



STAFF REPORT

CJ DENS SUBDIVISION (File No. SUB20-02)

CONSOLIDATED FILES: SHORELINE SUBSTANTIAL DEVELOPMENT PERMIT, SHORELINE CONDITIONAL USE PERMIT AND SHORELINE VARIANCE (SHOR20-01); CRITICAL AREAS REVIEW (CA20-08); ARCHAEOLOGICAL REVIEW (ARCH20-08); TEMPORARY USE PERMIT (TUP20-05); STATE ENVIRONMENTAL POLICY ACT (SEPA20-17)

Type III

Staff Report Date: May 19, 2021

TO	Hearings Examiner	HEARING DATE	May 25, 2021
PROPOSAL	To subdivide 49.62 acres into 152 detached single-family residential lots.		
LOCATION	The site is located at 715 SE Leadbetter Road in the NE ¼ of Section 34, Northwest ¼ of Section 35, Township 2 North, Range 3 East, of the Willamette Meridian; and described as tax parcels 177906000, 178172000 and 178236000.		
APPLICANT	CJ Dens Lacamas II LLC PO Box 2239 Kalama, WA 98625	CONTACT	AKS Engineering & Forestry, LLC Michael Andreotti (360) 882-0419
APPLICATION SUBMITTED	November 25, 2020; Resubmitted January 8, 2021	APPLICATION COMPLETE	January 15, 2021
SEPA	The City issued a SEPA Mitigated Determination of Non-significance (MDNS) May 6, 2021, with a comment period that ends on May 20, 2021. The SEPA MDNS was mailed to property owners May 5, 2021 and published in the Post Record on May 6, 2021. Legal publication #548070.		
PUBLIC NOTICES	Notice of Application was mailed to property owners within 300 feet of the site on January 27, 2021 and published in the Post Record on January 28, 2021. Legal publication #503830. Notice of public hearing was mailed to property owners within 300 feet of the site on May 5, 2021 and published in the Post Record May 6, 2021. Legal publication #548270.		

APPLICABLE LAW: The application was submitted on November 25, 2020 and the applicable codes are those codes that were in effect at the date of application. Camas Municipal Code (CMC) Title 16 Environment, Title 17 Land Development, and Title 18, specifically (but not limited to): Chapter 18.11 - Parking, Chapter 18.13 - Landscaping, Chapter 18.18 - Site Plan Review, and Chapter 18.55 Administrative Procedures; Camas Shoreline Master Program (Ord. 15-007) and the Shoreline Management Act (RCW 90-58) (WAC 173-27).

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PROJECT SUMMARY

Application has been made to the City of Camas for preliminary plat approval for a single-family residential subdivision located at 715 SE Leadbetter Road in the R-7.5 Single-Family Residential zone with an Airport Overlay Zone. The preliminary plat proposal would segregate 49.62-acres into 152 lots in three phases ranging in size from 5,508 square feet to 8,908 square feet, with an average lot size of 6,839 square feet. The proposal includes tracts for a trail, open spaces, critical areas, private access roads, parking, and stormwater facilities.

The subject property is bordered to the southeast by Deerhaven Phase 1 subdivision, the northeast by a single-family residence and to the north by City owned vacant land also zoned R-7.5. To the east is a single-family residence zoned Community Commercial (CC). To the west is a residence and the Camas Washougal Wildlife League clubhouse zoned Community Commercial (CC). SE Leadbetter Road borders the site on its south side where site access is also provided.

The site's topography varies with rock outcroppings, level plateaus, and steep slopes up to 80% that slope downwards towards SE Leadbetter road along Lacamas Lake. Lacamas Lake sits south of SE Leadbetter Road. Two streams and a wetland are located at the northern end of the site, with a small stream located at the southeast corner. Much of the site was previously logged in 2015 leaving stands of evergreen trees dispersed throughout the site, but primarily covered in shrubs and grass.

The project site's frontage also lies within the regulated shoreline of Lacamas Lake. The Camas Shoreline Master Program (SMP) classifies the shoreline of the property as "Urban Conservancy" shoreline environment. The subdivision of land requires a Shoreline Substantial Development permit as the total cost of the development exceeds \$6,416.00 or as adjusted by the State Office of Financial Management per SMP section 2.3.2.1. Although project improvements are located above the ordinary high-water mark (OHWM) of Lacamas Lake, a public access road, utilities, a trail and residential lots are located within the "Urban Conservancy" shoreline environment. In the "Urban Conservancy" shoreline environment, the trail and residential structures are permitted outright with a 100-foot setback from the OHWM whereas public access roads and utility improvements are permitted subject to a Conditional Use Permit and require a 100-feet from the OHWM. The roadway site entrance and utility improvements will require Shoreline Variances for encroaching in the required setbacks.

The development is subject to review and approval of the following permits: Shoreline Substantial Development Permit (SDP), Shoreline Conditional Use Permit, Shoreline Variance, Critical Area permit, SEPA review, Archaeological review, Temporary Use Permit and Subdivision review. The staff report includes criteria for review for all these permit types.

FINDINGS

Shoreline Master Program (SHOR20-01)

SMP Standards for Evaluation

- **Shoreline Substantial Development Permits** must be consistent with the approved Shoreline Master Program (SMP) element goals, objectives, and general policies of the designated environment; policy statements for shoreline use activities; and with use activity regulations.
- **Shoreline Conditional Use Permits.** These provisions shall apply only when it can be shown that extraordinary circumstances exist and that the public interest would suffer no substantial detrimental effect. SMP Conditional Use Permits require final approval or disapproval from the Department of Ecology after final local action has been taken.
- **Shoreline Variances.** The applicant must demonstrate that the variance is the minimum necessary to afford relief and that it will not cause adverse effects to the environment. SMP Variances require final approval or disapproval from the Department of Ecology after final local action has been taken.

Master Program Goals and Policies

SMP Chapter 3

At page 3-1 of the SMP, the general goals of the program are to use the full potential of the shorelines in accordance with the surrounding areas, the natural resource values, and the unique aesthetic qualities; and develop an ordered and diversified physical environment that integrates water and shoreline uses while achieving a net gain of ecological function. Primarily, the subdivision supports the following shoreline goals:

SMP, Section 3.2 *Shorelines of Statewide Significance*, “Development should be focused in already pre-developed shoreline areas to reduce adverse environmental impacts and to preserve undeveloped shorelines.”

SMP, Section 3.7 *Public Access and Recreation*, “The goal of public access and recreation is to increase the ability of the general public to enjoy the water’s edge, travel on the waters of the state, and to view the water and the shoreline from adjacent locations.”

SMP, Section 3.10 *Shoreline Use and Development*, “The goal for shoreline use and development is to balance the preservation and development of shorelines in a manner that allows for mutually compatible uses. Resulting in land use patterns will be compatible with shoreline designations and sensitive to and compatible with ecological systems and other shoreline resources. To help with this balance, shoreline and water areas with unique attributes for specific long term uses such as commercial, residential, industrial, water, wildlife, fisheries, recreational and open space shall be identified and reserved.”

SMP, Section 3.11 *Transportation, Utilities, and Essential Public Facilities*, “The goal for transportation, utilities, and essential public facilities is to provide for these facilities in shoreline areas without adverse effects on existing shoreline use and development or shoreline ecological functions and/or processes.”

FINDING: Staff finds that the project is consistent with the general policies of Chapter 3, given that the proposed location of improvements is within areas that are already developed and mitigated for in those areas that are impacted; promotes public access and recreation to the shorelines and waters of the state; and designed with large natural open space tracts in the shoreline to not adversely impact shoreline ecological functions.

Urban Conservancy Shoreline Designation**SMP Chapter 4**

The management policies of the Urban Conservancy Shoreline Designation at SMP Section 4.3.3.4 are as follows:

- 1. Uses that preserve the natural character of the area or promote preservation of open space or critical areas either directly or over the long term should be the primary allowed uses. Uses that result in restoration of ecological functions should be allowed if the use is otherwise compatible with the purpose of the Urban Conservancy shoreline designation and the setting.**

FINDING: The project is consistent with the SMP designation of Urban Conservancy because most of the shoreline jurisdiction is located within proposed natural area tracts to help protect ecological function of the shoreline. The roadway site entrance, trail, utility improvements and portions of residential lots located within the shoreline jurisdiction will be compensated through restoration to achieve a no net loss of ecological function.

- 2. Single family residential development shall ensure no net loss of shoreline ecological functions and preserve the existing character of the shoreline consistent with the purpose of this designation.**

FINDING: Although a portion of proposed residential lots 1-5 and 31-32 are located within the Urban Conservancy shoreline jurisdiction, all the lots are located outside of the required 100-foot setback from the OHWM to ensure no net loss of shoreline ecological functions.

- 3. Low-intensity public access and public recreation objectives should be implemented whenever feasible and when significant ecological impacts can be mitigated (e.g. trails).**

FINDING: The project proposes public access and recreation improvements with the construction of a pedestrian pathway through proposed natural area tracts adjacent to SE Leadbetter Road.

- 4. Thinning or removal of vegetation should be limited to that necessary to (1) remove noxious vegetation and invasive species; (2) provide physical or visual access to the shoreline; or (3) maintain or enhance an existing use consistent with critical areas protection and maintenance or enhancement of shoreline ecological functions.**

FINDING: The majority of vegetation removal is limited to previously logged areas. Unavoidable impacts to native vegetation include the location of vehicular entrance road, utilities and the trail that will be mitigated with replanting within the natural area tracts.

