Proposed

County Staff added arrow to show existing storm water catch basin:



## Comments Received from the Abutting Property Owners, Public, and Government Agencies

- Comments from Abutting Property Owners and/or Public: No comments received.
- Comments from Agencies: Various comments have been received. The following are of note:

- County Development Engineering Division: At this point they have preliminarily approved the proposal subject to the granting of easement on PenMet Parks parcel, SEPA issuance, and shoreline permit approval. More specifically, they have reviewed the proposal for compliance with the County Site Development and Stormwater Drainage Regulations (Pierce County Code, Title 17A) as well as landslide and erosion hazards per the County Critical Areas Code (Pierce County Code, Title 18E).
- County Resource Management Section: They have also approved the proposal. More specifically, they completed review of a report titled, “Wetland, Shoreline, Fish and Wildlife Habitat Assessment Report, Colvos Heights,” dated October 11, 2021, prepared by Soundview Consultants, LLC. Of note, a wetland is located on parcel 0222215005 (this parcel is not part of the proposal and is located east of the plat / south of the PenMet Parks parcel). It is categorized as a Category IV wetland that is approximately 2,050 square feet in size. It requires a 25-foot buffer with a 15-foot building setback. In addition, there is a drainage course located on parcel number 3162000100 (vacant lot 10 in the northeast corner of the plat). It is categorized as a Type N2 Water that requires a 65-foot buffer and 15-foot building setback.
- Washington State Department of Ecology: They sent a letter dated March 25, 2022, stating, in part, the following: “Pierce County SMP 18S.30.100 Water Quality, Stormwater, and Nonpoint Pollution states that the intent of the Water Quality, Stormwater, and Nonpoint Pollution policies and regulations is to protect against adverse impacts to water quality and quantity. The policies and regulations of this Section shall be reviewed adjacent to the project proposal. In addition, pursuant to 18S.30.100 C.2., and the water quality regulations found in Title 17A PCC, water quality impacts shall be avoided. Please refer to the regulations of this chapter including 18S.30.090 C.4. which states in the Natural SED, commercial, industrial, multi-family residential, and non-water oriented recreation uses are prohibited. More information may be necessary to demonstrate the application is consistent with Pierce County SMP and Title 18S PCC.
- Tribes (Puyallup, Nisqually and Squaxin Island): No tribes have requested a cultural/archaeological resources survey. However, a shellfish biologist with the Puyallup Tribe contacted the County about potential concerns to shellfish beds...but did not elaborate further.

**Site History/Characteristics:**

- The proposal is to serve the recorded plat of Colvos Heights. It is a 24-lot detached single-family subdivision recorded in 1966.
- The plats’ eastern boundary is located approximately 150 feet to the west of Colvos Passage (between the City of Gig Harbor and Kitsap County).
- The plats western boundary is abutted by 14<sup>th</sup> Avenue NW. Connecting with this public road, two private roads extend eastward into the plat. The northern road is 144<sup>th</sup> Street NW and the southern is 143rd Street NW. Both end with cul-de-sacs. The southern road provides access to the majority of the lots within the plat. The proposal involves the southern road.

- The topography of the plat slopes downwards from west to east. For example, the northwest corner of the plat has an elevation of approximately 340 feet while the northeast boundary has an elevation of approximately 80 feet. The extreme east side of the plat, especially the northeast corner, has the steepest slopes.
- Within the plat, four parcels are currently vacant including the one in the extreme northeast corner (lot 10) over which the proposed storm water drainage line would cross.
- In 2017, the County received a complaint regarding storm water drainage being directed off the plat site and onto the abutting parcel to the east resulting in one or more landslides. The County subsequently determined that a violation did exist and issued a Notice and Order to Correct violation to the owner (Hornby) of parcel number 3162000090 (lot 9).

Staff Comment: The proposal is intended to resolve the existing violation.

**Additional Proposal Details:**

The proposed storm system will collect and convey stormwater runoff from a total of approximately 9.3 acres consisting of single-family residences, roads, and associated improvements as well as areas of native vegetation. The proposed drainage improvements will intercept stormwater at the current low point (catch basin) within 143rd Street NW. A filter would be installed in the catch basin to be periodically cleaned/replaced to catch silt. From the catch basin, a 12-inch diameter pipe would extend to the shoreline. Proposed stormwater piping will maintain a slope of 0.75% or greater to maintain proper conveyance capacity. Where the pipe is located above ground and on the slope, it would be anchored approximately every 50 feet. Some limbing of trees and shrubs may be required but, overall, vegetation disturbance will be minimal given the installation strategy and concern for slope stability.

