

**BEFORE THE HEARING EXAMINER  
FOR THE TOWN OF COUPEVILLE**

In the Matter of the Application of	)	No. CUP-22-001
	)	
<b>Bill Criswell,</b>	)	<b>NE Birch St. Apartments</b>
<b>on behalf of Eagle Property Group, LLC</b>	)	
	)	
<u>For Approval of a Conditional Use Permit</u>	)	FINDINGS, CONCLUSIONS, AND DECISION

**SUMMARY OF DECISION**

The request for approval of a conditional use permit to allow construction of a two 3,600-square-foot, two-story, four-unit buildings for multi-family residential uses on a 0.43-acre lot at 203 NE Birch Street, is **APPROVED**. Conditions are necessary to mitigate specific impacts of the proposed development.

**SUMMARY OF RECORD**

Hearing Date:

The Hearing Examiner held an open record hearing on the request on May 23, 2023.

Testimony:

The following individuals presented testimony under oath at the open record hearing:

Joshua Engelbrecht, Assistant Planner  
Donna Keeler, Planning Director  
William Criswell, Applicant Representative  
Jared Russell, Applicant Representative

Exhibits:

The following exhibits were admitted into the record:

1. Staff Report, dated May 10, 2023
2. Submitted Plans and Studies, dated March 20, 2023
3. Certificate of Appropriateness, issued February 23, 2023
4. Whidbey Island Public Hospital District Access Easement, dated February 2, 2023
5. SEPA Determination and Nonsignificance and Supporting Materials, issued May 3, 2023
6. Notice Materials, various dates
7. Planning Director Code Interpretation, dated May 7, 2023
8. Staff Powerpoint, presented May 23, 2023

*Findings, Conclusions, and Decision  
Town of Coupeville Hearing Examiner  
NE Birch St. Apartments CUP  
No. CUP-22-001*

9. Traffic Memorandum prepared by Michael J. Read of TENW, dated August 30, 2022

The Hearing Examiner enters the following findings and conclusions based upon the testimony and admitted exhibits.

## FINDINGS

### Application and Notice

1. Applicant Bill Criswell, of Stig Carlson Architecture, on behalf of owner Eagle Development Group, LLC (collectively, Applicant), requests approval of a conditional use permit (CUP) to develop two four-unit multifamily buildings at 203 NE Birch Street,<sup>1</sup> for a total of eight multifamily units which will be made available for rent. Each building will have approximately 3,600 square feet of floor area, with two units on the ground floor and two units on the second floor. Access will be provided off NE Birch Street via an access easement granted by Whidbey Island Public Hospital District, an adjacent property owner. Thirteen parking stalls are proposed. *Exhibit 1, Staff Report, pages 1 and 4; Exhibit 2; Exhibit 4.*
2. The Town of Coupeville (Town) determined that the application was complete on March 1, 2023. On March 20, 2023, the Town mailed notice of the application to property owners within 300 feet of the subject property and posted notice of the application on the subject property. On March 22, 2023, the Town caused notice of the application to be published in the *Whidbey News-Times* newspaper. On May 8, 2023, the Town mailed notice of the public hearing to property owners within 300 feet of the subject property and posted notice on the subject property and at Town Hall, as well as on the Town's website. The hearing notice was also posted at the public library and the post office. On May 10, 2023, the Town caused notice of the public hearing to be published in the *Whidbey News-Times*. No public comments or agency comments were received. *Exhibit 1, Staff Report, pages 4 and 5; Exhibit 6.*

### State Environmental Policy Act

3. The Town acted as lead agency and analyzed the environmental impacts of the proposal as required by the State Environmental Policy Act (SEPA), Chapter 43.21C Revised Code of Washington (RCW). The Town issued a Notice of Application/SEPA Optional Determination of Nonsignificance on March 22, 2023, using the optional DNS process under Washington Administrative Code (WAC) 197-11-355. The Town reviewed the Applicant's Environmental Checklist and other available information on file, including the agency and public comments cited above, and determined that the proposal would not have a probable significant adverse impact on the environment. Accordingly, the Town issued a Determination of Nonsignificance (DNS) on May 3, 2023. The DNS was not appealed. *Exhibit 1, Staff Report, page 5; Exhibit 5; Exhibit 6.*

---

<sup>1</sup> Tax parcel no. R13233-084-4760.

