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**COMMUNITY PLANNING &
ECONOMIC DEVELOPMENT DEPARTMENT**

Joshua Cummings, Director

Creating Solutions for Our Future

**BEFORE THE HEARING EXAMINER
FOR THURSTON COUNTY**

In the Matter of the Application of)	Project No. 2011102333
)	
Net Venture Farms, Inc.)	Xia/Wheeler SSDP
)	
)	
For Review of a)	
Shoreline Substantial Development Permit)	FINDINGS, CONCLUSIONS, AND DECISION
_____)	

SUMMARY OF DECISION

Review of the approved shoreline substantial development permit for the intertidal geoduck bed at 9330 Maple Beach Lane is **GRANTED**. Operations may continue per the 2013 Hearing Examiner decision without additional conditions of approval or future reviews.

SUMMARY OF RECORD

Request:

Net Venture Farms, Inc. (Applicant) operates a 0.92-acre commercial intertidal geoduck farm on Eld Inlet at 9330 Maple beach Lane NW in Olympia, which is authorized pursuant to a shoreline substantial development permit approved by the Hearing Examiner on January 18, 2013 and finalized at the termination of subsequent review proceedings on September 3, 2014. Condition number 7 of the original permit includes the following requirement:

The aquaculture operation shall be reviewed by the Resource Stewardship Department through an open record review hearing in front of the Thurston County Hearing Examiner prior to subsequent replanting or within seven years, whichever occurs first. Review shall assess emerging environmental research and environmental issues arising from the

approved operation, if any. If facts at the time of the review warrant cumulative impact analysis under then-applicable law, it shall be conducted during the review. The hearing shall be held within 60 days following an application for review filed by the Applicant with the Thurston County Resource Stewardship Department.

Applicant representative Hui Xia applied for the required review on December 17, 2019.

Hearing Date:

The Thurston County Hearing Examiner held an open record hearing on application request on March 10, 2020.

Testimony:

At the hearing the following individuals presented testimony under oath:

Scott McCormick, Associate Planner, Thurston County
Hui Xia, Applicant

Exhibits:

At the hearing the following exhibits were admitted in the record:

EXHIBIT 1 Community Planning and Economic Development Department Staff Report to the hearing Examiner, including the following attachments:

- Attachment a Notice of Hearing
- Attachment b Zoning/Vicinity Map
- Attachment c Master Application, received December 17, 2019
- Attachment d JARPA, received December 17, 2019
- Attachment e Hearing Examiner Decision for original SSDP, dated January 18, 2013
- Attachment f Email from Robert Smith, Senior Planner (CPED) to Applicant, dated December 19, 2019
- Attachment g Letter from Robert Smith, Senior Planner (CPED) to Applicant, dated November 7, 2019
- Attachment h Notice of Application, dated January 23, 2020, with 500-foot adjacent property owners list
- Attachment i Email from the Squaxin Tribe, dated January 27, 2020
- Attachment j Email from the Nisqually Tribe, dated January 27, 2020

- Exhibit 2 Photograph of posted hearing notice
- Exhibit 3 Staff Report (from original permit hearing), dated December 17, 2012, with attachments
- Exhibit 4 Applicant Representative Hui Xia's written comments

Based on the record developed at hearing, the following findings and conclusions are entered:

FINDINGS

Background on Condition number 7

1. The Applicant operates a 0.92-acre commercial intertidal geoduck farm on Eld Inlet at 9330 Maple beach Lane NW in Olympia, which was authorized pursuant to a shoreline substantial development permit approved by the Hearing Examiner on January 18, 2013 and finalized at the termination of subsequent review proceedings on September 3, 2014. Condition number 7 of the permit includes the following requirement:

The aquaculture operation shall be reviewed by the Resource Stewardship Department through an open record review hearing in front of the Thurston County Hearing Examiner prior to subsequent replanting or within seven years, whichever occurs first. Review shall assess emerging environmental research and environmental issues arising from the approved operation, if any. If facts at the time of the review warrant cumulative impact analysis under then-applicable law, it shall be conducted during the review. The hearing shall be held within 60 days following an application for review filed by the Applicant with the Thurston County Resource Stewardship Department.

