



April 07, 2021

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

**RE: CJ Dens Subdivision Review Comments Response (SUB20-02)**

Dear Lauren:

This letter is written as a response to the comments received on March 9, 2021 for the CJ Dens Subdivision (SUB20-02). I have included with comment, with AKS's response below.

Trees:

1. Hazard trees were identified as noted on page 11 of the applicant's staff report yet not identified on the tree survey. The tree survey must include a hazardous tree evaluation per CMC 18.13.045.B.2.e. Numerical value based on the following: 1) failure potential, 2) size of part most likely to fail, 3) distance to target (i.e. residence).

**Response: The Narrative will be updated to describe the existing trees more accurately. The Tree Report will be updated to correct the errors identified by staff and provide clarity on tree health and safety. The Tree Report will also address root protection zones.**

*This will be a condition of approval if updated documentation is not provided before public hearing.*

2. Several trees were identified for removal within open space and buffer tracts. Why do the trees within those tracts that are not proposed for development need to be removed (i.e. Tract A)? What is the quality of habitat for the trees proposed for removal in those areas?

**Response: Trees within the wetland buffer will remain and be evaluated as needed during construction to ensure no trees become candidates for removal. The Tree Report will be updated to provide clarity on tree health and safety and retain trees that do not pose an immediate threat to the site or future development. The Arborist will note that the City has requested retention of trees originally proposed for removal and these trees will also be evaluated during and after construct to ensure safety for the site.**

*This will be a condition of approval if updated documentation is not provided before public hearing.*

3. Show building envelopes in relation to the trees. Is there a potential for tree to be preserved within the rear yard setbacks in lots (for instance, lots 92-101)?

**Response: Building setbacks will be shown on the tree plan. The Tree Report will be updated to provide additional clarity for tree removal related to site grading. As shown, the plan does exceed the tree unit requirements of the City.**

*This will be a condition of approval if updated documentation is not provided before public hearing.*

4. How many "dead" trees are proposed for removal?

**Response: Dead trees to be removed are shown in the tables on sheet P5.3-P5.5. There is a total of 71 dead trees currently proposed for removal. Dead trees within the open space tract will be retained unless it is determined they are hazards during construction. The Arborist will note that the City has requested retention of trees originally proposed for**

removal and these trees will also be evaluated during and after construct to ensure safety for the site.  
No further comment.

Critical Areas:

5. A preliminary mitigation plan is required per CMC 16.53.050.E.1, including the applicable contents listed in 2 (a) and (b) (i-xi).

**Response:** The preliminary mitigation plan and updated critical areas report will be provided.

This will be a condition of approval if updated documentation is not provided before public hearing.

6. The tree survey denotes tree removal within the wetland buffer. Per CMC 16.51.125, a 2 to 1 replacement ratio for tree removal in wetland buffers is required including a replanting plan for the replacement trees. The mitigation for tree removal in the wetland buffer is not counted towards the tree unit count required in CMC 18.13.051.A.

**Response:** The Plans and Tree Report will be modified to retain all trees within the wetland buffer.

This will be a condition of approval if updated documentation is not provided before public hearing.

7. See enclosed Geotechnical review comments from 3rd party reviewer, Earth Engineers, dated March 9, 2021.

**Response:** There are no issues with the geotechnical review.

No further comment.

Trail:

8. T-3 Regional Trail requires a 12-ft wide pave trail per the City's Parks Recreation and Open Space (PROS) plan. However, staff finds a 6-ft. wide paved trail, consistent with the local trail requirements in the PROS plan, is acceptable to help reduce tree removal and grading impacts. Keep in mind the Parks Department will have the final input on trail requirements.

**Response:** Plans will be updated to a 6-foot gravel trail. With portions widened to 8-foot and turnaround at the west end as requested by the Parks Department.

No further comment. Parks Dept. will review final design.

Negotiated Flexibility:

9. Lots 31 thru 33 shall require larger front yard setback due to driveway access.

**Response:** Per the Pre-Application meeting notes, SE Leadbetter Road is classified as a 2-lane local road. SE Leadbetter Road is also not identified as an arterial or collector in the City of Camas Comprehensive plan. Sight distance will be reviewed for the driveways.

This will be a condition of approval prior to Final Engineering plan approval.