### Comprehensive Plan and Zoning

The Town Comprehensive Plan designates the property as “Town Commercial.” The purpose of the commercial districts (including Town Commercial) is “to provide for commercial development that is appropriate in size and scale to the Town, to provide for efficient circulation and to preserve the historic character of the Town. The General Commercial District provides for slightly more intensive uses than the Town Commercial District. Examples of permitted uses include retail businesses, professional offices, restaurants, theaters, personal services, private clubs and bed and breakfast facilities.” *2012 Comprehensive Plan, page 18; LU 2.2, page 23.*

Town staff identified the following Comprehensive Plan goals and policies as relevant to the proposal:

- Land Use Goal 1: To promote a development pattern that recognizes and enhances Coupeville’s historic small-town character.
- Housing Goal 1: To provide for adequate housing opportunities for current and future residents of Coupeville while retaining the small-town historic character of the Town.

Additionally, staff identified the following specific policies as particularly relevant:

- LU 2.5: Use appropriate buffers to minimize visual, sound, and odor impacts between residential neighborhoods and adjacent more intensive uses.
- LU 2.9: Prohibit any further commercial development adjacent to SR 20, except for professional offices.
- LU 5.1: Encourage the accommodation of future population growth primarily through infill construction and use of existing undeveloped subdivision lots rather than the creation of new lots.

Town staff comment that the proposed apartment project utilizes an existing lot to provide housing options within walking distance to job centers, public transit, and commercial opportunities. As the use is for residential purposes and not commercial, the Planning Director has determined bullet number two above (LU 2.9) does not apply. As part of the Certificate of Appropriateness process, this project was found to be consistent with the Ebey’s Landing National Historical Reserve Design Guidelines by the Historic Preservation Commission. In finding consistency, this project recognizes and enhances the historic, small-town character of Coupeville while also providing housing opportunities for new residents. Additionally, the applicant has indicated that the Hospital adjacent to the project site may pursue agreements to retain some of the units for their travelling staff. *Exhibit 1, Staff Report, page 7; Exhibit 3.*

4. The property is located within the Town Commercial (“TC”) zoning district, which partially implements the Town Comprehensive Plan’s commercial land use designation, described above. *CTC 16.08.050.B*. The TC zone is “intended to provide for a wide range of commercial uses that are proportional in scale and compatible in character with historic uses in the Town, and that cater to both vehicular and nonmotorized access. More intensive, larger or automobile-dependent commercial land uses are not appropriate for this district.” *Id.*
5. Land uses within the TC zone are divided among principal uses, accessory uses, and conditional uses. *CTC 16.080.050.B*. The term “principal use” means “the primary or predominant use to which the property or building is or may be devoted, and to which all other uses on the same lot are accessory.” *CTC 16.04.060.B*. The term “conditional use” means “a use permitted in one or more zones but which, because of characteristics peculiar to such use or because of size, technological processes or equipment, or because of the exact location with reference to surroundings, streets, and existing improvements or demands upon public facilities, requires a special degree of control to make such uses consistent with and compatible to other existing or permissible uses in the same zone or zones. A conditional use is a form of special exception.” *Id.*
6. Within the TC zone, multifamily dwellings are listed as a conditional use. Various other uses are listed as principal uses, including retails sales, professional offices, restaurants, theaters, professional services, microbreweries, clubs, bed-and-breakfasts, short-term rentals, and single-family historic homes. *CTC 16.04.060.B*. A note preceding the TC land use table states that “[a]llowed uses within the town commercial zoning district are as follows, provided that only professional offices are allowed as principal uses adjacent to SR 20.” *Id.* The subject property is adjacent to SR 20. *Exhibit 2; Exhibit 8*.
7. On May 7, 2023, Planning Director Donna Keeler issued a code interpretation in which she explained that the language preceding the TC use table restricted *principal uses* along SR 20 to professional offices only, but it did not restrict *conditional uses* along SR 20. Because multifamily is listed as a conditional use, multifamily development is not prohibited along SR 20 by the language preceding the TC use table. Only principal uses are restricted, not conditional uses. *Exhibit 1, Staff Report, page 6; Exhibit 7; Exhibit 8*.
8. Staff reviewed the proposal for compliance with parking, setback, and height requirements in Chapter 16.12 CTC, and found all requirements would be met. *Exhibit 1, Staff Report, page 5*.
9. The property is located within Ebey’s Landing National Historic Reserve (Reserve). Chapter 16.13 CTC requires proposals for the construction of new structures within the Reserve to undergo design review by the Ebey’s Landing Historic Preservation Commission (HPC). Consistent with code requirements, the HPC reviewed the proposal