- 5. Low intensity water-oriented commercial uses may be permitted if compatible with surrounding uses.**

FINDING: Water-oriented commercial uses are not proposed and therefore this criterion is not applicable.

General Shoreline Use and Development Regulations**SMP Chapter 5**

The following general regulations of Chapter 5 Section 5.1 (beginning on page 5-1) are as follows:

1. Shoreline uses and developments that are water-dependent shall be given priority.

FINDING: The development is not water-dependent and is separated from Lacamas Lake by SE Leadbetter Road, which will not interfere with other water-dependent uses.

2. Shoreline uses and developments shall not cause impacts that require remedial action or loss of shoreline functions on other properties.

FINDING: The proposed development will not affect shoreline functions on other properties or require remedial action as Best Management Practices (i.e. erosion control, etc.) will be implemented throughout project construction.

3. Shoreline uses and developments shall be located and designed in a manner such that shoreline stabilization is not necessary at the time of development and will not be necessary in the future for the subject property or other nearby shoreline properties unless it can be demonstrated that stabilization is the only alternative to protecting public safety and existing primary structures.

FINDING: The proposed development will not require shoreline stabilization at the time of the development or in the future.

4. Land shall not be cleared, graded, filled, excavated or otherwise altered prior to issuance of the necessary permits and approvals for a proposed shoreline use or development to determine if environmental impacts have been avoided, minimized and mitigated to result in no net loss of ecological functions.

FINDING: The applicant has applied for proper permits and has not requested to begin work prior to receiving approvals.

5. Single family residential development shall be allowed on all shorelines except the Aquatic and Natural shoreline designation, and shall be located, designed and used in accordance with applicable policies and regulations of this Program.

FINDING: Portions of seven (7) single-family residential lots are located within the "Urban Conservancy" Shoreline Designation and setback more than the required 100-feet from the OHWM.

6. Unless otherwise stated, no development shall be constructed, located, extended, modified, converted, or altered or land divided without full compliance with CMC Title 17 Land Development and CMC Title 18 Zoning.

FINDING: The proposed development requires compliance with the applicable regulations from CMC Title 17 Land Development and CMC Title 18 Zoning.

7. On navigable waters or their beds, all uses and developments should be located and designed to: (a) minimize interference with surface navigation; (b) consider impacts to public views; and (c) allow for the safe, unobstructed passage of fish and wildlife, particularly species dependent on migration.

FINDING: This criterion is not applicable as the proposed project is not on navigable waters or their beds.

8. Hazardous materials shall be disposed of and other steps be taken to protect the ecological integrity of the shoreline area in accordance with the other policies and regulations of this

Program as amended and all other applicable federal, state, and local statutes, codes, and ordinances.

FINDING: The application does not propose the use of hazardous materials and therefore this criterion is not applicable.

- 9. In-water work shall be scheduled to protect biological productivity (including but not limited to fish runs, spawning, and benthic productivity). In-water work shall not occur in areas used for commercial fishing during a fishing season unless specifically addressed and mitigated for in the permit.**

FINDING: This criterion is not applicable as in-water work is not proposed.

- 10. The applicant shall demonstrate all reasonable efforts have been taken to avoid, and where unavoidable, minimize and mitigate impacts such that no net loss of critical area and shoreline function is achieved. Applicants must comply with the provisions of Appendix C with a particular focus on mitigation sequencing per Appendix C, Section 16.51.160 Mitigation Sequencing. Mitigation Plans must comply with the requirements of Appendix C, Section 16.51.170 Mitigation Plan Requirements, to achieve no net loss of ecological functions.**

FINDING: The application includes critical area reports for fish and wildlife habitat conservation areas and geologically hazardous areas within shoreline jurisdiction with discussions of avoidance and minimization efforts. Further discussion is provided in Section 5.3 below.

- 11. The effect of proposed in-stream structures on bank margin habitat, channel migration, and floodplain processes should be evaluated during permit review.**

FINDING: This criterion is not applicable as no in-stream work is proposed.

- 12. Within urban growth areas, Ecology may grant relief from use and development regulations in accordance with RCW 90.58.580, and requested with a shoreline permit application.**

FINDING: The activity is in city limits and therefore this criterion is not applicable.

Archaeological, Cultural and Historic Resources

SMP Section 5.2

The application included an archaeological predetermination survey report that was sent to the Department of Archaeology and Historic Preservation and Tribal Representatives for review and comment. The report concluded that no further archaeological work is necessary.

FINDING: If an item of possible archaeological interest is discovered on site, work will immediately cease and notification of the findings will be sent to the appropriate parties.

Critical Areas Protection

SMP Section 5.3

The subject parcel includes the following critical areas and their associated buffers as located within the shoreline designation as regulated by the SMP: Geologically Hazardous Areas and Fish and Wildlife Habitat Conservations Areas. Critical area regulations are located within the SMP, Appendix C.

Geologically Hazardous Areas – SMP Appendix C, Chapter 16.59

Clark County GIS mapping identifies steep slopes at the southern portion of the property within the shoreline jurisdiction. As such, the applicant submitted a Geotechnical Engineering Report dated July 2016 prepared by Hart Crowser including a supplemental memorandum dated November 2020. The

reports indicated a northwest-trending slope abutting the north side of SE Leadbetter Road with variable landforms and gradients gentle to steep. The reports concluded surface or subsurface active landsliding was not observed, and the soils do not present a slope stability hazard to the proposed development, if designed in conformance with the recommendations in this report. The geohazard areas that are located within the shoreline designation are proposed to be placed in natural area tracts for preservation. A trail system is proposed to meander within in the natural area tracts.

Fish and Wildlife Conservation Areas- SMP Appendix C, Chapter 16.61

Clark County GIS identifies Lacamas Lake adjacent to or within (300-feet) of the subject property, which requires a 150-foot buffer per SMP Appendix C Section 16.61.040.D. However, per SMP Appendix C Section 5.3.2.c, "*Lacamas Lake buffers from OHWM shall not extend landward of NE Leadbetter Road.*" Since NE Leadbetter is located along the project site's southern boundary line and separates the subject property and the Lake, the provisions of Chapter 16.61 are not applicable.

FINDING: Impacts to critical areas will be mitigated with Best Management Practices for erosion control construction and native re-vegetation measures to ensure no net loss of ecological functions to the shoreline area and maintain habitat connectivity to the shoreline. Staff finds the applicant will comply with the provisions of the Critical Areas regulations as conditioned.

Site Planning and Development

SMP Section 5.7

The regulations concerning Site Planning and Development at SMP Section 5.7 include the following applicable policies regarding the project proposal:

- 1. Land disturbing activities such as grading and cut/fill shall be conducted in such a way as to minimize impacts to soils and native vegetation.**

FINDING: Land disturbing activities in the shoreline are limited to accommodate the site access road, proposed trail, a portion of Lots 1-5, 31 and 32 and erosion control best management practices will be implemented. Vegetation removed for site improvements will be replanted with trees and native vegetation.

- 2. Impervious surfaces shall be minimized to the extent feasible so as not to jeopardize public safety.**

FINDING: Impervious surfaces are minimized to the greatest extent feasible to include the intersection of N Elk Drive, a trail, and a couple of driveways for residential lots 31 and 32, which will be mitigated via a stormwater system that will protect neighboring properties.

- 3. When feasible, existing transportation corridors shall be utilized.**

FINDING: The proposed roadway improvements will utilize the existing transportation corridor as much as possible via access from the existing SE Leadbetter Road at the site's frontage.

- 4. Vehicle and pedestrian circulation systems shall be designed to minimize clearing, grading, alteration of topography and natural features, and designed to accommodate wildlife movement.**

FINDING: The proposed roadway and trail design is the least impactful to the environment and will continue to accommodate wildlife movement.

- 5. Parking, storage, and non-water dependent accessory structures and areas shall be located landward from the OHWM and landward of the water-oriented portions of the principle use.**

FINDING: Parking, storage and non-water dependent accessory structures and areas associated with residential lots 1-5, 31 and 32 are located landward from the OHWM to the greatest extent practicable. There are no water-oriented uses proposed.

- 6. Trails and uses near the shoreline shall be landscaped or screened to provide visual and noise buffering between adjacent dissimilar uses or scenic areas, without blocking visual access to the water.**

FINDING: The proposed trail is buffered from NE Leadbetter Road via existing mature trees without blocking views of Lacamas Lake.

- 7. Elevated walkways shall be utilized, as appropriate, to cross sensitive areas such as wetlands.**

FINDING: The proposed project does not include crossing sensitive areas such as wetlands within the shoreline and therefore this criterion is not applicable.

- 8. Fencing, walls, hedges, and similar features shall be designed in a manner that does not significantly interfere with wildlife movement.**

FINDING: The portion of residential lots 1-5, 31 and 32 will have private fences at their property lines but will not interfere with wildlife movement within the adjacent proposed natural area tracts.

- 9. Exterior lighting shall be designed, shielded and operated to: a) avoid illuminating nearby properties or public areas; b) prevent glare on adjacent properties, public areas or roadways; c) prevent land and water traffic hazards; and d) reduce night sky effects to avoid impacts to fish and wildlife.**

FINDING: Proposed lighting within the development adjacent to the shoreline will be directed away and down lit to protect the night sky.