10. Staff finds the proposed negotiated flexibility acceptable with the following conditions:
  - a. Provide a robust replanting plan in Tract A (this includes a mitigation ratio of 2:1 for the trees removed for the trail),

**Response:** The applicant proposes to plant additional plantings in strategic locations adjacent to the rights-of-way, while letting the central portion of the open spaces follow a natural process for regrowth. A seed mix containing native shrubs will also be used to seed areas within the open space tracts where grading for the development occurs. The seed mix will help with the natural re-establishment of the entire open space. The steep slopes will also make installation and maintenance of large amounts of planting in the open space difficult. The tree mitigation calculation for trees removed for the trail will be shown on the plans.

This will be a condition of approval if updated documentation is not provided before public hearing.

- b. Provide an active tot lot amenity to be centrally located within the plat and

**Response:** The Plans will be updated to show play amenities in Tract I, incorporated into the open space and trail leading to the overlook. The amenities will be designed to be integrated into the environment as opposed to being a standard tot lot style playground.

This will be a condition of approval if updated documentation is not provided before public hearing.

- c. Garages shall be setback a minimum 5-feet from the front wall of the house per code. The garage setback from the right-of-way will be a minimum of 20-feet.

**Response:** The Applicant would like to us the modified lot standards listed below:

**Front Yard Setback:** 10 Feet

**Garage Setback:** 18 Feet (Minimum 5 feet from the front wall of the house)

**Rear Yard Setback:** 15 Feet

**Maximum Building Lot Coverage:** 50%

As discussed above, additional plantings will be provided for the large open space tracts and play amenities will be provided in Tract I to offset for these modifications. The Applicant requests the 10-yard front setback to allow for as much rear yard space while providing a home where the garage is setback a minimum 5 feet from the front wall of the home. The 18-foot garage setback will also allow for better rear yards and siting of the home for lot grading and is similar to setbacks for garages in surrounding jurisdictions.

**Landscaping:** Garage setback need to be 20-feet to accommodate vehicle overhang onto sidewalk and will be a condition of approval.

11. Final landscape plan shall show the driveway approaches to ensure street tree compliance.

**Response:** Proposed Condition: Final landscape plan to show driveway approaches to ensure street compliance prior to final construction approval.

This can be a condition of approval.

12. 10-ft. L2 landscape buffer should surround stormwater facility at the property lines and include a paved access driveway.

**Response:** The Plans have been updated to identify the location of the L2 buffer. Plantings will be provided with the final landscape plan.

This can be a condition of approval.

**Engineering:**

13. A pedestrian connection is required from Tract L to N 50th Avenue consistent with CMC 17.19.040.B.10.b.ii.

**Response:** The Plans will be updated to show Lot 103 as a flag lot access from N 50<sup>th</sup> Avenue and Tract L will end at the south side of Lot 102. Therefore, the distance from N 49<sup>th</sup> Avenue to the end of Tract L is less than 300 feet and no pedestrian access is required. An exhibit is also included with this document to show the modifications.

Refer to attached Fire Marshall review notes.

14. Provide grading profiles and cross sections for retaining walls.

**Response:** The proposed wall locations are shown on the preliminary plans and the proposed walls will not exceed the maximum allowed height of 6 feet. Wall types, cross sections, and other necessary engineering information will be provided during final engineering review.

*This will be a condition of approval prior to Final Engineering plan approval.*

15. Dead-end turnarounds required on private roads located in Tract K (Lots 85-89), Tract L (Lots 98-103), and Tract M (Lots 109-112). For Tract M, the applicant is encouraged to work with staff on other mitigation measures.

**Response:** The plans will be updated to show a turnaround for Tract K. Lot 103 will become a flag lot accessing from N 50<sup>th</sup> Avenue and Tract L will end at the south side of Lot 102. Therefore, Tract L is less than 150 feet. Tract M has been shortened to less than 150 feet, with access still provided to all lots on the tract. Exhibits were provided to the City showing the updates are included with this letter. All houses in the development are sprinklered and all homes can be reached by a 150-foot hose run from the end of each tract.

*Refer to attached Fire Marshall review notes.*

16. Dead-end turnaround required at the end of N 50th Avenue at Lot 152.

**Response:** The Plans will be updated to show a hammerhead turnaround at the terminus of Lot 152 in Tract T.

*This will be a condition of approval prior to Final Engineering plan approval.*

17. Private access roads, to three or four dwelling units, with a minimum of 12-foot paved and 20-foot clear may require additional mitigation due to potential difficulties for fire and EMS vehicles.