**Surrounding Land Use / Shoreline / Zoning Designation**

	LAND USE	SHORELINE	ZONING
North	Vacant (owned by PenMet Parks)	Natural	Park and Recreation (PR)
South	Single-family residences	Conservancy	Rural 10 (R10)
East	Single family residences	Conservancy (uplands) and Aquatic Marine (Puget Sound)	R10
West	Single family residences	Not applicable	R10

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

**Gig Harbor Peninsula Community Plan (Pierce County Code, Title 19A – Appendix E)**

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.

Staff Comment: A review of the plan reveals that there are numerous policies that could apply to this proposal but would result in an excessively long report. Further, the shoreline policies and regulations, addressed throughout the rest of this report, address similar issues such as regarding vegetation preservation, aesthetics, and cumulative impacts.

## **Pierce County Shoreline Code (Pierce County Code, Title 18S):**

This code applies to Puget Sound and the uplands located 200 feet landward of the shoreline.

1. Shoreline Environment Designations (Chapter 18S.20): The proposal involves three designations:
  - A. **Natural**: The intent of the Natural SED is to ensure long-term preservation of shorelines that are ecologically intact or minimally degraded, sensitive to human influence, or retain value because of their natural, unaltered condition.
  - B. **Conservancy**: The intent of the Conservancy SED is to conserve and manage existing natural resources and valuable historic and cultural areas while providing recreational benefits to the public and while achieving sustained resource utilization and maintenance of floodplain processes. Shoreline ecological functions should be preserved by avoiding development that would be incompatible with existing functions and processes, locating restoration efforts in areas where benefits to ecological functions can be realized, keeping overall intensity of development or use low, and maintaining most of the area's natural character.
  - C. **Aquatic**: The intent of the Aquatic SED is to protect, restore, and manage the unique characteristics and resources of marine and fresh waters.

*Staff Comment:* The proposal would support an existing residential development that was approved years ago when adequate storm water drainage facilities were somewhat of an afterthought. Regardless of if this proposal is approved or not, the subdivision will remain and water will continue to flow downhill toward Puget Sound. It seems preferable to have a properly designed, and constructed system to handle that water rather than the informal/unpermitted situation that currently exists. It is *potentially* possible that in lieu of storm water outfall a different system could be constructed (for example, a detention/retention pond). However, this could result in plat lot #10 being completely occupied by storm water facilities, may not be preferable to have a heavy pond of water near a steep slope, and most storm water ponds have outlets regardless (to meter out the water or provide a route during extreme events). Perhaps there are other options available. Either way, water is going to flow downhill. There are other plats along the east shoreline of Colvos Passage that have similar stormwater pipes approved under the old shoreline regulations (Pierce County Code, Title 20). Should future plats be proposed along the shoreline under the new shoreline regulations (Title 18S) then it would be a valuable discussion as to if other options are feasible other than simply directing storm water in pipe to the shoreline.

Note, it appears the Aquatic Marine designation does not apply as the application materials indicate that all work would be located landward of the ordinary high water mark (OHWM) and, therefore, would not be within that designation.

2. General Policies and Regulations (Chapter 18S.30): The purpose of this Chapter is to provide general development policies and regulations that are, or could be, applicable to all shoreline uses and development in all shoreline environment designations. Of the nine items listed in this chapter, the following are potentially applicable to this proposal:
  - A. Archaeological, Cultural, and Historic Resources.

Staff Comment: No Tribes have requested a survey. In addition to these regulations, the only other “regulations” that the County has regarding this topic is a policy from February 2020. In that policy, one of the triggers to require a full-blown survey is if known resources are on and/or within 500 feet of the site. The issue regarding when the County will require archaeological/cultural surveys (not just for this site, but throughout unincorporated Pierce County) has been coming up more and more in the last several years...and have risen to the level of the County Council. Whether or not they will take any legislative action on this topic (such as incorporating the issue into the County Critical Areas Code) is unknown at this point.

- B. 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. This means assuring no net loss of ecological functions and processes in shorelines, and protecting critical area designated in the Critical Areas Code (Pierce County Code, Title 18E).

This section requires upland buffers, as measured landward from the ordinary high-water mark. Within Natural, it is 150 feet and within Conservancy it is 100 feet. There are various exceptions to the buffer without obtaining a Shoreline Variance. The only notable one that appears to apply states the following: Water dependent uses and public shoreline access are allowed within the standard shoreline buffer subject to applicable regulations of the Master Program.

Note, Chapter 18S.70, Appendix A defines “water-dependent” as the following: "Water-Dependent" means a use or portion of a use which cannot exist in a location that is not adjacent to the water and which is dependent on the water by reason of the intrinsic nature of its operations.

