



May 7, 2021

Lauren Hollenbeck  
City of Camas Community Development  
616 NE 4<sup>th</sup> Avenue,  
Camas, WA 98607

**RE: CJ Dens (SUB20-02) Land Use Application Document Updates**

Dear First Name:

This letter is written to address updates to the plans and documents submitted for CJ Dens (SUB20-02) based on comments received from the City of Camas (City) on March 9, 2021 and April 16, 2021, as well as meetings with the City to discuss the comments on March 22, 2021 and March 26, 2021.

**Land Use Narrative**

Updates to the Land Use Narrative are below. The sections discussed below are intended to completely replace the corresponding section from the Land Use Narrative.

**Chapter 16.31 ARCHAEOLOGICAL RESOURCE PRESERVATION**

**16.31.070 Predetermination report required.**

**Response:** An archaeological predetermination was completed by Archaeological Investigations Northwest, Inc. (AINW) as part of the original application (SUB10-03). DAHP requested additional predetermination work be completed for the project. AINW completed the additional predetermination on January 27, 2021 and determined that no additional work would be required. This standard is met.

**16.51.160 Mitigation requirements.**

- A.** The applicant shall avoid all impacts that degrade the functions and values of a critical area or areas. Unless otherwise provided in these provisions, if alteration to the critical area is necessary, all adverse impacts to or from critical areas and management zones resulting from a development proposal or alteration shall be mitigated in accordance with an approved critical area report and SEPA documents.

**Response:** This application proposes to have no impacts to the Wetland A or Stream 1 in the northwest portion of the site. Buffer modifications are proposed for Wetland A buffers. The buffer modifications will include buffer reduction and buffer averaging, as allowed by CMC. A portion of the proposed T-3 trail will be required to cross Stream 3 in the southeast corner of the site. A culvert will be used to cross the stream. Mitigation will be provided for the impacts created by the crossing as described in the Mitigation Plan provide by ELS. See the Preliminary Plans, Critical Areas Report and Buffer Modification Plan, and Mitigation Plan included with this application for more information.

**16.53.050 Wetland permits.**

- C.** Buffer Standards and Authorized Activities. The following additional standards apply for regulated activities in a wetland buffer to ensure no net loss of ecological functions and values:

5. **Other Activities in a Buffer.** Regulated activities not involving stormwater management, road and utility crossings, or a buffer reduction via enhancement are allowed in the buffer if all the following conditions are met:

**Response:** As part of the tree survey conducted for the site, some dead and unhealthy trees were identified along the edge of the wetland buffer adjacent to the development. These trees will be reviewed during and after construction to ensure they do not become dangerous to the health, safety, and welfare of the residents and greater community. If it is determined at that time that removal of the tree is necessary, proper permitting will be obtained and mitigation will be provided per Camas Municipal Code (CMC). No other activities are proposed within the wetland buffer. This standard is met.

**17.19.030 - Tract, block and lot standards.**

**A. Environmental Considerations.**

2. **Vegetation.** In addition to meeting the requirements of CMC Section 18.13.045, Tree Regulations, every reasonable effort shall be made to preserve existing significant trees and vegetation, and integrate them into the land use design.

**Response:** The subject site has groups of trees along the property boundary and surrounding the critical areas. There is also a grouping of trees in the south-central portion of the site. Trees immediately impacted by grading and identified as posing an immediate risk to health, safety, and welfare are proposed to be removed. In the large open space and critical area tract, unhealthy and dead trees will be left with the initial tree removal effort. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional trees propose an immediate risk and need to be removed. If additional trees proposed for removal require permitting and mitigation, these will be obtained and provided with the tree removal. With the development, trees will be installed in the open space tracts, as well as street trees, to help replace some of the tree canopy that will be removed. See the Tree Plan and Tree Report included with this application for more information. This standard is met.

3. **Density transfers may be applicable if developer preserves critical areas.** See Chapter 18.09 of this code.

**Response:** The applicant proposes to create a ±16.00-acres of natural area tracts for the protection of critical areas and natural vegetation, making density transfer applicable. The application proposes the use of density transfer to reduce the front setback to 10 feet with a 20-foot garage setback; reduce the rear setback to 15 feet; and increase the lot coverage to 50%. The applicant also proposes to maintain the requirement that the garage be set back 5 feet from the front of the dwelling. As part of the negotiation, the City requested robust planting in the natural area tracts, construction of a public overlook, and construction of a play area. An overlook and play area are proposed in Tract I. Planting of trees, shrubs, and seed mixes, above code requirements, are proposed in all open space tracts to provide the robust planting requested. As part of the robust planting, the applicant is providing a total of 1,465 tree units (well above the required 878 tree units) between retained trees, open space trees, and street trees. Additionally, the tree unit number does not account for trees proposed in Tracts A and B (93 trees), as those trees

are proposed to have a smaller initial planting size to increase survivability. See the Preliminary Plans included with this application for more information. This standard is met.