**Response:** A turnaround will be provided for Tract K, and Tract L and M will be shortened to less than 150 feet. All houses in the development are sprinklered and all homes can be reached by a 150-foot hose run from the end of each tract.

*Refer to attached Fire Marshall review notes.*

18. The curb radii at the intersection of all private and public roads, to be 25-foot on both sides of the road.

**Response:** Engineering staff is discussing the requirement with the Fire Marshal to determine the need for radii.

*Refer to attached Fire Marshall review notes.*

19. A dedicated location for address monuments at the intersection of public and private roads is to be shown on the plans.

**Response:** The Plans will be updated to show the proposed location for address monuments. The final design of the monuments will be determined during final engineering.

*Agreed*

20. All road sections shall be per the City's Design Standards Manual, use the signed and approved Street details, including for the applicable private road section.

**Response:** The Plans will be updated to show road sections per the City's Design Standards Manual.  
*Agreed*

21. All mechanical stormwater treatment vaults to be located in their own tract, which will be owned and maintained by homeowners/Homeowners Association.

**Response:** The Applicant is willing to provide a maintenance agreement and note on the final plat requiring the HOA to maintain the mechanical treatment portion of the catch basins.

Staff is not in support of treatment vaults located in City ROW

22. Address site distances at for trail crossing and driveways proposed for lots 31 thru 33 on N Elk Drive.

**Response:** Per the Pre-Application meeting notes, SE Leadbetter Road is classified as a 2-lane local road. SE Leadbetter Road is also not identified as an arterial or collector in the City of Camas Comprehensive plan. The trail crossing will be at the intersection of Elk Drive SE Leadbetter Road. Sight distance will be reviewed for the trail crossing and driveways.

**Stormwater:** Refer to attached trail crossing/sight distance Engineering notes.

23. Treatment for phosphorous is required prior to discharge into Lacamas Lake but is not addressed in preliminary TIR. Required to be addressed in final TIR.

**Response:** This was addressed in Section F of the Preliminary TIR on page 4, phosphorus treatment will be provided per Chapter 5 of the CSDSM.

**Proposed Condition:** Phosphorous treatment is required for discharge into Lacamas Lake and shall be address in the final Stormwater TIR.

This will be a condition of approval.

24. Use of mechanical treatment catch basins, located within the City's ROW, is not approved. All treatment vaults are to be located on private tracts.

**Response:** See response to issue 21.

Staff is not in support of treatment vaults located in City ROW

25. Collection of rear yard stormwater runoff and discharged/dispersed onto adjacent property is not approved. Per CMC 14.02.010.B.2 and CMC 17.19.040.C.3 and C.3.e stormwater is not to impact the neighboring properties. Specifically, the stormwater discharge from Lots 92-103 as stated on the preliminary stormwater plan.

**Response:** As shown on the Pre-Developed Basin Map in the Preliminary Stormwater report, Basin 3S is within a separate Threshold Discharge Area (TDA) and has its own point of compliance that flows across the eastern boundary of the project. The Post-Developed Basin 3S is smaller and will contain only rear yard runoff. Per requirements outlined in the Washington Department of Ecology's Western Washington Stormwater Manual, Basin 3S of this project is required to meet minimum requirement 4 (Preservation of Natural Drainage Systems and Outfalls) to maintain drainage flows to the east and minimum requirement 7 (Flow Control). Properties to the east of the project site should not be negatively impacted from rear yard stormwater runoff. This will be further analyzed and described in the Final Stormwater TIR.

**Proposed Condition:** Show in the final Stormwater TIR that stormwater runoff will not impact neighboring properties.

This will be conditioned in both the final TIR and proposed design to address on the final Engineering plans. Not to impact adjacent parcels per CMC 14.02.010.B.2 & 17.19.040. C.3 & C.3.e.

26. Justification of the existing culvert crossings, that discharge to Lacamas Lake, located on NE Leadbetter to handle the existing runoff verses the increased runoff from CJ Dens.

**Response:**      **The culverts will be upsized with the development to account for increased flows.**

**Proposed Condition:** Existing culverts crossing NE Leadbetter Road shall be upsized as necessary to meet the requirements for the proposed stormwater management. Justification of culvert sizing shall be shown in the final Stormwater TIR.

