A Land Use Narrative for CJ Dens Type III Subdivision

Date: November 2020

Submitted to: City of Camas
Community Development
616 NE 4th Avenue
Camas, WA 98607

Applicant: CJ Dens Lacamas II LLC
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AKS Job Number: 5504

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Community Development
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PO Box 2239
Kalama, WA 98625

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Site Location:
715 SE Leadbetter Road
Camas, WA 98607
Parcel #s: 177906-000, 178172-000, and 178236-000

Site Size:
49.62 Acres (2,161,423 SF)

Land Use Districts:
Single-family Residential (R-7.5)

I. Executive Summary

Through this application, CJ Dens Lacamas II, LLC (Applicant) requests approval from the City of Camas (City) to subdivide the subject site, described below, into 152 single-family lots for the future construction of detached single-family homes. The site is located at the east end of Lacamas Lake, on the north side of SE Leadbetter Road and is addressed 715 SE Leadbetter Road, Camas, WA 98607. The site is identified as Clark County Parcels 177906-000, 178172-000, and 178236-000. The development will gain access from SE Leadbetter Road and N Adams Street and will provide access to the individual lots with an internal street network. Future circulation will be provided to the north, to connect to the future arterial in the City of Camas Six Year Transportation Improvement Program. The Applicant will also ensure protection of the existing critical areas on site, including two streams and a wetland, as well as the shoreline buffer for Lacamas Lake. The applicant will also provide a trail parallel to SE Leadbetter road, which is identified as a portion of the T-3 trail in the City of Camas Park, Recreation, and Open Space (PROS) Plan.

In addition to this narrative, the application package includes the materials necessary for the City to review and approve this submittal, including Preliminary Plans, Stormwater Technical Information Report (TIR), updated Geotechnical Site Investigation Report, updated Traffic Impact Study, updated Wetland and Habitat Report, Shoreline substantial development permit application, and an amended State Environmental Policy Act (SEPA) checklist.

The highlights of this project that will be discussed further in this narrative include:

- Platting of 152 single-family lots.
- Construction of the public internal street network for lot access and circulation.
- Construction of a multi-use path based on the PROS Plan.
- Protection of existing critical areas and central open space.
- Construction of an overlook to provide views of Lacamas Lake and the surrounding hills.
- Common parking areas throughout the development for additional guest parking.
- Construction of water, sanitary sewer, and stormwater utilities for the development.
- Construction of water transmission line from south boundary to north boundary.

The project is to be constructed in a maximum of 3 phases as follows:

- Phase 1 – Construct 51 lots with development access from SE Leadbetter Road, create the large central open space, construct the multi-use trail, and construct necessary roadways and utilities.
- Phase 2 – Construct 64 lots and the development access from N Adams Street, construct the overlook, and construct necessary roadways and utilities.
- Phase 3 – Construct 37 lots and the remaining roadways and utilities.

The written narrative includes findings of fact demonstrating that the application complies with all applicable approval criteria. These findings are supported by substantial evidence, including Preliminary Plans and other written documentation. This information, which is included in this application package, provides the basis for the City to approve the application.

II. Site Description/Setting

The subject site consists of three parcels and is ±49.62 acres in size. The site is addressed as 715 SE Leadbetter Road, Camas, WA 98607. The included properties are identified as Clark County Parcel Number 177906-000 of the northeast ¼ of Section 34 and Parcel Numbers 178172-000 and 178236-000 of the northwest ¼ of Section 35, Township 2 North, Range 3 East, Willamette Meridian. The site is zoned Residential – 7.5 (R-7.5) with an Airport Overlay. Neighboring properties are zoned R-7.5 and Business Park to the north, R-7.5 to the northeast and southeast, Community Commercial to the east and west, and Residential – 12 (R-12), Parks/Open Space (P/OS), and Water to the south. Properties to the north and northeast are vacant. The property to the east is in use as large-lot residential and the properties to the southeast are in use as single-family residential. One property to the south across SE Leadbetter Road is in use as large-lot residential, with the remaining parcels south of the site covered by Lacamas Lake. The property to the west is in use as large-lot residential and the Camas Washougal-Wildlife League clubhouse.

The site has frontage on SE Leadbetter Road along the south boundary and N Adams Street is stubbed to the site from the south, in the east portion of the site. SE Leadbetter road is classified as an existing 2-lane local road without sidewalk, curb, or gutter. Frontage improvements are not proposed for SE Leadbetter road because the City plans to close the road to vehicle traffic west of the site in the future. N Adams Street is classified as a 2 Lane Local/Sprinklered (52-foot right-of-way (ROW)) and will be extended into the site.

The site is hilly with steep slopes in the south and northeast portions of the site. The site generally slopes from north to south, with a small portion in the northwest sloping from southeast to northwest into a valley containing a wetland and stream. Shallow bedrock exists throughout the site, with a few rock outcroppings on site. The existing vegetation on site consists of stands of evergreen trees interspersed deciduous trees along the north, south, west, and portions of the east boundary, as well as a stand in the south-central portion of the site. Shrubs and grasses make up the remainder of the vegetation on site. A wetland in located in the northeast portion of the site and continues off site to the northwest. An unnamed stream, classified as a Type Np stream by the Washington State Department of Natural Resources (DNR) Water Typing System, flows through the wetland from the northeast to the southwest, and generally follows the north property line. There is also an unnamed Type Ns stream in the southeast corner of the site, flowing from off site, southwesterly across the site. Both streams cross under SE Leadbetter Road and drain to Lacamas Lake. The Clark County GIS archaeological predictive model ranges from Low-Moderate to High across the site. The site is not within a City of Camas mapped critical aquifer recharge area (CARA). All critical areas will be discussed in further detail later in this narrative.

III. Applicable Review Criteria

CITY OF CAMAS COMPREHENSIVE PLAN GOALS

Citywide Land Use Goal: Maintain a land use pattern that respects the natural environment and existing uses while accommodating a mix of housing and employment opportunities to meet the City's growth projections.

Response: The subject site is zoned for residential development (R-7.5). There is substantial demand for single-family housing in the City of Camas. The proposed subdivision provides the necessary infrastructure and supplies in-demand housing products at a density consistent with the site and surrounding zoning, while maintaining existing critical areas and

providing large natural area tracts on site. Therefore, the proposed development is consistent with the adopted comprehensive plan.

Neighborhood Goal: Create vibrant, stable, and livable neighborhoods with a variety of housing choices that meet all stages in the life cycle and the range of affordability.

Response: The proposed subdivision will provide a mix of lot sizes and provide single-story and two-story product, creating a neighborhood with a mix of single-family home options. The proposed lots meet the requirements of the R-7.5 zone, using the density transfer option for sites with critical areas, which provides housing types consistent with the overall comprehensive plan.

Natural Environment Goal: Develop and interconnected network of parks, trails, and open space to support wildlife corridors and natural resources and enhance the quality of life for Camas residents and visitors.

Response: The Applicant proposes to create three large natural area tracts that will maintain and protect the wetland and stream along the north portion of the site, as well as the stream in the southeast corner of the site. The tracts will also help protect existing trees along the south boundary of the site. The development will also provide a portion of the proposed T-3 trail as shown in the PROS Plan, along the southern portion of the site through two of the natural area tracts.

Citywide Housing Goal: Maintain the strength, vitality, and stability of all neighborhoods and promote the development of a variety of housing choices that meet the needs of all members of the community.

Response: The proposed subdivision will provide a mix of lot sizes and provide single-story and two-story product, creating a neighborhood with a mix of single-family home options. The proposed lots meet the requirements of the R-7.5 zone, using the density transfer option for sites with critical areas, which provides housing types consistent with the overall comprehensive plan.

Affordable Housing Goal: Create a diversified housing stock that meets the needs of all economic segments of the community through new developments, preservation, and collaborative partnerships.

Response: The proposed subdivision will provide a mix of lot sizes and provide single-story and two-story product, creating a neighborhood with a mix of single-family home options. The proposed lots meet the requirements of the R-7.5 zone, using the density transfer option for sites with critical areas, which provides housing types consistent with the overall comprehensive plan.

Environmental Stewardship Goal: To preserve Camas' natural environment by developing a sustainable urban environment and protecting habitat and vegetation corridors.

Response: The proposed subdivision will provide three large natural area tracts to protect the existing wetland and streams, as well as many of the existing trees on site. Along with these protections, trees will be planted in the central open space, street trees installed with the roads, and trees and shrubs installed in the smaller open space tracts to help create a sustainable urban environment. See the Tree Plan and Tree Report and Landscape Plans included with this application for more information.