- 10. Utilities shall be located within roadway and driveway corridors and rights-of-way wherever feasible.**

FINDING: Proposed utilities within the shoreline jurisdiction will be located within the roadway where feasible. Sections of stormwater lines will be located within the shoreline to connect to the existing roadside ditch, which will be revegetated.

- 11. A use locating near a legally established aquaculture enterprise, including an authorized experimental project, shall demonstrate that such use would not result in damage to destruction of the aquaculture enterprise, or compromise its monitoring or data collection.**

FINDING: This criterion is not applicable as there is not aquaculture enterprise within the vicinity.

Specific Shoreline Use Regulations

SMP Chapter 6

The specific use regulations for recreational development begins at page 6-19 of the SMP.

SMP Section 6.3.11 Recreational Development

- 1. Water-oriented recreational uses and developments are preferred.**

FINDING: A multi-use regional trail is proposed along the site's frontage within natural area tracts.

- 2. Trails shall be designed and constructed in substantial compliance with the standards of the *Camas Park, Recreation and Open Space Comprehensive Plan, Design & Development Guidelines (2007, Appendix A)*, with the constructed width varying by trail type and critical area protection.**

FINDING: The PROS plan identifies the T-3 Multi-Use Regional Trail, a 12-foot wide paved trail, along SE Leadbetter Road at the site's frontage. Consistent with the PROS plan, the trail is proposed along the site's frontage within natural area tracts that contain steep slopes and existing trees. To minimize grading and the removal of trees, the proposed design of the trail will be a minimum 6-8ft. wide compact gravel surface.

3. Recreation areas or facilities on the shoreline shall provide physical or visual public access in accordance with Section 5.5.

FINDING: The proposed T-3 multi-use regional trail will provide visual access to the Lacamas Lake shoreline.

4. Parking areas that are accessory to recreational uses shall be located upland a minimum of the one hundred and fifty (150) feet away from the immediate shoreline, with pedestrian trails or walkways providing access to the water.

FINDING: Parking areas are not proposed for this section of T-3 multi-use regional trail and therefore this criterion is not applicable.

5. All permanent, substantial, recreational structures and facilities shall be located outside officially mapped floodways.

FINDING: The proposed development is not located within mapped floodways.

6. Parks and trailheads shall be provided with restrooms with hand washing facilities in accordance with public health standards and without adversely altering the natural features attractive for recreational uses.

FINDING: Parks and trailheads are not proposed and therefore this criterion is not applicable.

7. Recreational facilities shall make adequate provisions, such as densely vegetated buffer strips, screening, fences, and signs, to protect the value and enjoyment of adjacent or nearby private properties and natural areas from trespass, overflow and other possible adverse impacts.

FINDING: The proposed T-3 multi-use regional trail will connect with the existing sidewalk at the east property line and directional signage will be provided for pedestrian traffic.

8. Provisions shall be made for the proposed of water areas from drainage and surface runoff in all recreational development requiring the use of fertilizers and pesticides in areas adjacent to shorelines, such as in play fields and golf courses.

FINDING: Fertilizers and pesticides are not proposed for usage in the shoreline.

SMP Section 6.3.12 Residential Development

The specific use regulations for residential development begins at page 6-21 of the SMP. The applicant addresses the criteria of this section at page 21-22 of the narrative.

1. Residential development shall include provisions to ensure preservation of native vegetation and control erosion during construction.

FINDING: The application proposes natural area tracts within the shoreline jurisdiction to protect native trees and vegetation. Erosion control measures and best management practices will be implemented to minimize erosion impacts as shown on the preliminary grading and erosion control plan.

2. New residential construction shall be located so as not to require shoreline stabilization measures.

FINDING: The residential lots are located north of NE Leadbetter Road, which separates the proposal from Lacamas Lake, and therefore will not require shoreline stabilization.

3. New residential development shall be prohibited in, over, or floating on the water.

FINDING: This criterion is not applicable as residential development is not proposed in, over, or floating on the water.

4. New residential development shall be located and designed that the bulk and density of structures minimizes view obstructions to and from the shoreline.

FINDING: The portion of residential lots within the shoreline are terraced up the hill and designed to comply with the required maximum 35-ft. height requirement. View impacts of the shoreline from properties to the north will be minimized.

5. Clustering of residential units shall be allowed where appropriate to minimize physical and visual impacts on shorelines.

FINDING: Clustering of residential units is not proposed and therefore this criterion is not applicable.

6. In those areas where only onsite sewage systems are available, density shall be limited to that which can demonstrably accommodate protection of surface and groundwater quality.

FINDING: No on-site sewage systems are proposed within this development and therefore this criterion is not applicable.

7. New residential development, including sewage disposal systems, shall be prohibited in floodways and channel migration zones.

FINDING: The proposed project is not located in a floodway or a channel migration zone and therefore this criterion is not applicable.

8. Appurtenances, accessory uses, and facilities serving a residential structure shall be located outside setbacks and critical areas and buffers unless otherwise allowed under this Program to promote community access and recreational opportunities.

FINDING: Appurtenances, accessory uses, and facilities are located outside setbacks and critical areas and therefore this criterion is not applicable.

9. New residential units or lots created through land division in the shoreline shall be sized and configured in accordance with the city's zoning ordinance and shall only be permitted when the following standards are met:

- a. **Flood hazard reduction measures are not required and will not be necessary during the life of the development or use in accordance with Appendix C, Chapter 16.55 Frequently Flooded Areas.**
- b. **Shoreline stabilization measures are not required.**

FINDING: Portions of residential lots 1-5, 31 and 32 are located approximately 200-feet from the OHWM but outside of flood hazard areas. Therefore, flood hazard reduction measures and shoreline stabilization measures will not be necessary.

SMP Section 6.3.14 Transportation Uses

The specific use regulations for transportation begins at page 6-21 of the SMP. The applicant addresses the criteria of this section at page 23 of the narrative.

- 1. All transportation facilities shall be constructed and maintained to cause the least possible adverse impacts on the land and water environments, shall respect the natural character of the shoreline and make every effort to preserve wildlife, aquatic life and their habitats.**

FINDING: The proposed NE Elk Road roadway intersection improvements will take access from existing SE Leadbetter Road with no additional street frontage improvements. The roadway intersection improvements are designed to have the least possible impacts to the natural environment.

- 2. New or expanded surface transportation facilities not related to and necessary for the support of shoreline activities shall be located outside the shoreline jurisdiction or set back from the ordinary high water mark far enough to make shoreline stabilization, such as rip rap, bulkheads or jetties, unnecessary.**

FINDING: The roadway intersection improvements are on the north side of NE Leadbetter Road, which separates the site from Lacamas Lake, and landward from the ordinary high- water mark where shoreline stabilization is not necessary.

- 3. Transportation facilities shall not adversely impact existing or planned water-dependent uses by impairing access to the shoreline.**

FINDING: The proposed NE Elk Road roadway intersection improvements will increase access to the shoreline including the proposed trail to any potential future nearby water dependent uses.

- 4. All roads shall be set back from waterbodies and shall provide buffer areas of compatible, self-sustaining native vegetation. Shoreline scenic drives and viewpoints may provide breaks in the vegetative buffers to allow open views of the water.**

FINDING: The proposed NE Elk Road intersection improvements are on the north side of SE Leadbetter Road and the intersection is separated by Lacamas Lake from the road. The development includes two proposed natural area tracts with native vegetation along SE Leadbetter Road that include a proposed trail that offers viewpoints of Lacamas Lake.

- 5. Transportation facilities that are allowed to cross over waterbodies and associated wetlands shall utilize elevated, open pile or pier structures whenever feasible to reduce shade impacts. All bridges shall be built high enough to allow the passage of debris and anticipated high water flows.**

FINDING: The proposed project does not include transportation crossings over waterbodies or associated wetlands and therefore this criterion is not applicable.

- 6. Fills for transportation facility development shall not be permitted in waterbodies or associated wetlands except when all structural or upland alternatives have proven infeasible and the transportation facilities are necessary to support uses consistent with this program.**

FINDING: Fills in waterbodies or associated wetlands are not proposed as part of this project and therefore this criterion is not applicable.

- 7. Transportation and utility facilities shall be required to make joint use of rights-of-way and to consolidate crossing of waterbodies where feasible.**

FINDING: Proposed utilities will be located within the right-of-way where feasible. Crossing of waterbodies is not proposed.

SMP Section 6.3.15 Utilities

The specific use regulations for utilities begins at page 6-22 of the SMP. The applicant addresses the criteria of this section at page 23 of the narrative.

- 1. Whenever feasible, all utility facilities shall be located outside shoreline jurisdiction. Where distribution and transmission lines (except electrical transmission lines) must be located in the shoreline jurisdiction they shall be located underground.**

FINDING: Water, storm drainage lines including the power lines for street lighting will be located underground and within the right-of-way where feasible.

- 2. Where overhead electrical transmission lines must parallel the shoreline, they shall be no closer than one hundred (100) feet from OHWM unless topography or safety factors would make it unfeasible, then a shoreline conditional use permit shall be required.**

FINDING: Overhead electrical transmission lines are not proposed and therefore this criterion is not applicable.

- 3. Utilities shall be designed, located and installed in such a way as to preserve the natural landscape, minimize impacts to scenic views, and minimize conflicts with present and planned land and shoreline uses.**

FINDING: Proposed utilities within the shoreline jurisdiction will be placed underground within the proposed right-of-way of the new intersection, including upsizing two culverts under SE Leadbetter Road. Underground utilities outside of rights-of-way will be replanted with native vegetation.