**This will be a condition of approval.**

Sincerely,

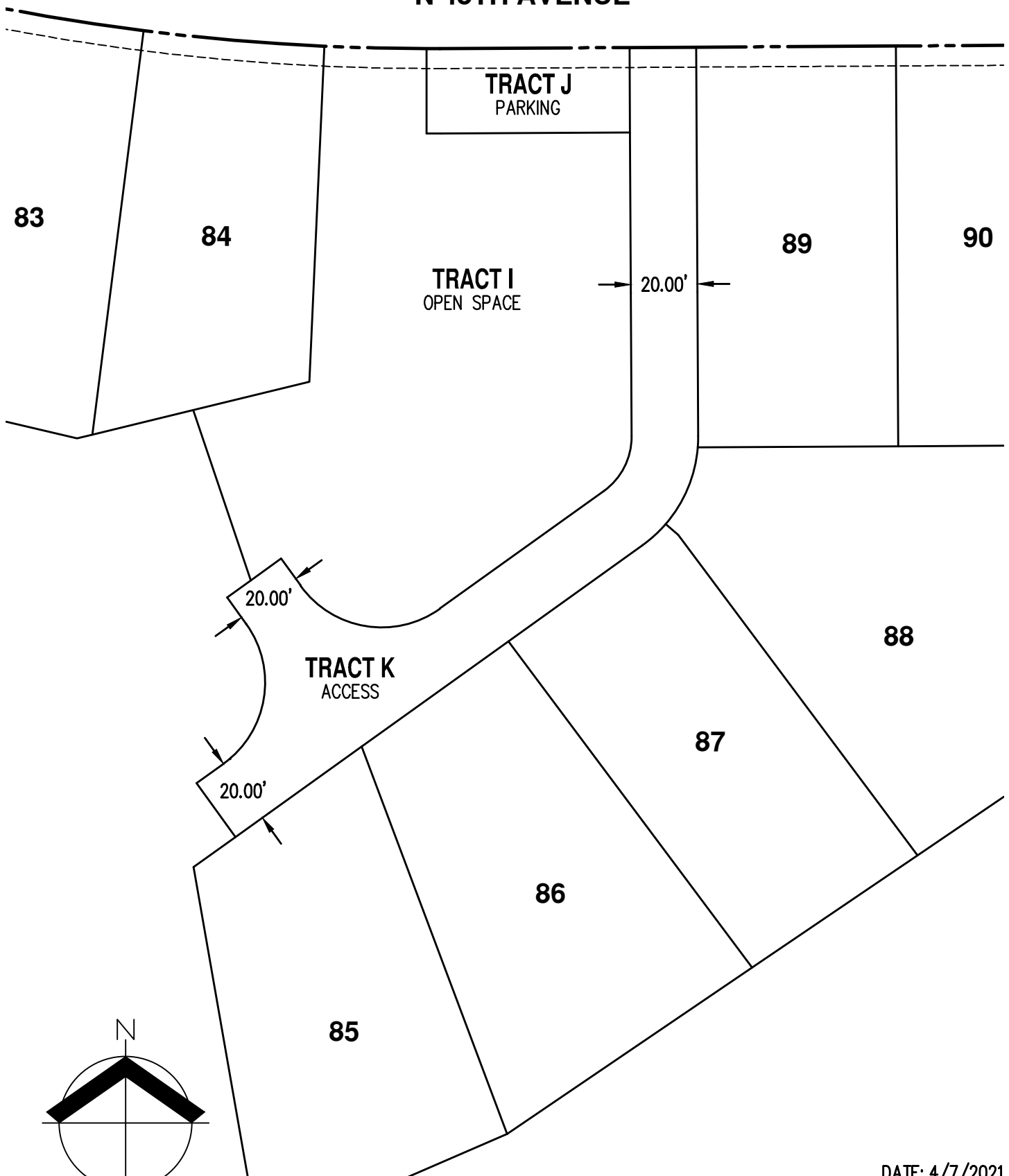
**AKS ENGINEERING & FORESTRY, LLC**



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Vancouver, WA 98682  
(360) 882-0419 | [andreottim@aks-eng.com](mailto:andreottim@aks-eng.com)

Attachments:

Exhibits A-C Tract Adjustment Exhibits  
Exhibit D Trail Exhibit  
Exhibit E Sight Distance Exhibit