in a public meeting on January 17, 2023 and recommended a “Certificate of Appropriateness” for the project, subject to conditions. The HPC determined that, with three conditions, the proposal would be consistent with Reserve Design Guidelines and with the Secretary of the Interior’s Standards for Rehabilitation. Accordingly, the project was issued a “Certificate of Appropriateness” on February 23, 2023. Pursuant to CTC 16.13.080.B.3, the conditions of approval for the Certificate of Appropriateness are included as conditions of approval for the CUP. The Certificate of Appropriateness includes the following conditions necessary for the findings of consistency:

- The proposed landscaping be maintained in perpetuity.
- Any proposed lighting complies with lighting design standards in Chapter 4.9.1. including using downward directional lighting and screening light fixtures so that the light source is not visible off-site.
- All other applicable permits, including a conditional use permit, are required prior to construction.

*Exhibit 1, Staff Report, pages through 5, 7; Exhibit 3.*

#### Existing Property and Proposed Development

10. The 0.43-acre lot (18,681 square feet) is currently vacant and is overgrown with grasses and weeds. The Applicant seeks approval to building two 3,600-square-foot, two-story, four-unit buildings for multi-family residential uses, for a total of eight units, which would be made available for rent. The two buildings will be separated by an outdoor courtyard and circulation space. The Applicant proposes 13 parking spaces along the north portion of the property. The Applicant proposes to retain 60 feet of vegetative buffer area between the buildings and SR 20 to the south. Approximately 20 percent of the lot area would be developed under the Applicant’s proposal. The Applicant has submitted a proposed stormwater plan in compliance with the 2019 Department of Ecology (DOE) Stormwater Management Manual for Western Washington and would submit a final stormwater plan prior to construction. *Exhibit 1, Staff Report, pages 1 and 4; Exhibit 2.*
11. To the north, across NE Birch Street, the subject property abuts an existing hospital. To the south, across SR 20, the subject property abuts cultivated farmland. To the east, the subject property abuts an undeveloped forest, which is owned by the Hospital District. To the west, the subject property abuts existing office buildings. *Exhibit 1, Staff Report, page 2; Exhibit 2; Exhibit 8.*

#### Conditional Use Permit

12. As noted above, the Town Planning Director determined that a multifamily development could be allowed in the TC zoning district adjacent to SR 20 as a conditional use. The Applicant submitted a project narrative addresses the criteria for CUP approval under CTC 16.14.030.C:

*Findings, Conclusions, and Decision  
Town of Coupeville Hearing Examiner  
NE Birch St. Apartments CUP  
No. CUP-22-001*

- The proposed apartments will consist of two 3600 square feet, two-story buildings, each with two, two- bedroom two-bathroom 900 square feet units above and two two-bedroom two-bathroom 900 square feet units below for a total of eight two-bed two-bath 900 square feet rental apartment units. The two buildings will be located closer to NE Birch St. allowing for a generous planted buffer between the buildings and State Route 20. Thirteen parking spaces will be provided off of Birch Street and accessed via a driveway easement previously arranged with the Hospital. The two buildings will be separated by an outdoor courtyard and circulation space. Additional improvements include necessary drainage and utility improvements and extensive landscaping. The current proposed development area amounts to approximately 20 percent of the site, with the rest of the property dedicated to parking, circulation, and a large open green space.
- The apartments are intended to serve residents of Coupeville as well as visiting healthcare professionals. Eagle Development Group has had conversations with the Hospital and there is potential for two of the units to be rented by the hospital on an on-going basis to be used by visiting healthcare professionals.
- The proposed Eagle Apartments development provides much needed rental housing between two buildings that are designed to reflect the historic and rural character of The Town. The apartments will potentially serve healthcare professionals working across Birch Street at Whidbey General Hospital while other tenants could walk, bike, or drive to work, shop, or dine in Coupeville and beyond. The proposed buildings will meet all applicable building codes and development regulations and the project has already received a Certificate of Appropriateness from the Ebey’s Landing National Historic Reserve Design Commission.
- The proposed apartments will not be significantly detrimental to public health, safety, and welfare. The apartments will provide needed rental housing and contribute to the community by providing high quality, architecturally interesting, safe, and walkable rental apartment units for existing and new residents of Coupeville. The proposed apartments will not substantially diminish the value of nearby property or improvements. The design of the buildings was revised and refined in response to neighbor and staff comments received through the Ebey’s Reserve design review process. The Applicant believes that the proposal fits in well with its agrarian surroundings with little impact to neighboring properties.
- The proposed apartments on Birch St. are generally in harmony with the Town of Coupeville Comprehensive Plan First Draft Staff Report and Draft Future Land Use Map. The zoning for the parcel for the proposed apartments remains Commercial, with parcels zoned High Density Residential directly to the east. The apartments would make a significant contribution to the goals of the staff report by providing increased housing capacity for essential workers such as

