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October 10, 2018

San Juan County Department of Community Development
PO Box 947
Friday Harbor, WA 98250

Dear San Juan County Department of Community Development:

RE: Westcott Shores Joint Use Boating Facility

Summary of Proposal

Project Location

The proposed new joint use boating facility will be shared by five properties. The project is located on the northwest shoreline of Westcott Bay on San Juan Island. The pier is positioned between two properties located at:

Address- 59 & 63 Wildwood Lane, Friday Harbor, WA 98250
Tax Lot # 462341003000 & 462341009000
Latitude: 48.598626 Longitude: -123.152817

Legal Description:

59 Wildwood Lane (Dickhaus)	63 Wildwood Lane (Appleton)
Alterations to Short Plats of Westcott Shores	Westcott Shores Lot 1 Short Plat – LT
2 & Westcott Shores 3 TGW Undivided Interest	TGW Interest in Common Tidelands and
In Common Area 2	41010
Section 23, Township 36N, Range 4W	Section 23, Township 36N, Range 4W

B. Joint Use Owner's Information

Taxlot 46234101-1000

Roy & Jennifer Robinson
57 Wildwood Lane
Friday Harbor, WA 98250-8169

Taxlot 46234100-7000

Roy & Jennifer Robinson
57 Wildwood Lane
Friday Harbor, WA 98250-8169

Taxlot 46234100-3000

David Dickhaus, (signatory for all Westcott Shores owners listed on this document)

(59 Wildwood Lane)
11401 Discovery Heights Circle
Anchorage, AK 99515-2721

Taxlot 46234100-9000

(63 Wildwood Lane)
Warren & Nancy Appleton
P.O. Box 1532
Mercer Island, WA 98040-1532

Taxlot 46234100-1000

Leonie B. Griswold
977 White Point Road
Friday Harbor, WA 98250

Project Description

The proposal is to construct a new boating facility composed of a joint use dock located between lots 59 & 63 Wildwood Lane. The dock would be shared by five adjacent shoreline properties in the Westcott Shores Short Plat and Alteration of the Westcott Shores Short Plat 2 and 3. With the exception of the Wood Family Trust property located at the easternmost boundary of the Westcott Shores Short Plat (TPN 4623410050000), all property owners within the plat have signed a joint use agreement prohibiting more than one dock. Two of the joint users, Griswold (462341001000) and Robinson (TPN 462341011000) are “option users” with a right to temporarily moor a boat at the proposed dock until such time they choose to fully participate. However, even as “option users” their properties are bound in the same manner as the full users (Appleton 46234100-9000, Dickhaus 46234100-3000 and Robinson 46234100-7000), prohibiting more than one dock for the properties party to the agreement. Additionally, the applicants agree to a condition allowing the Wood Family Trust property to participate in the joint use dock should they choose to in the future, thereby ensuring that there will only be one moorage facility for the all six of the properties within the Westcott Shores short plat covering over 800 lineal feet of shoreline.

The dock, along with an existing mooring buoy, is designed to accommodate six boats of approximately 20’ to 30’ in length, with one boat for each of the six lots in the plat. It’s anticipated that the Wood Family Trust lot (TPN will eventually become a party to the joint use agreement). The proposal includes a 176’ x 5’7” fully grated pier (982 sf), a 48’ x 4’7” fully grated ramp (220 sf), a 10’ x 6’ fully grated ramp landing float (60 sf), and a 60’ x 8’ fully grated float (480 sf). Total area less the ramp overlap is 1724 sf; total length is 238 feet. A new stairway located at the landward end of the pier will provide access to the common shoreline for the owners of the plat and their guests. The new stairway will replace the existing stairs on the Appleton and Dickhaus properties, which will be removed.

Mitigation includes¹:

1. Removal of two (2) sets of concrete stairwell landings from the upper shore zone, and two (2) stairwells;

¹ Proposed mitigation indicated with an * is in conjunction with the Corps of Engineers permitting process.

2. Removal of a derelict float located across Westcott Bay on the shore of English Camp property. The 8' wide by 18' long (144 square feet) solidly decked float is currently resting on the seabed and is no longer useful. The float will be removed and disposed of at an approved upland facility. See the attached "Addendum to Westcott Shores Joint Use Dock Application", Appendices 11 and 12)
3. A small depression in the shoreline at the applicant property is proposed for conversion to potential forage fish habitat. This depression is roughly 35' wide by 55' long when measured between the existing rock banks on either side, and from MHW to 0' MLLW. Approximately 1925 square feet of beach nourishment is proposed for placement in this depression. For the proposed shape and size of the proposed area see the imagery in Appendixes 13-15 of the "Addendum to Westcott Shores Joint Use Dock Application";
4. Planting of woody vegetation is proposed for approximately 3400 square feet of shoreline associated with the applicant properties. Planting is proposed for areas within 50' of the high tide line and will include various species of native woody vegetation. Vegetation will be monitored for 5 years, ensuring 100% survival of plants in the first two years, and 80% survival for the final three. Plants will be protected from herbivory. Any plants that expire will be replaced prior to the following year's monitoring survey. The associated mitigation planting plan, native plant list, and approximate planting areas are included in Appendices 16-18 of the attached "Addendum to Westcott Shores Joint Use Dock Application";

Areas where structures are removed from the riparian zone will be revegetated, and additional vegetation will be added to the bank structure where vegetation is currently absent. No disturbance or removal of vegetation is proposed. Despite being in Westcott Bay, where the entire bay is documented as herring spawning habitat, the project area is void of submerged aquatic vegetation and represents poor spawning habitat.

The proposed joint-use dock is intended to provide water access to the owners of up to five (5) parcels, two (2) of which are optional users. This guarantees a reduction in overall development of the shoreline in this area on all involved parcels. Structural removals and revegetation are listed in Appendix B of the biological evaluation (see attached).

Application Checklist for Land Use Review - General Requirements

1. **Completed application form:** The signed Shoreline Permit Application form is enclosed.
2. **Legal Description of the site:** Enclosed.
3. **Completed SEPA Environmental Checklist:** Enclosed.
4. **Fee:** A check made out to the San Juan County DCD for \$4500 is enclosed.
5. **Evidence of available and adequate water supply:** NA
6. **Evidence of sewer availability:** NA
7. **Clearing, grading, and stormwater plan:** NA
8. **Stormwater discharge to a County maintained road or ditch:** NA

9. **Driveway approaches onto public roads:** NA
10. **Commercial, industrial, public, and institutional facilities:** NA
11. **List of neighboring property owners:** Enclosed.
12. **Description of surrounding land use:** Westcott Bay is entered from a relatively narrow passage located between the southern tip of White Point and Horseshoe Bay to the south. The passage is heavily used during the boating season for access to recreational activities at English Camp in Garrison Bay and to access the numerous buoys and docks in the bays. The majority of the Westcott Shores plat lots are developed with single-family residences as are the surrounding lots. Multiple docks are located to the south in Horseshoe and Garrison Bays, a large dock associated with the Westcott Bay Oyster Company is located on the east side of Westcott Bay, a new joint use dock is located to the south on White Point shared by the Encore and second wave properties, and single user dock is located adjacent to the west side of the Westcott Shores Plat.
13. **Critical Areas:** Critical areas known to exist on the subject properties include marine habitats and critical aquifer recharge areas.