**N 48TH AVENUE**

DATE: 4/7/2021

**TRACT K ADJUSTMENT EXHIBIT****EXHIBIT  
A**

AKS ENGINEERING & FORESTRY, LLC  
 9600 NE 126TH AVE, STE 2520  
 VANCOUVER, WA 98682  
 360.882.0419 WWW.AKS-ENG.COM

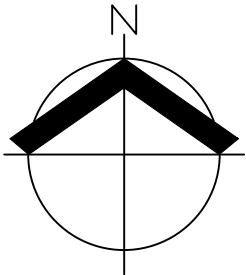
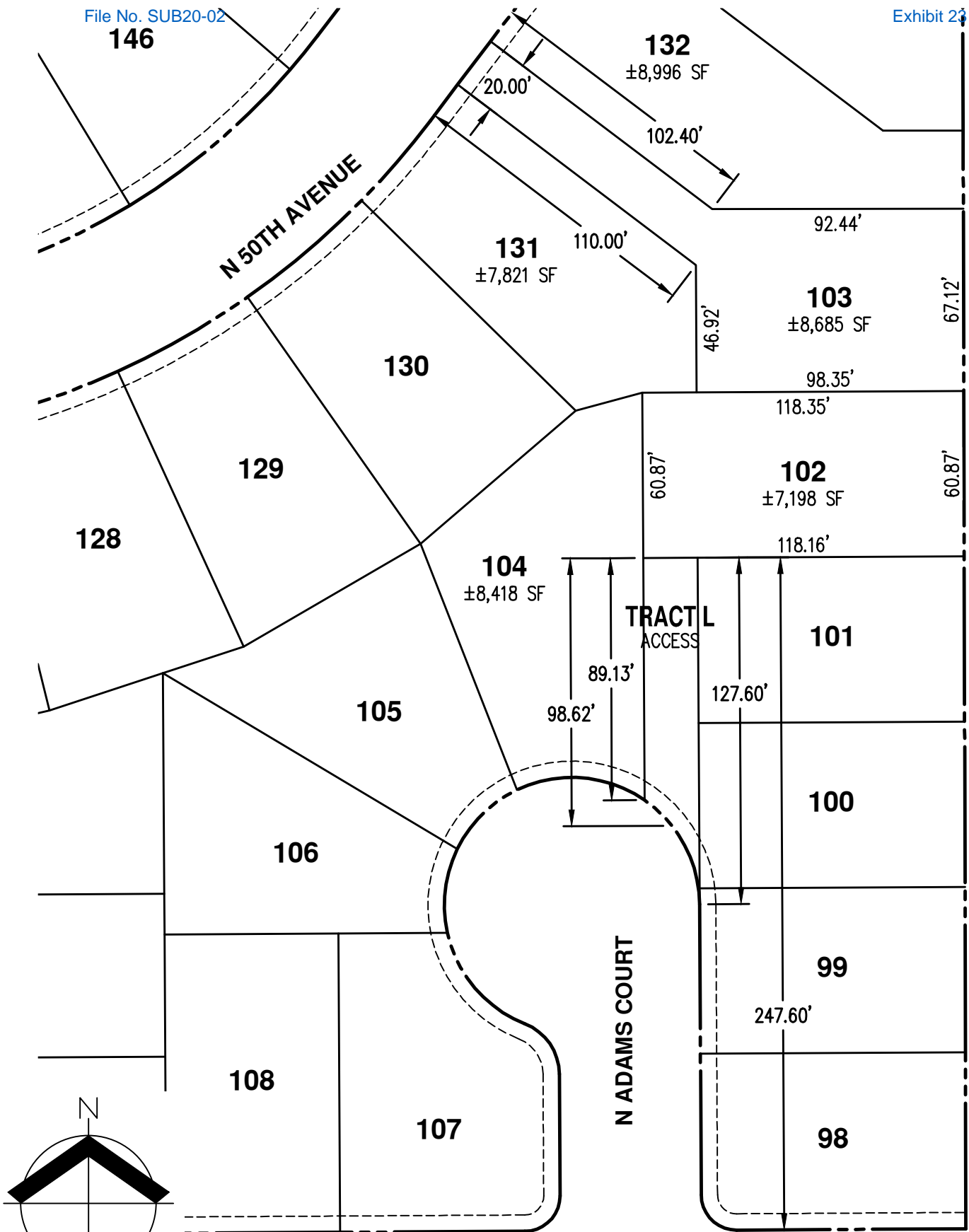


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 CHKD: JMM  
 AKS JOB:  
 5504

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SCALE: 1" = 40 FEET



ORIGINAL PAGE SIZE: 8.5" x 11"