teachers, emergency service providers and health care workers. The buildings meet historic preservation goals of the Comprehensive Plan, having been reviewed and issued a Certificate of Appropriateness by the Ebey's Landing Historic Preservation Commission. Finally, and as mentioned above, the apartments would provide eight new walkable, bikeable, safe and thoughtfully designed housing units for current and future residents of Coupeville to work, shop and dine in the community.

*Exhibit 2.*

13. Town staff analyzed the proposal for consistency with the requirements of CTC 16.14.030.C and determined:
- Submitted application material and public information from the County assessor's office indicate that the proposed use meets applicable development regulations under Coupeville Town Code.
  - The proposal will be required to provide stormwater design for the proposal prior to submittal of a building permit. The stormwater narrative submitted with the application was reviewed by the Public Works Director who determined it was sufficient for the Conditional Use Permit process
  - Adjacent uses include office uses associated with Whidbey Health Hospital to the north. The submitted traffic study estimates that no intersection in the immediate vicinity would see substantial increase to demand. Additionally, there is temporal separation between the hours of high use of the adjacent buildings and the proposed apartments. Staff does not believe this proposal will materially disturb nearby properties.
  - As proposed, the apartment project utilizes an existing lot to provide housing options within walking distance to job centers, public transit, and commercial opportunities. As the use is for residential purposes and not commercial, the Planning Director has determined policy LU 2.9 [discussed above] does not apply. As part of the Certificate of Appropriateness process, this project was found to be consistent with the Ebey's Landing National Historical Reserve Design Guidelines by the Historic Preservation Commission. In finding consistency, this project recognizes and enhances the historic, small-town character of Coupeville while also providing housing opportunities for new residents. Additionally, the applicant has indicated that the Hospital adjacent to the project site may pursue agreements to retain some of the units for their travelling staff.

*Exhibit 1, Staff Report, pages 6 through 8; Exhibit 2; Exhibit 3.*

#### Testimony

14. Assistant Planner Joshua Engelbrecht testified generally about the application and, how, with conditions, it would meet the criteria for a conditional use permit. He described the

proposal for two buildings of multifamily dwelling units, each with 3,600 square feet of floor area. He testified that access would occur by way of a private easement granted by the adjacent hospital. Mr. Engelbrecht explained that the Applicant would be required to submit and obtain approval of a stormwater plan complying with requirements of the Department of Ecology Stormwater Management Manual for Western Washington and would be reviewed for compliance during building permitting.

Mr. Engelbrecht testified that he had reviewed a traffic study provided by the Applicant and had determined the project would have no adverse impacts on traffic. The traffic study was not present in the exhibits delivered with the staff report, so he provided the study immediately following the hearing.<sup>2</sup>

Mr. Engelbrecht testified that the proposal would be compliant with the Comprehensive Plan, because the Comprehensive Plan encourages housing so long as it is consistent with the town's aesthetic and historical character. He noted the project had received a Certificate of Appropriateness, which documented its compliance with this requirement. He said the development of the currently vacant parcel would be consistent with surrounding development and would also provide housing in close proximity to jobs, transit, and commercial opportunities. He did recognize, however, that the Comprehensive Plan does not specifically contemplate multi-family housing in the Town Center land use designation.