Critical aquifer recharge areas (SJCC 18.35.080) - No impact is anticipated to critical aquifer recharge areas as the proposal is for remodel of an existing residential accessory structure and a residential dock. The proposed use is not included within the list of uses requiring inspection for potential impacts to groundwater per SJCC 18.30.140E. The Groundwater Protection Requirements noted in SJCC 18.30.140C for use of pesticides, petroleum products and other chemicals that could be a health hazard in drinking water will be followed.

Fish and Wildlife Habitat Conservation Areas (FWHCA, SJCC 18.35.110 – 140 and 18.50.130 - 160): The critical area requirements establish protection standards for aquatic fish and wildlife habitat conservation areas (FWHCA). Including a requirement to demonstrate no net loss to shoreline ecological functions. If project proposals do not comply with the critical area protections in SJCC [18.50.130](#), applicants must submit a mitigation sequence analysis to the department.

The attached critical areas report and addendum prepared by Jen Jay Inc. addresses potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information.

Frequently Flooded Areas (SJCC 18.35.075):The shoreline fronting the applicants properties is identified by the County database as being partially located within a frequently flooded area. The flood elevation is +13' MLLW. A flood elevation certificate is not applicable to structures located seaward of the Mean High Water Line as such structures are considered to be in the floodway and are controlled by separate regulations per SJC Policy 09-001 (ESA and FEMA Flood Hazard Area Requirements).

14. **Heights of Proposed Structures:** The maximum height of the two piles used to support the ramp-landing float will be approximately 15' above MLLW.
15. **Pedestrian pathways and sidewalks:** The stairs and dock will be accessed from the common shoreline where possible and from a pedestrian access easement located along the Dickhaus and Appleton common property line. The existing Appleton and Dickhaus stairs to the beach will be removed and replaced by a single stairway to the common beach located at the landward end of the proposed pier. The areas where structures are removed from the riparian zone will be revegetated,
16. **Landscape screening plans:** Landscape screening is not required as no trees are proposed to be removed. However, additional vegetation will be added to the bank where vegetation is currently absent as mitigation in conjunction with the Corps of Engineers permitting process.
17. **Financial guarantee for required landscaping:** None proposed.
18. **Description of proposed signs:** None proposed.
19. **Utilities and exterior lighting:** None proposed.
20. **Cultural Resources:** Community Development and Planning Department staff stated that the project site is not located in an archaeological buffer zone.
21. **Shoreline Permit Criteria:**
 - a. Consistent with the policies of the Shoreline Management Act and its implementing regulations, Chapter 90.58 RCW and Chapter 173-27 WAC, as amended.
 - i. *A shoreline permit is required for construction of a new dock. Where a development is not exempt it must comply with the applicable policies and regulations of the adopted Shoreline Master Program as authorized by 90.58.RCW and 173-27 WAC. The San Juan County Shoreline Master permits docks in the Conservancy shoreline environments subject to the policies and regulations of the SMP.*
 - b. Consistent with the policies and regulations of the Shoreline Master Program in Chapter [18.50](#) SJCC.
 - 18.50.240 Over-water structures including boating facilities, docks, piers, mooring buoys, and mooring and recreational floats.

A. General Regulations.

1. All over-water structures including boating facilities, docks, piers, mooring buoys, and mooring and recreational floats must be designed to avoid or minimize adverse impacts on marine and aquatic life, and the shore process corridor and its operating systems. Over-water structures are restricted to the minimum size necessary to meet the requirements of the proposed water-dependent use.

The attached critical areas report and addendum prepared by Jen Jay Inc. address potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project, incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended.

In order to avoid grounding at the extreme low tide of -4' MLLW, the landward end of the float was positioned at a minimum depth of -5.5' MLLW.

The dock, along with an existing mooring buoy, is designed to accommodate six boats of approximately 20' to 30' in length, with one boat for each of the six lots in the plat. It's anticipated that the option users (Griswold and Robinson) will eventually become full participants as will the owner of the Wood Family Trust lot (TPN 4623410050000).

2. All over-water structures must be sited and designed to avoid or minimize the need for new and maintenance dredging.

No dredging is proposed or anticipated.

3. The construction of all over-water structures including new, modifications or replacements of existing facilities must meet the applicable design criteria established by the WDFW in WAC [220-660-140](#) and [220-660-380](#) relative to materials, siting, disruption of currents, restrictions of tidal prisms, flushing characteristics, and fish passage to the extent that those criteria are consistent with protection of the shore process corridor and its operating systems.

This will be addressed later in the narrative.

4. At least one safety ladder must be placed on the long side of all new or enlarged main floats at 60-lineal-foot intervals.

A ladder will be provided along the main float.

5. In general, only one form of moorage or other structure for boat access to the water is allowed on a single lot. A mooring buoy may be allowed to serve single lots, and areas with community use docks, boat ramps and railways.

Appleton, Dickhaus, and Robinson have buoys. The Dickhaus buoy will be incorporated into the joint use agreement and shared by all users.

6. Provided the structure will result in no net loss of shoreline ecological functions, storage structures are allowed on private docks, floats, and piers. Except as provided in SJCC [18.50.280](#), structures on private docks, floats and piers may be up to three feet in height and 24 square feet in size.

The joint use agreement provides for one small communal container for storage of maintenance and safety equipment.

7. Public access and ecological restoration shall be incorporated into publicly financed projects when feasible.

The project will not be publically financed. Even so, restoration of the shoreline will occur upon removal of the Appleton and Dickhaus stairs (the Robinson stairs will remain) and consolidation into a single stairway providing access to the beach by the joint users.

8. Multiple use and expansion of existing over-water structures are preferred over construction of new over-water structures.

The purpose of the proposal is to provide moorage for the owners of the residential lots within the Westcott Shores Plats as a plat dock pursuant to SJCC 18.50.530. There is not an existing dock located within the plat that can be expanded. The owner of the neighboring dock located to the west indicated that she is not interested in expanding or sharing the dock (see attached letter from Leonie Griswold).

9. The order of preference for over-water structures is:

a. Mooring buoys – *The Dickhaus buoy will be incorporated into the joint use agreement and shared by all users . See page 12, section 2 for more information on the feasibility of mooring buoys as an alternative to the proposed dock.*

b. Existing marinas – *Two marinas are located within the eight-mile service range of the proposed dock: Roche Harbor and Snug Harbor Marinas. Roche Harbor Marina stated “We have an extensive waitlist with no availability at this time. At this time, all slips under 30’ is at least a 30 year wait. All slips 36’ and above is a 5 to 15 year wait. For our smaller slips we give priority to our outer island residence and our tenants with fishing boats. My transfer list supersedes my waitlist.*

Snug Harbor stated “NO, nothing available as of now. and up to two years waiting list. That is with the new docks.”

