

June 18, 2012

**OFFICE OF THE HEARING EXAMINER
KING COUNTY, WASHINGTON**
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REPORT AND DECISION

SUBJECT: Department of Development and Environmental Services File Nos. **L04P0032 and L07SH003**
Proposed Ordinance No. **2011-0404**

TALL CHIEF COUNTRY CLUB
Preliminary Plat Application
Shoreline Management Substantial Development Permit

Location: West side of W Snoqualmie River Road SE and the Snoqualmie River, north of 19th Way SE, between Redmond and Fall City

Applicant: John Tomlinson
represented by **Thomas Pors**
1700 Seventh Avenue Suite 2100
Seattle, WA 98101
Telephone: (206) 357-8570
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Intervenors: Steve and Janet Keller and
Snoqualmie Valley Preservation Alliance
represented by **Charles Klinge**
Groen Stephens & Klinge
11100 NE Eighth Street Suite 750
Bellevue, WA 98004
Telephone: (425) 453-6206
Email: klinge@gsklegal.pro

King County: Department of Development and Environmental Services (DDES)
represented by **Lanny Heno**
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SUMMARY OF RECOMMENDATIONS/DECISION:

Department's Preliminary Recommendation:

Approve, with conditions

Department's Final Recommendation:

Approve, with revised conditions

Examiner's Decision:

Approve, with further revised conditions

EXAMINER PROCEEDINGS:

Hearing Opened:

November 29, 2011

Hearing Continued to:

December 15, 2011 and January 4, 2012

Hearing Continued on call:

January 4, 2012

Hearing Reconvened:

April 3, 2012

Hearing Administratively Continued:

April 3, 2012

Hearing Record Closed:

May 5, 2012

Participants at the public hearing and the exhibits offered and entered are listed in the attached minutes. A verbatim recording of the hearing is available in the Hearing Examiner's Office.

FINDINGS, CONCLUSIONS AND DECISION: Having reviewed the record in this matter, the Examiner now makes and enters the following:

FINDINGS:**1. General Information:**

Developer:

John Tomlinson
1738 Bellevue Way NE
Bellevue WA 98004

Agent:

De-En Lang
Lang Associates
10658 Riviera Place
Seattle WA 98125

STR:

5-24-07

Location:

1313 West Snoqualmie River Road. The site is located on the west side of West Snoqualmie River Road and the Snoqualmie River, north of 19th Way

Zoning:

RA-5, RA-10, A-35

Acreage:

191.2 acres

Number of Lots:

18

Density:

Approximately 1 unit per 10 acres

Lot Size:

Approximately 2.4 to 5.45 acres in size

Proposed Use:

Single Family Detached Dwellings

Sewage Disposal:

Individual on-site septic

Water Supply:

Ames Lake Water Association

Fire District:

King County Fire District No. 27

School District:

Snoqualmie Valley District No. 410

Plat Submittal:

December 27, 2004

Plat Application Completeness Date: December 27, 2004

Shoreline Application Submittal: May 8, 2007

2. Except as modified herein, the facts set forth in the DDES reports to the Examiner and the DDES and King County Department of Transportation (KCDOT) testimony are found to be correct and are incorporated herein by reference.
3. The subject 191.2 acre property lies within the floodplain and side slopes of the Snoqualmie River Valley east of Redmond and northwest of Fall City, at 1313 W Snoqualmie River Road SE on the west side (partly the site of the current Tall Chief Country Club). West Snoqualmie River Road SE in such location is just west of the Snoqualmie River's normal channel (closer at the northern end of the property's frontage on W Snoqualmie River Road). It is roughly an anvil-shaped parcel, with the northeasterly half, approximately, within the Snoqualmie River floodplain (and partially within the floodway) and the westerly half (longer segment in the north-south dimension) lying on the generally moderately to gradually easterly descending slopes on the west side slopes of the valley. Some slope areas have steep portions. A stretch of five discrete Class wetlands lie in the westerly portion of the onsite floodplain abutting the topographic break; a Class 3 stream also courses onsite. The sideslopes are moderately wooded with successive growth of native overstory and groundcover; the eastern, floodplain portion is developed as a mostly grassy golf course with stands of mature trees. No critical areas other than the aforementioned steep slope and wetland areas lie onsite or within close proximity, except for the Snoqualmie River corridor on the east side of W Snoqualmie River Road. The surrounding area in the floodplain is mostly developed in agricultural use including pasture and crop tillage as well as vegetable farming, with standard farm ensemble residences and outbuildings typical of agriculture. The sideslopes in the area, to the west of the discrete Snoqualmie River Valley, are developed with some areas of semi-rural/large-lot suburban single-family residential subdivisions, larger acreage homesites and vacant wooded tracts.
4. The natural site drainage is into Snoqualmie River basin; the natural southerly subbasin of the site drains easterly to an offsite wetland within that basin rather than into the Patterson Creek drainage as earlier thought.
5. Applicant John Tomlinson proposes subdivision of the property with a cluster of 18 detached single-family residential lots and separate tracts for critical area preservation and buffering and drainage facilities, etc. Additionally, tracts in the east portion that are in the floodplain but not in the wetland critical areas are proposed to be made available for agricultural usage (though no longer in separate lot-owner holdings as previously proposed). Access to the proposed lots is intended to be provided by a primary access road (aka SE 10th Street) running due west from W Snoqualmie River Road, utilizing the current Tall Chief Country Club access drive, which after its straight segment into the site would curve southerly to climb the side slopes and run fairly due south, with numerous curves, to first provide a road stub for future road extension so the south (and a turnaround) and then curves westerly and then north to terminate in a cul-de-sac in the area of Lots 15 through 18 in the southwestern portion of the site. A second road access for emergency purposes only (including as an alternative route for resident school pedestrians during flooding conditions in the valley; see below) would be provided, extending into the property from the west and connecting to existing residential roadways upslope and to the west. Easement provisions for use of the offsite connections to the secondary access road have been executed.
6. The proposed residential density would be approximately one dwelling unit per 10 acres. The lot sizes range from approximately 2.4 to 5.5 acres. As noted, the proposal utilizes the clustering provisions established in county code (KCC 21A.14.040). Review of the proposed lot sizes and density results demonstrates that the proposal conforms to the density prescriptions of the zoning code (as articulated in detail in a tentative finding by the Examiner at hearing, which oral articulation is incorporated herein by reference).