Applicant representative Hui Xia applied for the required review on December 17, 2019. *Exhibits 1, 1.C, 1.D, 1.E, and 1.F.*¹

2. In the December 2012 open record public hearing on Project No. 2011102333, County Planning Staff

concluded that with conditions, the proposal would comply with SSDP criteria. Among other conditions of approval, Staff recommended condition number 7 requiring the project to be reviewed for impacts and potential additional mitigation through an open record public hearing for a new SSDP before the County hearing Examiner after five years and/or before replanting, stating:

Even though existing biological analyses generally have found that no long-term significant impacts are associated with geoduck aquaculture, there are some areas of ongoing research related to water quality and the effect on ESA-listed species in particular. The Washington Sea Grant program is conducting that research at the direction of the Washington State Legislature. A more detailed discussion of that program follows below. Combined with the relative modernity of geoduck aquaculture in the form proposed, it is prudent to reassess the biological research and aquacultural practices at a specified time in the future as it relates to the subject

¹ The Examiner notes that since the issuance of the 2013 SSDP, the County's Planning Department changed names and is now known as the Community Planning and Economic Development Department.

bed. The Department will recommend that a re-review of the entire operation of the subject project be conducted by the Hearing Examiner in the future.

Exhibit 1.E, Finding 35 (internal citations omitted).

3. Staff supported its 2012 recommendation for future re-review prior to replanting by citing WAC 173-27-090(3), which states: "Authorization to conduct development activities shall terminate five years after the effective date of a substantial development permit." Because the Department interprets "development activity" to include placement of structures (tubes and netting) on the beach, that each planting cycle would essentially require new review and authorization to "develop" the shoreline. In the December 2012 public hearing, Staff argued that according to the WAC, permission to conduct development activity terminates after five years, with a potential one-year extension upon application. *Exhibit 1.E, Finding 36.*

4. While in 2012 testimony, Staff characterized the recommendation in Condition number 7 as requiring perpetual five year review and renewal, in a parallel vein to the five-year review established in the County Code for gravel quarries, the issued SSDP did not establish perpetual re-review. Conclusion 6 of the January 18, 2013 decision stated:

[B]ecause the Sea Grant study is not completed, because commercial geoduck aquaculture is a relatively new enterprise, and because many citizens of Thurston County and Resource Stewardship Staff are concerned about any potential long term adverse effects to Puget Sound, it is appropriate to require review prior to future crop plantings. Resource Stewardship's argument that the five-year limit established in WAC 173-27-090(3) should be applied is not persuasive in the case of a geoduck operation due to the cyclic nature of the proposed use. ... Staff's alternative recommended condition that would require review of the SSDP in seven years or prior to replanting is adopted. Review at that future time will look at the final report of the Sea Grant study and will consider impacts shown to be occurring on-site. If facts at the time merit cumulative impact analysis pursuant to the SMA or other law in effect at the time, it shall be conducted during the review.

Exhibit 1.E, Conclusion 6 (emphasis added).

5. The remaining conditions of approval recommended by Staff in the 2012 SSDP, which were adopted with minor modification required: compliance with all County Code and SMPTR requirements and the MDNS conditions; obtaining all required state and federal permits and providing copies of approval documents to the County prior to site preparation; prohibiting fill on the beach and advance approval by the ACOE should any beach excavation become necessary; prohibition of release of sediments into Puget Sound; requiring site preparation to commence within two years and initial installation of "structures" (tubes and netting) must be completed within five years of final approval; compliance with the approved site plan and advance review of any deviation therefrom; control of lighting to prohibit off-site glare; compliance with County noise standards and control of noise within allowed standards such that it does not rise to a level found "persistently annoying" by receiving properties; and prohibition of hard structures or markers on the beach. *Exhibit 1.E, Finding 37.*

6. As noted in the 2013 SSDP decision, in addition to compliance with County conditions,

the SSDP required “at a minimum, the following State and Federal permits or exemptions therefrom: ACOE NWP 48 Certification or Individual Permit under Section 10; DOE Section 401 Water Quality Certification, DOE Coastal Zone Management Certification, State Department of Health Harvest Site Certification, State Department of Health Shellfish Operation License, and Washington State Department of Fish and Wildlife Aquatic Farm Permit. The proposal may be required, by the ACOE, to obtain a Section 404 Clean Water Act Permit. Each of these permits would contain specific required mitigation to protect public health, safety, and general welfare.” *Exhibit 1E, Finding 38.*

7. The Hearing Examiner’s 2013 SSDP decision contained the following findings related to then-current environmental research on geoduck operations:

42. In 2007, the Washington state legislature passed a law directing Washington Sea Grant to study key uncertainties as to the impacts of geoduck cultivation on the Puget Sound ecosystem and on wild geoduck populations. One of the research efforts granted access to the site by MDNS measure #3 is the Washington Sea Grant program. Sea Grant established six priority objectives to assess:

- 1) The effects of structures commonly used in the aquaculture industry to protect juvenile geoducks from predation;
- 2) The effects of commercial harvesting of geoducks from intertidal geoduck beds, focusing on current prevalent harvesting techniques, including a review of the recovery rates for benthic communities after harvest;
- 3) The extent to which geoducks in standard aquaculture tracts alter the ecological characteristics of overlying waters while the tracts are submerged, including impacts on species diversity and the abundance of other organisms;
- 4) Baseline information regarding naturally existing parasites and diseases in wild and cultured geoducks, including whether and to what extent commercial intertidal geoduck aquaculture practices impact the baseline;
- 5) Genetic interactions between cultured and wild geoducks, including measurement of differences between cultured and wild geoduck in term of genetics and reproductive status; and
- 6) The impact of the use of sterile triploid geoducks and whether triploid animals diminish the genetic interactions between wild and cultured geoducks.

Exhibit 1, Attachment P.

43. Through a competitive bidding process, Sea Grant selected from among proposed studies to address the objectives, choosing three:

- Geochemical and Ecological Consequences of Disturbances Association with Geoduck Aquaculture Operations in Washington (G. VanBlaricom, UW, J. Cornwell, UM): assessing all phases of geoduck aquaculture in terms of effects on plant and animal communities (fish, shellfish, and plant) and physical/chemical effects to beaches
- Cultured-Wild Interactions: Disease Prevalence in Wild Geoduck Populations (C. Friedman, UW): Developing baseline information on pathogens to improve understanding of geoduck health and management of both wild and cultured

stocks.

- Resilience of Soft Sediment Communities after Geoduck Harvest in Samish Bay (J. Ruesink, UW): examining the effect of geoduck aquaculture on soft-sediment tide flat and eelgrass meadow habitats.

Interim reports summarizing research to date have been submitted to the Legislature in 2009, 2011, and 2012. The final results of the three funded studies will be reported to the Legislature in December 2013. *Exhibit I, Attachment P.*

44. The 2012 interim report contains the following summary of preliminary research observations from study inception to date:

- Benthic infaunal communities are not significantly altered;
- Current practices have minimal impacts on benthic communities of infaunal invertebrates, with no spillover into adjacent habitats, suggesting that the disturbance occurring on the scale of current harvest practices is within the range of natural variation;
- Significant differences in the structure of mobile macrofauna communities between planted and nonplanted areas do not persist once tubes and nets are removed during the grow out phase;
- Nutrients released from geoduck operations are low with localized effects likely to be negligible, and the overall rate of nutrient release is not changed from the natural rate;
- No distinct patterns have been observed in the distribution of disease organisms as a function of geographic location or water depth; and
- In Fisk Bar, where eelgrass recruited after geoducks were planted, harvest activities significantly impacted the eelgrass, with limited spillover effects to adjacent, non-farmed sites; however, within one year, eelgrass recovery had begun on the harvested site, suggesting that current practices do not render sites unsuitable for later eelgrass colonization.

Again, final results would be reported to the Legislature in December 2013. *Exhibit I, Attachment P.*

Exhibit I.E.

8. The Applicant's approved SSDP was appealed to the Board of Thurston County Commissioners, where it was upheld, and subsequently appealed to the Washington State Shoreline Hearings Board. After conducting a consolidated open record appeal of the Applicant's SSDP and three other geoduck SSDPs issued by Thurston County in early 2013, the Shoreline Hearings Board concluded that the County had not erred in not requiring cumulative impacts analysis for the four approved geoduck SSDPs. The Board based its determination that no cumulative impacts analysis had been required prior to issuance of the four SSDPs on the "the strict conditioning [on the four permits] including the special condition requiring another review prior to replanting." *SHB No. 13-006c, issued October 11, 2013.* That special condition was number 7, which mandated the instant review.