The shoreline permit authorizing revision of the Snug Harbor Marina, was for remodel of the marine with no increase in the number of moorage spaces (see attached). Given that the “new docks” referred to in the response by Snug Harbor will not generate any additional moorage, the likelihood of alternate moorage becoming available in two years for the five boats associated with the proposed dock is extremely low.

c. Moorage and recreational floats unattached to a pier or floating dock;

d. Boating facilities, docks and ramps serving five or more residences – *The proposal is for a boating facility ultimately serving up to six residences.*

e. Joint use or community docks.

f. Single use docks

10. Applicants for a shoreline substantial development permit for boating facilities, joint use community docks, private docks, piers, moorage floats and buoys shall demonstrate how the proposed development will be designed, constructed and maintained to minimize adverse impacts. Impacts must be mitigated in accordance with SJCC [18.50.140](#), [18.50.150](#) and [18.50.160](#). At a minimum, potential impacts to the following shall be evaluated:

a. Littoral drift and Sand movement:

The report Current and Historical Coastal Geomorphic (Feeder Bluff) Mapping of San Juan County prepared by Coastal Geological Services, Inc, 2010, identifies a drift cell (SJ26) in the cove to the southwest of the proposed dock site. The proposed dock site is located outside of the drift cell. According to the report, there is no appreciable drift over the rocky shoreform where the dock is proposed, it is not identified as a feeder bluff, transport zone, or an accretion shoreform. Net shore drift in the drift cell is to the north and east (from left to right). No feeder bluffs, toe erosion, or landslides are identified at the dock site. The transport zone for sediments is located in the coves to the south and north of the dock site, not at the dock site (see map 21 of the report).

b. Water circulation and quality:

The project area has adequate flushing action for the proposed moorage. The USGS report, Bathymetry, Substrate and Circulation in Westcott Bay, San Juan Islands, Washington by Eric Grossman, Andrew Stevens, Chris Curran, Collin Smith, and Andrew Schwartz, 2010, provides an excellent description of the tidal flushing characteristics of Westcott Bay:

Westcott Bay is 3 km in length, averages 800 m in width, and is connected to Garrison Bay inside of a narrow (150 m) mouth opening into Mosquito Pass. Westcott Bay is relatively shallow reaching a maximum depth of approximately -8.5 m, although 35% of the bay is less than -2 m and 48% is less than -3 m.

Two small intermittent streams discharge into the head of the bay. Westcott Bay is oriented WSW-ENE and because of its narrow mouth, receives little swell in the form of wind waves originating from summertime northwest and periodic wintertime southwest fetch. This region of the San Juan Islands is characterized by a 3.5-4.0 m tide regime which generates strong observable tidal currents in Mosquito Pass.

The seafloor of Westcott Bay is complex with high relief between the entrance at Mosquito Pass and Bell Point, while the head of the bay is shallow, smooth and lacking relief (see Fig. 6 below). A distinct narrow channel incises to -8.5 m along the central axis

of the outer bay and is deeper along the north edge of the entrance to the bay. A sill 7-8 m deep separates Mosquito Pass from Westcott Bay. The channel/trough extends east to the area north of Bell Point, where it gradually shallows toward the head of the bay. The margins of the trough are relatively steep, exceeding 35-40% slope immediately southeast of White Point. These complex sill and trough features are likely a result of complex and strong currents, the presence of rocky substrate at the seafloor, and the regional glacial history. The bathymetry between Bell Point and the head of the bay is relatively smooth and featureless likely reflecting extensive sedimentation of fine material.

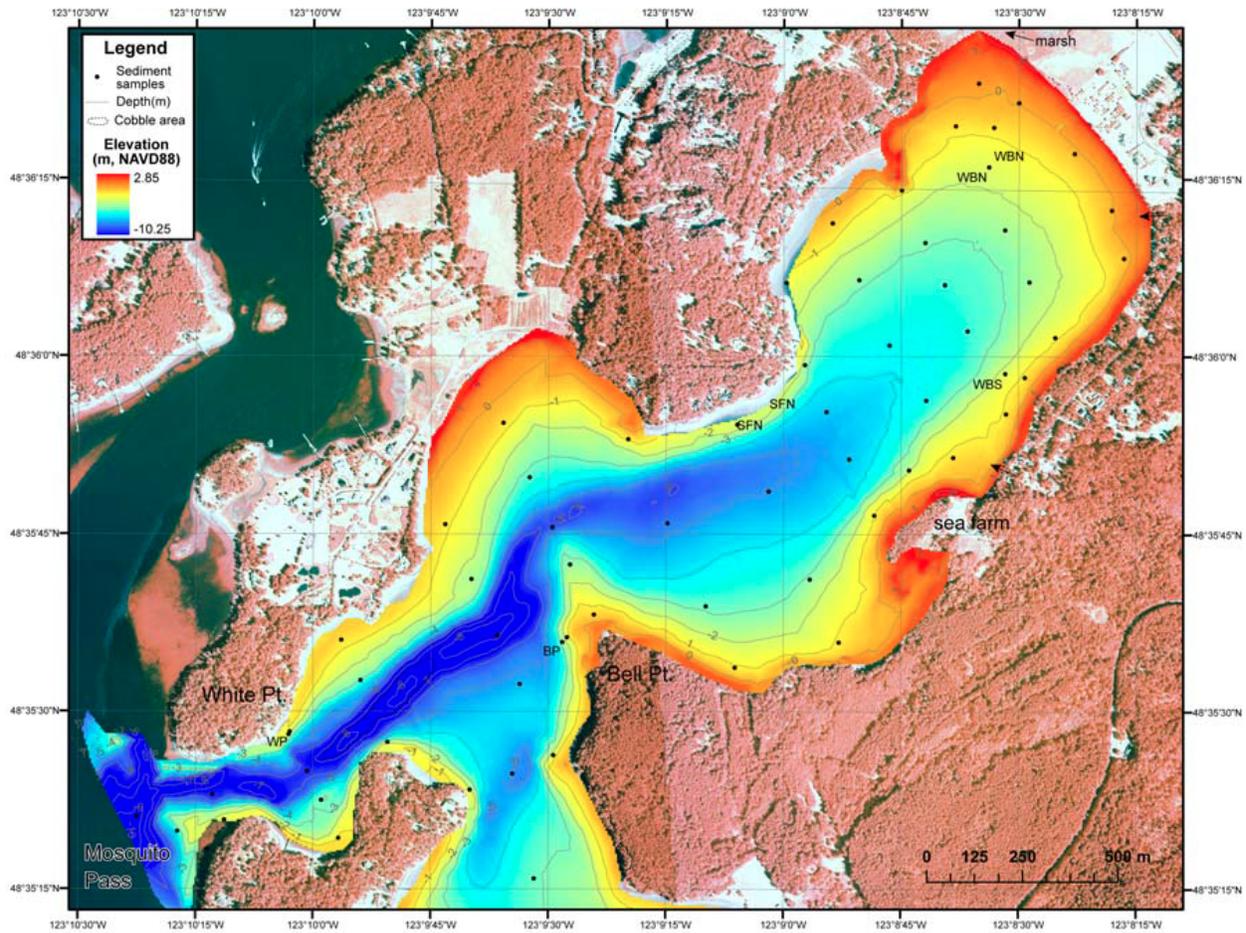


Figure 6

Generally, higher currents were found along the central axis of Westcott Bay, and especially along the northwest edge of the entrance to Westcott Bay.