Mr. Engelbrecht explained that the reference to the landscaping in the proposed conditions of approval was to the Applicant's site plans, which show a 60-foot landscape buffer between the buildings and SR 20. He recommended approval of the application with the conditions proposed in the staff report. *Testimony of Joshua Engelbrecht.*

15. Planning Director Donna Keeler elaborated on the proposal's compliance with the Comprehensive Plan. She said the reason for the prohibition against commercial uses allowed outright other than office buildings along SR 20 was that a gas station had been built too close to SR 20 and had damaged the town's aesthetic and historical character. To prevent further degradation of the unique view corridor along SR 20, the Town had decided to limit commercial development along SR 20. Ms. Keeler said the proposal was consistent with the Comprehensive Plan because of the unusually wide, 60-foot landscape buffer, which would serve to protect the view corridor along SR 20—the reason for having special rules along SR 20 in the first place. Ms. Keeler concurred with the recommendation of the Historic Preservation Committee that the 60-foot landscape buffer would be sufficient to protect the view corridor and thus ensure consistency with the Comprehensive Plan. *Testimony of Donna Keeler.*

---

<sup>2</sup> Admitted as Exhibit 9.



16. Applicant Representative William Criswell testified that he had been in negotiation with the hospital next door and had offered the hospital right of first refusal to use at least some of the proposed rental units to house visiting nurses. Thus, although the proposal was not a commercial use, it was supportive of a commercial use. He said he and his architect had worked hard to design a project that would be visually appropriate in this location. *Testimony of William Criswell.*
17. Jared Russell, another member of the Applicant’s team, testified that the Comprehensive Plan shows multifamily housing in the immediate vicinity of the subject property. He believed this was further evidence that the proposal is compliant with the Comprehensive Plan. *Testimony of Jared Russell.*

#### Staff Recommendation

18. Town staff recommends approval of the CUP, with conditions. The Applicant raised no objections to the proposed conditions. *Exhibit 7, Staff Report, page 8. Testimony of Joshua Engelbrecht; Testimony of Donna Keeler; Testimony of William Criswell.*

### **CONCLUSIONS**

#### Jurisdiction

The Hearing Examiner has authority to hold public hearings and make decisions on applications for conditional use permits.<sup>3</sup> *CTC 2.52.090.A; CTC 2.52.100.*

#### Criteria for Review

Under CTC 16.14.030.C, a Conditional Use Permit may be approved only if the Hearing Examiner concludes that all the following criteria are met:

1. The proposed use, at the proposed location, is consistent with the purposes of the development regulations and zone district in which it is to be located, and that the proposed use will meet all the applicable requirements of the development regulations.
2. The proposed use, at the proposed location, will not be significantly detrimental to the public health, safety and welfare, will not substantially harm or diminish the value of nearby property or improvements, and will not materially disturb the owners of nearby properties in the reasonable use of these properties. The [Hearing Examiner] may waive this finding in cases where the proposed use is considered to be a public necessity.

---

<sup>3</sup> Although the administrative provisions of CTC 16.06.050 identify the Planning Commission as the responsible body for conducting public hearings on conditional use permit applications, and the procedures for issuance of a conditional use permit under CTC 16.14.030 identify the Town Council as the decision-making authority, CTC 2.52.150 states that “[a]ny and all provisions of town code, and any and all provisions of the rules of procedure adopted by the examiner, that are in conflict with [Chapter 2.52 CTC] are superseded.” Accordingly, the explicit grant of authority to the Hearing Examiner to hear and decide conditional use permit applications under CTC 2.52.090.A supersedes these conflicting provisions.

3. The proposed use will generally be in harmony with the comprehensive plan.

*CTC 16.14.030.C.*

The Hearing Examiner may require and attach conditions to the conditional use permit conditions to ensure consistency with the spirit and intent of the zoning ordinance and the comprehensive plan and with the harmony and beneficial use of neighboring uses. Such conditions may be more restrictive and in excess of the dimensional standards for the district in which the condition use is proposed. In addition, the Hearing Examiner may require and attach to the conditional use permit time limits for compliance with some or all conditions. *CTC 16.14.030.B.* The Hearing Examiner may deny a request for a conditional use permit if the anticipated impacts of the proposed use at a specific location cannot reasonably be mitigated. *CTC 16.14.030.A.*

The criteria for review adopted by the Town Council are designed to implement the requirement of Chapter 36.70B RCW to enact the Growth Management Act. In particular, RCW 36.70B.040 mandates that local jurisdictions review proposed development to ensure consistency with Town development regulations, considering the type of land use, the level of development, infrastructure, and the characteristics of development. *RCW 36.70B.040.*