Staff Comment: The existing plat itself is clearly not water-dependent. However, this proposal (to create a storm water pipe/outfall) might be water-dependent and allowed within the buffer without a shoreline variance. Specifically, this proposal would not exist if Puget Sound did not exist. At this point, Staff has not requested a variance but has raised the potential in the past. In preparing this report, Staff can see points on both sides and finds that it should probably be discussed with the Washington State Department of Ecology to see how they view similar requests on a statewide basis.

- C. Excavation, Dredging, Filling, and Grading. The intent of the Excavation, Dredging, Filling, and/or Grading policies and regulations is to provide direction for shoreline excavation, dredging, filling, and/or grading associated with a principal use. This Section may contain more restrictive regulations that limit or effectively preclude a use or development that is authorized pursuant to another Section(s) and this Section shall control in the event of a conflict.

Staff Comment: It appears the proposal meets all of the applicable policies and regulations in this section. The plat was recorded in the 1960s when the construction of and/or regulations regarding stormwater drainage systems (for plats) were not adequate or non-existent. The proposal would attempt to address, in part, the concern.

D. Scenic Protection and Compatibility: The purpose of the Scenic Protection and Compatibility policies and regulations is to preserve shoreline scenic vistas and to ensure development on shorelines is compatible with the surrounding environment, existing, and planned development.

Staff Comment: The proposal would be located below ground and just barely above grade. It may be visible immediately after construction. However, once vegetation regrows, the proposal is likely to be nearly invisible. The application materials state that the above ground pipe would have earth-tone colors.

E. Shoreline Stabilization: The intent of the Shoreline Stabilization policies and regulations is to allow shoreline stabilization structures or measures where no alternatives are feasible to accommodate development along the shorelines, while preserving and improving ecological functions of the shoreline and while protecting the shoreline environment from impacts caused by development within and adjacent to geologically hazardous areas.

Staff Comment: Staff would recommend that no bulkhead be allowed at the location of the outfall, other than measures to dissipate the energy of the water as it comes out the end of the pipe (to help prevent erosion/scouring of the beach).

F. Shoreline Modifications: The intent of the Shoreline Modification policies and regulations is to limit those actions that modify the physical configuration or qualities of the shoreline area. Shoreline modifications are those actions that modify the physical configuration or qualities of the shoreline area, usually through the construction of a physical element such as a dike, breakwater, pier, weir, dredged basin, fill, bulkhead, or other shoreline structure. They can include other actions, such as clearing, grading, or application of chemicals.

Staff Comment: Staff has the same comments as addressed in the prior section (shoreline stabilization).

G. Water Quality, Stormwater, and Nonpoint Pollution: The intent of the Water Quality, Stormwater, and Nonpoint Pollution policies and regulations is to protect against adverse impacts to water quality and quantity.

Staff Comment: Again, the plat was recorded in the 1960s when the construction of and/or regulations regarding stormwater drainage systems (for plats) were not adequate or non-existent. The proposal would attempt to address, in part, the concern. It appears that the proposal would, in part, include a filter in the catch basin to provide some water quality some controls.

3. Use and Development Policies and Regulations (Chapter 18S.40): To implement this Title, various types of uses and development anticipated to be carried out on, or occupy, shorelines have been grouped into categories. The categories are the mechanism for applying appropriate policies and regulations to different types of uses and development. This Chapter lists the categories and the corresponding policies and regulations. This Chapter supplements, and does not replace, the Use Category standards of the Zoning Code (Pierce County Code, Title 18A). Of the twelve items listed in this chapter, the following are potentially applicable to this proposal:

- A. **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.

*Staff Comment:* The subject plat already exists. This proposal is attempting to address an existing problem with that plat.

- B. **Utilities:** The intent of the Utilities policies and regulations is to provide for present and future services and facilities that produce, convey, store, or process power, fuel, wastewater, communications, solid waste, and the like while minimizing conflicts with other permitted shoreline uses and development.

*Staff Comment:* It is unclear if this section would apply as the principal/primary use of the site is not for utilities but for a subdivision. However, this is bit of a unique situation (retrofitting an existing plat) so Staff has included it regardless.

#### 4. Permits and Approvals (Chapter 18S.60)

- A. **Shoreline Permit Table (18S.60.030):** This table is utilized to determine what permits are required based upon the proposed use and shoreline environment designation(s). The table shows the following:

(1) In the Natural SED:

- Land divisions for detached single-family with infrastructure requires a Shoreline Substantial Development Permit and Administrative Conditional Use Permit.
- Utilities requires a Shoreline Substantial Development Permit.