D. Lots. The lot size, width, shape and orientation shall conform to zoning provisions and the following:

1. Each lot must have frontage and access onto a public street, except as may otherwise be provided (e.g., approved private roads, access tracts);

**Response:** All lots other than Lots 12-13, 85-88, 100-102, and 109-112 will have frontage onto the internal street network. The lots mentioned above will gain access to the public street network through access tracts. All lots have a minimum width of 60 feet and minimum depth of 80 feet. All lots on a curve or cul-de-sac have minimum frontages of 30 feet. See the plans included with this application for more information. This standard is met.

5. Flag lots, access tracts, and private roads may be permitted only when the community development director or designee finds the applicant meets the criteria listed hereinafter:

**Response:** This application proposes one flag lot, Lot 103. The flagpole is 20 feet wide and will have a minimum 12-foot paved surface. Lot 103 will also have a minimum of four off-street parking spaces (two garage and two driveway spaces). Four access tracts are proposed to provide access to Lots 12-13, 85-88, 100-102, and 109-112. Each of these lots will provide a minimum of four on-site parking spaces (two garage and two driveway spaces) and have address signs as required by this section. This standard is met.

E. Tracts and Trails.

1. If land division is located in the area of an officially designated trail, in accordance with the current version of the parks, recreation and open space comprehensive plan, provisions shall be made for reservation of the right-of-way or for easements to the city for trail purposes including the construction of the trail. Trail standards for each trail type shall be as specified in appendix B of the parks, recreation and open space comprehensive plan or as amended.

**Response:** The Applicant proposes to construct a 6-foot-wide gravel trail along the southern portion of the site, through the natural area tracts. This trail is a portion of the T-3 trail in the City PROS Plan. As requested by the Camas Parks and Recreation department, portions of the trail have been widened to 8 feet to provide for maintenance vehicle pull outs. The widened areas extend east and west from N Elk Drive, two widened section east of N Elk Drive, three widened sections spaced out west of Lot 1, and a turnaround at the west end of the site. This standard is met.

18.09.060 Density transfers.

D. Where a tract under "C" above, includes one-half acre or more of contiguous area, the city may provide additional or negotiated flexibility in lot sizes, lot width, or depth, or setback standards. In no case shall the maximum density of the overall site be exceeded. The City may, also provide the landowner with:

1. A credit against park and open space impact fees per Chapter 3.88; or
2. Cash from the parks and open space impact fee fund or other public fund.

**Response:** This application proposes the use of density transfer due to the presence of critical areas on site. The Applicant proposes three natural area tracts to protect the critical and natural areas on site, totaling ±10.28 acres in size. Using the setback standards flexibility allowed under 18.09.060(D), the applicant is proposing adjustments to the standards in Table 18.90.040 Table 1 and Table 2. The table below shows the requested modifications to the standards. As part of the requested modification, the City requested that the Applicant install additional trees within Tract A, as well as a passive recreational opportunity in Tract I, and a play area, which the Applicant has provided. See the Preliminary Plans included in with this application for more information. This standard is met.

<b>CJ Dens Subdivision Lot Standards (R-7.5)</b>		
<b>Standard</b>	<b>18.09.040 Table 1</b>	<b>Proposed</b>
Maximum density (dwelling units/net acre)	5.8	No Change
Average lot area (square feet)	-	-
Minimum lot size (square feet)	5,250	No Change
Maximum lot size (square feet)	9,000	No Change
Minimum lot width (feet)	60	No Change
Minimum lot depth (feet)	80	No Change
Maximum building lot coverage	40%	50%
Maximum building height (feet)	35	No Change
<b>Standard</b>	<b>18.09.040 Table 2</b>	<b>Proposed</b>
Minimum front yard – Building (feet)	20	10
Minimum front yard – Garage (feet)	-	20
Garage from front of Dwelling (feet)	5	5
Minimum side yard (feet)	5	No Change
Minimum side yard flanking a street and corner lot rear yard (feet)	10	No Change
Minimum rear yard (feet)	25	15
Minimum lot frontage on a cul-de-sac or curve (feet)	30	No Change

**18.13.045 Tree survey.**

**B. A tree survey must contain the following:**

**1. Inventory.**

- a. Map of the site, with tree locations numbered
- b. Include all significant trees that will be impacted by the proposed development, which may include trees off-site if canopies overhang the subject property. Open space tracts to be set aside for conservation purposes do not need to be included in survey.
- c. Provide the common and scientific name of inventoried trees.