Critical Area Goal: To preserve, maintain, and restore the City's critical area to protect their function and values.

Response: The proposed subdivision will provide two large natural area tracts to protect the existing wetland and streams. There will be no direct impact to the wetland or streams and all buffer impacts will be averaged or mitigated for on site.

Landscape Enhancement and Tree Preservation Goal: To protect Camas' native landscape and mature tree cover.

Response: The proposed subdivision will provide three large natural area tracts to protect the existing wetland, streams, and as much native vegetation as practicable. New trees will be planted in the central open space, street trees will be installed with the roads, and trees will be installed in the smaller open space tracts to replace tree cover removed with the development.

Street Goal: Street will function for all users including bicyclists, pedestrians, transit users, and motorists.

Response: All streets within the development will be designed to City standards and include sidewalks for pedestrians, and with the low traffic volume, bicyclists will be able to share the roadway with motorists. There is currently no public transit service to the area.

Walking, Bicycling, and ADA Mobility Goal: The needs of bicyclists, pedestrians, transit users, and accessibility (ADA-compliant) will be considered in all street improvements and will be integrated in all collector and arterial roadway projects, including regular safe street crossings.

Response: The subdivision is providing sidewalks along all streets within the development as well as a portion of the T-3 trail through the southern natural areas to connect to the future and existing City trail system.

Design and Low-Impact Development Goal: The transportation system will be designed to support community character and environmental policies.

Response: All roads within the development are proposed with a 52-foot-wide reduced ROW to help reduce impacts to the existing wetland, streams, and native vegetation. The reduced width will also help to calm traffic and create a neighborhood that supports walkability and community.

Safety and Traffic Calming Goal: Design and construct safe transportation facilities that meet applicable requirements.

Response: All roads within the subdivision are designed to City standards and proposed as 52-foot-wide roads with 28-foot pave surfaces. The road layout is somewhat curvilinear, and parking will be allowed on one side of the street. These design elements will help with traffic calming and create a safe transportation facility.

Transportation Demand Management Goal: Transportation planning will achieve the efficient use of transportation infrastructure, increase its person carrying capacity, and accommodate and facilitate future growth consistent with land use objectives.

Response: The subdivision proposes a road layout that will have carrying capacity for the proposed neighborhood, as well as allow for expansion and future circulation to the north.

Parks and Recreation Goal: Preserve and enhance the quality of life in Camas through the provision of parks, recreation programs, recreational facilities, trails, and open spaces.

Response: The proposed subdivision will construct a portion of the T-3 trail through the southern natural area tracts that will connect to the future and existing public trail systems around Lacamas Lake.

General Utility Goal: Provide utility services to all businesses, residents, and properties in the City limits. In urban area, eliminate private water and sewer/septic systems, including wells used only for irrigation.

Response: All new lots will be provided with public water and sewer service. The development will also construction a water transmission main from SE Leadbetter Road, to the north boundary to allow for future expansion of the City's water system.

CITY OF CAMAS MUNICIPAL CODE

Title 5 - BUSINESS TAXES, LICENSES AND REGULATIONS

Chapter 5.45 TELECOMMUNICATIONS (Article VII. - Conditions of Telecommunications Right-of-Way Use Authorizations, Telecommunications Franchises, and Facilities Leases)

5.45.365 Location of facilities.

Response: All electric, cable, or telecommunication lines installed with the development will be located underground. The final location of these utilities will be determined with final construction plans. This standard is met.

TITLE 12 – STREETS, SIDEWALKS AND PUBLIC PLACES

Chapter 12.24 Street Names

Response: The proposed streets have been named according to the City of Camas Street Naming Manual. N 48th Avenue, N 49th Avenue, and N 50th Avenue are the next numerical street names based on adjacent development to the east. N Adams Street is an extension of an existing road, and N Adams Court is a cul-de-sac at the end of N Adams Street that is less than four hundred feet long. N Elk Drive is named for native fauna and does not generally conform to the northerly-southerly or easterly-westerly grid. This standard is met.

TITLE 14 - OFFENSES AND MISCELLANEOUS PROVISIONS

Chapter 14.02 STORMWATER CONTROL

Response: Stormwater runoff generated by the proposed development will be collected on site. All pollution generating runoff will be treated by mechanical filters within the catch basins located in the streets. The majority of the treated stormwater will be conveyed and discharged directly to Lacamas Lake at existing discharge points using the large water body exemption for stormwater discharge. A small portion of the treated stormwater will be conveyed to a stormwater pond in Tract R for detention, prior to being released to Wetland A at rates permitted by Camas Municipal Code (CMC). The stormwater system is designed per the Stormwater Management Manual for Western Washington. See the Preliminary Stormwater Technical Information Report (TIR) and Preliminary Plan included with this application for more information. This standard is met.

TITLE 16 - ENVIRONMENT

Chapter 16.07 SEPA CATEGORICAL EXEMPTION AND THRESHOLD DETERMINATIONS

16.07.040 Environmental checklist.

Response: A SEPA checklist was submitted and received a Mitigated Determination of Non-significance on May 27, 2014 under permit SUB10-19. As stated in the pre-application meeting notes from the City of Camas, dated February, 20, 2020, "The applicant may utilize the existing SEPA checklist as fewer impacts are anticipated with this proposed development as opposed to the original development approval (SUB10-03)." However, the applicant is now proposing temporary on-site rock crushing during construction; therefore, an amended SEPA checklist has been provided with the application. This standard is met.

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). No further archaeological site work was required with the original land use approval and the proposed development will have significantly less impact to the site. Therefore, there is no new information that would require additional archaeological work and the original predetermination meets the requirements of this section. This standard is met.

Chapter 16.51 GENERAL PROVISIONS FOR CRITICAL AREAS

16.51.090 Applicability.

Response: This application is for a Type III Subdivision. Therefore, the standards of this section apply.

16.51.130 Review required.

Response: A Critical Areas Report and Buffer Modification Plan were completed by Ecological Land Services (ELS) and approved with the original application (SUB10-03). Since the original approval City code relating to wetlands has changed, ELS provided an updated Critical Areas Report and Buffer Modification Plan with this application. The report identified one wetland, a Type Np stream, and a Type Ns stream on site. It also identified a Type Ns stream northwest of the wetland off site, and a Type S shoreline for Lacamas Lake off site to the south. The wetland is identified as Wetland A. The Type Np stream on site is identified as Stream 1 and the Type Ns stream on site is identified as Stream 3. 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 wetlands or streams. Buffer modifications are proposed for Wetland A buffers. The buffer modifications will include buffer reduction and buffer averaging, as allowed by CMC. See the Preliminary Plans and Critical Areas Report and Buffer Modification Plan included with this application for more information.

Chapter 16.53 WETLANDS

16.53.020 Rating system.

B. Wetland Rating System. Wetlands shall be rated according to the Washington State Department of Ecology (ecology) wetland rating system found in Washington State Wetland Rating System for Western Washington—2014 Update (Revised, Ecology Publication #14-06-029, October 2014) or most current edition. The rating system document contains the definitions and methods for determining if the criteria below are met:

1. Wetland Rating Categories.

Response: The site contains one wetland. Wetland A is a Category III sloped and depressional, forested wetland located in the northwest portion of the site. The wetland is ±2.46 acres in size with the main hydrology sources coming from hillside runoff, input from Stream 1, and precipitation. Stream 1 flows thorough Wetland A from the northeast to the southwest and forms a permanently flowing outlet for the wetland.

2. Date of Wetland Rating. Wetland rating categories shall be applied as the wetland exists on the date of adoption of the rating system by the local government, as the wetland naturally changes thereafter, or as the wetland changes in accordance with permitted activities. Wetland rating categories shall not change due to illegal modifications.

Response: A site visit and wetland rating was performed by Ecological Land Services (ELS) in August 2020. See the Critical Areas Report and Buffer Modification Plan included with this application for more information. This standard is met.

16.53.030 Critical area report—Additional requirements for wetlands.

Response: A Critical Areas Report meeting the requirements of this section was prepared by ELS on November 18, 2020. The report is included with this application. This standard is met.

16.53.040 - Standards.

B. Wetland Buffers.

Buffers. Wetland buffer widths shall be determined by the responsible official in accordance with the standards below:

1. All buffers shall be measured horizontally outward from the delineated wetland boundary or, in the case of a stream with no adjacent wetlands, the ordinary high water mark as surveyed in the field.