7. Water service would be provided to the homesites by the Ames Lake Water Association (but not to standard fireflow levels). Residential sanitation would be by the individual onsite septic systems.
8. The development drainage system for the proposed subdivision must conform to the 1998 edition of the King County Surface Water Design Manual (SWDM). Initially, the Applicant had intended to direct most site development drainage directly to the Snoqualmie River, but has changed the design approach so that development drainage is now proposed to be primarily conveyed in collection systems to drainage detention and water quality facilities in the northwest portion of the site (above the floodplain) and then released at flows conforming to certain standards (level 3 flow control (voluntarily offered) and basic water quality treatment in this case).
9. A formal drainage adjustment has been granted by DDES under file L12V002, subject to a number of conditions, to permit diversion of the natural southerly subbasin of the site (which drains easterly to an offsite wetland) to be diverted to be conveyed to the proposed detention pond. Such adjustment is issued under.
10. A road standards variance has been granted by the King County Department of Transportation (KCDOT) under file L04V0109 for cul-de-sac length and emergency turnarounds. The road variance decision also notes the acceptability of the emergency connection to the west, subject to DDES approval. The emergency access connection will be a road in private ownership, which the variance also approves. The variance decision denied a requested reduction of roadside obstacle setback requirements in order to preserve existing mature Lombardi poplars on the entrance road west from W Snoqualmie River Road SE.
11. Great concern has been expressed by neighboring and nearby property owners and residents, including Intervenors Steve and Janet Keller and the Snoqualmie Valley Preservation Alliance, about the proposed development not adequately maintaining rural character by its clustering and density. They assert that rural character as characterized by the comprehensive plan in its policy declarations mandates lesser density of development, and also opine their concern about urban migrants to upscale rural homesites who possess value systems and perspectives different than existing residents and not befitting the agricultural and pastoral rural area. The Examiner notes the property's zoning, with some RA-5 zoning and the majority at RA-10, both Rural Area zones, and a small portion zoned A-35, an agricultural zone, and observes that the county's zoning treatment of the property is on the whole relatively high and medium density for the rural area and concludes that from a land use regulatory standpoint rural character concerns, including the policy articulations in the comprehensive plan, must be presumed to have been consciously implemented by the legislative authority in the enactment of development regulations (which under the growth management act (GMA) are presumed to implement the comprehensive plan).
12. The fact of the existing zoning implementation of the comprehensive plan, in the face of the plan's articulations of support for maintaining rural character, agricultural uses and pastoral landscape, etc., with RA-5 and RA-10 zoning of the majority of the property, combined with the zoning code's allowance of clustered subdivision development such as is proposed here, leave the Examiner with no regulatory justification to deny the application or impose a reduced density based on such concerns about maintaining rural character, as meritorious as they may be in general. Taken as a whole,¹ the county's comprehensive plan and development regulations have

¹ Perhaps in a legislative balancing of interests, though that is not for the Examiner to determine and is not evident in the record, and certainly cannot be considered under Washington law as a perhaps-Solomonic operating guide to the Examiner in adjudicating the substantive merits of the proposal and the opposition to it. One of the legal premises underlying the land use planning and regulatory system in Washington State is that decisions on individual applications must be based upon adopted ordinances and policies rather than upon the personal preferences or general fears of those who may currently live in the neighborhood of the property under consideration. [*Department of Corrections v. Kennewick*, 86 Wn. App. 521, 937 P.2d 1119

resulted in the express allowance here of a rural cluster subdivision of the density proposed. The site design in general achieves the meritorious assignment of development to the least environmentally and contextually sensitive portions of the site, which is one of the fundamental tenets of allowing and indeed promoting cluster development in certain areas, with the development proposed for the less sensitive and wooded side slopes, generally as far away from offsite agricultural uses as reasonably possible, and leaving the floodplain and critical areas undisturbed and preserved and buffered. Though the clustering may present a slightly more visually apparent density on the developed portions of the site than would be the case if the property were developed under a standard minimum lot size of five acres (not withstanding the critical area and floodplain/floodway development regulations which may be brought to bear in such instance), the lots are still fairly generous in size and, at a minimum of 2.4 acres, will maintain a sufficiently non-urban clustering appearance. In the final analysis, the Examiner finds the proposal to be in compliance with the development regulations and finds no authority essentially to preempt the allowances of the development regulations by unilaterally determining that the cited comprehensive plan policies promoting rural character preservation, etc., mandate something different than what the express (and legally plan-implementing) GMA development regulations permit.

13. Intervenor Keller, whose property abuts the site in the southeastern portion, have expressed concern about the proposal for the downslope portions of the abutting and nearby lots (Lots 5-12) to have their development drainage infiltrate into the soil, which raises fears that such drainage infiltration will cause adverse drainage impacts (greater inundation and/or of more duration, of concern for tillage viability) on their property. The Examiner notes that in many areas there are intervening wetlands (which naturally retard discharge) between the lots and Intervenor's adjacent active ag fields, and, more critically, that the development's drainage provisions must still meet the standards of the SWDM, which include governing release rates. The Examiner finds no factual justification and no legal authority to require measures above and beyond the express standards of the detailed applicable SWDM, which, again, is promulgated under express authority granted by the County's legislative authority and constitutes a GMA development regulation.
14. Much has been made in this proceeding about whether the access road can be rebuilt to meet county standards in a manner which does not raise it above its current elevation in the floodplain (required so as not to impede floodwaters nor cause a rise in the base flood elevation). The Applicant has gone into great detail in technical submittals and provision of evidence and testimony at hearing to demonstrate that such rebuilding can be accomplished under the standards of not impeding floodwaters and not raising the base flood elevation to a satisfactory degree. At the preliminary plat review stage, which as provided by state law is essentially an "approximate drawing" level of review (preliminary and conceptual but with sufficient facts presented to make the "appropriate provisions" determinations mandated by RCW 58.17.110), it has been sufficiently shown that the road improvement can occur in conformity with flood hazard regulations, which will be implemented in detail in the construction plan and final plat review stages. The facts presented in hearing indicate that there may be some construction management and timing issues so as to ensure that such work occurs in a seasonally appropriate timeframe;

(1997); *Indian Trail Prop. Ass'n. v. Spokane*, 76 Wn. App. 430, 439, 886 P.2d 209 (1994); *Maranatha Mining v. Pierce County*, 59 Wn. App. 795, 805, 801 P.2d. 985 (1990); *Woodcrest Investments v. Skagit County*, 39 Wn. App. 622, 628, 694 P.2d 705 (1985)] The evaluation of the application must therefore be based upon officially adopted laws and ordinances, plans and policies as well as legally accepted principles. And a subdivision proposal need only meet the minimum standards which apply; alternative design cannot be forced arbitrarily. The legislative wisdom of state and county lawmakers must be respected "as is" in deciding land use applications, since policy decisions are the province of the legislative authority. [*Cazzanigi v. General Electric Credit*, 132 Wn. 2d 433, 449, 938 P.2d 819 (1997)] A quasi-judicial decisionmaker cannot substitute the decisionmaker's judgment for that of the legislative body "with respect to the wisdom and necessity of a regulation." [*Rental Owners v. Thurston County*, 85 Wn. App. 171, 186-87, 931 P.2d 208 (1997)]

that is a matter purely under the administrative authority of DDES in its engineering and construction plan reviews and construction management responsibilities, and is not a matter under the Examiner's direct authority here.