The flushing action in the bay is strongest at the mouth of the bay and diminishes as depths decrease near the head of the bay. The blue area in figure 6 indicates the channel that runs along the mid-part of Westcott Bay where currents are the strongest. Figure 7 below helps to illustrate this as well by showing the steepest parts of the Bay in red. The

proposed dock would be located along a point that projects into the deeper part of the Bay where currents are stronger. Due to the lack of docks in the vicinity and the adequacy of tidal flushing at the project site, minor discharges from boats moored at the dock are not expected to be a significant concern. Consequently, cumulative discharges from vessels moored in the bay would be expected to be low.

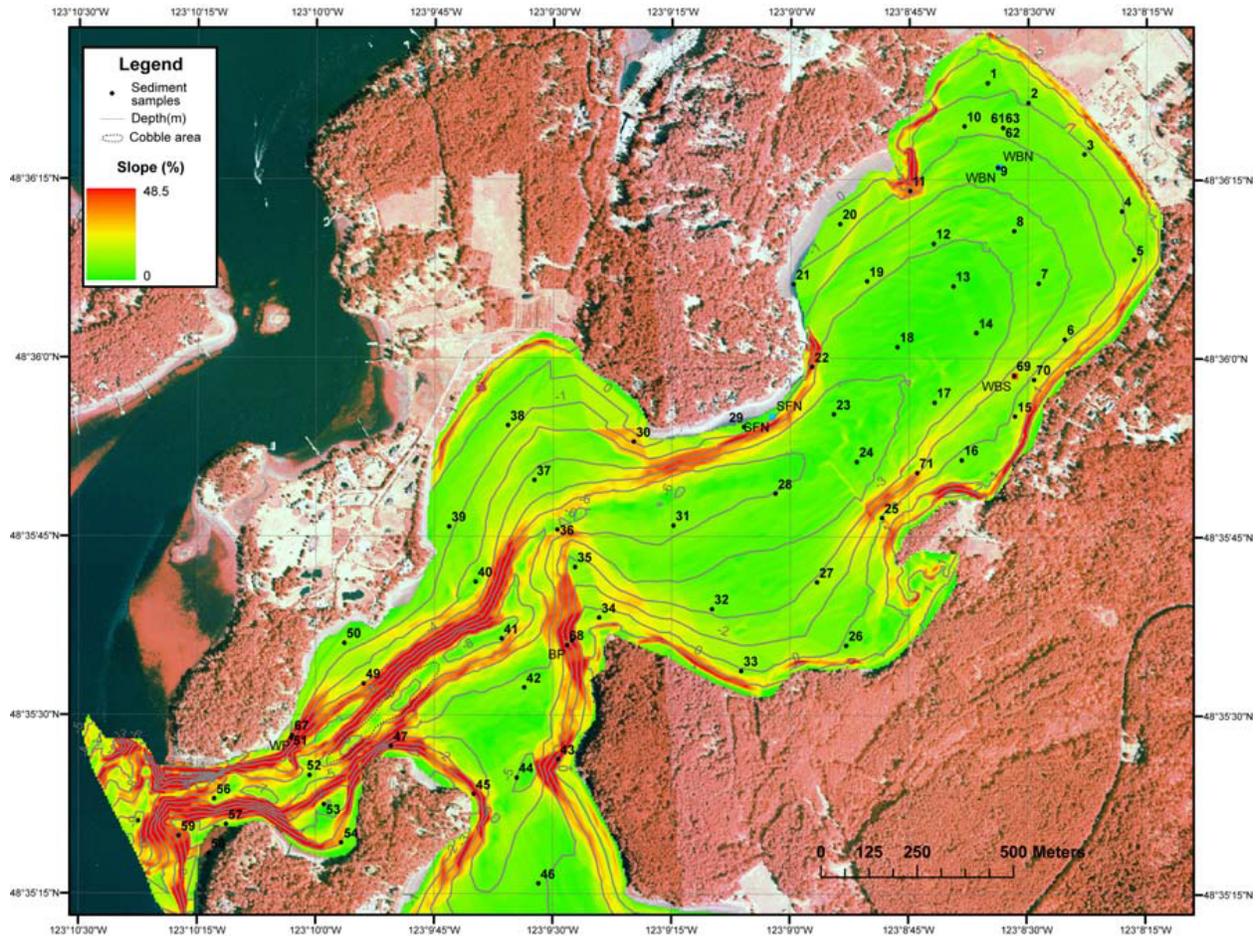


Fig. 7. Map showing seafloor slope of Westcott Bay with steep slopes characterizing the complex sill and trough region of the western half of the bay and relatively low slopes common of the broad gentle seafloor at the head of the bay.

d. Fish and wildlife

The attached critical areas report and addendum prepared by Jen Jay Inc. address potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended

e. Navigation:

The narrowest distance between the dock site and the opposite side of Westcott Bay is over 1800 feet. The dock would extend 238 feet into the Bay leaving more than adequate room for navigation within the Bay.

f. Scenic views:

To minimize scenic impacts, the dock would be a joint use facility potentially serving up to six lots. Joint use would preclude the possibility additional docks within the Westcott Shores plats. The float would be secured by anchors instead of piles, minimizing its visual profile.

g. Public access to the shoreline:

Public access along the shoreline would be restricted as the tidelands are not public, they are owned by the applicants.

11. Boating facilities that are expected to interfere with the normal erosion-accretion process associated with feeder bluffs are prohibited.

The shoreline where the dock is proposed is not identified as a feeder bluff.

13. Boats moored at residential boating facilities shall not be used for commercial overnight accommodations.

Commercial use of the dock is not proposed.

B. Regulations – General Design and Construction Standards.

1. Nontoxic materials should be used in construction. Use of treated wood containing toxic compounds should be minimized and may only be used where nontoxic materials are deemed infeasible and as allowed by this subsection as follows:

New pier piles will be galvanized steel pipe; pier and ramp will be welded aluminum truss design with fiberglass grated decking; moorage float will be constructed of chemonite treated timbers with roto-molded foam filled flotation tubs and molded plastic decking (see the attached materials list for more information).

2. Pilings employed in piers or any other structure shall have a minimum vertical clearance of one foot above the extreme high water of marine shorelines or OHWM of lakes.

The pilings will have a minimum vertical clearance of one foot above the extreme high water.

3. All floats shall have stops that serve to keep the bottom of the float off tidelands at low tide or off the substrate in lakes.

Float stops will be included.