2. Buffer widths are established by comparing the wetland rating category and the intensity of land uses proposed on development sites per Tables 16.53.040-1, 16.53.040-2, 16.53.040-3 and 16.53.040-4. For Category IV wetlands, the required water quality buffers, per Table 16.53.040-1, are adequate to protect habitat functions.

Response: According to the Critical Areas Report, Wetland A has a habitat score of 7, requiring a high intensity land use buffer of 150 feet. This standard is met.

16.53.050 Wetland permits.

A. General.

Response: This application proposes modification to the Wetland A buffer. Therefore, a wetland permit is required. A Critical Areas Report and Buffer Modification Plan are included with this application. This standard is met.

B. Standards—General. Wetland permit applications shall be based upon a mitigation plan and shall satisfy the following general requirements:

1. The proposed activity shall not cause significant degradation of wetland functions;

2 The proposed activity shall comply with all state, local, and federal laws, including those related to sediment control, pollution control, floodplain restrictions, stormwater management, and on-site wastewater disposal.

Response: The proposed development activity will have no impact to the habitat within the wetlands or streams. There will be modifications to the buffers for Wetland A as allowed by CMC. The proposed modification will create zero net loss for the buffer functions on site. See the Buffer Modification Plan included with this application for more information. Erosion control plans will be included in the final construction plans for sediment and pollution control. A Preliminary Stormwater Plan is included with the application, detailing how the Applicant proposes to manage stormwater. No on-site wastewater will be disposed of in the wetlands. This standard is met.

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:

1. Buffer Reduction Incentives. Standard buffer widths may be reduced under the following conditions, provided that functions of the post-project wetland are equal to or greater after use of these incentives.

a. Lower Impact Land Uses. The buffer widths recommended for proposed land uses with high-intensity impacts to wetlands can be reduced to those recommended for moderate-intensity impacts if both of the following criteria are met:

i. A relatively undisturbed, vegetated corridor at least one hundred feet wide is protected between the wetland and any other priority habitats that are present as defined by the Washington State Department of Fish and Wildlife; and

ii. Measures to minimize the impacts of the land use adjacent to the wetlands are applied, such as infiltration of stormwater, retention of as much native vegetation and soils as possible, direction of noise and light away from the wetland, and other measures that may be suggested by a qualified wetland professional.

Response: The high intensity land use buffer required for Wetland A is 150 feet. The Applicant is proposing to reduce the buffer on the south and east sides of the wetland to a moderate intensity 110-foot buffer by retaining native vegetation, directing noise and lights away from the wetlands, installing fences along property lines, and installing signs identifying the wetland buffer. See the Buffer Modification Plan included with this application for more information. This standard is met.

> 2. Buffer Averaging. Averaging buffers is allowed in conjunction with any of the other provisions for reductions in buffer width (listed in subsection (C)(1) of this section) provided that minimum buffer widths listed in subsection (C)(1)(c) of this section are adhered to. The community development department shall have the authority to average buffer widths on a case-by-case basis, where a qualified wetlands professional demonstrates, as part of a critical area report, that all of the following criteria are met:
>
> a. The total area contained in the buffer after averaging is no less than that contained within the buffer prior to averaging;
>
> b. Decreases in width are generally located where wetland functions may be less sensitive to adjacent land uses, and increases are generally located where wetland functions may be more sensitive to adjacent land uses, to achieve no net loss or a net gain in functions;
>
> c. The averaged buffer, at its narrowest point, shall not result in a width less than seventy-five percent of the required width, provided that minimum buffer widths shall never be less than fifty feet for all Category I, Category II, and Category III wetlands, and twenty-five feet for all Category IV wetlands; and
>
> d. Effect of Mitigation. If wetland mitigation occurs such that the rating of the wetland changes, the requirements for the category of the wetland after mitigation shall apply.

Response: The application proposes the use of buffer averaging as part of the project. As previously stated, only buffers on the south and east sides of the wetland will be reduced. The buffer will be reduced ±11,417, with this area replaced on site at the west end of the exiting wetland buffer. At no point will the buffer be reduced below the allowed minimum 82.5-foot-wide buffer. See the Buffer Modification Plan included with this application for more information. This standard is met.

> 3. Stormwater Facilities. Stormwater facilities are only allowed in buffers of wetlands with low habitat function (less than four points on the habitat section of the rating system form); provided, the facilities shall be built on the outer edge of the buffer and not degrade the existing buffer function, and are designed to blend with the natural landscape. Unless determined otherwise by the responsible official, the following activities shall be considered to degrade a wetland buffer when they are associated with the construction of a stormwater facility:

Response: The wetlands have a habitat rating of 7. Therefore, stormwater facilities are not allowed within the wetland buffers. No stormwater facilities are proposed within the wetland buffer. This standard is met.

4. Road and Utility Crossings. Crossing buffers with new roads and utilities is allowed provided all the following conditions are met:

a. Buffer functions, as they pertain to protection of the adjacent wetland and its functions, are replaced; and

b. Impacts to the buffer and wetland are minimized.

Response: No roads or utilities are proposed to cross the wetland or its buffer. This standard does not apply.

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 hazard trees were identified along the south and east edge of the wetland buffer. Only hazard trees adjacent to future lots are proposed for removal. If feasible, cut trees will be left in place in the buffer to habitat creation. All other hazard trees are being proposed to remain as they are creating habitat and have value if retained within the wetland buffer No other activities are proposed within the wetland buffer. This standard is met.

Chapter 16.61 FISH AND WILDLIFE HABITAT CONSERVATION AREAS

16.61.010 Designation of fish and wildlife habitat conservation areas.

A. Fish and wildlife habitat conservation areas include:

5. Waters of the State. Waters of the state includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington, as classified in WAC 222-16-031, or its successor. This does not include man-made ditches or bio-swales that have been created from areas not meeting the definition of waters of the state. Furthermore, wetlands designation and protection are regulated under CMC Chapter 16.53.

Response: The Critical Areas Report completed by ELS identified Lacamas Lake, located south of the site across SE Leadbetter Road. Lacamas Lake is identified as a Type S water of the state with a riparian habitat buffer width of 150 feet and a shoreline jurisdiction of 200 feet. The riparian habitat buffer is functionally isolated by SE Leadbetter Road; therefore, no riparian habitat buffer of the lake is located on site. The shoreline is designated Urban Conservancy and a Shoreline Substantial Development Permit is included with this application. See the Critical Areas Report and Buffer Modification Plan included with this application for more information. This standard is met.

TITLE 17 LAND DEVELOPMENT

Chapter 17.11 SUBDIVISIONS

17.11.030 Preliminary subdivision plat approval.

A. Preapplication.

Response: A preapplication conference was held on February 20, 2020. The pre-application expired prior to submittal of this application; however, the Planning Director agreed to waive another pre-application conference as the design has not substantially changed since the original pre-application was submitted and coordination over the layout continued with the City between the pre-application and submittal of this land use package. An email showing this confirmation is included in this application package. This standard is met.

B. Application. In addition to those items listed in CMC 18.55.110, the following items are required, in quantities specified by community development department, for a complete application for preliminary subdivision approval. Items may be waived if, in the judgment of the community development director or designee, the items are not applicable to the particular proposal:

Response: The application submitted for preliminary subdivision plat approval contains all the required information listed in this section. This standard is met.

D. Criteria for Preliminary Plat Approval. The hearings examiner decision on an application for preliminary plat approval shall be based on the following criteria:

1. The proposed subdivision is in conformance with the Camas comprehensive plan, parks and open space comprehensive plan, neighborhood traffic management plan, and any other city adopted plans;

Response: As stated previously, the proposed subdivision meets all applicable goals of the Camas Comprehensive Plan. The development will construct a portion of the T-3 trail along the site frontage as shown in the Camas PROS plan, as well as provide a public overlook within the development to access views to the south. The development will provide traffic circulation by constructing a new access on SE Leadbetter Road, extending N Adams Street into the site, and providing for future circulation to the north when the planned arterial is constructed. This standard is met.

2. Provisions have been made for water, storm drainage, erosion control and sanitary sewage disposal for the subdivision that are consistent with current standards and plans as adopted in the Camas Design Standard Manual;

Response: The proposed subdivision will provide water and sanitary sewer connections for each proposed lot. The sanitary sewer will connect to the existing sanitary sewer pump station on SE Leadbetter Road. The water main will connect to the existing main in SE Leadbetter Road and the existing main in N Adams Street will be extended into the site. The development will also construct a separate high-pressure water transmission line from SE Leadbetter Road to the north site boundary. Stormwater will be collected and treated on site. The majority of the treated stormwater will be discharged to Lacamas Lake, with a small portion of the site detained in a wetpond prior to be discharged to the existing wetland and stream at approved rates. A preliminary erosion control plan is included with

this application. A more detailed and site-specific erosion control plan will be provided with final construction plans. This standard is met.