- 4. Transmission, distribution, and conveyance facilities shall be located in existing rights of way and corridors or shall cross shoreline jurisdictional areas by the shortest, most direct route feasible, unless such route would cause significant environmental damage.**

FINDING: Proposed underground utilities will primarily be placed with right-of-way. Proposed underground utilities proposed outside of right-of-way are placed in the most direct, shortest routes and mitigated with native vegetation.

- 5. Utility production and processing facilities, such as power plants and wastewater treatment facilities, or parts of those facilities that are nonwater-oriented shall not be allowed in the shoreline jurisdiction unless it can be demonstrated that no other feasible option is available, and will be subject to a shoreline conditional use permit.**

FINDING: Utility production and processing facilities are not proposed and therefore this criterion is not applicable.

- 6. Stormwater control facilities, limited to detention, retention, treatment ponds, media filtration facilities, and lagoons or infiltration basins, within the shoreline jurisdiction shall only be permitted when the following provisions are met.**

- a. The stormwater facility is designed to mimic and resemble natural wetlands and meets the standards of CMC 14.02 Stormwater and the discharge meets state water quality standards;**
 - b. Low impact development approaches have been considered and implemented to the maximum extent feasible.**

FINDING: There are no stormwater control, detention, or treatment facilities located within shoreline jurisdiction. Therefore, this criterion is not applicable.

- 7. New and modifications to existing outfalls shall be designed and constructed to avoid impacts to existing native aquatic vegetation attached to or rooted in substrate. Diffusers or discharge points**

must be located offshore at a distance beyond the nearshore area to avoid impacts to those habitats.

FINDING: Stormwater will outfall through two existing culverts that cross under SE Leadbetter Road to Lacamas Lake that are proposed to be upsized and will likely need additional riprap at the discharge point. As such, mitigation for the impacts will be required to include invasive plant removal and/or the installation of native plant material around the culverts. Mitigation for the culvert improvements will need to be included in the final mitigation plan.

- 8. Water reclamation discharge facilities (e.g. injection wells) are prohibited in the shoreline jurisdiction, unless the discharge water meets State Department of Ecology Class A reclaimed water standards...(excerpt)**

FINDING: This criterion is not applicable as no water reclamation facilities are proposed.

- 9. Where allowed under this program, construction of underwater utilities or those within the wetland perimeter shall be scheduled to avoid major fish migratory runs or use construction methods that do not cause disturbance to the habitat or migration.**

FINDING: This criterion is not applicable as the construction of underwater utilities or those within the wetland perimeter are not proposed.

- 10. All underwater pipelines transporting liquids intrinsically harmful to aquatic life or potentially detrimental to water quality shall provide automatic shut off valves.**

FINDING: This criterion is not applicable as no underwater pipelines are proposed.

- 11. Upon completion of utility installation/maintenance projects on shorelines, banks shall, at a minimum, be restored to pre-project configuration, replanted and provided with maintenance care until the newly planted vegetation is fully established. Plantings at installation shall be at least 2" minimum caliper at breast height if trees, five-gallon size if shrubs, and ground cover shall be planted from flats at 12" spacing, unless other mitigation planting is recommended by a qualified biologist and approved by the Administrator.**

FINDING: This criterion is not applicable as utility installation/maintenance projects on the bank of the shoreline is not proposed. However, additional plantings are included in the natural area tracts as part of the project improvements in the shoreline.

Variances	SMP Appendix B Section IX
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The proposed development includes setbacks for a public access road and utilities, which are not consistent with the SMP. As such, a variance is necessary to encroach into the required 100-foot right of way setback and underground utilities from the OHWM of the UC shoreline designation. The location for a portion of the roadway improvements and underground utilities, although closer than the required setbacks from the OHWM, are consistent with the SMP general policies as noted above at SMP Sections 3.2 *Shoreline of Statewide Significance* and 3.11 *Transportation, Utilities, and Essential Public Facilities* and SMP Section 5.7.10 *Site Planning*.

- A. A request for a variance to a development may be authorized when the applicant can demonstrate all the following:**

- 1. That if the applicant complies with the provisions of the Program then they cannot make any reasonable use of the property. The fact that there is the possibility that the property might make a greater profit by using the property in a manner contrary to the intent of the Program is not a sufficient reason for a variance.**

FINDING: SE Leadbetter Road sits at the site's frontage and is currently located within shoreline jurisdiction. As such, direct access (i.e. N Elk Drive) to the site from SE Leadbetter Road is required and the proposed location of N Elk Drive is necessary to accommodate steep slopes and the retention of trees on site. Although utilities lines will be placed within roadways to the greatest extent practicable, small sections of the proposed stormwater lines will be placed in the shoreline jurisdiction to maintain existing stormwater drainage patterns. As such, the placement of the vehicular entrance to the site and utilities are the least impactful alternative to the shoreline.

- 2. That the hardship is specifically related to unique conditions of the property (e.g. irregular lot shape, size or natural features) and not, for example, from deed restrictions or the applicant's own actions;**

FINDING: The variance is necessary due to the existing location of SE Leadbetter Road in the shoreline designation, where vehicular access to the site is provided from, and the site is further constrained by existing steep slopes, trees, and stormwater drainage patterns.

- 3. The variance requested is the minimum necessary to afford relief;**

FINDING: The proposed improvements within the 100-foot shoreline setback are limited to the connection of approximately 16-feet of the N Elk Drive entrance to the site and associated underground utilities into SE Leadbetter Road, the installation of approximately 23-feet of stormwater pipe west of the existing pump station to connect to the existing stormwater line in SE Leadbetter Road, the replacement of existing stormwater culverts within improved areas, and the construction of a stormwater outfall to the existing roadside ditch. Relocating these improvements further west for example, would result in greater impacts to the shoreline area.

- 4. That the variance will not constitute a grant of special privilege not enjoyed by other properties in the area;**

FINDING: N Elk Drive entrance to the site and associated utilities are necessary for the proposed residential development as required by the municipal code. Most of the proposed subdivision is located outside of the shoreline jurisdiction.

- 5. That the design of the project will be in harmony with the other authorized uses in the area, and the intent of the Program; and**

FINDING: The land uses in the area are recreational, due to the proximity of Lacamas Lake, vacant park land and nearby residential. The proposed development is designed with natural area tracts that include tree retention and a trail system that will provide better public access to these recreational areas and nearby residential uses.

- 6. That the public welfare and interest will be preserved; if more harm will be done to the area by granting the variance than would be done to the applicant by denying it, the variance will be denied.**

FINDING: Providing a public access trail, a site access intersection (N Elk Drive) at a location with an existing road, including the construction of a stormwater outfall pipe and improvements to existing culverts, helps preserve the public welfare and interest through public recreational access, transportation circulation and stormwater management.

- 7. If proposed waterward of the OHWM, then the public right of navigation and use will not be adversely affected.**

FINDING: No work is proposed in the water therefore this criterion is not applicable.

Conditional Use Permits**SMP Appendix B Section X**

As discussed throughout this report, the proposed activity is improvements to an arterial roadway in the “Urban Conservancy” shoreline environment, which is allowed as a conditional use per Table 6-1 of the SMP.

Pursuant to SMP, Appendix B, “*Conditional use approval may be granted only if the applicant can demonstrate all of the following*”:

1. The use will not cause significant adverse effects on the environment or other uses;

FINDING: No adverse effects are anticipated as two large natural area tracts for preservation are proposed within the shoreline area and proposed impacts are minimal, which will be restored to ensure no net loss of ecological functions.

2. The use will not interfere with normal public use of public shorelines;

FINDING: No interference with the public use of the shoreline will occur as the intersection of N Elk Road connecting to the existing SE Leadbetter Road currently in the shoreline and the proposed underground utilities outside of right-of-way will be replanted with native vegetation. Furthermore, the additional trail improvements will enhance public access to the shoreline.

3. Design of the development will be compatible with the surrounding authorized uses, the Program, and the comprehensive plan; and

FINDING: The proposed residential development has been designed with large natural area tracts to protect the shoreline and is compatible the existing surrounding recreational and residential uses. Construction is limited within the shoreline to N Elk Road entry road and associated utilities, water lines connecting to the existing roadside ditch in SE Leadbetter Road for stormwater management, new culvert crossings and a riprap outfall. The proposed development will provide no net loss to the function of the shoreline for Lacamas Lake, as well as providing a needed housing product to meet the housing needs of the comprehensive plan.

4. The proposed use is consistent with the general intent of the Program, and the Act.

FINDING: As discussed throughout this report, the proposed project improvements in the shoreline is designed to minimize ecological impact and to protect existing ecological function of the shoreline by providing two natural open space tracts. Further, the project will not interfere with other shoreline uses and will improve public access to the shoreline. The project is in conformance with the general intent of the SMP.

FINDINGS

Title 16 Environment

STATE ENVIRONMENTAL POLICY ACT (SEPA20-17)**CMC CHAPTER 16.07**

A SEPA checklist was submitted and a Mitigated Determination of Non Significance (MDNS) was issued May 6, 2021 as the proposed development includes more than ten residential dwelling units per CMC 16.07.020.A.1. The mitigation measures identified in the SEPA MDNS will need to be complied with (See Exhibit 26). The comment period ends May 20, 2021. As of the writing of this staff report, SEPA comments were received from Southwest Clean Air Agency (Exhibit 31).

FINDING: Staff finds the mitigation measures identified in the SEPA MDNS will need to be complied with.