15. The development was reviewed under the standard traffic impact reviews set forth in Title 14 KCC. No intersection improvements or imposition of Mitigation Payment System (MPS) fees are required. (The development will generate less traffic than was projected for the existing golf course development, and thus presents no net traffic increase and thus no *nexus* of adverse traffic impacts.)
16. School pedestrian safety has been expressed as a concern, which is a valid one in the instant case. The normal bus stop for the prospective resident schoolchildren will be on the plat entry road somewhat interior of the intersection with W Snoqualmie River Road (relocated westerly to enhance driver visibility of flooding conditions on the access road). W Snoqualmie River Road in the subject location is relatively high in elevation compared to the remainder of the floodplain in the immediate area, and the interior access road dips significantly lower so it will experience inundation sooner than W Snoqualmie River Road will at the subject location.
17. The safety concern is that schoolchildren may be dropped off at a flood-safe bus stop but then may encounter an inundated pedestrian route to gain access to their homesites in the westerly portion of the site. This issue has been suitably resolved by the relocation of the bus stop westerly to enhance bus driver visibility of access road flooding conditions and provision of the secondary emergency access route noted previously, extended westerly to connect with other private road access routes in the uplands and by the interior relocation of the bus stop to enhance driver visibility of access road inundation. Permission for utilization of such emergency secondary access route has been obtained by the Applicant.
18. It will be incumbent on the Snoqualmie Valley School District to manage its bus transportation, similarly to the manner in which it already manages bus transportation during inclement weather such as periods of snow and ice and other flooding situations, to decide when to trigger usage of the emergency secondary access route for resident school pedestrians rather than dropping them off at the standard location. The Examiner will require as a condition of approval that prior to final plat approval, the school district acknowledge in writing the availability of the secondary emergency access pedestrian route to be utilized during periods when the main subdivision access road is forecast to be or is experiencing flood inundation.
19. An additional issue of concern to neighboring and nearby agricultural operators is that the prospective lot owners be given legal notice of a "right to farm," notice that agricultural activities occur in the subject area, essentially forestalling validity of complaints about agricultural operations and secondary effects such as odors, slow moving farm machinery and animals on roadways, agricultural operations noise, etc. The notice is required by code provisions and shall be required to be placed on the face of the plat, the recordation of the plat and subsequent notice on title will give effective legal notice to prospective purchasers and future owners of the proposed residential lots.
20. The Applicant has received county approval of the required farm management plan for the proposed open space farm tracts in the eastern portion of the cluster development site.
21. Under the Shoreline Management Act and the County's implementing Shoreline Management Master Program, the shoreline environment designation of the property is Conservancy. A Shoreline Management Substantial Development Permit is required for the access road reconstruction and construction of certain drainage facilities, due to their location in the Snoqualmie River floodplain, and is an application component of this proceeding. The proposal has been analyzed by DDES for conformity with the shoreline master program and the Shoreline

Management Act (SMA) and county implementing regulations, which analysis is incorporated herein by reference. The proposal conforms to the criteria for approval of the requested substantial development permit.

CONCLUSIONS:

1. Disputation by Intervenors of the vesting of the application, principally whereby they argue that the version of the SWDM that should pertain is that in effect at the time of the later-realized-necessary 2007 application for the shoreline permit rather than the SWDM version pertaining at the time the plat application was complete, is not persuasive. The drainage aspects of the development are subordinate to the central application for subdivision, as is the shoreline permit component. To rule that the subordinate shoreline permit vesting date should drive the vesting date of the plat application's secondary aspects merely because of essentially a cross-referencing of regulations would be tantamount to allowing a backdoor challenge to the plat vesting date. This the Examiner cannot permit; it does not comport to the essential holdings of subdivision application vesting in the state. Except for directly discrete aspects of the shoreline regulations, all of the land use controls appurtenant to and secondarily involved in review of the subdivision proposal are those in effect on December 27, 2004.
2. The Examiner accords deference to DDES's interpretation of the fill-restricting shoreline regulations as limiting fill to no net fill increase. The interpretation by the professional administrative staff charged with administering the county land use codes, not shown to be clearly in error, is deserving of deference. [*Mall, Inc. v. City of Seattle*, 108 Wash.2d 369, 385, 739 P.2d 668 (1987)]
3. The cluster subdivision requirement of perimeter vegetation buffering is shown to be able to be met, within the floodplain area or by use of code-established allowances of alternative measures. The final outcome of the examinations of options in such regard and ultimate compliance with code requirements is a matter to be addressed post-preliminary plat approval and decided administratively by DDES in construction plan review prior to final plat approval, as provided in recommended condition language.
4. The proposed subdivision, as conditioned below, would conform to applicable land use controls. In particular, the proposed type of development and overall density are specifically permitted under the RA-5, RA-10 and A-35 zoning applied to the pertinent portions of the site.
5. If approved subject to the conditions below, the proposed subdivision will make appropriate provisions for the topical items enumerated within RCW 58.17.110, and will serve the public health, safety and welfare, and the public use and interest.
6. The conditions for final plat approval set forth below are reasonable requirements and in the public interest.
7. The dedications of land or easements within and adjacent to the proposed plat, as shown on the revised preliminary plat submitted on April 3, 2012, or as required for final plat approval, are reasonable and necessary as a direct result of the development of this proposed plat, and are proportionate to the impacts of the development.