3. **Provisions have been made for road, utilities, street lighting, street trees and other improvements that are consistent with the six-year street plan, the Camas Design Standard Manual and other state adopted standards and plans;**

Response: The applicant proposes roads meeting the standards of the City and the design standard manual. Planting strips are provided for street trees and street lighting is included in the design. Provisions have been made for utilities as shown in the plans included with this application. This standard is met.

4. **Provisions have been made for dedications, easements and reservations;**

Response: All needed easements and reservations are shown on the plans submitted with this application. This standard is met.

5. **The design, shape and orientation of the proposed lots are appropriate to the proposed use;**

Response: As shown on the plans submitted with this application, all lots are oriented fronting a street or access tract and are shaped appropriately to allow home construction. This standard is met.

6. **The subdivision complies with the relevant requirements of the Camas land development and zoning codes, and all other relevant local regulations;**

Response: As shown in the plans and documents submitted with this application, the subdivision complies with all requirements of the CMC and other relevant regulations.

7. **Appropriate provisions are made to address all impacts identified by the transportation impact study;**

Response: The Applicant's Transportation Engineering Consultant, Mackenzie, prepared a Trip Update Letter for revision to the Traffic Impact Analysis (TIA) for the originally approved subdivision (SUB10-03). The original TIA was complete in August 2010 and determined that the 297-lot subdivision would generate 2,831 average daily trips with 218 a.m. peak hour trips and 280 p.m. peak hour trips. The Trip Update Letter states that the proposed 152-lot subdivision will generate 1,528 average daily trips with 113 a.m. peak hour trips and 152 p.m. peak hour trips. Therefore, the proposed development will generate 1,303 fewer average daily trips, 105 fewer a.m. peak hour trips, and 128 fewer p.m. peak hour trips than the originally approved subdivision. See the Trip Update Letter included with this application for additional information. This standard is met.

8. **Appropriate provisions for maintenance of commonly owned private facilities have been made;**

Response: The tracts included in the subdivision will be maintained by the homeowners' association. This standard is met.

9. Appropriate provisions, in accordance with RCW 58.17.110, are made for:

   a. The public health, safety, and general welfare and for such open spaces, drainage ways, streets, or roads, alleys or other public ways, transit stops, potable water supplies, sanitary wastes, parks and recreation, playgrounds, schools and school grounds and all other relevant facts, including sidewalks and other planning features that assure safe conditions at schools bus shelter/stops, and for students who walk to and from school, and

   b. The public use and interest will be served by the platting of such subdivision and dedication;

Response: As stated previously, the subdivision is providing for the development of an in-demand product in single-family housing. The development includes roads meeting the standards of the City, a multi-use path, and natural area tracts to protect the wetlands, streams, and native vegetation. Water and sanitary sewer are provided for each lot. A water transmission line to extend City service north and provisions for stormwater collection and treatment are also provided. This standard is met.

10. The application and plans shall be consistent with the applicable regulations of the adopted comprehensive plans, shoreline master plan, state and local environmental acts and ordinances in accordance with RCW 36.70B.030.

Response: The plans and documents submitted with this application meet the requirements of this section. This standard is met.

Chapter 17.19 DESIGN AND IMPROVEMENT STANDARDS

17.19.020 Improvements, supervision, inspections and permits required.

A. Required Improvements.

1. Every developer shall be required to grade and pave streets and alleys, install curbs and gutters, sidewalks, monuments, sanitary and storm sewers, water mains, fire hydrants, street lights and street name signs, underground transmission lines, provide and install centralized mail delivery boxes as determined by the U.S. Postal Service, together with all appurtenances in accordance with specifications and standards in the Camas Design Standards Manual, the six-year street plan, and other state and local adopted standards and plans as may be applicable.

2. Other improvements installed at the option of the developer shall conform to city requirements.

3. Existing wells, septic tanks and septic drain fields shall be abandoned, in accordance with state and county guidelines regardless of lots or properties served by such utility unless otherwise approved by public works director.

Response: The site is currently vacant, and no wells or septic systems exist on site. The developer will construct paved streets with curbs, gutters, and sidewalks. All required utilities, including a large water transmission line, and other improvements will be provided. See the plans included with this application for more information. This Standard is met.

17.19.030 - Tract, block and lot standards.

A. Environmental Considerations.

1. Critical Areas. Land that contains a critical area or its buffer as defined in Title 16 of this code, or is subject to the flood hazard regulations, shall be platted to show the standards and requirements of the critical areas.

Response: The critical areas on site are proposed to be platted and protected in large natural area tracts. This standard is met.

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. As many of the trees will be protected as practicable within the development area. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional hazard trees need to be removed. There will also be trees 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 an 18-foot garage setback; reduce the rear setback to 15 feet; and increase the lot coverage to 50%. As part of the negotiation, the City requested planting of trees in the natural area tracts and construction of the overlook, both of which will be provided with the development. This standard is met.

B. Blocks. Blocks shall be wide enough to allow two tiers of lots, except where abutting a major street or prevented by topographical conditions or size of the property, in which case the approval authority may approve a single tier.

Response: The proposed development is generally designed with blocks wide enough to provide two tiers of lots. Between N 49th Avenue and N 50th Avenue a small block of single tier lots are proposed. This single tier layout is necessary to provide lots meeting code requirements, while protecting critical areas and open space and avoiding shallow bed rock to the greatest extent practicable. Existing topography also dictated road location to ensure grade and Americans with Disabilities Act (ADA) requirements are met for roads and intersections. A 10-foot landscape tract is provided between the rear of the lots and the ROW for N 49th Avenue. This standard is met.

C. Compatibility with Existing Land Use and Plans.

1. Buffer Between Uses. Where single-family residential lots are to be adjacent to multiple-family, commercial or industrial land use districts, and where natural separation does not exist, adequate landscape buffer strips and/or solid fences for purposes of buffering sound, restricting access, pedestrian safety and privacy shall be provided.

Response: The single-family development will be adjacent to a commercial land use district along portions of east and west boundary. The Applicant proposes to construct 6-foot solid wood fences in these locations. This standard is met.

2. Conformity with Existing Plans. The location of all streets shall conform to any adopted plans for streets in the city. The proposed land use shall respond to and complement city ordinances, resolutions and comprehensive plans.

Response: The City has plans for an arterial to be located along the north boundary of the site. The arterial is identified as the North Shore East/West Arterial on the City's 2021-2026 Six Year Street Priorities Map. Tract O is proposed to be set aside for future ROW for the arterial and proposed N 50th Avenue will extend to the tract for connection to the future arterial. 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, 100-103, and 109-112 will have frontage onto the internal street network. The lots mentioned above will have frontage onto access tracts providing access to the public street network. 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.

2. Side Lot Lines. The side lines of lots shall run at right angles to the street upon which the lots face as far as practical, or on curved streets they shall be radial to the curve;

Response: All side lot lines are at right angles or radial to the curve of road rights-of-way. This standard is met.

3. Building Envelopes. No lot shall be created without a building envelope of a size and configuration suitable for the type of development anticipated:

a. For single-family residential zones, a suitable size and configuration generally includes a building envelope capable of siting a forty-foot by forty-foot square dwelling within the building envelope,

Response: All lots for this application are single-family lots. Each lot provides a building envelope capable of siting a minimum 40-foot by 40-foot building. The building envelopes are shown for reference only and proposed building envelopes will vary based on lot size and shape. This standard is met.

> c. Other factors in considering the suitability of the size and configuration of any residential lot include the presence of, or proximity to critical areas, adjoining uses or zones, egress and ingress, and necessary cuts and fills;

Response: This application proposes lots adjacent to a wetland. The design accounts for the shape of the wetland and averages or mitigates for buffer impacts, as allowed by CMC. 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 does not propose any flag lots. Four access tracts are proposed to provide access to Lots 12-13, 85-88, 100-103, 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.

> 6. Double Frontage Lots. Residential lots which have street frontage along two opposite lot lines shall be avoided, except for double frontage lots adjacent to an arterial or collector, which must comply with the following design standards:

Response: The Applicant proposes 15 double frontage lots (Lots 23-30 and 116-122) with the development. Due to the location of critical areas, open space, and shallow bedrock, along with site topography, it is not feasible to avoid the double frontage lots. A landscape tract is proposed at the rear of the lots between the lot and ROW. This standard is met.