ARCHAEOLOGICAL RESOURCE PRESERVATION (ARCH20-08)

CMC CHAPTER 16.31

An archaeological predetermination report was prepared for the site in 2010 for a larger residential subdivision development. A supplemental archaeological predetermination report was prepared in January 2021 for the current proposed residential development. Based on both reports, no further archaeological work is necessary at this time. The report and findings are not subject to the open public records act and as such, the city cannot disclose the results.

FINDING: Staff finds a condition of approval is warranted that if potential artifacts are discovered during the course of construction, work must immediately cease and both State Department of Archaeological and Historic Preservation and the City shall be notified.

CRITICAL AREAS (CA20-08)

CMC CHAPTER 16.51

CMC Chapter 16.53 Wetlands

Clark County GIS mapping identified the subject property with a wetland at the northern boundary. A *Critical Areas Report & Buffer Mitigation Plan* prepared by Ecological Land Services (ELS) dated November 18, 2020 (Exhibit 9) identified one Category III depressional, forested wetland on the preliminary plat as Tract S (Wetland A). Wetland A (2.46-acres) at the northern portion of the site is to be adjacent to a high land use intensity (i.e. residential), where an 150-ft. buffer is required per CMC Table 16.53.040-3.

The applicant is proposing to reduce the required buffer width on the south side of Wetland A from 150-ft to 110-ft. as allowed per CMC 16.53.050.C.1.a where high intensity land uses can be reduced to those for moderate intensity land uses if a) an undisturbed vegetated corridor at least 100-ft side is protected between the wetland and other priority habitats and 2) measures to minimize impacts of the land use adjacent to the wetlands are applied. At pages 5 and 6 of the *Critical Areas Report & Buffer Mitigation Plan*, an existing heavily dense forested area exists approximately 450 feet wide from the wetland to the northern property line, which will be preserved in Tract S. Furthermore, stormwater from the residential lots on the south side of the wetland buffer will be discharged to maintain wetland hydrology, as well as existing trees will be retained that do not pose a hazard, and house lights and outdoor speakers will be directed away from the wetland. Staff finds a condition of approval is necessary to ensure that Lots 135-152 direct outdoor lighting and speakers away from the wetland.

Buffer averaging is also proposed by the applicant, which is permitted per CMC 16.53.050.C.2. The edge of the 110-ft. wetland buffer adjacent to Lots 151, 152 and Tract R is proposed to be reduced approximately 0.262 acres in an area that currently lacks vegetation. The west end of the buffer is proposed to be increased 0.262-acres in a more sensitive area. Further, the buffer width is reduced no less than 75 percent of the required 110-feet, which is 82.5-feet, and therefore in compliance with CMC 16.53.050.C.2.

Any trees removed within a critical area buffer are required to be replaced at a mitigation ratio of 2:1 per CMC 16.51.125.B and shown on the final mitigation plan to be conditioned as such.

CMC 16.61 Fish and Wildlife Habitat Conservation Areas

Clark County GIS mapping identified the subject property with fish and wildlife habitat conservation areas (i.e. streams and Lacamas Lake). The *Critical Areas Report & Buffer Mitigation Plan* prepared by

Ecological Land Services (ELS) dated November 18, 2020 (Exhibit 9) identified three small, non-fish bearing streams on the preliminary plat within Tract S (Stream 1 and 2) and Tract A (Stream 3). Stream 1 flows derives offsite at the northwest portion of the site, travels through Wetland A and exits the site to the west. Stream 2 begins at the northern portion of the site and travels off site in the northwest direction for approximately 1,000 feet before joining Stream 1. At the southeast corner of the site, Stream 3 flows in the southwest direction from the Deerhaven Subdivision. The applicant has provided a 25-ft. wide buffer for Streams 1 and 3 and a 50-ft. wide buffer for Stream 2 consistent with CMC 16.61.040.D. No impacts to Stream 1 and 2 buffers are proposed. Stream 3 impacts include a section of the T-3 Regional Trail via a culvert. Mitigation should be addressed in the final mitigation plan and conditioned as such.

CMC Chapter 16.51 General Provisions for Critical Areas

Staff recommends a condition of approval for the installation of temporary construction fencing prior to construction that clearly marks in the field the critical area buffers and fencing should remain throughout permitted construction activities. In addition, prior to final plat approval, permanent signs and fencing should be installed at the edge of the critical area buffers per CMC 16.51.210.B and C. Sign and fencing specifications should be submitted to the City for review and approval prior to installation.

Prior to final plat approval, a conservation covenant should be recorded with the County to ensure long-term preservation of the critical areas and their associated buffer, including maintenance of any mitigation actions, per CMC 16.51.240 and conditioned as such. Further, a copy of the recorded conservation covenant document must be submitted to the City prior to final plat approval.

The applicant will be required to post a mitigation bond in an amount deemed acceptable by the City to ensure the stream mitigation is fully functional per CMC 16.51.250.

FINDING: Staff finds the project to be developable based on the findings in the *Critical Areas Report & Buffer Mitigation Plan* report prepared by Ecological Land Services (ELS) dated November 18, 2020. Staff finds a condition of approval is required that a final mitigation plan per CMC 16.53.050.E.3 submitted to the City for review and approval prior to final engineering plan approval.

CMC Chapter 16.59.060(C) Geotechnical Evaluation and Assessment

Clark County GIS mapping identified the subject property to contain geologically hazardous areas (i.e. steep slopes and landslide hazard areas). As such, the applicant submitted a Geotechnical Engineering Report dated July 2016 prepared by Hart Crowser including a supplemental memorandum dated November 2020. The reports indicated a northwest-trending slope abutting the north side of SE Leadbetter Road with variable landforms and slopes gentle to steep. At page 6 of the 2016 report, Hart Crowser found that “the soils do not present a slope stability hazard to the proposed development, if designed in conformance with the recommendations in this report” (See Exhibit ____). The City’s geotechnical consultant Earth Engineers, Inc. (EEI), performed a peer review of the geotechnical report and concurred that the report is in compliance with CMC 16.59.060 (Exhibit ____).

FINDINGS: Staff finds the property to be developable based on the findings and recommendations in the geotechnical reports. Staff finds a condition of approval is required that the geotechnical report recommendations in the Hart Crowser 2016 report and 2020 memo be complied with to minimize any potential hazards associated with construction.

Title 17 Land Development

CMC Chapter 17.11.030(D) Criteria for Preliminary Plat Approval:

The hearings examiner decision on 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.

Comprehensive Plan

The subject property is designated as Single-Family Medium in the City's Comprehensive Plan, which includes the Single-Family Residential (R-7.5) zone designation. Citywide Housing Goal H-1 states, "Maintain the strength, vitality, and stability of all neighborhoods and promotes the development of a variety of housing choices that meet the needs of all members of the community." To facilitate alternative housing choices, affordable housing and ageing readiness within the City of Camas, accessory dwelling units (ADU's) are an allowed use within the residential zones under CMC 18.07.040 Table 2 and should not be precluded in CC&R's.

Further, Neighborhood Goal LU-3 states, "Create vibrant, stable and livable neighborhoods with a variety of housing choices that meet all stages in the life cycle and a range of affordability." The side building elevations on corner lots are highly visible from the street and should exhibit architectural variation similar to the front of the building façade, including landscaping, in order to avoid blank walls thereby supporting the city's goal of creating vibrant and livable neighborhoods in Camas.

The Natural Environment Comprehensive Plan Policy NE-1.7 states, "Limit clearing, grading, and soil disturbance outside building footprints in order to maintain the natural hydrologic functions of the site." Due to the steep slopes, multiple retaining walls are utilized throughout the site to create flat lots, and therefore site grading should be minimized to retain the natural contours of the land.

Overall, the 2035 City of Camas Comprehensive Plan supports the subdivision through a number of land use and transportation policies such as the following:

- LU Policy 1.3: Maintain compatible use and design with the surrounding built and natural environments when considering new development or redevelopment.
- LU Policy 1.4: Ensure the park and recreation opportunities are distributed equitably throughout the City and work to achieve park and continuous trail corridors from Green Mountain to the Columbia River.
- LU Policy 3.3: Encourage connectivity between neighborhoods (vehicular and pedestrian) to support citywide connectivity and pedestrian access.
- LU Policy 3.4: Camas residents are protective of the small-town ambiance and family-friendliness of the community. Discourage exclusive neighborhoods, privacy walls, and gated communities.
- LU Policy 3.5: Where neighborhoods adjoin natural areas or trails, ensure connections through neighborhoods to enhance access to recreation amenities.
- LU Goal 4: Develop an 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.
- LU Policy 4.3: Encourage regional trail connectivity and increased access throughout the City to support multi-modal transportation and physical activity.
- T Policy 1.3: Construct streets that are interconnected and avoid long cul-de-sacs or dead ends.

- T Policy 2.1: Enhance travel choices and provide pedestrian and bicycle routes designed especially for them, not simply along routes designed for cars. Route planning should seek shortcuts and other opportunities that give walking or biking advantages over the automobile.
- T Policy 2.5: Coordinate with schools and the community to designate safe pedestrian and bicycle routes between residential areas, schools and public facilities.