9. The Shoreline Hearings Board Final Order affirming the Applicant's 2013 SSDP contained additional conditions, still in effect on the permit, requiring as follows: that the Washington Geoduck Growers Environmental Codes of Practices be treated as containing mandatory requirements rather than optional practices; that, in the event of conflict between permitting decisions issued by local, state, and federal agencies with the requirements of the Washington Geoduck Growers Environmental Codes of Practices, the more restrictive/environmentally protective measures be implemented; and that the Applicants require their employees to attend any training made available by WDFW or any other qualified entity relating to the identification of Pacific herring spawn. The Board's additional conditions did not specify explicit review parameters for the pre-replanting SSDP review beyond those established in Condition number 7. *SHB No. 13-006c, issued October 11, 2013*. Although no record of further proceedings was available for the instant review hearing, the Shoreline Hearings Board Final Order was appealed unsuccessfully to the courts of Washington, where it was dismissed. *Exhibit 1.F*.

Current Review of the SSDP

10. The Shoreline Master Program for Thurston County (SMPTR) designates the subject property as a Conservancy shoreline, in which aquaculture remains an allowed use. *Exhibits 1 and 3*.
11. Following completion of the appeal process, the Applicant first planted geoducks pursuant to the SSDP during the summer of 2014 and plans to commence harvest of that initial crop in August 2020. Consistent with the affirmed permit, harvest would be done "in the dry" during low tide or "in the wet" during high tide using divers. Although at the time of the original application the Applicant had indicated reliance primarily on "in the dry" harvest from the beach, in the instant review the Applicant desires flexibility in harvest methodology. Based on the Applicant's experience, use of divers is preferred by neighbors and by customers. After harvest, the substrate would be allowed to settle for a period of four months prior to replanting the following crop. *Exhibits 1.D and 4; Hui Xia Testimony*.
12. Consistent with the approved permit, the initial crop of geoducks was planted in PVC pipes at a density of one pipe per square foot and secured with area netting. For the future crop, the Applicant proposes to decrease the pipe density to one per 1.4 square feet and to use a combination of PVC pipes and mesh tubes. These changes would reduce the amount of plastic used by approximately 32 percent. Area netting would also be decreased, as mesh tubes do not require area netting. A newer trend in geoduck aquaculture, the use of mesh tubes is intended to minimize alteration of the substrate, provide improved movement for sand dollars and other benthic organisms, and reduce aesthetic impacts. Mesh tubes are placed and removed in the same manner as PVC tubes, except for not requiring area nets or anchoring. The substrate on the subject tidelands is too soft to exclusively use mesh tubes, but the Applicant desires to use them to the extent possible. Consistent with the approved SSDP, all tubes – mesh and PVC – would be removed within two years of planting. *Exhibits 1, 1.D, and 4; Hui Xia Testimony*.

13. The conclusions of the final report of the Geoduck Aquaculture Research Program by Sea Grant (December 2013) f to the legislature were consistent with the conclusions from the interim Sea Grant reports summarized in the January 18, 2013 decision (cited in full in Finding 7, above).² The subsequent final Sea Grant report published in 2015, focusing on the ecology and economics of shellfish aquaculture, included an additional study *Evaluating Trophic and Non-Trophic Effects of Shellfish Aquaculture in the Central Puget Sound Food Web*. This final report found that anti-predator structures such as PVC tubes and nets, “had a larger influence on the surrounding food web by providing predation refuge or by changing foraging,” as compared to the geoducks themselves, which were not found to have trophic effects on the food web.³
14. In the instant review of the approved SSDP, County Staff submitted that the Applicant’s proposed use of mesh tubes is consistent with the most current geoduck aquaculture research through reducing the use of, and thus impacts associated with, area netting. County Staff were not aware of any other emerging research relevant to geoduck aquaculture and the subject SSDP. *Exhibit 1; Scott McCormick Testimony*.
15. Since the 2013 SSDP decision, fewer than ten permits for geoduck aquaculture have been approved. County Staff submitted that this number does not warrant a current cumulative impacts analysis. Planning Staff is not aware of any environmental issues of concern with respect to the existing operation. The Applicant has not received complaints from neighbors regarding operations on site. *Exhibit 1; Testimony of Scott McCormick and Hui Xia*.
16. Notice of the public hearing was sent to all owners of property within 500 feet of the site, published in The Olympian, and posted on site on or before February 28, 2020. There was no public comment on the review application. Comments submitted by the Nisqually Indian Tribe and the Squaxin Island Tribe did not identify any issues of concern. *Exhibits 1, 1.A, 1.I, 1.J, and 2; Xia Testimony*.