4. Nonbiodegradable materials used in float, pier, or dock construction shall be shielded and enclosed to prevent disintegration.

5. Overhead wiring and plumbing are prohibited on boating facilities, joint use and private docks, and piers.

Overhead wiring is not proposed.

6. New or relocated boathouses and covered moorages are prohibited on boating facilities except as allowed for railway systems in SJCC [18.50.290](#)(E).

A boathouse is not proposed.

7. Dock lighting shall shine downward, be of a low wattage, and not exceed a height of three feet above the dock surface. All lighting must be consistent with SJCC [18.50.200](#).

Any proposed dock lighting will comply with this requirement.

8. All construction-related debris shall be disposed of properly and legally. Any debris that enters the water shall be removed promptly. Where feasible, floats shall be secured with anchored cables in place of pilings. The cabling must have a mid-line float or similar mechanism to keep the cable from dragging and disturbing the bottom substrates, vegetation and aquatic life.

See the attached BMPs addressing disposal of construction debris. The floats will be secured with anchored elastic cables designed to avoid dragging and disturbing the bottom substrates, vegetation and aquatic life.

9. Over-water structures must be marked with reflectors, or otherwise identified to prevent unnecessarily hazardous conditions for water surface users during the day or night. In general, the exterior finish of all structures shall be nonreflective and a color that will visually blend with the background.

Reflectors will be installed as necessary to alert boaters to the presence of the dock.

18.50.250 Regulations – Boating facilities – General.

A. Boating facilities must not intrude into or over shoreline critical areas unless all of the following criteria are met:

1. The public need for an intrusion is demonstrated and the proposal protects the public trust, as embodied in RCW [90.58.020](#). To demonstrate how the project protects the public trust, the applicant shall submit a narrative demonstrating that the proposal:

a. Is consistent with the goals and policies and regulations of this SMP.

The goals and policies and regulations of the SMP are addressed herein.

b. Benefits the public by providing physical or visual access to the shoreline; and

The proposed boating facility and stairs will provide physical and visual access to the shoreline by the owners of the lots in the Westcott Shores plats.

c. Will not have an adverse impact on the navigability of adjacent waters.

The narrowest distance between the dock site and the opposite side of Westcott Bay is over 1800 feet. The dock would extend 236 feet into the Bay leaving more than adequate room for navigation within the Bay.

2. No feasible alternative exists.

Each of the joint users has buoys. Use of the buoys has proven to be an inadequate and dangerous alternative to the proposed dock. The shoreline is rocky with no place to store a dinghy at high tides. Dickhaus stated that at times he has attempted to leave his canoe on the shore and doing so has resulted in damage (holes in the canoe) as a result of waves banging the canoe against the rocks. Robinson has experience similar damage to his dinghy.

The beach slopes very gradually until about -5' MLLW. The substrate turns to mud a short distance seaward of the bank. All the joint users have indicated that it is difficult to near impossible to drag a dinghy through the mud a substantial distance at lower tides prior to reaching water deep enough to float a dinghy. This is especially troublesome during the boating season when low tides occur during the day, precluding access to and from the buoys during the time when boating is most likely to occur.

The Dickhaus buoy is proposed to be used in conjunction with proposed dock. Retaining the buoy will allow a smaller moorage float than would otherwise be required for moorage of six 20' to 30' boats. Additionally, the proposed dock will provide an adequate landing and moorage area for dinghies than is currently available along the shore.

See the "demand analysis" below and previous discussion on expansion of existing facilities and the availability of moorage at commercial marinas.

3. The project and any required mitigation will result in no net loss of shoreline ecological functions associated with critical fresh and saltwater habitat.

The attached critical areas report prepared by Jen Jay Inc. addresses potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. No post construction monitoring is recommended. See the attached biological report for more information

4. The project is consistent with the state's interest in resource protection and species recovery.

The attached critical areas report and addendum prepared by Jen Jay Inc. address potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation

measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended

B. The location, construction, management, and, if necessary, mitigation of adverse impacts of new and expanded boating facilities and associated accessory uses must conform with SJCC [18.50.140](#), [18.50.150](#) and [18.50.160](#) and result in no net loss of shoreline ecological functions.

The attached critical areas report and addendum prepared by Jen Jay Inc. addresses potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended

C. Boating facilities must be the minimum size needed to accommodate the intended use as demonstrated by the demand analysis required in SJCC [18.50.330](#).

In order to avoid grounding at the extreme low tide of -4' MLLW, the landward end of the float was positioned at a minimum depth of -5.5' MLLW.

The dock, along with the Dickhaus buoy, is designed to accommodate six boats of approximately 20' to 30' in length, with one boat for each of the six lots in the plat. It's anticipated that the option users (Griswold and Robinson) will eventually become full participants as will the owner of the Wood Family Trust lot (TPN 4623410050000)..

D. Private boating facilities designs may not accommodate more than one boat per residential unit except that one additional space for every 10 residential units served is allowed to accommodate guests.

The dock, along with the Dickhaus buoy, is designed to accommodate six boats of approximately 20' to 30' in length, with one boat for each of the six lots in the plat. It's anticipated that the option users (Griswold and Robinson) will eventually become full participants as will the owner of the Wood Family Trust lot (TPN 4623410050000).

E. Boating facilities shall be set back at least 10 feet from side property lines. However, a boating facility may be located adjacent to or upon a side property line when mutually agreed to by contract or by covenant with the owners of the adjacent property. A copy of such contract or covenant must be recorded with the County auditor in a format approved by the department to run with each parcel's titles. (Ord. 1-2016 § 30)

The proposed dock will be located along the projection of the common property line between the Appleton and Dickhaus properties. The location has been agreed upon by the owners as demonstrated in the signed joint use agreement, which embodies an access easement along the said the common property.

18.50.330 Boating facilities, docks, piers, floats, and ramps – Submittal requirements.

A. For all new or expanded boating facilities, docks, piers, floats, and ramps, applicants must provide a demand analysis demonstrating the need for the proposal that addresses at least the following criteria:

1. The total amount of moorage proposed (except for ramps);

Moorage for up to six boats of approximately 20' - 30' associated with the six lots in the Westcott Shores plats.

2. The total number of commercial moorage spaces within the service range of the proposed facility, including vacancies or waiting lists at facilities existing on the date of the application;

Two marinas are located within the eight-mile service range of the proposed dock: Roche Harbor and Snug Harbor Marinas. Roche Harbor Marina stated "We have an extensive waitlist with no availability at this time. At this time, all slips under 30' is at least a 30 year wait. All slips 36' and above is a 5 to 15 year wait. For our smaller slips we give priority to our outer island residence and our tenants with fishing boats. My transfer list supersedes my waitlist.

Snug Harbor stated Snug Harbor stated "NO, nothing available as of now. and up to two years waiting list. That is with the new docks."

The shoreline permit authorizing revision of the Snug Harbor Marina, was for remodel of the marine with no increase in the number of moorage spaces (see attached). Given that the "new docks" referred to in the response by Snug Harbor will not generate any additional moorage, the likelihood of alternate moorage becoming available in two years for the five boats associated with the proposed dock is extremely low.