Parks and Open Space Comprehensive Plan

The City of Camas adopted and updated the Parks, Recreation, and Open Space (PROS) plan in 2014. The subject site is located in an area identified by the PROS plan as requiring a trail connection, in particular the T-3 Multi-Use Regional trail which connects to the east and west of the site. Per the PROS plan at page 4-5, "Proposed segments of the trail system are generalized to make connections or follow the direction of natural corridors. Final alignments are subject to change due to environmental conditions, development or alternate routes." Further, trails should be off-street as much as possible per Objective 4A of the PROS plan.

The conceptual trail connection was presented to the Parks and Recreation Commission on March 24, 2021. The general public accessible trail connection will be provided as shown on Preliminary Site Plan (Exhibit 8); a east-west trail through proposed Tracts A and B connecting the existing sidewalk at SE Leadbetter Road / NE Adams Street to the City owned parcel to the west.

The placement of the trail should avoid the removal of existing healthy trees. The PROS plan identifies the T-3 trail as a Regional trail with a 12-foot paved width. To minimize impacts to existing trees and grading, staff finds the T-3 trail may be reduced to a minimum 6-feet wide with 8-feet in width where feasible to accommodate for maintenance vehicles and to be comprised of compact gravel. Directional trail signage should be provided as approved by the City. The trail should be constructed prior to final acceptance of phase one. Easement to be provided for city ownership and maintenance and conditioned as such. Said easement should be dedicated with the final plat.

FINDING: Staff finds that as conditioned the applicant can and will provide trail system consistent with the City's 2014 Parks, Recreation and Open Space Comprehensive Plan.

Neighborhood Traffic Management Plan

The City has a Neighborhood Traffic Management Plan (NTM). The NTM plan identifies the need for installation of acceptable traffic calming features when a proposed development will create 700 Average Daily Trips (ADT) or more. The submitted *Trip Update Letter* from Mackenzie, dated October 21, 2020, found the project is expected to generate approximately 1,528 Average Daily Trips (ADT) with 113 new AM peak hour trips and 152 PM peak hour trips.

Based on the projected number of ADTs noted in the October 21, 2020 TIA, staff recommends a condition of approval that prior to final engineering plan approval, the following onsite and offsite locations for traffic calming measures, shall be shown on the final engineering plans.

- The intersection of N 48th Avenue and N Adams Street; and
- N Adams Street at the creek crossing in the Deerhaven subdivision.
- Additional onsite traffic calming measures may be required. Applicant shall discuss with staff prior to final engineering plan approval.

FINDING: Staff finds that this proposed project is subject to the requirements for traffic calming measures, and as conditioned, can and will meet the requirements as noted in the City's NTM plan.

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.

Water: In accordance with CMC 17.19.040.C.4 Water System, each lot within a development shall be served by a water distribution system designed and installed in accordance with the city's *Design Standards Manual* (CDSM). There is an existing 12-inch ductile iron water main located in SE Leadbetter Road. The applicant has proposed to connect to the existing 12-inch water main and extend a 12-inch water transmission main to the northern most limits of the proposed development via N Elk Drive to the northeastern most end of N 50th Avenue in order to allow for the future extension of a water transmission main to serve the North Shore.

The applicant has proposed to construct the 8-inch water distribution system, which will be served from the new 12-inch transmission main via a pressure reducing vault to be located at the intersection of SE Leadbetter Road and N Elk Drive. The future 8-inch water distribution system will be for the benefit of the proposed development with water services provided to each dwelling unit as well as privately owned water services and meters for landscaping. The applicant will be required to extend the future 8-inch water distribution system to the limits of the proposed development at the dead-ends on N 49th Avenue and N 50th Avenue. Additionally, the applicant has proposed to connect to the existing 8-inch water main located at the existing dead-end on N Adams Street in the Deerhaven subdivision.

The applicant has proposed to construct a single trench for the 12-inch transmission main and the 8-inch water distribution main. Staff recommends a condition of approval that prior to final engineering plan approval, that the applicant should submit for review and approval the details for the shared waterline trench.

FINDINGS: Staff finds that adequate provisions for water, as conditioned, can or will be made.

Storm Drainage: In accordance with CMC 17.19.040.C.3 the storm drainage collection system shall meet the requirements of the city's stormwater standards and the city's *Design Standards Manual* (CDSM). There are existing road side ditches along the north side of SE Leadbetter Road which collects the surface runoff and discharges stormwater via a series of culverts crossing under SE Leadbetter Road to Lacamas Lake. The Deer Haven subdivision, located on the east side of the proposed development, has a creek that bisects the subdivision and flows northeast to southwest thru the future Tract A. This stream flows to the roadside ditch along SE Leadbetter Road and outfalls to Lacamas Lake via an existing culvert crossing. As stated in the preliminary stormwater report (TIR), Lacamas Lake is flow-control exempt per Volume 1, Chapter 3.4.7 of the 2019 edition of Ecology's *Stormwater Management Manual for Western Washington* (SWMMWW).

A preliminary stormwater report (TIR), dated November 2020, was prepared by AKS Engineering & Forestry. The preliminary TIR states that the stormwater from the proposed development will ultimately be directed to the existing ditch on the north side of SE Leadbetter Road and discharge to Lacamas Lake via existing culverts that cross under SE Leadbetter Road. The preliminary TIR did not provide verification that the existing culverts were sized to accommodate the combined flows from offsite and the proposed development. As Lacamas Lake is flow-control exempt, stormwater is not detained prior to release which would necessitate the need to verify the existing culverts. The applicant provided a memo, dated May 7, 2021, that addresses the upsizing of the culverts located within the Shoreline Jurisdiction. Staff recommends a condition of approval, that prior to final engineering plan approval, that the applicant should submit a final stormwater report (TIR) to the City for review and approval. The final TIR is to address the upsizing of the existing culverts located in the shoreline Jurisdiction.

The applicant has proposed to construct a stormwater collection system which will collect the majority of the site stormwater runoff via a series of catch basins, manholes, and conveyance piping. The proposed system will also provide a series of rear yard runoff collection systems for Lots 12-22 and Lots 135-152 that are to be located in private stormwater easements. Staff recommends a condition of approval that requires the private stormwater easements located on Lots 12-22 and Lots 135-152 to be owned and maintained by the HOA are to be shown on the final engineering plans and the final plat.

The applicant has proposed that the rear yard runoff from Lots 92-103 will be collected and dispersed onto neighboring properties, with the roof drains connected to storm laterals stubbed from the conveyance system in N Adams Court. Staff recommends a condition of approval that, prior to final engineering plan approval, the applicant should submit to the City, for review and approval a revised stormwater management plan for Lots 92-103. Said plan should ensure that adjacent parcels and downstream drainageways and/or properties will not be negatively affected, per Camas Municipal Code (CMC) 14.02 and 17.19.040.C as stated below:

- CMC 14.02 Stormwater Control:
14.02.010.B.2 Minimize damage to property from increased runoff rates and volumes.
- CMC 17.19 Design and Improvement Standards:
17.19.040.C.3 Storm Drainage - The storm drainage collection system shall meet the requirements of the city's officially adopted storm water standards.
17.19.040.C.3.e - All lots shall provide drainage for stormwater runoff from roof and footing drains to an approved drainage system. Rear yard low point area drains and/or storm drain lateral stubs connected to an approved drainage system shall be provided to each lot as necessary to prevent stormwater runoff impacts to adjoining parcels as determined by the city.

Per CMC 17.19.040.C.a, storm drainage facilities shall be placed on their own tract or within an open space tract and are to be maintained by the homeowners with the development in accordance with city standards. The applicant has proposed to construct a stormwater facility, which will be located on Tract R between Lot 151 and Lot 152 which will collect a small portion of the site runoff and then discharge from the storm facility to the wetlands located on Tract S.

As Lacamas Lake is a flow-control exempt water body, the applicant is not required to provide stormwater detention; however, treatment for pollution-generating surfaces is required. The applicant has proposed to provide treatment in the form of mechanical filter catch basins located within the street right-of-way, which is contrary to CMC 17.19.040.C.3.a. Staff does not support this proposal. Staff recommends a condition of approval that the applicant should locate any form of stormwater treatment in a dedicated Tract per CMC 17.19.040.C.a. Said requirement should be addressed and identified prior to final engineering plan approval in the final engineering construction drawings and all new stormwater tracts are to be identified on the final plat.

FINDINGS: Staff finds that adequate provisions for storm drainage, as conditioned, can or will be made.

Erosion Control: In accordance with CMC 14.06 Erosion Control, adequate erosion control measures are to be provided during the site improvements for the proposed development in accordance with the *Camas Design Standards Manual* (CDSM) and Ecology's *Stormwater Management Manual for Western Washington* (SWMMWW). Staff recommends a condition of approval that the applicant shall to submit the Erosion Sediment Control (ESC) plans, as a part of the site improvement plans, to the City for review and approval prior to final engineering plan approval.

In accordance with CMC 17.21.050.B.3 an erosion control bond, in the amount of 200% of the erosion control items is required for land-disturbing activities in excess of one acre. Staff recommends a condition of approval that the applicant should provide an Erosion Control Bond prior to final engineering plan approval and/or start of any land-disturbing activities.

Additionally, the applicant will provide a copy of both their *NPDES General Construction Stormwater Permit* (GCSWP) and their *Stormwater Pollution Prevention Plan* (SWPPP), which is a requirement of the NPDES GCSWP permit. The NPDES GCSWP permit is issued by the Washington State Department of Ecology for land-disturbing activities of an acre or more. The NPDES GCSW Permit and SWPPP are to be submitted to the City prior to start of any land-disturbing activities. Staff recommends a condition of approval that, prior to final engineering plan approval and/or start of any land-disturbing activities, a copy of the NPDES GCSW Permit and SWPPP are to be submitted to Engineering.