CONCLUSIONS

Jurisdiction

The Hearing Examiner has jurisdiction to decide shoreline substantial development applications pursuant to TCC 2.06.010(C), RCW Chapter 36.70, WAC 173-27, and Section One, Part V of the Thurston County Shoreline Master Program.

Criteria for Review

The scope of review is as described in Condition number 7 of the 2013 approval:

² Although not offered for the record, the Examiner takes note of the final report of the Geoduck Aquaculture Research Program by Sea Grant to the Legislature. See <https://wsg.washington.edu/wordpress/wp-content/uploads/publications/Geoduck-Final-Report-Dec-2013.pdf>.

³ Although not offered for the record, the Examiner takes note of the final Sea Grant study. See <https://wsg.washington.edu/wordpress/wp-content/uploads/Shellfish-Aquaculture-Washington-State.pdf>, page 22.

Review shall assess emerging environmental research and environmental issues arising from the approved operation, if any. If facts at the time of the review warrant cumulative impact analysis under then-applicable law, it shall be conducted during the review... .

Exhibit 1.E.

Conclusions Based on Findings

1. Based on the record submitted, no recent environmental research or environmental issues have been identified that support a requirement for cumulative impact analysis prior to planting the next geoduck crop. The current proposal to reduce the amount of plastic and area netting used, as compared to that approved in 2013, represents a reduction in potential environmental impact as compared to that approved and is consistent with current trends in geoduck aquaculture. *Findings 3, 4, 5, 6, and 7.*
2. The Applicant's proposed change in materials, reduced tube density, and requested flexibility to use either wet or dry harvest techniques are compatible with the original approval and do not necessitate an entirely new or amended permit (see Exhibit 1.E, Condition number 8). *Findings 3, 4, 5, and 6.*
3. Nothing in the record suggests any need for additional future reviews of the approved 2013 permit and none are imposed by the instant review.

DECISION

Based upon the preceding findings and conclusions, review of the shoreline substantial development permit for the intertidal geoduck bed at 9330 Maple Beach Lane is **APPROVED**. Operations may continue per the 2013 Hearing Examiner decision without additional conditions or future reviews.

Decided March 24, 2020.



Sharon A. Rice
Thurston County Hearing Examiner

THURSTON COUNTY
PROCEDURE FOR RECONSIDERATION AND APPEAL
OF HEARING EXAMINER DECISION TO THE BOARD

NOTE: THERE MAY BE NO EX PARTE (ONE-SIDED) CONTACT OUTSIDE A PUBLIC HEARING WITH EITHER THE HEARING EXAMINER OR WITH THE BOARD OF THURSTON COUNTY COMMISSIONERS ON APPEALS (Thurston County Code, Section 2.06.030).

If you do not agree with the decision of the Hearing Examiner, there are two (2) ways to seek review of the decision. They are described in A and B below. Unless reconsidered or appealed, decisions of the Hearing Examiner become final on the 15th day after the date of the decision.* The Hearing Examiner renders decisions within five (5) working days following a Request for Reconsideration unless a longer period is mutually agreed to by the Hearing Examiner, applicant, and requester.

The decision of the Hearing Examiner on an appeal of a SEPA threshold determination for a project action is final. The Hearing Examiner shall not entertain motions for reconsideration for such decisions. The decision of the Hearing Examiner regarding a SEPA threshold determination may only be appealed to Superior Court in conjunction with an appeal of the underlying action in accordance with RCW 43.21C.075 and TCC 17.09.160. TCC 17.09.160(K).

A. RECONSIDERATION BY THE HEARING EXAMINER (Not permitted for a decision on a SEPA threshold determination)

1. Any aggrieved person or agency that disagrees with the decision of the Examiner may request Reconsideration. All Reconsideration requests must include a legal citation and reason for the request. The Examiner shall have the discretion to either deny the motion without comment or to provide additional Findings and Conclusions based on the record.
2. Written Request for Reconsideration and the appropriate fee must be filed with the Resource Stewardship Department **within ten (10) days of the written decision**. The form is provided for this purpose on the opposite side of this notification.