**Response:** A tree inventory has been completed by AKS as part of the tree survey. Trees that will be protected and impacted with the project are identified on the plans and in the report. Multiple tracts are proposed to protect as many of the existing trees as practicable with the development. Trees immediately impacted by grading and identified as posing an immediate risk to health, safety, and welfare are proposed to be removed. In the large open space and critical area tract, unhealthy and dead trees will be left with the initial tree removal effort. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional trees propose an immediate risk and need to be removed. If additional trees proposed for removal require permitting and mitigation, these will be obtained and provided with the tree removal. See the Preliminary Plans and Report included with this application for more information. This standard is met.

**18.13.050 - Standards for landscape, tree and vegetation plans.**

- C. Landscape, Tree and Vegetation Plan must include a combination of trees, shrubs, and ground cover to achieve the purposes of this chapter.**
- 1. Required landscaping shall be comprised of a minimum of sixty percent native vegetation (or adapted to northwest climate), or drought-tolerant vegetation, and fifty percent evergreen.**
  - 2. Deciduous trees shall have straight trunks, be fully branched, have a minimum caliper of two inches, be equivalent to a fifteen-gallon container size, and be adequately staked for planting.**
  - 3. Evergreen trees shall be a minimum of five feet in height, fully branched, and adequately staked for planting.**

**Response:** Plants proposed in the landscape plan are either native or adapted to the northwest climate, as well as a majority being evergreen. With the exception of trees proposed in Tracts A and B, all plant materials will meet the requirements of this section. Tree planted in Tracts A and B will be planted as one-gallon pots to have the best chance of survivability and healthy growth in the tracts. Given the potential of shallow bedrock and steep slopes, the survivability of trees planted at a larger size would be very low. See the Landscape Plan included with this application for more information. This standard is met.

**18.13.051 - Minimum tree density requirement.**

- B. Tree Density Calculation. Specific instructions on how to perform tree density calculations are provided in the Design Standards Manual. "Tree Unit" is a unit of measurement based upon the size of the diameter of the tree measured at the breast height ("dbh"). New trees are given a value of one (1) Tree Unit, as they must be a minimum of 2" dbh when planted. Tree Unit values are summarized in the following Table:**

**Response:** The total site area is ±49.62 acres. There are ±5.72 acres to be set aside as a natural area tract to protect the wetland and stream in the northwest portion of the site. As no development activity will occur in this tract, the significant number or protected trees and land area are not used for tree unit calculations. Therefore, there are ±43.90 net acres of developable land used in the calculation of the required tree density. The application is for a residential development; the applicant is required to provide 20 tree units per acre, for a total of 878 tree units (43.90 x 20). There are 1,068 tree units that are to be retained on site, as well as 338 proposed street trees and 59 proposed open space trees meeting

tree unit requirement, for a total of 1,465 tree units (67 percent more than required). There are also 93 trees proposed in the large open spaces to be planted at a size that does not meet tree unit requirements. Additionally, a significant number of existing trees are proposed in the northwest portion of the site that were not included in the calculation as previously noted. See the Tree Report and Preliminary Plans included with this application for more detail. This standard is met.

**18.13.052 Tree and native vegetation preservation.**

- A.** When determining where to retain or plant trees, locations with healthy soils, native understory vegetation, and mature trees shall have priority when there are feasible alternative locations on site for proposed buildings and site improvements to achieve the minimum tree unit density per acre. This may require site redesign. Provided, where necessary, density transfer areas may be used to ensure protection and retention of trees.

**Response:** As many of the existing trees as practicable on site are proposed to be protected and retained. The majority of the trees proposed for retention are located in one of three proposed natural area tracts. The trees in these areas are mature trees with a mix of native understory vegetation. Trees immediately impacted by grading and identified as posing an immediate risk to health, safety, and welfare will be removed. In the large open space and critical area tract, unhealthy and dead trees will be left with the initial tree removal effort. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional trees propose an immediate risk and need to be removed. If additional trees proposed for removal require permitting and mitigation, these will be obtained and provided with the tree removal. This standard is met.

- B.** In designing a development project and in meeting the required tree density, the applicant must provide a Landscape, Tree and Vegetation plan that retains healthy, wind firm trees in the following priority:
1. Trees located within critical area buffers. Trees must be identified within a protected tract.
  2. Significant wildlife habitat, or areas adjacent and buffering habitat.
  3. Significant trees that are greater than 36 inch dbh.
  4. Groves of trees, or other individual healthy trees with the intent to retain must be located in separate tract if part of a land division, or other protective mechanism if other development type,
  5. Trees, that if removed would cause trees on adjacent properties to become hazardous.