FINDINGS: Staff finds that adequate provisions for erosion control, as conditioned, can or will be made.

Sanitary Sewage Disposal: In accordance with CMC 17.19.040.C.2, sanitary sewers shall be provided and designed in accordance with the city's *Design Standards Manual* (CDSM). There is an existing sanitary sewer pump station located on the north side of SE Leadbetter Road to the west of the proposed intersection of SE Leadbetter Road and N Elk Drive. This sanitary pump station discharges to the existing sanitary sewer force main located in SE Leadbetter Road.

The applicant is proposing to construct an 8-inch gravity sewer main to serve the proposed development, including sanitary sewer laterals provided to each lot. The applicant will be required to extend the future 8-inch gravity sewer system to the limits of the proposed development at the dead-ends on N 49th Avenue and N 50th Avenue. The 8-inch gravity sewer main that will be located in the southern portion of N 48th Avenue will leave the public right-of-way at Lot 74 and proceed east-to-west behind Lots 44 - 50 and tie into the 8-inch gravity sewer main in N Elk Drive at Lot 41. This segment of the 8-inch gravity sewer main is to be located in a 20-foot wide paved utility access road. Staff recommends a condition of approval that the applicant should provide an access and maintenance easement to the city over and under the sanitary sewer main located in the utility access road. Said easement should be dedicated with the final plat.

The proposed gravity sewer main will discharge into the sewer pump station. There will be a segment of the public gravity sewer main, including manholes, that will be constructed across Tract B south of Lot 1. As Tract B will be owned and maintained by the HOA, a 15-foot wide sewer access and maintenance easement across Tract B to the city's sewer pump station will be required. Staff recommends a condition of approval that the applicant should provide a minimum 15-foot wide access and maintenance easement to the city over and under the sanitary sewer main located in Tract B. Said easement should be dedicated with the final plat.

The applicant is proposing to extend the gravity sewer main to the end of the private roads located on Tracts E, K, L, and M for the benefit of the adjacent lots. Staff recommends a condition of approval that the applicant should provide an access and maintenance easement to the city over and under the sanitary sewer main located within Tracts E, K, L, and M. Said easement should be dedicated with the final plat.

FINDINGS: Staff finds that adequate provisions for sanitary sewage disposal, as conditioned, can or will be made

Existing wells, septic tanks, and septic drain fields: CMC 17.19.020 (A 3) requires abandonment of existing wells, septic tanks, and septic drain fields. Any existing wells, septic tanks, and drain fields

should be properly abandoned and/or decommissioned in accordance with State and County guidelines prior to final plat approval. If applicable, any water rights associated with the abandoned well(s) shall be transferred to the City. Staff recommends a condition of approval that, if there are any existing wells or septic systems, documentation should be provided to engineering prior to final plat approval that said wells and/or septic systems have been properly abandoned and/or decommissioned in accordance with State and County guidelines.

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 Standards Manual and other State adopted standards and plans;

Roads: Streets for the proposed development shall be designed in accordance with CMC 17.19.040.B Streets.

[Public Roads]: The applicant has proposed to construct the interior public roads in accordance with Table 17.19.040-2.A Minimum Public Street Standards requiring a 52-foot wide right-of-way, 28-foot paved surface, 5-foot wide detached sidewalks and planter strips on both sides, and no parking permitted on one side. The proposed public road section is supported by the city engineer.

Per 17.19.040.B.1 half-width street improvements along an existing roadway is required when it is determined to be appropriate by the city engineer. The applicant is not proposing to construct the half-width street improvements along the frontage abutting SE Leadbetter Road due to the following constraints: the existing roadway abuts Lacamas Lake on the south side and an abundance of large mature fir trees line the length of SE Leadbetter Road along the north side. The applicant is proposing to limit the frontage improvements to the intersection of SE Leadbetter Road and the future N Elk Drive. The proposed frontage improvements plan is supported by the city engineer.

[Private Roads]: Per Table 17.19.040-1 Minimum Private Street Standard A, access to four dwelling units or less requires a minimum tract width of 20-feet, a minimum 12-foot wide paved surface, and no parking on either side. Additionally, streets more than 150-feet, as measured from the centerline of the adjacent road, require a dead-end turnaround. The applicant has proposed four (4) private streets accessing four dwelling units or less as described in the following tracts:

- a. Tract E provides access to future Lots 12 and 13 and is approximately 100-feet in length from the centerline of N 50th Avenue. The applicant proposed to meet Minimum Private Street Standard A. In order to provide for safe movement of emergency service workers, due to the private road sloping as much as 10% downhill from N 50th Avenue and the potential need for the use of fire truck outriggers, staff recommends the applicant should provide a 6-foot wide easement in addition to Minimum Private Street Standard A and conditioned as such. Said easement should be for emergency use.
- b. Tract K, providing access to future Lots 85, 86, 87, and 88, is approximately 330-feet in length from the centerline of N 48th Avenue and is proposed to meet Minimum Private Street Standard A with a dead-end turnaround, per CDSM. Due to the length of the proposed private road and the private road sloping up to 8.25% downward from N 48th Avenue, staff recommends a condition of approval that the applicant should widen Tract K from 20-feet to 24-feet with a paved surface of 24-feet, beginning at the southern property line of Lot 89. The applicant should design and construct a dead-end turnaround per CDSM with guardrail along the downslope radius and end of the road. Said design should meet the weight requirements for a fire engine (38K pounds) and fire truck (62K pounds) fully loaded with water, equipment, and staff.

- c. Tract L, providing access to future Lots 100, 101, and 102, is approximately 142-feet in length from the centerline of the cul-de-sac on N Adams Court with a retaining wall proposed between the western edge of the private access road and Lot 104. Tract L is proposed to meet Minimum Private Street Standard A. In order to provide for safe movement of emergency service workers, due to the adjacent Lot 104 being proposed at a lower elevation than the proposed street in Tract L, the proposed retaining wall being located on the property line between Lot 104 and the private street, and the potential need for the use of fire truck outriggers, staff recommends that the applicant should provide a minimum 20-foot wide tract with a minimum 18-foot paved surface, and that the design for the retaining wall adjacent to the road meet the weight requirements for a fire engine (38K pounds) and fire truck (62K pounds) fully loaded with water, equipment, and staff. Additionally, staff recommends a condition of approval that the applicant should provide a 6-foot wide easement in addition to Minimum Private Street Standard A, along the frontage of Lots 100 and 101 that allows for deployment of fire engine outriggers and safe movement around the engine. Said easement should be for emergency use.
- d. Tract M, providing access to future Lots 109, 110, 111, and 112, is approximately 133-feet in length from the centerline of N 49th Avenue. Tract M is proposed to meet Minimum Private Street Standard A. In order to provide for safe movement of emergency service workers, staff recommends a condition of approval that prior to final engineering plan approval, the applicant should provide a minimum 20-foot wide tract, with a minimum 18-foot paved surface. Additionally, staff recommends that the applicant should provide a 6-foot wide easement along the frontage of Lots 109 and 110, that allows for deployment of fire engine outriggers and safe movement around the engine. Said easement should be for emergency use.

The minimum curb radii on a public street with a 52-foot right-of-way width and 28-feet of paved surface is 25-feet. The Fire Marshal has determined that access from a public road with 52-feet of right-of-way onto private roads, without a minimum 25-foot curb radius has caused damage to existing curbs and sidewalks. Staff recommends a condition of approval that prior to final engineering plan approval, that the applicant will be required to work with staff to provide a minimum 25-foot curb radius or other approved designed access approach with thickened sidewalks, at the transitions from public road to provide road as follows:

- Tract E: A 25-foot curb radius is required on the south side only adjacent to Lot 11.
- Tract K: A 25-foot curb radius is required on the east side only adjacent to Lot 89. The access to Tract K is adjacent to private parking Tract J on the west side, therefore, the applicant has proposed to construct a thickened driveway approach from the west side of Tract J to the east side of Tract K.
- Tract L is adjacent to Lot 104, which consists of a narrow radius frontage. As such, the 25-foot curb radius is waived between Tract L and Lot 104; however, the applicant has proposed to construct a continuous thickened driveway approach across Lot 104 to the south property line of Lot 100.
- Tract M: A 25-foot curb radius is required on both sides of the private road, adjacent to Lot 109 on the east side and Lot 113 on the west side.

Per CDSM Table 1 – Guidelines for Geometry of Private Roadways, private street Standard A prohibits parking on both sides of the road. Staff recommends a condition of approval, prior to final engineering plan approval, the applicant should provide no parking and towing signs (with phone numbers), for review and approval, as the city does not provide for towing on private roads.

Utilities, Street Lighting, Street Trees, and Other Improvements:

[Street lighting]: LED Street lighting will be installed along all street frontages in accordance with the Camas Design Standards Manual (CDSM). The locations for street lights are to be coordinated with the locations of other site features; such as street trees, driveways, and other utilities. Staff recommends a condition of approval that street light locations are to be shown on the engineering and landscape plans prior to final engineering plan approval. Additionally, staff recommends a condition of approval that draft electrical plans for street lighting are to be submitted for review and approval by the City prior to submittal to Clark Public Utilities. Additionally, any street lighting proposed for private streets is required to be metered separately and are to be owned and maintained by the HOA.