DATE: 4/7/2021

## TRACT L ADJUSTMENT EXHIBIT

AKS ENGINEERING & FORESTRY, LLC  
 9600 NE 126TH AVE, STE 2520  
 VANCOUVER, WA 98682  
 360.882.0419 WWW.AKS-ENG.COM

EXHIBIT  
**B**

DRWN: MPA  
 CHKD: JMM  
 AKS JOB:  
 5504



N 50TH AVENUE

128

127

126

125

124

111

112

20.00'

144.88'

110

145.00'

114

113

TRACT M  
ACCESS

109

N 49TH AVENUE

DATE: 4/7/2021

## TRACT M ADJUSTMENT EXHIBIT

EXHIBIT  
**C**

AKS ENGINEERING & FORESTRY, LLC  
 9600 NE 126TH AVE, STE 2520  
 VANCOUVER, WA 98682  
 360.882.0419 WWW.AKS-ENG.COM

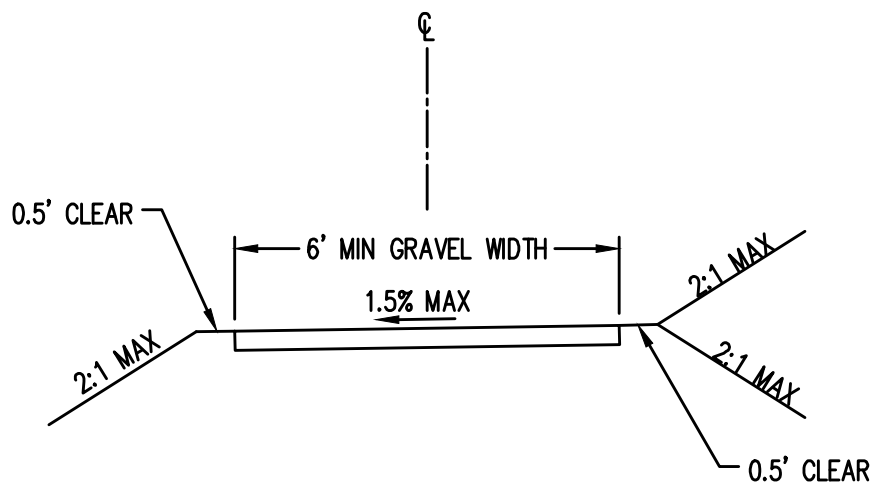
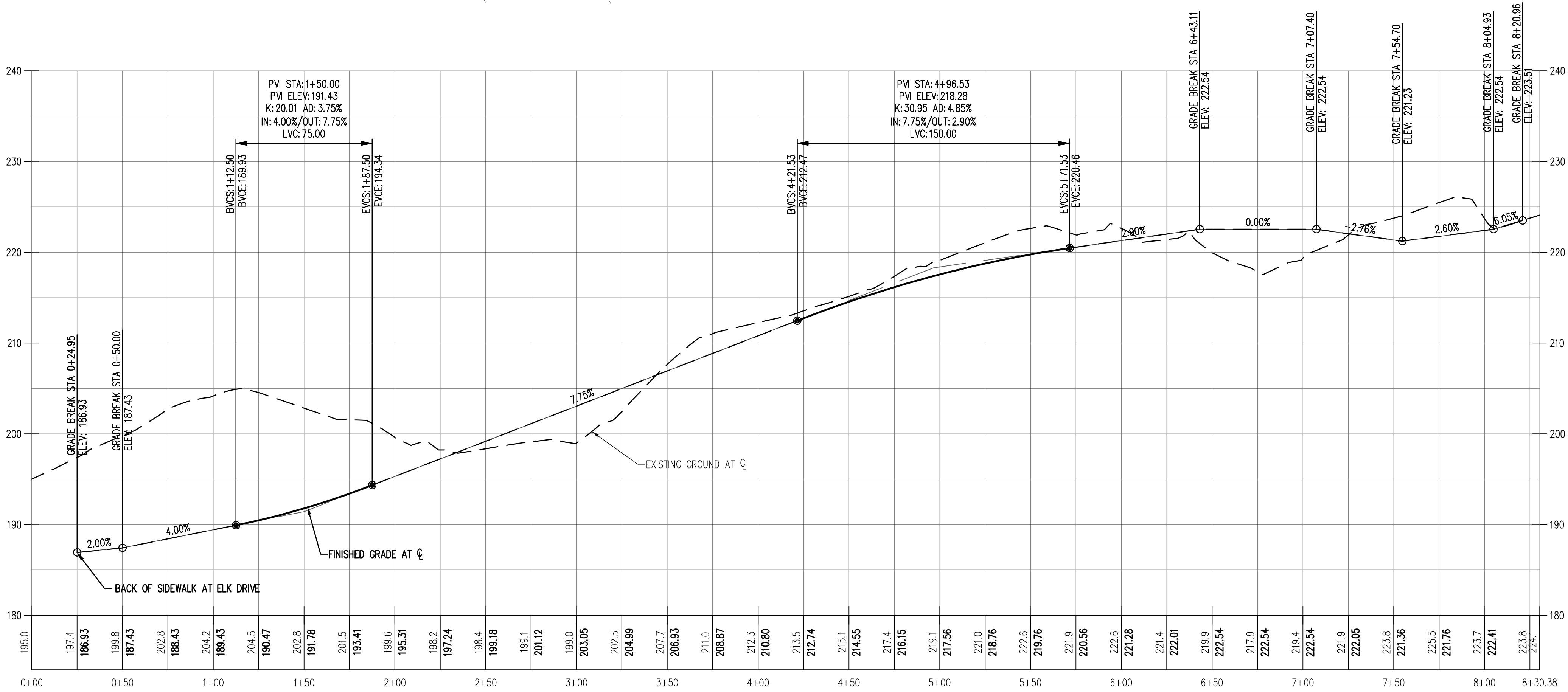
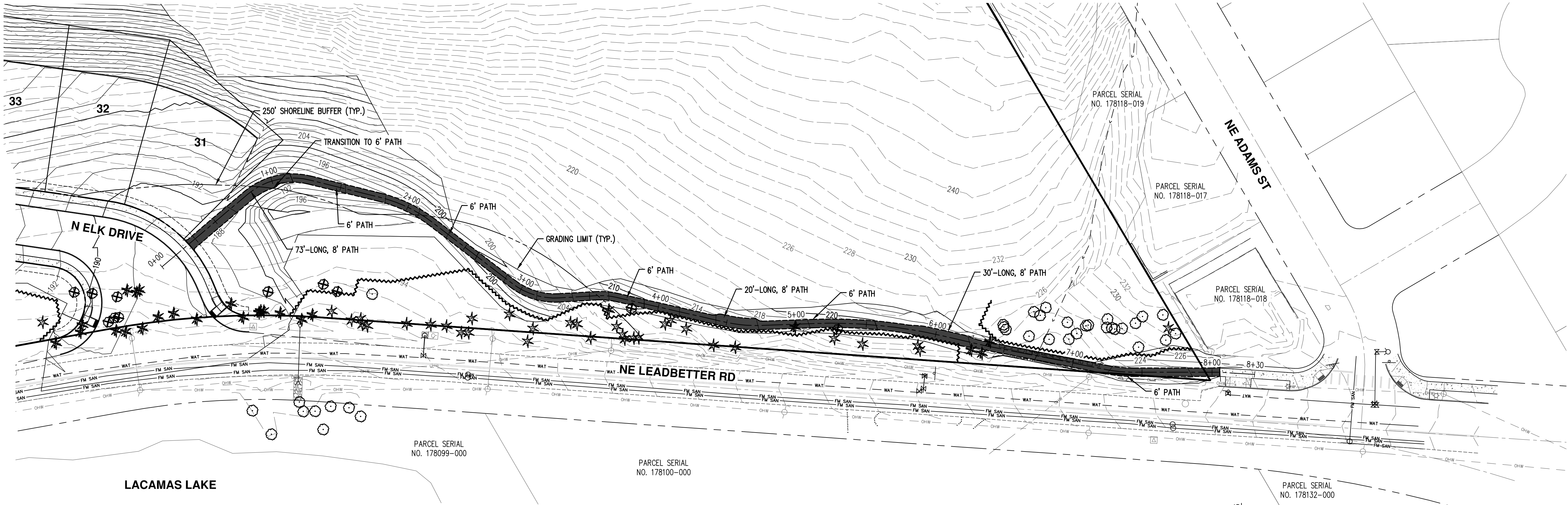
**AKS**

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 5504

SCALE: 1" = 40 FEET



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 ORIGINAL PAGE SIZE: 8.5" x 11"