> 7. Corner Lots. Corner lots may be required to be platted with additional width to allow for the additional side yard requirements;

Response: This application proposes corner lots that have sufficient width and depth to allow for adequate vision clearance at the corners. See the Preliminary Plans included with this application for more information. This standard is met.

> 8. Restricted Corner Lots. Corner lots restricted from access on side yard flanking street shall be treated as interior lots and conform to front, side and rear yard interior setbacks of CMC Chapter 18.09; and

Response: No restricted corner lots are proposed with this application. This standard does not apply.

> 9. Redivision. In dividing tracts into large lots which at some future time are likely to be redivided, the location of lot lines and other details of the layout shall be such that redivision may readily take place without violating the requirements of these regulations and without interfering with the orderly development of streets. Restriction of building locations in relationship to future street right-of-way shall be made a matter of record if the approval authority considers it necessary.

Response: No redivision is anticipated with any lots or tracts proposed with this application. This standard does not apply.

> 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 5-foot-wide 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. This standard is met.

> 4. Tracts and trails that are not dedicated to the city and are located within the subdivision, short plat or planned development are the responsibility of the homeowners association to maintain. Provisions must be in writing, such as in CC&Rs, informing the homeowners of the responsibility and outlining the maintenance procedures in accordance with city standards.

Response: The applicant will grant an easement for the trail to the City of Camas. The City will own and maintain the trail since it is a portion of the T-3 trail identified in the City PROS Plan. This standard does not apply.

> F. Landscaping.
>
> 1. Each dwelling unit within a new development shall be landscaped with at least one tree in the planting strip of the right-of-way, or similar location in the front yard of each dwelling unit, with the exception of flag lots and lots accessed by tracts. Required trees shall be a minimum two-inch diameter at breast height (dbh) to create a uniform streetscape (dbh is four and one-half feet above the ground as measured from upside of tree).

Response: The applicant proposed to plant one tree per lot in the plater strip. See the landscape plans included with this application for more information. This standard is met.

> 2. The city council finds that the existing mature landscaping of trees, and shrubs provide oxygen, filter the air, contribute to soil conservation and control erosion, as well as provide the residents with aesthetic and historic benefits. For these reasons, the city encourages the retention of existing trees that are not already protected as significant trees under the Camas Municipal Code. Generally, the city may allow the tree requirements under subsection (F)(1) of this section to be reduced at the request of the developer, by a ratio of two new trees in favor of one existing tree, provided such trees have been identified on approved construction plans.

Response: The applicant is proposing three large natural area tracts for the protection of critical areas and trees. Tree retention will be discussed in more detail later in this narrative. This standard is met.

3. Prior to final acceptance of any land development, the land developer shall install trees adjacent to or within all common areas and landscape tracts as specified in the Camas Design Standards Manual.

Response: Trees will be installed in landscape areas as required. See the landscape plans included with this application for more information. This standard is met.

4. Street trees adjacent to individual lots must be installed prior to final occupancy or secured or bonded, and installed prior to expiration of the two-year warranty period, whichever comes first.

Response: Street trees will be installed at the time of home construction on the adjacent lot. Street trees adjacent to tracts will be installed with construction of the roadway adjacent to the tract. See the Landscape Plans included with this application for more information. This standard is met.

5. Landscaping shall conform to plant criteria in the Camas Design Standards Manual. Any planting of trees or shrubs within the right-of-way or vision clearance area must be shown on the construction drawings for approval.

Response: As shown on the Landscape Plans submitted with this application, all planting material meets the requirements of the Camas Design Standards Manual. Vision clearance areas are shown on the plans for approval. This standard is met.

6. Storm drainage facilities, pump stations and other visible facilities shall be required to include a ten foot L2 landscaped buffering in accordance with criteria in the Camas Design Standards Manual if within thirty feet of any street or accessory structure.

Response: As shown on the Landscape Plans included with this application, a 10-foot L2 buffer is provided along the street frontage for the stormwater facility in Tract R. This standard is met.

G. Non-City Utility Easements. Easements for electric lines or other public utilities may be required. Easements for utilities shall be a minimum of six feet in width and centered on front or side lot lines.

Response: This application proposes a 6-foot-wide public utility easement along the lot frontages, behind the ROW. See the Preliminary Plans included with this application for more information. This standard is met.

H. Watercourse Easements. Where a development is traversed by a watercourse, drainageway, channel or stream, there shall be provided a stormwater easement or drainage right-of-way conforming substantially with the lines of such watercourse and such further width as will be adequate for the purpose. Streets parallel to major watercourses may be required.

Response: All streams that traverse the site are located in future natural area tracts. No road is required or proposed adjacent to these water courses. This standard is met.

I. Street Signs. The developer shall be responsible for the initial cost of any street name or number signs, or street markings, including installation thereof, that public works finds necessary for the development.

Response: The applicant will install all street signs associated with the project. This standard is met.

J. Lighting. Street lighting shall conform to the Clark public utility standards and approved by the city. The developer shall bear the cost of the design and installation of the lighting system.

Response: A preliminary Lighting Plan showing the location of all proposed streetlights is provided with this application and will be included in the final construction plans. This standard is met.

K. All residential streets shall conform to the guidelines and standards of the city neighborhood traffic management plan.

Response: All roads within the subdivision are designed to City standards and proposed as 52-foot-wide roads with 28-foot paved surfaces. The road layout is somewhat curvilinear, and parking will be allowed on one side of the street. These design elements will help with traffic calming and create a safe transportation facility. This standard is met.

17.19.040 - Infrastructure standards.

B. Streets

6. Extension. Proposed street systems shall extend existing streets at the same or greater width unless otherwise approved by the public works department and authorized by city council in approval of the plat.

a. Streets and pedestrian/bicycle paths shall be extended to the boundaries of the plat to ensure access to neighboring properties, unless the presence of critical areas or existing development render such extension infeasible. The design shall contribute to an integrated system of vehicular and pedestrian circulation.

b. Grading of steep topography may be necessary to achieve this objective.

Response: As shown on the plans submitted with the application, proposed N Adams Street extends into the site along the east boundary. The extension of N Adams Street will provide a second connection to SE Leadbetter Road. N 50th Avenue will extend to the north boundary of the site for connection to the future east-west arterial. N 49th Avenue will extend to the east boundary of the site for future circulation to the east. A section of the T-3 trail will be constructed along the south portion of the site and will extend from the east boundary to the west boundary of the site to connect to future sections of the T-3 trail. This standard is met.

8. Right-of-way, tract and pavement widths for streets shall be based on Table 17.19.040-1 and Table 17.19.040-2.

Table 17.19.040-2 Minimum Public Street Standards

Public Street	Right-of-Way	Pavement Width	Sidewalk
A. Street (by approval of City Engineer)[1]	52’	28’	Five foot detached sidewalk on both sides, with planter strip, no parking on one side.
B. Street (two lane)	60’	36’	Five foot detached sidewalks required on both sides of the street, with planter strip. Bike lanes required on collectors and arterials, no on-street parking.
C. Street (three lane)	74’	46' to include 12' median	Six foot detached sidewalks required on both sides of the street, with planter strip, bike lanes, no on-street parking.
D. Street (five lane)/Arterial	100’	74' to include 14' median	Six foot detached sidewalks required on both sides of the street, with planter strip, bike lanes, no on-street parking.

Table Notes:

1 All buildings abutting a street designed and constructed with less than 36 feet of pavement width shall have automatic fire sprinkler systems installed that comply with NFPA 13D or 13R.

Response: All roads in the development (N Elk Drive, N Benton Street, N Adams Street, N Adams Court, N 48th Avenue, N 49th Avenue, and N 50th Avenue) are designed as two-lane local streets with 52-foot, full-width rights-of-way, 28-foot of paved width, 7-foot planter strips, and 5-foot sidewalks on each side. All homes will have automatic fire sprinkler systems installed. This standard will be met.

10. Street Layout. Street layout shall provide for the most advantageous development of the land development, adjoining area, and the entire neighborhood. Evaluation of street layout shall take into consideration potential circulation solutions for vehicle, bicycle and pedestrian traffic, and, where feasible, street segments shall be interconnected.