#### Conclusions Based on Findings

1. **With conditions, the proposed use, at the proposed location, would be consistent with the purposes of the development regulations and zone district in which it is to be located, and the proposed use would meet all the applicable requirements of the development regulations.** The property is located in the Town Commercial (TC) zoning district, which is primarily “intended to provide for a wide range of commercial uses that are proportional in scale and compatible in character with historic uses in the Town, and that cater to both vehicular and nonmotorized access.” *CTC 16.08.050.B.* However, the TC district does allow multifamily housing as a conditional use. In addition, most commercial uses in the TC district along SR 20 are prohibited—only offices are allowed outright. Thus, although this proposal is not a commercial use, it is the type of use that may conditionally be allowed, particularly in properties adjacent to SR 20. The Examiner agrees with Ms. Keeler’s code interpretation that the restrictions against most primary uses adjacent to SR 20 are not intended to restrict any of the conditional uses, including multifamily housing.

The proposed 13 parking spaces exceeds the 12 required by CTC 16.12.070 (1.5 spaces per dwelling unit). The structures comply with the minimum height requirements, lot width, structure height, and setback requirements set forth in Chapter 16.12 CTC. *Findings 1 through 18.*

*Findings, Conclusions, and Decision*  
*Town of Coupeville Hearing Examiner*  
*NE Birch St. Apartments CUP*  
*No. CUP-22-001*

2. **With conditions, the proposed use, at the proposed location, would not be significantly detrimental to the public health, safety, and welfare; would not substantially harm or diminish the value of nearby property or improvements, and would not materially disturb the owners of nearby properties in the reasonable use of these properties.** The Town analyzed the environmental impacts of the proposal and determined that there would be no significant adverse environmental impacts. That determination was not appealed. The Historic Preservation Committee determined that three conditions were necessary to ensure compliance with historic preservation requirements. The Town staff agreed with the HPC's conditions, and the Hearing Examiner recognizes the subject-matter expertise of the HPC. The HPC's three conditions are hereby adopted as conditions of approval, as contemplated by CTC 16.13.120.D.4. *Findings 1 through 18.*
  
3. **With conditions, the proposed use would generally be in harmony with the Comprehensive Plan.** The property is designated "Town Commercial" by the Town Comprehensive Plan. Town staff identified several Comprehensive Plan goals and policies that are relevant to the proposal and determined that the proposal would be consistent with these goals and policies. The Hearing Examiner concurs with this determination. The Examiner concludes that Policy LU 2.9, which prohibits all commercial development along SR 20 except for professional offices, is an indication that the normal pro-commercial policies for the Town Commercial land designation are modified in the case of properties adjacent to SR 20. Although the Comprehensive Plan does not specifically contemplate multi-family housing anywhere with the Town Center, the Examiner is persuaded by the testimony of Mr. Englebrecht and Ms. Keeler that a well-screened multifamily project in this location would be consistent with the intent of the Comprehensive Plan to protect the SR 20 view corridor. Adjacent to SR 20, it is appropriate to provide well-screen housing of the type contemplated in Policy LU 5.1 and Housing Goal 1. Policy 2.5 requires appropriate buffers between residential and more intensive land uses, which is provided here. In addition, Mr. Criswell's testimony indicates that the rental units may, in the future, support the existing hospital, which is encouraged under the Comprehensive Plan. *Findings 1 through 18.*

### **DECISION**

Based on the preceding findings and conclusions, the request for a conditional use permit to allow construction of a two 3,600-square-foot, two-story, four-unit buildings for multi-family residential uses, with 13 parking spaces, on a 0.43-acre lot at 203 NE Birch Street, is **APPROVED**, with the following conditions:

1. The Landscaping proposed in the Applicant's submitted plans (Exhibit 2 of this decision) shall be maintained in perpetuity.

*Findings, Conclusions, and Decision  
Town of Coupeville Hearing Examiner  
NE Birch St. Apartments CUP  
No. CUP-22-001*

2. Any lighting must comply with the lighting design standards in Chapter 4.9.1 of the Ebey's Landing National Historical Reserve Design Guidelines, including the use of downward directional lightning and screened light fixtures so that the light source is not visible off-site.
3. All required permits shall be obtained prior to construction.

**DECIDED** this 26th day of May 2023.



ALEX SIDLES  
Hearing Examiner  
Town of Coupeville