3. The expected service population and boat ownership characteristics of the population, if necessary for specific design elements related to facility length or necessary water depth;

The dock, along with the Dickhaus buoy, is designed to accommodate six boats of approximately 20' to 30' in length, with one boat for each of the six lots in the plat. It's anticipated that the option users (Griswold and Robinson) will eventually become full participants as will the owner of the Wood Family Trust lot (TPN 4623410050000).

4. Approved facilities, or pending applications, within the service range of the proposed facility;

A search was made of pending shoreline permit applications using the Department of Community Development's permit search engine. Thirteen pending applications were indicated. Of the thirteen applications, only four were for docks (PSJ000-14-0010, PSJ-17-0003, PSJ-17-0007, and PSJ000-17-0009). Of the four applications, only PSJ000-17-0003 was located on San Juan Island, and that application is for a facility located outside of the eight-mile service area (137 Paintbrush Ln.) associated with the proposed application. Consequently, there are no pending applications with the potential to provide alternative moorage to the proposed use.

5. Proposals for new boating facilities, docks, piers, floats, and ramps shall provide documentation demonstrating that expansion of facilities existing at the time of application is not feasible or would not be adequate to meet current demand.

The purpose of the proposal is to provide moorage to the owners of lots within the Westcott Shores Plats as a plat dock pursuant to SJCC 18.50.530. There is not an existing dock located within the plat that can be expanded. . The owner of the neighboring dock located to the west indicated that she is not interested in expanding or sharing the dock (see attached letter from Leonie Griswold).

B. At the discretion of the director, the following documents for new or expanded boating facilities, docks, piers, floats and ramps may be requested:

1. A mitigation plan in accordance with SJCC [18.50.140](#), [18.50.150](#) and [18.50.160](#) if the project will result in unavoidable adverse impacts to shoreline ecological functions or processes.

The attached critical areas report and addendum prepared by Jen Jay Inc. addresses potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended

2. A biological assessment compliant with the ACOE and FEMA Region 10 floodplain habitat assessment and mitigation guidance, and the demand analysis prepared in accordance with subsection (A) of this section;

See above.

3. A slope bathymetry map.

See the embedded map from [Bathymetry, Substrate and Circulation in Westcott Bay, San Juan Islands, Washington](#) showing the slope bathymetry of Westcott Bay.

4. An assessment of current water-dependent uses in the vicinity and documentation of potential impacts to those uses and mitigating measures.

See the attached Shoreline Modifications map identifying approved facilities within the service range of the proposed facility. The proposed dock would be located adequate distances from buoys and docks within Westcott bay to avoid any conflicts.

5. An assessment of pedestrian shoreline access or the infeasibility of providing public access areas for public ramps.

Public access along the shoreline would be restricted as the tidelands are not public, they are owned by the applicants. Access to the shoreline by the owners of the lots within the plats will be provided by stairs connected to the proposed dock.

6. Location of wetlands within 300 feet and FWHCAs within 200 feet of the project area.

There are no wetlands within 300 feet of the proposed dock. FWHCA are addressed in the attached critical area report.

7. Field location of the OHWM.

The field location of the OHWM was identified by a qualified surveyor and is noted on the plans.

WDFW Design Guidelines - WAC 220-660-380 Residential and public recreational docks, piers, ramps, floats, watercraft lifts, and buoys in saltwater areas (relative to materials, siting, disruption of currents, restrictions of tidal prisms, flushing characteristics, and fish passage to the extent that those criteria are consistent with protection of the shore process corridor and its operating systems.

This section applies to the design and construction of permanent, seasonal or temporary docks, piers, ramps (gangways), floats, watercraft lifts, and mooring.

(1) **Description:** Docks are structures that are fixed to the shoreline but floating upon the water. Piers are fixed, piling-supported structures. Floats (rafts) are floating structures that are moored, anchored, or otherwise secured in the water that are not directly connected to the shoreline. A ramp is a gangway that connects a pier or shoreline to a float and provides access between the two. Pilings usually associated with these structures are timber, steel, reinforced concrete, or composite posts that are driven or jacked into the bed. A watercraft lift is a structure that lifts boats and personal watercraft out of the water. A mooring buoy is a structure floating on the surface of the water that is used for private and commercial vessel moorage.

(2) **Fish life concerns:**

(a) Over-water and in-water structures can alter physical processes that create or maintain habitat that supports fish life. These processes include light regime, hydrology, substrate conditions, and water quality. Light reduction is the main impact to fish life at critical life stages. Light reduction or shading by over-water or in-water structures reduces survival of aquatic plants. Aquatic plants provide food, breeding areas, and protective nurseries for fish life.

(b) Shallow water provides juvenile fish a refuge from predators like larger fish. Over-water and in-water structures can alter movement of juvenile salmon, steelhead and other fish species. Structures grounding on the bed can physically block migration and damage forage fish spawning beds. The light/dark contrast of shading/no shading caused by over-water and in-water structures can affect migration behavior. Fish respond by moving into deeper water which increases the risk of predation.

(3) **Residential and public recreational pier, ramp, float, watercraft lift and buoy design – Generally:**

(a) The department requires that new structures are designed with a pier and ramp to span the intertidal beach, whenever feasible.

The proposed pier and ramp span the intertidal beach, terminating at approximately - 5.5' MLLW.

(b) The design and location of structures must follow the mitigation sequence to protect salt water habitats of special concern.

The attached critical areas report and addendum prepared by Jen Jay Inc. addresses potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended

(i) Design and locate structures to protect juvenile salmonid migration, feeding, and rearing areas.

(ii) Design and locate structures to protect documented Pacific herring, Pacific sand lance, and surf smelt spawning beds; and rockfish and lingcod settlement and nursery areas.

(iii) The department will require a seagrass/macroalgae habitat survey for all new construction unless the department can determine the project will not impact seagrass and kelp beds, and in herring spawning beds other macroalgae used as spawning substrate. A survey is not required for replacement of an existing structure within its original footprint.

The eelgrass and macroalgae survey determined that there was no eelgrass or kelp located within 25' of the proposed dock.

(A) Structures must be located at least twenty-five feet (measured horizontally from the nearest edge of the structure) and four vertical feet away from seagrass and kelp beds (measured at extreme low water).

(B) In documented herring spawning areas, structures must be located at least twenty-five feet (measured horizontally from the nearest edge of the structure) and four vertical feet from macroalgae beds on which herring spawn (measured at extreme low water).

(iv) If artificial nighttime lighting is used in the project, use low-intensity lights that are located and shielded to prevent light from attracting fish or disrupting fish migration behavior, unless there are safety constraints.

Artificial lighting is not proposed.

(v) The design must not include skirting including batter fencing constructed around piers, docks, or floats unless approved by the department. The design should not use treated wood for the decking of the structure. The design may use treated wood for structural elements. Treated wood structural elements subject to abrasion by vessels,

floats, or other objects must incorporate design features such as rub strips to minimize abrasion of the wood.