Response: The street layout provides the most advantageous development of the land and overall neighborhood. N 49th Avenue is located to provide circulation to the east and NW 50th Avenue is located to provide circulation to the north when those properties develop. All Streets within the development are laid out to protect critical and natural areas while minimizing the grading required to construct the roads wand lots. A section of the T-3 trail will also be constructed to allow pedestrian and bicycle circulation to the east and west to connect future extensions of the T-3 trail. This standard is met.

a. Circulation Plan. Applicants shall submit a circulation plan at application which includes the subject site and properties within six hundred feet of the proposed development site. The plan shall incorporate the following features both on-site and off-site:

Response: A Circulation Plan is included with this application meeting the requirements of this section. This standard is met.

b. Cross-circulation shall be provided that meets the following:

i. Block lengths shall not exceed the maximum access spacing for the roadway class per the city's design standards manual.

Response: The maximum access spacing for local roads is 600 feet. Due to existing topography and the protection of critical and natural areas, there are block lengths that exceed 600 feet. Even with the extended block lengths, the street layout will provide for circulation within the development, as well as the surrounding properties. The table below shows block lengths greater than 600 feet and the reason this spacing is necessary.

Road	Block	Distance	Reason
N Elk Drive	SE Leadbetter Road to N 49th Avenue	951.82 feet	Existing topography and protection of natural area
N 48th Avenue	N Adams Street to N 49th Avenue	911.45 feet	Existing topography and protection of natural area
N 49th Avenue	N Elk Drive to N Benton Street	883.12 feet	Existing topography
N 49th Avenue	N 48th Avenue to N Adams Street	729.84 feet	Existing topography
N 50th Avenue	N Elk Drive to N Benton Street	911.65 feet	Existing topography and protection of critical areas
N 50th Avenue	N Benton Street to Future Arterial	999.29 feet	Existing topography and protection of critical areas

ii. Cul-de-sacs and permanent dead-end streets over three hundred feet in length may be denied unless topographic or other physical constraints prohibit achieving this standard. When cul-de-sacs or dead-end streets are permitted, a direct pedestrian or bicycle connection shall be provided to the nearest available street or pedestrian oriented use.

Response: This application proposes a cul-de-sac, N Adams Court, which is 125 feet long. The nearest available street is N 49th Avenue, and direct pedestrian and bicycle connections are provided to this street. See the Preliminary Plans included with this application for more information. This standard is met.

d. Where critical areas are impacted, the standards and procedures for rights-of-way in the critical areas overlay zone shall be followed.

Response: The roads are laid out to create no wetland or buffer impacts from roads. The lot layout also minimizes the impact to wetland buffers, and has no impact to wetlands. This standard is met.

e. When the proposed development's average lot size is seven thousand four hundred square feet or less, one additional off-street parking space shall be required for every five units, notwithstanding the requirements of CMC Chapter 18.11. These spaces are intended to be located within a common tract.

Response: This application proposes an average lot size of 6,839 square feet; therefore, additional off-street parking is required. The development proposed 152 lots requiring 30 off-street parking stalls. The application proposes 30 parking stalls dispersed throughout the development in Tracts C, D, G, J, N, O, P. This standard is met.

C. Utilities.

1. Generally. All utilities designed to serve the development shall be placed underground and, if located within a critical area, shall be designed to meet the standards of the critical areas ordinance.

a. Those utilities to be located beneath paved surfaces shall be installed, including all service connections, as approved by the public works department; such installation shall be completed and approved prior to application of any surface materials.

b. Easements may be required for the maintenance and operation of utilities as specified by the public works department.

Response: All proposed utilities are to be underground and located outside of critical areas. Some public utilities will cross private tracts, and in these cases, an easement will be granted to the City for these utilities. There are existing overhead powerlines along SE Leadbetter Road that will remain above ground since no frontage improvements are proposed and placing the powerlines underground would impact the existing mature trees along the site frontage. This standard is met.

2. Sanitary sewers shall be provided to each lot at no cost to the city and designed in accordance with city standards.

Response: Gravity sewer mains will be constructed in all roads within the development to serve most of the lots and will feed into the existing pump station located along SE Leadbetter Road. Due to site topography, some lots will require a private grinder pump to a pressure sewer main in the road. The pressure sewer mains will connect to the gravity mains prior to the pump station connection. Laterals will be provided for each lot, connecting to the mains in the street. This standard is met.

3. Storm Drainage. The storm drainage collection system shall meet the requirements of the city's officially adopted storm water standards.

Response: Stormwater runoff generated by the proposed development will be collected on site. All pollution generating runoff will be treated by mechanical filters within the catch basins located in the streets. The majority of the treated stormwater will be conveyed and discharge directly to Lacamas Lake at existing discharge points using the large water body exemption for discharge. A small portion of the treated stormwater will be conveyed to a stormwater pond in Tract R for detention, prior to being released to Wetland A at rates permitted by Camas Municipal Code (CMC). The stormwater system is designed per the

Stormwater Management Manual for Western Washington. See the Preliminary Stormwater Technical Information Report (TIR) and Preliminary Plan included with this application for more information. This standard is met.

4. Water System.

Response: Water mains will be constructed in all roads within the development. Each lot will be provided service from these water mains. The development will also construct a large water transmission main running from SE Leadbetter Road to Tract T to allow the City to expand their water system north of the site. No services will connect directly to the transmission line. The developer shall be refunded by the City for construction the transmission line. This standard is met.

Chapter 17.21 PROCEDURES FOR PUBLIC IMPROVEMENTS

17.21.030 - Land disturbing activities—Erosion prevention/ sediment control

Response: Preliminary erosion control plans are included with this application. A more detailed and site-specific erosion control plan will be provided with final construction plans for sediment and pollution control. This standard will be met.

Title 18 - ZONING

Chapter 18.09 DENSITY AND DIMENSIONS

18.09.040 Density and dimensions—Single-family residential zones.

Table 1—Density and Dimensions for Single-family Residential Zones[1]

Zone	R-6	R-7.5	R-10	R-12	R-15
A. Standard New Lots					
Maximum Density (dwelling units/net acre)	7.2	5.8	4.3	3.6	2.9
Average lot area (square feet)[4]	6,000	7,500	10,000	12,000	15,000
Minimum lot size (square feet)	4,800	6,000	8,000	9,600	12,000
Maximum lot size (square feet)[3]	9,000	12,000	14,000	18,000	24,000
Minimum lot width (feet)	60	70	80	90	100
Minimum lot depth (feet)	90	90	100	100	100
Maximum building lot coverage[5]	40%	40%	35%	30%	30%
Maximum building height (feet)[2]	35	35	35	35	35
B. Density Transfer Lots[1]					
Maximum Density (dwelling units/net acre)	7.2	5.8	4.3	3.6	2.9
Minimum lot size (square feet)	4,200	5,250	7,000	8,400	10,500
Maximum lot size (square feet)[3]	7,200	9,000	12,000	14,400	18,000

Zone	R-6	R-7.5	R-10	R-12	R-15
Minimum lot width (feet)	50	60	60	70	80
Minimum lot depth (feet)	80	80	90	90	100
Maximum building lot coverage[5]	40%	40%	40%	35%	35%
Maximum building height (feet)[2]	35	35	35	35	35

Table Notes:

1. For additional density and dimension provisions, see CMC Sections 18.09.060 through 18.09.180.
2. Maximum building height: three stories and a basement, not to exceed height listed.
3. For parcels with an existing dwelling, a one-time exception may be allowed to partition from the parent parcel a lot that exceeds the maximum lot size permitted in the underlying zone. Any further partitioning of the parent parcel or the oversized lot must comply with the lot size requirements of the underlying zone.
4. Average lot area is based on the square footage of all lots within the development or plat. The average lot size may vary from the stated standard by no more than five hundred square feet.
5. The maximum building lot coverage for single-story homes may be up to forty-five percent in R-6 and R-7.5 zones, and forty percent in R-10 and R-12 zones. To qualify for increased lot coverage, a single-story home cannot include a basement or additional levels.

Response: The proposed development contains critical areas. Therefore, the lot dimensions listed under (B) are being applied to this application. The gross site area is ±49.62 acres. There are ±15.93 acres of land being set aside for critical and natural areas and open space. The net site area is ±33.69 acres. The maximum allowed density for the site is 195 lots. The Applicant proposes 152 lots. The average lot area is 6,839 square feet, with a minimum lot area of 5,508 square feet and a maximum lot area of 8,908 square feet. All lots meet the minimum lot width of 60 feet and the minimum lot depth of 80 feet. Building lot coverage and building height requirements will be reviewed at the time of building permit application. This standard is met.