DECISION:

The preliminary plat of the *Tall Chief* subdivision, as revised dated March 7, 2012 and received by DDES March 9, 2012, and the companion Shoreline Management Substantial Development Permit are approved subject to the following conditions of approval:

Preliminary Plat Approval Conditions

1. Compliance with all platting provisions of Title 19A of the King County Code.
2. All persons having an ownership interest in the subject property shall sign on the face of the final plat a dedication that includes the language set forth in King County Council Motion No. 5952.
3. The plat shall comply with the base density requirements of the RA-5, RA-10 and A-35 zone classifications. All lots shall meet the minimum dimensional requirements of the RA-10 zone classification or shall be shown on the face of the approved preliminary plat, whichever is larger. Minor revisions to the plat which do not result in substantial changes may be approved at the discretion of the Department of Development and Environment Services.

Any plat boundary discrepancy shall be resolved to the satisfaction of DDES prior to the submittal of the final plat documents. As used in this condition, "discrepancy" is a boundary hiatus, an overlapping boundary or a physical appurtenance which indicates an encroachment, lines of possession or a conflict of title.

4. The applicant must obtain final approval from the King County Health Department, prior to recording.
5. All construction and upgrading of public and private roads shall be done in accordance with the King County Road Standards established and adopted by Ordinance No. 11187, as amended (1993 KCRS).
6. Preliminary Plat Condition 6 as stated in Exhibit 65 of the record regarding fire protection measures.
7. Final plat approval shall require full compliance with the drainage provisions set forth in King County Code 9.04. Preliminary review has identified the following conditions of approval, which represent portions of the drainage requirements. All other applicable requirements in KCC 9.04 and the Surface Water Design Manual (SWDM) must also be satisfied during engineering and final review.
 - a. Drainage plans and analysis shall comply with the 1998 King County Surface Water Design Manual. DDES approval of the drainage and roadway plans is required prior to any construction.
 - b. Current standard plan notes and ESC notes, as established by DDES Engineering Review shall be shown on the engineering plans.
 - c. The following note shall be shown on the final recorded plat:

"All building downspouts, footing drains, and drains from all impervious surfaces such as patios and driveways shall be connected to the permanent storm drain outlet as shown on the approved construction drawings # _____ on file with DDES and/or the Department of Transportation. This plan shall be submitted with the application of any building permit. All connections of the drains must be constructed and approved prior to

the final building inspection approval. For those lots that are designated for individual lot infiltration or dispersion systems, the systems shall be constructed at the time of the building permit and shall comply with the plans on file."

- d. Storm water facilities shall be designed using the KCRTS level 3 flow control standard. Water quality facilities shall also be provided using the basic water quality protection menu. The size of the proposed drainage tracts may have to increase to accommodate the required detention storage volumes and water quality facilities. All runoff control facilities shall be located in a separate tract and dedicated to King County.
 - e. A drainage adjustment regarding conveyance of stormwater to one facility was approved on March 6, 2012 (File L12V0012). The conditions of approval for the adjustment shall be addressed on the final engineering plans including the requirements for on-site bypass of storm water as referenced in condition 2 of the adjustment decision. The design criteria for bypass of stormwater is described on pages 1-36 and 3-52 in the drainage manual.
 - f. For that portion of the subject plat where stormwater dispersion is proposed, the plat includes designs for using the Forested Open Space (FOS) flow control exemption as outlined in the drainage manual for Core Requirement No. 3. The final engineering plans shall show all applicable requirements including the 65% forested open space boundaries and flow control BMP's for dispersion of storm water. If portions of the site proposed for FOS were previously cleared land areas, a mitigation plan shall be submitted to restore the vegetation and soils to meet the criteria for FOS. The final plat shall also show the area of FOS on the affected lots.
 - g. As required by Special Requirement No. 2 in the drainage manual, the 100-year floodplain boundaries shall be shown on the final engineering plans and recorded plat. Compensatory storage is required for any proposed fill or decrease of natural floodplain storage. (Also see Conditions 18-20 below in the related Shoreline Management Substantial Development Permit.)
 - h. A hydraulic project approval permit may be required from the Washington State Department of Fish and Wildlife for the proposed site improvements adjacent to streams and/or wetlands. Any required permits shall be submitted to King County prior to engineering plan approval.
 - i. The final engineering plans shall include designs to address dewatering of groundwater for site development as discussed in the geotechnical reports prepared for the project. A geotechnical report shall be submitted with the engineering plans to address soil conditions, grading, and conveyance of groundwater.
 - j. Preliminary Plat Condition 7.j as stated in Exhibit 65.
 - k. Preliminary Plat Condition 7.k as stated in Exhibit 65.
8. The proposed subdivision shall comply with the 1993 King County Road Standards (KCRS) including the following requirements:
- a. During preliminary review the applicant submitted road variance applications regarding the length of cul-de-sac and other design requirements for the roadways (See File Nos. L04V0109 and L09V0043). The final road improvements shall comply with the conditions of approval for the variance decision.

- b. The onsite cul-de-sac street labeled as SE 10th Street/ 304th Ave SE shall be improved as a rural subaccess street except as otherwise approved by the King County road variance process. The roadway serving Lots 13-18 shall be improved to rural minor access standards. As allowed by the road variance decision, the onsite roadway shall be private. The final plat shall include provisions for ownership and maintenance of the private road.
 - c. To provide emergency access for the subdivision, the existing gravel road shown on the preliminary plat map within easement #6094030 (Tract E on the preliminary plat) shall be improved to meet King County road standards except as allowed by the variance decision referenced above. The onsite portion of the emergency access shall include a 20 foot wide paved roadway. The offsite portions shall also be improved 20 feet wide with gravel surfacing and improvements for horizontal curvature on the campground property. An emergency access easement has been obtained by the applicant to make the offsite improvements and allow future use of the roadway. Tract E shall be owned and maintained by the homeowners association or other private entity as allowed by King County. Signage shall be placed at the intersection of Tract E with 304th Avenue SE in the subject plat, identifying Tract E as an emergency access.
 - d. The final engineering plans shall demonstrate compliance with standards for entering sight distance at the project entrance with West Snoqualmie River Road.
 - e. A 4-foot gravel shoulder is required for the plat frontage along West Snoqualmie River Road. The existing shoulder can be restored where feasible to provide the required shoulder width. The final engineering plans shall show the location of any existing shoulders and determine what areas require new improvements to achieve the four foot shoulder width. (Also see Condition 22 below.)
 - f. Preliminary Plat Condition 8.f as stated in Exhibit 65.
 - g. Preliminary Plat Condition 8.g as stated in Exhibit 65.
 - h. Preliminary Plat Condition 8.h as stated in Exhibit 65.
 - i. Preliminary Plat Condition 8.i as stated in Exhibit 65.
 - j. Modifications to the above road conditions may be considered by King County pursuant to the variance procedures in KCRS 1.08.
9. All utilities within proposed rights-of-way must be included within a franchise approved by the King County Council prior to final plat recording.
 10. (Deleted)
 11. Lots within this subdivision are subject to King County Code 21A.43, which imposes impact fees to fund school system improvements needed to serve new development. As a condition of final approval, fifty percent (50%) of the impact fees due for the plat shall be assessed and collected immediately prior to the recording, using the fee schedules in effect when the plat receives final approval. The balance of the assessed fee shall be allocated evenly to the dwelling units in the plat and shall be collected prior to building permit issuance.