B. APPEAL TO THE BOARD OF THURSTON COUNTY COMMISSIONERS (Not permitted for a decision on a SEPA threshold determination for a project action)

1. Appeals may be filed by any aggrieved person or agency directly affected by the Examiner's decision. The form is provided for this purpose on the opposite side of this notification.
2. Written notice of Appeal and the appropriate fee must be filed with the Community Planning & Economic Development Department **within fourteen (14) days of the date of the Examiner's written decision**. The form is provided for this purpose on the opposite side of this notification.
3. An Appeal filed within the specified time period will stay the effective date of the Examiner's decision until it is adjudicated by the Board of Thurston County Commissioners or is withdrawn.
4. The notice of Appeal shall concisely specify the error or issue which the Board is asked to consider on Appeal, and shall cite by reference to section, paragraph and page, the provisions of law which are alleged to have been violated. The Board need not consider issues, which are not so identified. A written memorandum that the appellant may wish considered by the Board may accompany the notice. The memorandum shall not include the presentation of new evidence and shall be based only upon facts presented to the Examiner.
5. Notices of the Appeal hearing will be mailed to all parties of record who legibly provided a mailing address. This would include all persons who (a) gave oral or written comments to the Examiner or (b) listed their name as a person wishing to receive a copy of the decision on a sign-up sheet made available during the Examiner's hearing.
6. Unless all parties of record are given notice of a trip by the Board of Thurston County Commissioners to view the subject site, no one other than County staff may accompany the Board members during the site visit.

C. STANDING All Reconsideration and Appeal requests must clearly state why the appellant is an "aggrieved" party and demonstrate that standing in the Reconsideration or Appeal should be granted.

D. FILING FEES AND DEADLINE If you wish to file a Request for Reconsideration or Appeal of this determination, please do so in writing on the back of this form, accompanied by a nonrefundable fee of **\$750.00** for a Request for Reconsideration or **\$1,051.00** an Appeal. Any Request for Reconsideration or Appeal must be **received** in the Building Development Center on the second floor of Building #1 in the Thurston County Courthouse complex no later than 4:00 p.m. per the requirements specified in A2 and B2 above. **Postmarks are not acceptable.** If your application fee and completed application form is not timely filed, you will be unable to request Reconsideration or Appeal this determination. The deadline will not be extended.

* Shoreline Permit decisions are not final until a 21-day appeal period to the state has elapsed following the date the County decision becomes final.



Project No. _____ Appeal Sequence No.: _____

Check here for: **RECONSIDERATION OF HEARING EXAMINER DECISION**

THE APPELLANT, after review of the terms and conditions of the Hearing Examiner's decision hereby requests that the Hearing Examiner take the following information into consideration and further review under the provisions of Chapter 2.06.060 of the Thurston County Code:

(If more space is required, please attach additional sheet.)

Check here for: **APPEAL OF HEARING EXAMINER DECISION**

TO THE BOARD OF THURSTON COUNTY COMMISSIONERS COMES NOW _____
 on this _____ day of _____, 20___, as an APPELLANT in the matter of a Hearing Examiner's decision rendered on _____, 20___, by _____ relating to _____

THE APPELLANT, after review and consideration of the reasons given by the Hearing Examiner for his decision, does now, under the provisions of Chapter 2.06.070 of the Thurston County Code, give written notice of APPEAL to the Board of Thurston County Commissioners of said decision and alleges the following errors in said Hearing Examiner decision:

Specific section, paragraph and page of regulation allegedly interpreted erroneously by Hearing Examiner:

1. Zoning Ordinance _____
2. Platting and Subdivision Ordinance _____
3. Comprehensive Plan _____
4. Critical Areas Ordinance _____
5. Shoreline Master Program _____
6. Other: _____

(If more space is required, please attach additional sheet.)

AND FURTHERMORE, requests that the Board of Thurston County Commissioners, having responsibility for final review of such decisions will upon review of the record of the matters and the allegations contained in this appeal, find in favor of the appellant and reverse the Hearing Examiner decision.

STANDING

On a separate sheet, explain why the appellant should be considered an aggrieved party and why standing should be granted to the appellant. This is required for both Reconsiderations and Appeals.

Signature required for both Reconsideration and Appeal Requests

APPELLANT NAME PRINTED

SIGNATURE OF APPELLANT

Address _____

Phone _____

Please do not write below - for Staff Use Only:

Fee of \$750.00 for Reconsideration or \$1,020.00 for Appeal. Received (check box): Initial _____ Receipt No. _____
 Filed with the Community Planning & Economic Development Department this _____ day of _____, 20___.