Table 2—Building Setbacks for Single-Family Residential Zones[1]

Lot Area	Up to 4,999 sq. ft.	5,000 to 11,999 sq. ft.	12,000 to 14,999 sq. ft.	15,000 or more sq. ft
Minimum front yard (feet)	20	20	25	30
Minimum side yard and corner lot rear yard (feet)	5	5	10	15
Minimum side yard flanking a street (feet)	15	20	25	30
Minimum rear yard (feet)	20	25	30	35
Minimum lot frontage on a cul-de-sac or curve (feet)	25	30	35	40

Table Notes:

1. Setbacks may be reduced to be consistent with the lot sizes of the development in which it is located. Notwithstanding the setbacks requirements of this chapter, setbacks and/or building envelopes clearly established on an approved plat or development shall be applicable.

Response: All lots will be required to meet the setbacks for 5,000 to 11,999 square foot lots. As part of the density transfer, the Applicant has requested flexibility in the setback requirement, which is discussed below in Section 18.09.060.D. See the Preliminary Plans included with this application for more detail. This standard is met.

18.09.060 Density transfers.

A. Purpose. To achieve the density goals of the comprehensive plan with respect to the urban area, while preserving environmentally sensitive lands and the livability of the single-family residential neighborhoods, while also maintaining compatibility with existing residences.

B. Scope. This section shall apply to new development in all residential (R) zoning districts.

Where a land division proposes to set aside a tract for the protection of a critical area, natural open space network, or network connector (identified in the City of Camas parks plan), or approved as a recreational area, lots proposed within the development may utilize the density transfer standards under CMC Section 18.09.040 Table-2.

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, which the Applicant has provided. See the Preliminary Plans included in with this application for more information. This standard is met.

CJ Dens Subdivision Lot Standards (R-7.5)		
Standard	**18.09.040 Table 1**	**Proposed**
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
Standard	**18.09.040 Table 2**	**Proposed**
Minimum front yard (feet)	20	10
Minimum front yard – Garage	5 feet (from front of dwelling)	18 feet from right-of-way
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

18.09.080 Lot sizes.

B. When creating new lots via short plats or subdivisions that are adjacent to a different residential zone designation, the new lots along that common boundary shall be the maximum lot size allowed for the zone designation of the new development (if a lower density adjacent zone), or the minimum lot size allowed for the zone designation of the new development (if a greater density adjacent zone), as based on CMC 18.09.040 Table 2, Section A. In applying this section, where a land division is required to increase the size of lots, the land division may utilize the density transfer provisions provided for in CMC Section 18.09.060.

Response: All adjacent residential zones are similarly zoned R-7.5, therefore this standard does not apply.

Chapter 18.13 LANDSCAPING

18.13.020 Scope.

A. Unless otherwise exempted, the standards of this chapter shall apply to any site to be developed. All applicable development activities shall be required to prepare a landscape plan and shall be required to meet the minimum tree density herein created.

B. The standards of this chapter shall apply to the following:

1. Commercial, industrial, governmental uses, and land divisions;

Response: This application is for a 152-lot subdivision and does not meet any of the exemptions listed in section 18.13.025 of the CMC. This chapter applies.

18.13.040 Procedure for landscape, tree and vegetation plans.

A. Applicants shall submit a detailed Landscape, Tree and Vegetation Plan with building and site improvement plans. Included in the plans (at a minimum) shall be type, size, and location of plants and materials.

B. A tree survey must be included for any applicable development proposing to remove trees.

Response: A detailed Landscape Plan and Tree Plan are included with this application. This standard is met.

8.13.045 Tree survey.

A. The applicant must submit a tree survey that is prepared by a certified arborist or professional forester.

Response: A tree survey (including plans and a Tree Report) has been prepared by a certified arborist with AKS Engineering and Forestry, LLC (AKS), and is included with this application. This standard is met.

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. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional hazard trees need to be removed.See the Preliminary Plans and Report included with this application for more information. This standard is met.

2. Assessment.

a. Size. Measure and provide the diameter at breast height (DBH).

b. Tree protection zone. (Refer to CMC 18.03.050 Environmental Definitions)

c. Tree health. An overall assessment of the trees structural stability and failure potential based on specific structural features (e.g. decay, conks, co-dominate trunks, abnormal lean) and rated as good, fair or poor.

d. Recommendation for preservation or removal. The recommendation will consider proposed grading, trenching, paving, fencing and other construction plans.

e. If hazardous, then an evaluation of hazardous trees will include a numerical value of hazard based on the following: failure potential; size of part most likely to fail; and distance to target (e.g. new residence).

Response: The tree survey included in this application contains all information required in this section. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional hazard trees need to be removed. See the report and plans included with this application for more detail. This standard is met.

18.13.050 - Standards for landscape, tree and vegetation plans.

B. Landscaping and trees shall be selected and located to deter sound, filter air contaminants, curtail erosion, minimize stormwater run-off, contribute to living privacy, reduce the visual impacts of large buildings and paved areas, screen, and emphasize or separate outdoor spaces of different uses or character.

Response: Existing trees and other vegetation are being preserved to the extent practicable to help with erosion, stormwater, and to help contribute to living privacy. Additional landscaping is proposed to help provide privacy and protect from erosion. This standard is met.

> 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. All plant materials will meet the requirements of this section. See the Landscape Plan included with this application for more information. This standard is met.

> D. Street trees will be required as part of the frontage improvements. Species, size and spacing of the trees must be consistent with the Design Standards Manual. Unless otherwise specified, trees must generally be spaced thirty feet apart. Substitute varieties are subject to approval by the City of Camas.

Response: Street trees are proposed with this application meeting the requirements of this section. See the Landscape Plan included with this application for more information. This standard is met.

> E. Proposed vegetation cannot be an invasive species as listed within the most current edition of the Clark County Noxious Weed List (e.g. English Ivy cultivars).

Response: No proposed vegetation are invasive species. See the Landscape Plan included with this application for more information. This standard is met.

> F. Shrubs shall be a minimum of five-gallon pot size. Upright shrubs shall have a minimum height at planting of eighteen inches. Spreading shrubs at planting shall have a minimum width of eighteen inches (smaller shrub sizes may be approved where it is more appropriate within a particular landscape plan).

Response: All plant materials proposed will meet the requirements of this section. See the Landscape Plan included with this application for more information. This standard is met.

> G. Ground Cover, defined as living material and not including bark chips or other mulch, shall be from containers of one gallon or larger. Plants shall be planted and spaced in a triangular pattern which will result in eighty percent cover in three years. Lawn cannot be the primary ground cover within required landscape buffers unless approved for stormwater conveyance. Grass species, if used as ground cover, shall be native or drought-tolerant, and appropriate for the use of the area.

Response: All groundcover materials proposed will meet the requirements of this section. Proposed lawn is not located within any required buffer. See the Landscape Plan included with this application for more information. This standard is met.

> **H.** Appropriate measures shall be taken, e.g., installation of irrigation system, to assure landscaping success. If plantings fail to survive, it is the responsibility of the property owner to replace them.

Response: Landscaped areas will be irrigated with an automatic irrigation system or adequate manual irrigation system. All irrigation in landscape tracts will be installed with the landscape at the time of neighborhood construction and maintained by the homeowners' association. All irrigation in planting strips adjacent to private lots will be installed with the home construction on that lot and be maintained by that homeowner. All irrigation will be design-build by the landscape contractor. This standard is met.

> **I.** Required trees, as they grow, shall be pruned in accordance with the International Society of Arboriculture. The pruned tree will provide at least eight feet of clearance above sidewalks and twelve feet above street roadway surfaces.

Response: All trees will be pruned to the appropriate height per this section. This standard will be met.

> **J.** Existing trees may be used as street trees if there will be no damage from the development which will kill or weaken the tree. Sidewalks of variable width and elevation may be utilized to save existing street trees, subject to approval by the city.

Response: Existing trees on site will be retained to the greatest extent practicable, however, none of those trees will be used as street trees. This standard does not apply.

> **K.** Vision clearance hazards shall be prohibited.

Response: No vision clearance hazards will be created with the proposed landscape. See the Landscape Plans included with this application for more detail. This standard is met.

> **L.** Street trees and other required landscaping which dies or is removed, must be replaced within one year of death or removal. Replacement street trees may be an alternative species from the city's recommended tree list, and may be in a different location as approved by the city.

Response: All required plant material that dies or is removed will be replaced per this section. This standard will be met.

18.13.051 - Minimum tree density requirement.

> **A.** Tree Density. A minimum tree density per net acre is required and must be incorporated within the overall landscape plan. The tree density may consist of existing trees, replacement trees or a combination of existing and replacement trees, pursuant to the priority established in Section 18.13.052.