12. Preliminary plat review has identified the following specific critical area regulatory requirements which apply to this project. All other applicable requirements from K.C.C. 21A.24 shall also be addressed by the applicant.
- a. The Class II wetlands shall have a 50-foot buffer as shown on the preliminary plat map dated March 7, 2012 (received March 9, 2012).
 - b. All wetland sensitive areas and their buffers shall be placed in Sensitive Area Tracts for long term protection.
 - c. Signage shall be installed along the Sensitive Area Tract boundaries for long term protection and to clearly mark the extent of the tract.
 - d. A 15-foot building set back line (BSBL) is required from the edge of all Sensitive Area Tracts and shall be shown on all affected lots.
 - e. Sensitive Area Tract boundaries shall be clearly marked with bright orange construction and silt fencing prior to construction or site clearing activities. The boundaries shall remain marked until construction is complete.
 - f. Road crossings of wetlands and buffers maybe allowed per KC 21A.24.330. Construction techniques such as retaining walls maybe required at wetland crossings to limit wetland impacts. A final mitigation plan shall be required during engineering review. (Also see Condition 21 below in the Shoreline Management Substantial Development Permit approval.)
 - g. The outer 25 feet of buffer on the eastern side of the wetlands may be used for farming activities as defined in the farm management plan. Fencing shall be installed along the wetland buffer/Critical Area Tract boundaries and the inner wetland buffer areas shall be planted with native vegetation.
 - h. Wetland hydrology may not be altered either during or after development. A hydrology analysis may be required during engineering review to show how wetland hydrology will be maintained after the site is developed.
 - i. The engineering plans shall be routed to Critical Areas Staff for review of compliance to the above conditions.

Geotechnical

- j. Determine the top, toe, and sides of 40% slopes by field survey. Provide a 50-foot buffer from these slopes. The buffer may be reduced with the submittal of a satisfactory soils report, subject to review and approval by a DDES geologist, prior to engineering plan approval. Added condition language from Condition 12.j of Exhibit 65 is incorporated herein by reference.
- k. The applicant shall delineate all on-site erosion hazard areas on the final engineering plans (erosion hazard areas are defined in K.C.C. 21A.06.415). The delineation of such areas shall be approved by a DDES geologist. The requirements found in K.C.C. 21A.24.220 concerning erosion hazard areas shall be met, including seasonal restrictions on clearing and grading activities.

1. The following note shall be shown on the final engineering plan and recorded plat:

**RESTRICTIONS FOR SENSITIVE AREA TRACTS AND SENSITIVE
AREAS AND BUFFERS**

Dedication of a sensitive area tract/sensitive area and buffer conveys to the public a beneficial interest in the land within the tract/sensitive area and buffer. This interest includes the preservation of native vegetation for all purposes that benefit the public health, safety and welfare, including control of surface water and erosion, maintenance of slope stability, and protection of plant and animal habitat. The sensitive area tract/sensitive area and buffer imposes upon all present and future owners and occupiers of the land subject to the tract/sensitive area and buffer the obligation, enforceable on behalf of the public by King County, to leave undisturbed all trees and other vegetation within the tract/sensitive area and buffer. The vegetation within the tract/sensitive area and buffer may not be cut, pruned, covered by fill, removed or damaged without approval in writing from the King County Department of Development and Environmental Services or its successor agency, unless otherwise provided by law.

The common boundary between the tract/sensitive area and buffer and the area of development activity must be marked or otherwise flagged to the satisfaction of King County prior to any clearing, grading, building construction or other development activity on a lot subject to the sensitive area tract/sensitive area and buffer. The required marking or flagging shall remain in place until all development proposal activities in the vicinity of the sensitive area are completed.

No building foundations are allowed beyond the required 15-foot building setback line, unless otherwise provided by law.

13. A homeowners' association or other workable organization shall be established to the satisfaction of DDES which provides for the ownership and continued maintenance of the open space and sensitive area tracts, and to assure implementation of the farm management plan if the resource tracts are conveyed to the residents of the subdivision.
14. Notes specific to the approved Farm Management Plan (March 2009) shall be placed on the final plat. The notes shall indicate what may be allowed, restrictions, etc., subject to DDES review and approval.
15. Preliminary Plat Condition 15 as stated in Exhibit 65.
16. Preliminary Plat Condition 16 as stated in Exhibit 65.
17. Preliminary Plat Condition 17 as stated in Exhibit 65.
18. Preliminary Plat Condition 18 as stated in Exhibit 65.
19. Preliminary Plat Condition 19 as stated in Exhibit 65.
20. The following notice shall be shown clearly on the face of the final recorded plat, and shall appear in large, bold type, separated from other notes on the final plat.

NOTICE ON TITLE

THIS NOTICE APPLIES TO ALL LOTS AND TRACTS WITHIN THIS SUBDIVISION

AND TO ALL FUTURE PURCHASERS AND SELLERS

The lots and tracts of this subdivision are located in close proximity to farms and King County designated agricultural lands. The operation of a farm involves usual and customary agricultural practices, which are protected under RCW 7.48.305, the Washington Right to Farm Act. Commercial farming activities may occur that are not compatible with residential development for certain periods of limited duration.

Agricultural activities conducted on farmland, if consistent with good agricultural practices established prior to surrounding nonagricultural activities, are presumed to be reasonable and shall not be found to constitute a nuisance unless the activity or practice has a substantial adverse effect on public health and safety. Sellers of property within this subdivision are obligated to provide written notice to buyers consistent with RCW 64.06.022.