TRAIL TYPICAL CROSS SECTION  
NTS

TRAIL 1.1  
Hor. Scale: 1"= 40'  
Vert. Scale: 1"= 8'  
STATIONING IS BASED ON TRAIL  
CENTERLINE UNLESS OTHERWISE NOTED

EXHIBIT D - T-3 TRAIL LOCATION

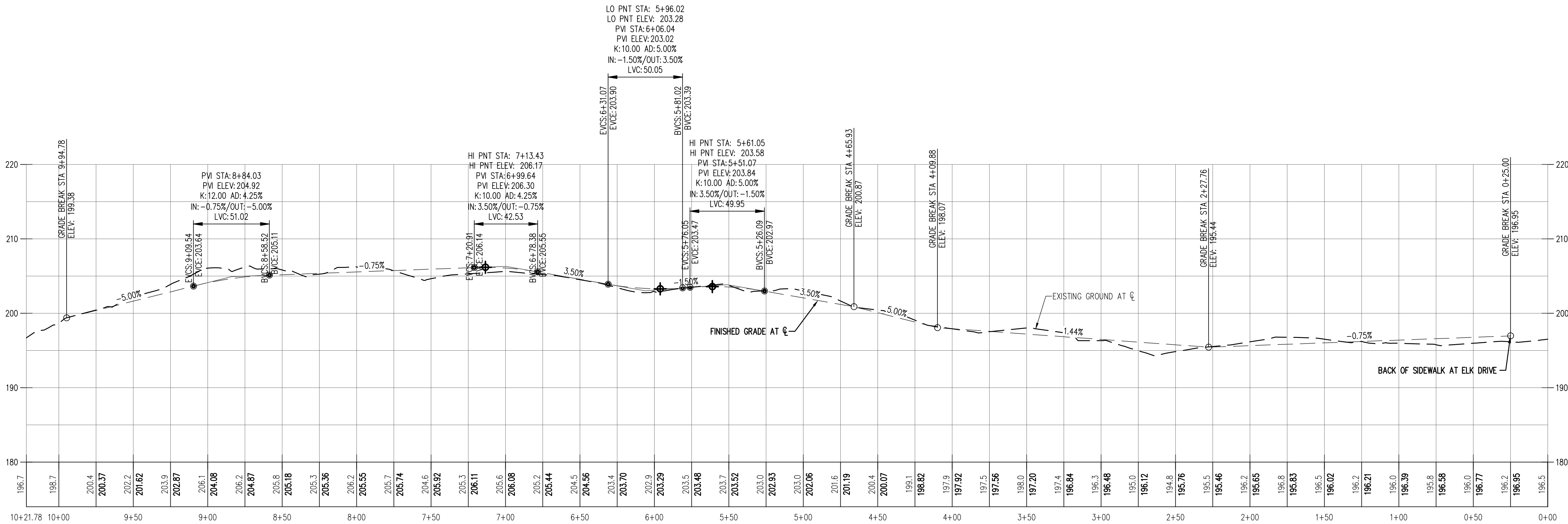
CJ DENS

CAMAS, WASHINGTON

|              |          |
|--------------|----------|
| JOB NUMBER:  | 5504     |
| DATE:        | 4/7/2021 |
| DESIGNED BY: | CJS      |
| DRAWN BY:    | CJS      |
| CHECKED BY:  | JMM      |

D-01





TRAIL 1.2  
Hor. Scale: 1"= 40'  
Vert. Scale: 1"= 8'  
STATIONING IS BASED ON TRAIL  
CENTERLINE UNLESS OTHERWISE NOTED

EXHIBIT D - T-3 TRAIL LOCATION  
CJ DENS  
CAMAS, WASHINGTON

|              |          |
|--------------|----------|
| JOB NUMBER:  | 5504     |
| DATE:        | 4/7/2021 |
| DESIGNED BY: | CJS      |
| DRAWN BY:    | CJS      |
| CHECKED BY:  | JMM      |



1. DESIGN SPEED OF 25 MPH ASSUMED FOR RIGHT TURN OFF OF LEADBETTER ROAD PER CITY OF CAMAS STAFF DURING PLANNING REVIEW MEETING.
2. PER AASHTO GREEN BOOK, 7TH EDITION; STOPPING SIGHT DISTANCE OF 155 FEET IS REQUIRED FOR 25 MPH.
3. STOPPING SIGHT DISTANCE IS MET FOR THE DRIVEWAY AT LOT 31 FOR VEHICLES TURNING RIGHT ONTO ELK DRIVE FROM LEADBETTER ROAD.
4. TRAIL CROSSING AT ELK DRIVE AND LEADBETTER ROAD MEETS STOPPING SIGHT DISTANCE FOR VEHICLES TRAVELING ON LEADBETTER ROAD.