Table 1: Required Tree Density

Proposed Activity	Required Minimum Tree Density per Net Acre	Required Tree Replacement
New Development	20 Tree Units	20 Tree Units per acre
Residential	20 Tree Units	20 Tree Units per acre
Developed commercial and industrial properties	20 Tree Units	3 Tree Units for every 1 tree unit removed up to the minimum tree density per acre.

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:

Table 1: Required Tree Density

Diameter at Breast Height "dbh"	Tree Units	Diameter at Breast Height "dbh"	Tree Units
1" to 5"	1	31" to 32"	12
6" to 12"	2	33" to 34"	13
13" to 14"	3	35" to 36"	14
15" to 16"	4	37" to 38"	15
17" to 18"	5	39" to 40"	16
19" to 20"	6	41" to 42"	17
21" to 22"	7	43" to 44"	18
23" to 24"	8	45" to 46"	19
25" to 26"	9	47" to 48"	20
27" to 28"	10	49" to 50"	21
29" to 30"	11	For larger trees, allow a ½ tree unit for every additional inch of dbh	

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 area has not been 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 1,051 tree units that are to be retained on site, as well as 340 proposed street trees and 80 proposed open space trees, for a total of 1,471 tree units. 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: The majority of the trees proposed for retention are located in the proposed natural area tracts. The trees in these areas are mature trees with a mix of native understory vegetation. As many of the existing trees outside of the proposed critical area as practicable are proposed for retention. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional hazard trees need to be removed. 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 contain a large majority of the trees on site. None of the trees in the critical area are considered in the tree unit calculation for the project as they are outside of the actual project area. Outside of the critical area, trees were preserved to the greatest extent practicable within the area to be developed. Trees in groves were given priority. Some trees in the wetland buffer are noted in the Tree Report as being hazard trees. Only hazard trees adjacent to future lots are proposed for removal. All other hazard trees are being proposed to remain as they are creating habitat and have value if retained within the wetland buffer. 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 to meet the tree density requirements for the development. 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 spaces on site. Tree locations shown for Tract A and B are preliminary and final placement will be determined during construction due to the presence of shallow bedrock on the site. See the Tree Report and Preliminary Plans included with this application for more information. This standard is met.

18.13.055 Landscape buffering standards.

Response: The proposed development is for 152 single-family lots. Therefore, based on 18.13.055 Table 1 – Landscape Buffers, there are no buffers required. This section does not apply.

Chapter 18.15 SIGNS

Response: No signs are proposed as part of this application. Any signs that will be installed will receive a sign permit prior to installation to ensure the sign meets the requirements of this chapter. This standard is met.

Chapter 18.47 TEMPORARY USE PERMITS

18.47.020 Permit required.

Response: The subject site has shallow base rock; therefore, rock excavation will occur as part of the site grading. The applicant would like to reuse the excavated rock on site for construction. In order to use the rock, it will need to be crushed. In order to reduce cost and truck trips to and from the site, the Applicant is requesting a temporary use permit to bring a mobile rock crusher on site to crush the excavated rock on site.

18.47.050 Criteria for approval.

A. The community development director may approve, or modify and approve an application for a temporary use permit if all of the application satisfies all of the following criteria:

1. The temporary use will not be materially detrimental to the public health, safety or welfare, nor injurious to property or improvements in the immediate vicinity;

Response: The mobile rock crusher will not be materially detrimental to the public health, safety, or welfare. While it will temporarily increase noise coming from the site during construction hours, it will reduce the number of truck trips that would be required if the rock were to be taken off site. The mobile rock crusher will be placed in a location that will be developed as part of the project and away from existing occupied buildings to keep noise to a minimum; therefore, it will not be injurious to property or improvements in the immediate vicinity. This standard is met.

2. The temporary use is compatible with the purpose and intent of this title, and the specific zoning district in which it will be located in accordance with the Chapter 18.07 "Use Authorization";

Response: The mobile rock crusher would generally not be compatible with the residential zoning of the site and surrounding properties. However, the temporary use will only be during site construction, located away from occupied structures, and is compatible with construction process of a residential development. This standard is met.

3. The temporary use is compatible in intensity and appearance with existing land uses in the immediate vicinity;

Response: The existing site is vacant and mostly cleared of vegetation. The surrounding properties are generally vacant or in use as large-lot residential and are forested. There are existing single-family residences abutting the southeast corner of the site. The mobile rock crusher would generally not be compatible with the use intensity and appearance of the site and surrounding properties. However, the temporary use will only be during site construction and is compatible with construction process of a residential development. The mobile rock crusher will also be located as far as possible from the adjacent residences. This standard is met.

4. Structures proposed for the temporary use comply with the setback and vision clearance area requirements of this title, and with applicable provisions of the Building and Fire Codes;

Response: The mobile rock crusher will not require any structures. However, it will be located outside of the required setbacks and will not be located near any intersection. This standard is met.

5. Adequate parking is available to serve the temporary use, and if applicable, the temporary use does not occupy required off-street parking areas for adjacent or nearby uses;

Response: The mobile rock crusher will be a use associated with the site construction. Parking will not be required specifically for the mobile rock crusher. Parking will be available on site during site construction. This standard is met.

6. Hours of operation of the temporary use are specified;

Response: The mobile rock crusher will be used during site grading and will operate during standard construction hours allowed by the City. This standard is met.

7. The temporary use will not cause noise, light, or glare which adversely impacts surrounding land uses.

Response: The mobile rock crusher will be used during site grading and will operate during standard construction hours. The mobile rock crusher will also be located as far as possible from the adjacent residences to minimize noise impact. The noised generated by the mobile rock crusher will not be greater than noises to be expected during site construction due to being located away from occupied structures. The mobile rock crusher will not generate any light or glare. This standard is met.

B. The community development director may authorize a temporary use permit for a use not specifically listed in Chapter 18.07 "Use Authorization."

Response: The mobile rock crusher is not a temporary use specifically listed in CMC Chapter 18.07. Therefore, the use will need to be authorized by the community development director. This standard is met.

18.47.060 Time limitation.

A temporary use is valid for up to one hundred eighty calendar days from the effective date of the permit, however, the community development director may establish a shorter time frame. The community development director may grant one extension not to exceed sixty days, upon the applicant showing compliance with all conditions of permit approval.

Response: The mobile rock crusher will be used during the site grading. Once rock cuts are complete and the mobile rock crusher will be removed from the site. The exact amount of time required to complete the rock crushing is unknown at this time due to project phasing, however, it is anticipated to be less than 180 total days. The applicant requests the full 180 days be approved to account for any delays that may come up during site grading, as well as possible extensions to account for project phasing.

18.47.080 Removal of a temporary use.

The community development director shall establish, as a condition of each temporary use permit, a time within which the use and all physical evidence of the use must be removed. If the applicant has not removed the use as required by the temporary use permit, the city may abate the use as provided in Section 18.47.090 of this chapter.

Response: As discussed above, the Applicant requests to have the 180 days allowed under Section 18.47.060. The Applicant also requests that the temporary use time frame not begin until the pre-construction meeting, after preliminary land use approval, to allow for the time to receive final engineering approval for construction. Rock crushing will be required for each phase; therefore, the Applicant also requests the ability to extend the permit if necessary, noting that the total active rock crushing days will be less than 180 days.

18.47.090 Abatement.

Prior to the approval of a temporary use permit, the applicant shall submit to the community development director an irrevocable, signed and notarized statement granting the city permission to summarily enter the applicant's property with reasonable notice and abate the temporary use, and all physical evidence of that use if it has not been removed as required by the terms of the permit. The statement shall also indicate that the applicant will reimburse the city for any expenses incurred in abating a temporary use under the authority of this chapter.

Response: Prior to land use approval, the Applicant will submit a statement granting the City permission to enter the property related to the temporary use. The statement will also state that the Applicant will reimburse the City as required in this section. This standard will be met.

IV. Conclusion

The Applicant is proposing a 152-lot, single-family subdivision meeting the requirements of the City of Camas R-7.5 zoning and other applicable portions of the Camas Municipal Code. The development will have wetland buffer impacts; however, a natural area tract will preserve the critical areas on site. Mitigation for the impacted wetland buffer will occur on site.

The submittal requirements have been met and the required finding made for all applicable approval criteria. These findings serve as the basis for the City to approve the application and are supported by substantial evidence in the application materials. Therefore, the Applicant respectfully requests approval of the proposed project (CJ Dens).