21. Preliminary Plat Condition 21 as stated in Exhibit 65.
22. Preliminary Plat Condition 22 as stated in Exhibit 65.
23. As part of the submittal of the engineering plans for the subject plat, the applicant shall submit a landscape plan to address the following requirements from Ordinance 15032, Sec. 19. The landscape plan shall be reviewed and approved by DDES prior to final engineering plan approval. DDES may require the posting of a bond to assure installation and the survival of required plantings for a 2-year period.

Except as provided below, a fifty-foot Type II landscaping screen, as defined in KCC 21A.16.040, shall be provided along the frontage of W. Snoqualmie River Rd. The planting materials shall consist of species that are native to the Puget Sound region. Preservation of existing healthy vegetation is encouraged and may be used to augment new plantings to meet the requirements of this section.

The width of the required Type II landscape screen and the number of new plantings installed may be reduced, pursuant to the provisions of KCC 21A.16.100. The placement of plantings at the intersection of SE 10th St./W. Snoqualmie River Rd. may be modified to comply with the sight distance requirements of the King County Road Standards.

If the applicant demonstrates, to the satisfaction of DDES staff, that it is not practical to provide the above-noted landscaping along W. Snoqualmie River Rd. and meet the applicable County floodplain regulations in effect on December 27, 2004, the required landscaping may be placed elsewhere on the site at a location which will partially obscure the views of the residences of the

subject plat from W Snoqualmie River Road In order to provide the Type II landscape screen along W Snoqualmie River Road the applicant may be required to revise the lot layout or eliminate one or more lots from the plat to provide sufficient floodplain compensating storage.

24. Prior to final plat approval, the Snoqualmie Valley School District shall have acknowledged in writing the availability of the secondary emergency access vehicle and pedestrian route to be utilized during periods when the main subdivision access road is forecast to be or is experiencing inundation during flood events.

Shoreline Management Substantial Development Permit Conditions

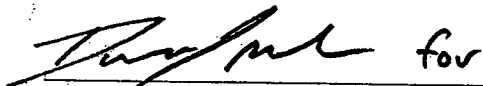
1. Nothing in this permit shall be construed as excusing the applicant from compliance with any federal, state, or local statutes, ordinances, or regulations applicable to this project other than the permit requirements of the Shoreline Management Act of 1971.
2. This permit may be rescinded pursuant to Section 14(7) of the Shoreline Management Act of 1971 in the event the permittee fails to comply with any conditions thereof.
3. Construction pursuant to this permit may not begin or be authorized until twenty-one (21) days from the date of filing the final order of King County with the Department of Ecology or the Attorney General; or until all review proceedings initiated within twenty-one (21) days from the date of such filing have been terminated.
4. **TIME REQUIREMENTS OF THE PERMIT (WAC 173-27-090).** The following requirements shall apply to all permits.
 - a. Upon a finding of good cause, based on the requirements and circumstances of the project proposed and consistent with the policy and provisions of the master program and the act, local government may adopt appropriate time limits as a part of action on a substantial development permit and local government, with the approval of the department, may adopt appropriate time limits as a part of action on a conditional use or variance permit: "Good cause based on the requirements and circumstances of the project," shall mean that the time limits established are reasonably related to the time actually necessary to perform the development on the ground and complete the project that is being permitted, and/or are necessary for the protection of shoreline resources.
 - b. Where neither local government nor the Department of Ecology include specific provisions establishing time limits on a permit as a part of action on the permit, the following time limits shall apply:
 - i. Construction shall be commenced or, where no construction is involved, the use or activity shall be commenced within two years of the effective date of a shoreline permit. Provided, that local government may authorize a single extension for a period not to exceed one year based on reasonable factors, if a request for extension has been filed before the expiration date and notice of the proposed extension is given to parties of record and the department.
 - ii. Authorization to conduct development activities shall terminate five years after the effective date of a shoreline permit. Provided, that local government may authorize a single extension for a period not to exceed one year based on reasonable factors, if a request for extension has been filed before the expiration date and notice of the proposed extension is given to parties of record and the department.

- iii. The effective date of a shoreline permit shall be the date of the last action required on the shoreline permit and all other government permits and approvals that authorize the development to proceed, including all administrative and legal actions on any such permit or approval. It is the responsibility of the applicant to inform the local government of the pendency of other permit applications filed with agencies other than the local government and of any related administrative and legal actions on any permit or approval. If no notice of the pendency of other permits or approvals is given to the local government prior to the date established by the shoreline permit or the provisions of this section, the expiration of a permit shall be based on the shoreline permit.
 - iv. When permit approval is based on conditions, such conditions shall be satisfied prior to occupancy or use of a structure or prior to commencement of a nonstructural activity: *Provided*, that an alternative compliance limit may be specified in the permit.
 - v. Revisions to permits under WAC 173-27-100 may be authorized after original permit authorization has expired under Condition 4.b.ii above: *Provided*, that this procedure shall not be used to extend the original permit time requirements or to authorize substantial development after the time limits of the original permit.
 - vi. Local government shall notify the Department of Ecology in writing of any change to the effective date of a permit as authorized above, with an explanation of the basis for approval of the change. Any change to the time limits of a permit other than those authorized by this condition shall require a new permit application.
5. Construction shall occur in conformance to the revised project plans and information received by King County on March 9, 2012.
 6. Any subsequent changes to the approved plans may require the applicant to obtain a new shoreline permit or a revision to this shoreline permit pursuant to WAC 173-27-100.
 7. If required, a Hydraulic Project Approval (HPA) shall be obtained from the Washington State Department of Fish & Wildlife prior to any work. Any conditions of the HPA shall be considered conditions of this shoreline permit.
 8. If required, an U.S. Army Corps of Engineers Permit "Corps Permit" shall be obtained from the U.S. Army Corps of Engineers prior to any work. Any conditions of the Corps Permit shall be considered conditions of this shoreline permit. In any event, erosion controls and Best Management Practices (BMP's) shall be implemented and maintained to prevent uncontrolled discharge of water, petroleum products, soil, and other deleterious materials from entering adjacent surface waters.
 9. Issuance of this Shoreline Management Substantial Development Permit does not grant the right to trespass upon private property.
 10. Prior to work, the applicant shall obtain final approval of the engineering plans for the pending plat of Tall Chief (L04P0032) and shall abide by any conditions set forth therein. Conditions of the plat approval shall be considered conditions of this Shoreline Permit.
 11. The applicant shall control erosion of disturbed areas by implementing Best Management Practices. The applicant's erosion and sedimentation control plan shall include the following as

warranted: installation of silt dams or catchments between work areas and all sensitive areas; the use of mulch and hydroseeding; planting of disturbed areas with native vegetation; and any measures determined to be appropriate. Appropriateness of fencing and location shall be approved and verified by a King County representative prior to commencement of any clearing, grading, or construction activities.