(2) In the Conservancy SED:

- Land divisions for detached single-family with infrastructure requires a Shoreline Substantial Development Permit.
- Utilities requires a Shoreline Substantial Development Permit.

(3) In the Aquatic (Marine) SED:

- Land divisions for detached single-family with infrastructure are prohibited.
- Utilities requires a Shoreline Substantial Development Permit and Conditional Use Permit.

*Staff Comment:* For this proposal, the upland designations (above the ordinary high-water mark) appear to allow the proposal subject to the approval of a Shoreline Substantial Development Permit and Shoreline Administrative Conditional Use Permit. Both permit applications have already been submitted. Note, all the notices have indicated this would be a Shoreline Conditional Use Permit (requiring Hearing Examiner review) but it appears only an Administrative Conditional Use Permit is required instead. Either way, no public comments have been received. With that said, at this point it appears that the County decision on these permits is administrative (does not involve the Hearing Examiner) but the Shoreline Administrative Conditional Use Permit still does require approval by the Washington State Department of Ecology. Also, if a Shoreline Variance is determined to be necessary, this would require approval by the Hearing Examiner and also Ecology.

It does not appear that the Aquatic (Marine) designation applies as no work is proposed waterward of the ordinary high-water mark (OHWM).

B. Shoreline Substantial Development Permit (18S.60.040): The following are the decision criteria:

- (1) The proposal is consistent with the policies and procedures of the Act.
- (2) The proposal is consistent with this Title's policies and regulations including, at a minimum, the following:
  - (a) Policies and regulations of the shoreline environment designation (SED) in which the proposal is located;
  - (b) Policies and regulations for Shorelines of Statewide Significance if the proposal is within such area;
  - (c) Policies and regulations within the applicable General Policies and Regulations found in Chapter PCC; and
  - (d) Policies and regulations within the applicable Use and Development Policies and Regulations found in Chapter 18S.40 PCC.
- (3) The proposal is consistent with the applicable provisions of Title 18E PCC.
- (4) The proposal is consistent with the applicable policies of the Comprehensive Plan and any applicable Community Plan.
- (5) The proposal is consistent with all applicable development regulations, including but not limited to Title 18A PCC, Development Regulations – Zoning.

*Staff Comment:* These criteria have essentially already been addressed previously throughout this report.

C. Shoreline Administrative Conditional Use Permit (18S.60.050). The following are the decision criteria:

- (1) The Director shall review the location of the proposal for compatibility with development permitted in the surrounding areas; and make further stipulations and conditions to reasonably assure that the basic intent of the Master Program will be served.
- (2) An Administrative Conditional Use Permit may be granted; provided, that the applicant demonstrates all of the following:

- (a) That the proposed use is consistent with the policies of the Act and the Master Program;
  - (b) That the proposed use will not interfere with the normal public use of public shorelines, nor use of waters under the Public Trust Doctrine;
  - (c) That the proposed use of the site and design of the project is compatible with other authorized uses within the area and with uses planned for the area under the Comprehensive Plan and Master Program;
  - (d) That the proposed use will cause no significant adverse effects to the shoreline environment in which it is to be located;
  - (e) That the public interest suffers no substantial detrimental effect; and
  - (f) The proposed use is consistent with all applicable development regulations.
- (3) In the granting of all Shoreline Administrative Conditional Use Permits, consideration shall be given to the cumulative impact of additional requests for like actions in the area. For example, if Shoreline Administrative Conditional Use Permits were granted for other developments in the area where similar circumstances exist, the total of the conditional uses shall also remain consistent with the policies of RCW [90.58.020](#) and shall not produce substantial adverse effects to the shoreline environment.

*Staff Comment:* These criteria have essentially already been addressed previously throughout this report. However, regarding cumulative impacts, it has been common practice for older plats, located along the shoreline, to pipe stormwater to the shoreline. Granted, the majority of these plats were developed before shoreline regulations existed or were approved under the old County shoreline regulations in effect until October 2018 (Pierce County Code, Title 20). It is potentially possible that newer subdivisions proposed along the shoreline, or just single-family residences on existing lots, may direct stormwater to the shoreline in the future. However, if all of these provide appropriate measures for pollution prevention, energy dissipation (to prevent scouring of the beach), etc...then it is unclear if this would create cumulative impacts to Puget Sound.

- (g) Shoreline Variance (18S.60.070)

*Staff Comment:* If a Shoreline Variance is ultimately required, this is the section in which the criteria are located.

### **Question from Staff for the PAC**

Does the PAC believe that the applicant is meeting the SD and SACP requirements or have any comments or recommendations?

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