**Response:** Three natural area tracts are proposed that protect a large majority of the existing trees on site. All trees within the critical areas and buffers will be retained, with none of the trees in Tract S considered in the tree unit calculation for the project as they are outside of the actual development area. Trees located within the critical areas and their buffers will be protected. Outside of the critical area, trees were preserved to the greatest extent practicable. Trees in groves were given priority and are located within the natural area tracts. In the large open space and critical area tracts, unhealthy and dead trees that do not pose an immediate risk will be left with the initial tree removal effort. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional trees propose an immediate risk and need to be removed. If



additional trees proposed for removal require permitting and mitigation, these will be obtained and provided with the tree removal. Significant wildlife habitat is projected in the three natural area tracts, included retention of dead trees, which provide additional habitat. Where feasible, trees over 36" DBH are proposed to be retained. Trees over 36" that will be removed are impacted by grading for the development. Trees immediately adjacent to the site were also evaluated to ensure they would not create a risk after removed of the on-site trees. See the Preliminary Plans and Tree Report included with this application for more information. This standard is met.

- C. **Mitigation and Replacement.** In areas where there are currently inadequate numbers of existing trees to meet minimum tree density, where the trees are inappropriate for preservation, the soils are poor, or there are significant invasive species, then mitigation shall be required to meet the minimum tree density. The applicant's proposed location for replacement trees or mitigation shall be subject to the city's approval of the Landscape Plan. Replacement trees shall be planted in the following priority:

**Response:** As previously discussed, there are enough existing trees being retained on site, outside of Tract S, to meet the tree density requirements for the development. Trees in Tract S will be protected but were not included in the tree unit calculation. However, the Applicant will also be installing additional trees in the Tract A and B natural areas, as well as street trees and trees in the smaller open space tracts on site. Trees proposed in Tracts A and B are proposed to be planted as one-gallon pots to have the best chance of survivability and healthy growth in the tracts. Given the potential of shallow bedrock and steep slopes, the survivability of trees planted at a larger size would be very low. Tree locations shown for Tract A and B are preliminary and final placement will be determined during construction, as near as possible to where they are proposed. See the Tree Report and Preliminary Plans included with this application for more information. This standard is met.

## Preliminary Plans

A full new Preliminary Plan set has been submitted to ensure that all updates are shown on all applicable plan sheets and there is no confusion moving forward. Generally, the updates to the Preliminary Plans are listed below.

- A dead-end turnaround is provided at the end of Tract K.
- Tract L has been shortened to less than 150 feet, as measured from the center point of the cul-de-sac on N Adams Court.
- Tract 103 was modified to become a flag lot accessing from N 50<sup>th</sup> Avenue.
- Tract M has been shortened to less than 150 feet, as measured from the center line of N 49<sup>th</sup> Avenue.
- A dead-end turnaround is provided in Tract T adjacent to Lot 152.
- The trail has been widened to 6 feet wide, with portions widened to 8 feet. The trail has been modified to connect and cross at the intersection of N Elk Drive and SE Leadbetter Road.
- A play area has been added to Tract I.

- Additional trees have been proposed in Tracts A and B, as well as a seed mix in disturbed areas that will provide additional native understory plant material in areas disturbed by grading. Seed mix is noted on the plans, but not shown as final disturbed areas will be determined during final engineering.
- Additional plant materials were also added to Tracts A and B adjacent to rights-of-way to provide additional landscape near public use areas.
- The required L2 buffer for the storm facility in Tract R has been identified. Plantings will be provided with the final design.
- Retention of additional trees originally proposed for removal. Many of these trees are unhealthy or dead, however the City requested they remain as they are generally centrally located in the open spaces and could provide habitat. These trees will be review after grading to determine if they will pose a risk to health, safety, and welfare. If they are determined to pose a rise, they will be removed, as necessary.

### Tree Report

The tree report has been updated to provide clarification on reasons for removal, to retain additional trees as mentioned above, and to update any information related to the additional tree retention. Many of the additional trees being retained are unhealthy or dead, however the City requested they remain as they are generally centrally located in the open spaces and could provide habitat. These trees will be review after grading to determine if they will pose a risk to health, safety, and welfare. If they are determined to pose a risk, they will be removed, as necessary. The updated tree report is included with this letter.

The City specifically requested we review the trees along the east boundary in the propose rear yards. After additional review, the majority of the trees proposed for removal are dead or in poor enough health to pose an immediate threat to the future homes. Where feasible, healthy trees along the east boundary are proposed to be retained.

Sincerely,

**AKS ENGINEERING & FORESTRY, LLC**



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