Skirting is not proposed. The proposed decking is molded fiberglass reinforced plastic; treated wood will not be used on any of the surfaces. See the attached materials list for more information.

(c) The structure must have been usable at the site within the past twelve months of the time of application submittal to be considered a replacement structure. Usable means no major deterioration or section loss in critical structural components is present.

Replacement is not proposed.

(d) Replacement of more than thirty-three percent or two hundred fifty square feet of decking or replacement of decking substructure requires installation of functional grating in the replaced section only. The grating must conform to the requirements in this section.

(4) Pier and ramp design:

(a) Design piers to maximize height over the bed to improve light transmission. The bottom of the pier must be at least six feet above the bed at the landward end.

The bottom of the pier is 10' above the bed as measured from the OHWM and 12' as measured from the MLLW.

(b) Limit the width of residential piers to no more than six feet wide. Limit the width of recreational piers to the minimum width needed to accommodate the intended use.

The pier width is 5'7".

(c) North/south oriented piers (338 to 22 degrees, or 158 to 202 degrees) greater than four feet in width must have at least thirty percent of the entire deck surface covered in functional grating. The grating must be installed parallel to the length of the pier for the entire length of the pier.

The pier is located perpendicular to the shore in a north/south orientation. The entire deck surface will be grated with fibergrate molded grating with 62% open area to the substrate.

(d) Northeast/southwest, northwest/southeast, and east/west oriented piers (23 to 157 degrees, 203 to 337 degrees) must have at least fifty percent of the entire deck surface covered in functional grating regardless of width. The grating must be installed parallel to the width of the pier, evenly spaced along the entire length of the pier.

(e) If only the minimum pier deck surface described in (c) or (d) of this subsection is covered, the grating material's open area must be at least sixty percent open area unless grating covers more than the minimum pier deck area of the pier. If the grating covers more than the minimum deck surface area, the grating material's open area can be reduced down to at least forty percent open area.

(f) Limit the width of residential ramps to four feet wide. Limit the width of public recreational ramps to the minimum width needed to accommodate the intended use. Cover the entire ramp surface with grating.

The exterior width of the ramp is 4'7" wide which is consistent with the allowed ramp width of 5' pursuant to SJCC 18.50. 260. The ramp is located perpendicular to the shore in a north/south orientation. The entire deck surface will be grated with fibergrate molded grating with 62% open area to the substrate.

(5) Float design (floats connected to a pier):

(a) Whenever feasible, place float so that the largest dimension is oriented north/south.

The ramp float is in-line with the pier which is oriented in a north/south direction. The moorage float is aligned to the shore which is oriented in an east/west direction in order to be in the deepest water and orient to the wind and currents.

(b) Limit the width of residential floats to eight feet. Limit the width of public recreational floats to the minimum width needed to accommodate the intended use.

The proposed moorage float is eight feet wide.

(c) Whenever feasible, limit the length of single-family dock floats to thirty feet and joint-use dock floats to sixty feet.

(d) If the design has a float positioned perpendicular to the ramp to serve as a ramp landing, this float must not be more than six feet wide and ten feet long.

The ramp float is six feet wide and ten feet long.

(e) Design floats in intertidal areas with stoppers or support pilings that keep the bottom of the floats at least one foot above the substrate so that the structure will not rest on the bottom.

The floats will include stoppers to keep the bottom of the floats at least one foot above the substrate.

(f) A float six feet wide or less must have at least thirty percent of the entire deck surface covered in functional grating. A float between six and eight feet wide must have at least fifty percent of the entire deck surface covered in functional grating. Orient grating so the lengthwise opening maximizes the amount of light penetration. Any objects that are not part of the structure on, above, or below the grating should not block light penetration. Flotation must be located under the solid decked area only.

The floats will be fully grated with 62% open area to the substrate.

(g) The grating material's open area must be at least sixty percent.

The floats will be fully grated with 62% open area to the substrate.

(h) Flotation for the structure must be fully enclosed and contained in a shell (tub). The shell or wrap must prevent breakup or loss of the flotation material into the water. The shell or wrap must not be readily subject to damage by ultraviolet radiation and abrasion.

Flotation will be encased in 3'x4'x20" molded plastic tubs.

(i) Embedded anchor(s), pilings (with stops), and float support/stub pilings may be used to hold floats in place.

Embedded anchors are proposed.

(j) If a project uses anchors to hold the float in place, the anchor lines must not rest on the substrate at any time.

The anchor lines will be elastic in order to stretch with the tides and avoid scouring the substrate at any time.

(6) Piling design:

(a) Use the smallest diameter and number of pilings required to construct a safe structure.

Twelve 10" diameter steep piles will be used as recommended by the contractor.

(b) Steel piling used to construct residential docks should not exceed twelve inches in diameter. Limit the diameter of steel piling used to construct public recreational docks to the minimum diameter needed to accommodate the intended use.

Twelve 10" diameter steep piles will be used as recommended by the contractor.

(c) The use of creosote or pentachlorophenol piling is prohibited. New and replacement piling can be steel, concrete, recycled plastic, or untreated or treated wood approved by the department.

(d) Treated wood piling must incorporate design features to minimize abrasion of the piling from contact with vessels, floats, or other objects.

(e) Fit all pilings with devices to prevent perching by fish-eating birds.

(10) Residential and public recreational dock, pier, ramp, float, floating dock, watercraft lift, and buoy construction:

(a) The dock or pier centerline must be reestablished during construction using the same methodology used to establish the centerline during the seagrass/macroalgae habitat survey.

(b) When installing steel piling, a vibratory hammer is preferred.

A vibratory hammer will be used to install the pilings.

(c) If impact pile driving is used, set the drop height to the minimum needed to drive the piling.

(d) Use appropriate sound attenuation to minimize harm to fish from impact pile-driving noise.

(e) To avoid attracting fish to light at night, limit impact pile driving to daylight hours whenever feasible.

- c. Consistent with the applicable sections of this code (e.g., Chapter [18.60](#) SJCC) – *All of the applicable regulations are addressed in section 18.50.*
- d. Consistent with the goals and policies of the Comprehensive Plan, Element 3, Section 5C Boating Facilities –

General

1. Locate, design and construct boating facilities to minimize adverse effects upon, and to protect all forms of aquatic, littoral or terrestrial life including animals, fish, shellfish, birds and plants, their habitats and their migratory routes.
2. Protect beneficial shoreline features and processes including erosion, littoral or riparian transport and accretion shoreforms, as well as scarce and valuable shore features including riparian habitat and wetlands.
3. The location, design, configuration and height of boathouses, piers, ramps, and docks should both accommodate the proposed use and minimize obstructions to views from the surrounding area.
4. Boating facilities should be designed to optimize the trade-offs between the number of boats served and the impacts on the natural and visual environments.
5. In providing boating facilities, the capacity of the shoreline site to absorb the impact should be considered.
6. The use of mooring buoys should be encouraged in preference to either piers or floating docks.
7. The use of floating docks should be encouraged in those areas where scenic values are high and where serious conflicts with recreational boaters and fishermen will not be created.
8. Piers should be encouraged where there is significant littoral drift and where scenic values will not be impaired.