12. Conduct refueling activities within a designated refueling area at a distance of not less than 200 feet away from the Snoqualmie River and associated wetland areas. Additionally, drip pans shall be fitted with absorbent pads and placed under all equipment being fueled. All equipment, if kept on site overnight, shall be parked at least 200 feet away from the river and associated wetland areas.
13. Daily inspection shall be provided by an erosion control specialist to ensure the adequacy and maintenance needs of all erosion and sedimentation control measures. Copies of the reports shall be submitted to the King County DDES. If the erosion control specialist determines there is an erosion or sedimentation problem, King County DDES shall be notified immediately and immediate corrective measures shall be implemented.
14. All manmade debris from the project within the construction zone shall be removed and disposed of at a location licensed for such disposal.
15. A copy of the County-approved project engineering plans shall be kept on-site at all times during construction.
16. (Deleted)
17. (Deleted)
18. Shoreline Condition 18 as stated in Exhibit 65.
19. As part of the development of the subject plat, no permanent fill may be placed within the floodway, which would result in a reduction of the flood storage capacity of the floodway. All applicable King County regulations regarding improvements in the floodplain shall be met.
20. Shoreline Condition 20 as stated in Exhibit 65.
21. Shoreline Condition 21 as stated in Exhibit 65.

DATED June 18, 2012.



Peter T. Donahue
King County Hearing Examiner

NOTICE OF RIGHT TO APPEAL

Subdivision Preliminary Plat Decision

In order to appeal the preliminary plat decision of the Hearing Examiner, written notice of appeal must be filed with the Clerk of the King County Council with a fee of \$250 (check payable to King County Office of Finance) on or before *July 2, 2012*. If a notice of appeal is filed, the original two copies of a written appeal statement specifying the basis for the appeal and argument in support of the appeal must be filed with the Clerk of the King County Council on or before *July 9, 2012*. Appeal statements may refer only to facts contained in the hearing record; new facts may not be presented on appeal.

Filing requires actual delivery to the Clerk of the Council's Office, Room 1200, King County Courthouse, 516 Third Avenue, Seattle, Washington 98104, prior to the close of business (4:30) p.m. on the date due. Prior mailing is not sufficient if actual receipt by the Clerk does not occur within the applicable time period. If the Office of the Clerk is not officially open on the specified closing date, delivery prior to the close of business on the next business day is sufficient to meet the filing requirement.

If a written notice of appeal and filing fee are not filed within 14 calendar days of the date of this report, or if a written appeal statement and argument are not filed within 21 calendar days of the date of this report, the decision of the Hearing Examiner contained herein shall be the final decision of King County without the need for further action by the Council.

Shoreline Management Substantial Development Permit Decision

The Shoreline Management Substantial Development Permit decision may be appealed to the State Shorelines Hearings Board. Requests for review are governed by RCW 90.58.180 and Chapter 461-08 WAC. More detailed information on appeal procedures may be obtained from the Shorelines Hearings Board at (360) 664-9160 or at <http://www.eho.wa.gov/>. Petitions for review by the Shorelines Hearings Board must be received by the Board within 21 days of the "date of filing," with copies served to the Attorney General's Office and Washington State Department of Ecology within seven days of the Board's receipt of the petition. The "date of filing" is the date the local decision on the permit is received by the Department of Ecology.

MINUTES OF THE NOVEMBER 29, 2011, DECEMBER 15, 2011, JANUARY 4, 2012, AND APRIL 3, 2012 PUBLIC HEARING ON DEPARTMENT OF DEVELOPMENT AND ENVIRONMENTAL SERVICES FILE NOS. L04P0032 AND L07SH003.

Mr. Peter T. Donahue was the Hearing Examiner in this matter. Participating in the proceeding were Kimberly Claussen, Pete Dye, Lanny Henoch, Mark Ossewaarde and John Shively for the Department; De-En Lang, Thomas Pors and Hal Hagenson for the Applicant; Steve Keller and Charles Klinge for the Intervenor, and Eric Haakenson, Cindy Parks, Bob Angrisano, Patrick Leen and Joe Monahan.

The following exhibits were offered and entered into the record on November 29, 2011:

Exhibit no. 1	DDES file no. L04P0032
Exhibit no. 2	Preliminary Report, dated November 29, 2011
Exhibit no. 3	Application for Land Use Permits received December 27, 2004
Exhibit no. 3B	Application for Shoreline permit received May 8, 2007
Exhibit no. 4	State Environmental Policy Act (SEPA) received December 23, 2003
Exhibit no. 4B	State Environmental Policy Act (SEPA) checklist for the Shoreline permit received May 8, 2007
Exhibit no. 5	SEPA Determination of Non-Significance issued September 29, 2011