9. In many cases, a combination of fixed and floating structures on the same dock may be desirable given tidal currents, habitat protection and topography, and should be considered.
10. The County should attempt to identify those shorelines where littoral drift is a significant factor and where, consequently, fixed piers probably would be preferable to floating docks.
11. To spare San Juan County from the so-called “porcupine effect” created by dozens of individual private docks and piers on the same shoreline, preference should be given to the joint use of a single structure by several waterfront property owners, as opposed to the construction of several individual structures.
12. Preference should be given in waterfront subdivisions or multi-family residential development to the joint use of a single moorage facility by the owners of the subdivision lots or units, or by the homeowners association for that subdivision or development, rather than construction of individual moorage facilities. Individual docks and piers should be prohibited, provided that the county may authorize more than one moorage facility if a single facility would be inappropriate or undesirable given the specific site and marine conditions. Such developments should include identification of a site for a joint-use moorage facility and the dedication of legal access to it for each lot or unit. However, it should be recognized that identification of a site for a common moorage facility does not imply suitability for moorage or that moorage development will be approved.
13. The capacity of the shoreline site to absorb the impacts of waste discharges from boats and gas and oil spills should be considered in evaluating every proposed dock or pier.
14. Expansion or repair of existing facilities should be encouraged over construction of new docks and piers.
15. To reduce the demand for single-user docks, multiple-user docks should be encouraged through construction and dimensional incentives.

The Comprehensive Plan Goals and Policies, sections d11, 12, and 15 give preference to joint use docks associated with waterfront subdivisions:

“Preference should be given in waterfront subdivisions or multi-family residential development to the joint use of a single moorage facility by the owners of the subdivision lots or units, or by the homeowners association for that subdivision or development, rather than construction of individual moorage facilities.”

The proposal is to provide moorage to serve all of the lots in the Westcott Shores plats, thereby minimizing the potential for multiple docks and reducing the impacts associated with multiple docks. The proposed dock is uniquely located on a geographical point that projects into Westcott Bay, taking advantage of deeper water that is not possible throughout much of the bay. Due to the shallow depths of the bay, the likelihood of additional docks is low. Furthermore, the project area has adequate flushing action with few docks in the vicinity of the proposal so discharges typically associated with moorage are relatively not a significant concern. As previously discussed, the project design, size and location would minimize environmental impacts. Additionally mitigation consistent with the ACOE permitting process is proposed. For these

reasons the proposal would be consistent with the shoreline policies applicable to this project. The regulations in the Shoreline Master Program implement the purpose and policies in the Comprehensive Plan. Compliance with the applicable regulations ensures compliance with goals and polices of the Comprehensive Plan.

22. 18.50.500 Private pedestrian pathways, stairways and ramps – General regulations.

A. Private pedestrian pathways, stairways and ramps used to provide pedestrian access to the OHWM from a single-family residence are normal residential appurtenances.

B. Private pedestrian pathways, stairways and ramps must not include roofs or roof covering materials such as awnings. They are exempt under SJCC [18.50.050](#) if the following standards are met:

1. All materials must be finished in subdued natural earth colors;
2. No construction or placement seaward or below the OHWM is allowed unless the private pedestrian pathway, stairway or ramp is physically connected to an exempt or permitted dock;

The stairway would be physically connected to the proposed dock. It's seaward end would terminate slightly landward of the OHWM.

3. The maximum vertical height of the structure is 15 feet and the maximum width of the structure is five feet. One intermediate landing or platform with a maximum size of five feet by five feet is allowed. Stairways may not be located on rock faces or bluffs that exceed a 60-degree angle; and

The maximum vertical height is 12'2".

4. The project complies with bank stability requirements of SJCC [18.35.055](#) through [18.35.070](#).

The stairs will be physically connected to the proposed dock at the top of the bank with no disturbance to the bank.

C. Every application, whether exempt or nonexempt, for private pedestrian pathways, stairways and ramps will be evaluated on the basis of:

1. Bank stability;

The bank is not indicated as a geologically hazardous area; no disturbance will occur to the bank as a result of the stair construction.

2. Bank geology;

The County database indicates the bank as bedrock.

3. Vegetation removal in Tree Protection Zone 1 and other requirements of SJCC [18.50.130](#);

No vegetation removal is proposed. Additional woody vegetation will be planted along the bank consistent with the ACOE permitting process.

4. Potential for revegetation;

Woody vegetation will be planted along the bank consistent with the ACOE permitting process.

5. Structural stability;

The stairs will be physically connected to the landing for the pier and pinned to bedrock at the top of the bank. No disturbance will occur to the bank.

6. Adverse impacts on shoreline ecological functions; and

The attached critical areas report and addendum prepared by Jen Jay Inc. addresses potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended.

7. Aesthetic impacts.

The new stairway will replace the existing stairs on the Appleton and Dickhaus properties, thereby concentrating improvements to a single area instead of multiple stairs located along the shoreline.

D. Private pedestrian pathways, stairways and ramps that are likely to interfere with the erosion-accretion process associated with feeder bluffs are prohibited.

The bank where the stairs are proposed is not indicated as a feeder bluff.

E. Where adverse impacts to shoreline ecological functions are expected, private pedestrian pathways, stairways and ramps are subject to the mitigation provisions of SJCC [18.50.140](#), [18.50.150](#) and [18.50.160](#).

The attached critical areas report and addendum prepared by Jen Jay Inc. addresses potential direct and indirect effects of the proposed project on listed species and FWHCAs. The report determined that the proposed project incorporates adequate conservation measures to protect FWHCA and will result in no net loss to ecological functions. The addendum includes mitigation measures which are hereby incorporated in the project description and further support the finding of no net loss to ecological functions. See the attached biological report and addendum for more information. No post construction monitoring is recommended

F. Public pedestrian trails identified in County planning documents are allowed in the shoreline and are regulated by SJCC [18.50.550](#).

23. **Small copy of site plan:** Enclosed.

24. **Large copy of site plan:** Not necessary.

25. **FEMA Habitat Assessment and Management Plan:** “All areas water or sea ward of the Mean High Water Line shall be considered as being within the Floodway and are controlled by separate regulations.” (SJC Policy No. 09-001).
26. **HPA from the WA Dept. of Fish and Wildlife:** A JARPA application has been submitted to the WDFW and is pending review and approval.
27. **Tree Removal Plan:** No trees are proposed to be removed.

Please feel free to call if you have any questions or need additional information.

Sincerely,

Jeff Otis
Agent for the Westcott Shores Property Owners

Attachments: Shoreline Application
 Environmental Checklist
 Critical areas report and addendum
 Drawings
 Dive survey
 Moorage availability letters
 Joint Use Agreement
 Light availability test report
 Contractor BMPs
 Property Owner List
 Legal Description