- Exhibit no. 6 Affidavit of posting noting posting date of October 25, 2011
- Exhibit no. 7 Revised preliminary plat map received May 25, 2011
- Exhibit no. 8 Assessor maps NW 5-24-07. 8-24-7
- Exhibit no. 9 Amended and Restated Easement Agreement recorded October 6, 2009
- Exhibit no. 9B Second Amended and Restated Easement Agreement recorded June 21, 2010
- Exhibit no. 10 Farm Management Plan submitted May 4, 2009
- Exhibit no. 11 Report of Geotechnical Investigation received December 27, 2004
- Exhibit no. 12 Addendum to Geotechnical report received May 4, 2009
- Exhibit no. 13 Wetland and Wildlife Study received December 27, 2004
- Exhibit no. 14 Conceptual Wetland Mitigation Plan received May 4, 2003
- Exhibit no. 15 Revised Conceptual Wetland Mitigation Plan received October 6, 2009
- Exhibit no. 16 Revised Conceptual Wetland Mitigation Plan received January 4, 2011
- Exhibit no. 17 Preliminary Technical Information Report and Downstream Analysis received May 25, 2011
- Exhibit no. 18 Updates to the DDES staff report: new condition for the plat application and deletion of condition 17 for the shoreline application
- Exhibit no. 19 Road Variance L09V0043 issued May 20, 2011
- Exhibit no. 19A Road Variance L04V0109 letter to De-En Lang from Paulette Norman dated August 5, 2008
- Exhibit no. 20 King County Surface Water Design Manual (1998) Adjustment L07V0057
- Exhibit no. 21 King County Certificate of Water Availability received January 4, 2011
- Exhibit no. 22 Letter from King County Fire Protection District No. 27 received January 28, 2010
- Exhibit no. 23 Letter from the Snoqualmie Tribe, dated October 17, 2011, regarding salmon activity in the Snoqualmie River
- Exhibit no. 24 Email from Robert Seana dated October 17, 2011, regarding site posting and area notice of the SEPA determination and Notice of Hearing
- Exhibit no. 25 Letter from Intervenor's representative stating their concerns to DDES dated November 22, 2011
- Exhibit no. 26 Declaration of Eric Haakenson in Support of Plaintiff's Motion for Summary Judgment executed August 5, 2010
- Exhibit no. 27 Keller plat map
- Exhibit no. 28 Keller diagram of runoff and soil
- Exhibit no. 29 Zoning Map of the subject and surrounding properties as extracted on May 15, 2005
- Exhibit no. 30 Email from Greg Bishop of Seattle-King County Public Health regarding preliminary approvals for the subject application, sent November 29, 2011
- Exhibit no. 31 Duplicate of Exh. no. 42
- Exhibit no. 32 Harold Hagenson's November 28, 2011, response to Edward McCarthy's November 22, 2011 expert report
- Exhibit no. 33 Lower Snoqualmie and Skykomish Rivers Work Map dated January 24, 2006
- Exhibit no. 34 2006 draft FEMA map of subject property

The following exhibits were offered and entered into the record on December 15, 2011:

- Exhibit no. 35 *not entered into record*
- Exhibit no. 36 Email from De-En Lang to Lanny Henoch sent December 7, 2011, relaying subdivision density dimension calculations
- Exhibit no. 36B Subdivision Density and Dimension Calculations Worksheet for the RA-10 zoned property dated April 27, 2009
- Exhibit no. 36C Subdivision Density and Dimension Calculations Worksheet for the RA-5-P dated April 27, 2009

- Exhibit no. 36D Subdivision Density and Dimension Calculations Worksheet for the A-35 zoned property dated April 27, 2009
- Exhibit no. 37 Downstream Analysis originally prepared December 23, 2004, revised March 22, 2007
- Exhibit no. 38 Certificate of Transportation Concurrency dated December 16, 2005
- Exhibit no. 39 Hagenson Consultants letter to DDES regarding King County Fire District #27's letter dated January 21, 2010
- Exhibit no. 40 Email from Don Gauthier to Hal Hagenson sent December 12, 2011 regarding the applicable FEMA flood maps
- Exhibit no. 41 King County's Fire-resistant Landscape Plants for the Puget Sound Basin
- Exhibit no. 42 Request for Subdivision Pre-Application Review to Public Health, Environmental Health Division
- Exhibit no. 43 Letter from Paul McCombs, Master GIS Analyst and DDES GIS Program Manager, explaining county zoning maps, dated December 12, 2011
- Exhibit no. 44 Zoning Map of the subject and surrounding properties as extracted and formatted by Paul McCombs on December 12, 2011
- Exhibit no. 45 Applicant's Response to Interrogatories to Parties and Submittal of Exhibits
- Exhibit no. 46 Preliminary plat (Alt B) map dated September 28, 2009

The following exhibits were offered and entered into the record on January 4, 2012:

- Exhibit no. 47 Document 'Keeping the Rural Vision' prepared by the Department of Community, Trade and Economic Development dated June 1999
- Exhibit no. 48 Excerpt from the GMA
- Exhibit no. 49 Excerpt from King County Roads site on Historic and Scenic Corridors
- Exhibit no. 50 Topographic map of property from Google earth
- Exhibit no. 51 Expert report for hearing by Engineer Edward J. McCarthy
- Exhibit no. 52A-D Photographs of property
- Exhibit no. 53 Letter to Hagenson Consulting LLC from Chief Chris J. Connor of King County Fire Protection District No. 27 dated January 3, 2012

The following exhibits were offered and entered into the record on April 3, 2012:

- Exhibit no. 54 Revised plat drawing, Sheet 1 of 1
- Exhibit no. 55 Revised plat drawing, Sheet C2-ALTC
- Exhibit no. 56 Revised plat drawing, Sheet C4-A
- Exhibit no. 57 Letter from DDES to the Applicant and Engineer on issuance of the new Surface Water Design Manual Adjustment for file no. L12V0002
- Exhibit no. 58 Wetland Hydrologic Analysis completed by Goldsmith Land Development Services dated March 2012
- Exhibit no. 59 Letter to the Hearing Examiner from Thomas M. Pors dated March 27, 2012
- Exhibit no. 60 Letter with copy of Expert Rebuttal Testimony of Harold Hagenson from Thomas Pors to the Hearing Examiner dated March 30, 2012
- Exhibit no. 61 Letter to Peter Dye from Ed McCarthy dated February 29, 2012
- Exhibit no. 62 Aerial photo of Jubilee Farms
- Exhibit no. 63 Natural Resource Conservation Service Soil Survey
- Exhibit no. 64 Soil Map of Tall Chief property
- Exhibit no. 65 Staff Revised Conditions
- Exhibit no. 66 Letter to Lanny Henoch from James M. Garhart dated March 14, 2012
- Exhibit no. 67 Agreement to Grant Emergency Access Easement with Aldarra Ridge Homeowners Association
- Exhibit no. 68 Letter from John C. Cochenour, President of Patterson Creek Preserve, LLC and Aldarra Ridge Homeowners Association dated March 28, 2012

- Exhibit no. 69 Letter to Lanny Henoch from Hal Hagenson of Hagenson Consultants, LLC dated December 29, 2011
- Exhibit no. 70 Letter to Lanny Henoch from Hal Hagenson of Hagenson Consultants, LLC dated December 14, 2011
- Exhibit no. 71 Letter to James Zogg from C. J. Shin of Soil & Environmental Engineers, Inc. dated January 12, 2012
- Exhibit no. 72 Excerpt from Ordinance 15032
- Exhibit no. 73 Letter to Lanny Henoch from Hal Hagenson of Hagenson Consultants, LLC dated March 26, 2012 on School Bus Emergency Routes
- Exhibit no. 74 School Bus Emergency Travel Route

PTD/vsm