[Street trees and Landscaping]: CMC 17.19.030 (F 1) requires one 2-inch diameter street tree in the planter strip of the right-of-way for each dwelling unit. The proposed street tree locations are shown on the Preliminary Landscape Plan, Sheets 90.-9.2 (Exhibit 8) in compliance with this requirement. Additionally, prior to final engineering approval, the applicant is to show proposed driveway locations for each lot to ensure that street trees are not impacted.

The street tree plantings and other landscaping as discussed throughout this report, should be included on the landscaping plans with final engineering plan submittal for the site improvements. Staff finds a condition of approval is required that the applicant submit to the City for review and approval a final landscape plan consistent with the landscaping standards in CMC Chapter 18.13, in addition to CMC Chapter 17.19.030.F.6, and include plantings from the City's approved plant list. Landscaping adjacent to or within tracts should be installed prior to final acceptance per CMC 17.19.030.F.3. Street trees adjacent to lots should be installed prior to final occupancy or bonded for per CMC 17.19.030.F.4.

[Storm Facility Landscaping]: CMC 17.19.030.F.6 requires that storm drainage facilities within 30-feet from any street or accessory structure to be landscaped with a 10-foot L2 buffer. The proposed storm facility located in Tract R should be landscaped with a L2 buffer at its lot lines and should be shown on the final landscape plans.

[Parking]: The proposed average lot size falls below 7,400 square feet and as such, the applicant has provided 30 parking stalls within Tracts C, D, G, J, N, O and P in compliance with this requirement in CMC 17.19.040.B.10.e. Subject to the requirements of CMC 18.13.060.A and E, parking areas are to be landscaped at all perimeters and provide a minimum 5-foot width of planting space.

FINDING: Staff finds that the applicant can or will make adequate provisions as conditioned for roads, 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.

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

The applicant's submittal includes proposed private stormwater easements for the benefit of Lots 1 thru 12; Lots 74 thru 83; Lots 43 thru 62; Lots 88 thru 91; Lots 103 thru 108; Lots 112 thru 115; and within private road Tracts E, L, and M. Staff recommends a condition of approval that the applicant should show the private stormwater easements on the construction drawings and on the final plat.

Additionally, a note is to be added to the face of the final plat stating that "the private stormwater easements, provided for the benefit of Lots 1 thru 12; Lots 74 thru 83; Lots 43 thru 62; Lots 88 thru 91; Lots 103 thru 108; Lots 112 thru 115; and within private road Tracts E, L, and M are to be owned and maintained by the applicable property owners." Said easement should be dedicated with the final plat.

The applicant is proposing to provide Internal public road to serve the development, with private roads that will provide access to several flag lots. Proposed Tracts E, K, L, and M are identified as private roads

(driveways) on the preliminary plat. Public sanitary sewer lines and private stormwater lines will be located within these private roads, as such the applicant is proposing to provide a blanket access and utility maintenance easement over the proposed private roads to the City of Camas at the time of final platting.

A homeowner's association (HOA) will be required and a copy of the CC&R's for the development will need to be submitted to the City for review and approval. Specifically, the applicant will need to make provisions in the CC&R's for ownership and maintenance of the storm drainage systems, fencing, walls, landscaping, irrigation, private roads, and tracts or easements outside of the City's right-of-way if applicable. Further, all necessary easements and dedications should be noted on the final plat.

FINDING: Staff finds that adequate provisions for dedications, easements and reservations can or will be made by the applicant at the time of final platting.

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

As shown on the preliminary plat, the proposed lots will have access onto a public or private street, have side lot lines that are generally perpendicular to the roadway they face and show building envelopes that are capable of site a square of 40 feet by 40 feet within the building envelope per CMC 17.19.030(D)(1-3).

[Density Transfer and Negotiated Preservation]: Proposed Tracts A and B on the preliminary plat is a natural area that includes a section of the T-3 Regional Trail as identified on the PROS plan and proposed Tract S contains wetlands and streams (i.e. critical areas), totaling approximately 16-acres. The applicant has the ability and has proposed to utilize the density transfer provisions per CMC 18.09.060.C when land is set aside in a tract for the protection of a critical area (i.e. wetlands and streams) or an approved recreational area (i.e. trails). As such, the City may provide additional or negotiated flexibility in lot sizes, lot width, lot depth, setback standards or lot coverage if the tract is a half-acre or more of contiguous land per CMC 18.09.060.D. Through negotiated preservation, the City has agreed to the applicant's request to reduce setbacks and increase lot coverage as discussed below provided the applicant incorporate in the plat a robust replanting plan in Tracts A and B and provide a natural play area or an active tot lot amenity centrally located within the plat.

At page 2 of the updated applicant's narrative (Exhibit 4) and as shown on preliminary plat plan sheets P9.0-P9.3 (Exhibit 8), a public overlook and a natural play area will be provided in Tract I in addition to a robust planting in open space tracts A and B.

[Lot sizes/dimensions]: The density of the overall site is well below the maximum allowed at 5.8 du/acre for the R-7.5 single-family residential zone. The density transfer provisions require a minimum lot size of 5,250 square feet and a maximum lot size of 9,000 square feet CMC 18.09.040.B Table 1. The proposed lots are between 5,900-9,000 square feet in size and meet the required minimum width of 60-feet and depth of 80-feet. Through negotiated preservation, the City agreed to the applicant's request to increase the lot coverage from 40 to 50%.

[Lot setbacks]: CMC 18.09.040.C- Table 2 specifies that "Setbacks are based on average lot sizes (not zone specific)". The average lot size for the proposed development falls under the 5,000 to 11,999 square foot range which requires a minimum 20-foot front yard setback, a 25-foot minimum rear yard setback, a 5-foot minimum side yard and corner rear yard setback and a 10-foot minimum side yard flanking a street setback. Through negotiated preservation, the City agreed to the applicant's request to 1) reduce the minimum front yard from 20 to 10-feet provided the garages are setback 20-feet from the right-of-way and setback 5-feet from the front of the dwelling per CMC 18.09.040-Table 2, Note 2 and 2) reduce the minimum rear yard from 25 to 15-feet. To allow for adequate sight distance, lots 31 and 32

will require larger front yard setbacks to include 15-feet to the house and 25-feet to the garage and will be conditioned as such. The minimum 40x40 building envelope and building setbacks should be shown on the final plat.

FINDINGS: Through negotiated preservation, staff concurs with the applicant's proposed changes to lot coverage and yard setbacks. Staff finds a condition of approval and plat notes are required that show the building envelopes and setbacks as described above on the final plat. Prior to engineering plan approval, the applicant should submit a final landscape plan that includes robust planting in Tracts A and B and final plans and specifications for the amenities in Tract I.

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

CMC Section 15.50.090 Clearing and Grading Standards:

CMC 15.50.090.A requires clearing and grading activities be conducted as to minimize potential adverse impacts to the vegetation, drainage and other natural features of the land. Clearing and grading should be conducted in a manner to preserve and enhance the city of Camas aesthetic character to include the preservation of unique landforms and natural features per CMC 15.50.090.E. Further, CMC 15.50.100.B requires the minimization of clearing and grading on slopes greater than 15%. Residential land development projects with steep slopes often include retaining walls for flatter lots, which may result in walls taller than 6-feet in height for lot design. To minimize clearing and grading and to further highlight the existing aesthetic landscape character of Camas, a revised clearing and grading plan with wall profiles and specifications should be submitted in compliance with CMC 18.17.060 *Retaining walls* prior to final engineering plan approval and conditioned as such.

CMC Section 18.07.030 Table 1 Sales Office Use

The application did not propose a sales office for the development. The absence of approval of a sales office consolidated with this Type III hearing, will limit sales office at the time of development to six months as a Temporary Use per CMC 17.07.040 Table 2 (Note 4). The applicant may provide for the contingency that a sales office use may be necessary for longer than six months. Staff finds that special conditions for the installation, use and removal of the sales office are appropriate, and are provided with this report if the applicant is in agreement.

FINDING: Staff finds a condition of approval is required that the mode home/sales office should be closed upon construction of the last residential structure.

CMC Chapter 18.13 Landscaping – Tree survey/Tree density

A minimum of 20 tree units (TU) per net developable acre (exclusive of critical areas) is required for residential development per CMC 18.13.051(A) Table 1- Required Tree Density and should be incorporated into the overall landscape plan. Based on the approximately 43.90 net developable acreage as identified in the Arborist Report (Exhibit 13), 878 TU's are required. The development proposes a final TU value post construction of 1,465 TU's to include retaining approximately 295 existing trees, planting 336 street trees and 61 trees within open space tracts, which exceeds the minimum TU per net acre requirement as described in the Arborist Report (Exhibit 13). In addition, 93 trees will be planted in the large natural area tracts (Tracts A and B) as noted at page 6 in the Applicant's supplemental narrative (Exhibit 4). Per the tree survey and arborist report, approximately 113 will be removed due to a number of factors including tree health, hazardous trees or to accommodate on-site improvements.

FINDING: Staff finds conditions of approval are required that trees identified for preservation and removal comply with the tree protection recommendations of the arborist report. Trees

proposed for retention on lots should install tree protection fencing on the outer perimeter of the critical root zone during construction. Preserved trees should be placed in a conservation easement or other permanent mechanism acceptable to the City. Any additional tree removal will require an updated arborist report for City review and approval from the City prior to removal. A note should be added on the face of the final plat that tree topping is prohibited.

CMC Chapter 18.34 Airport Overlay Zoning

The subject property is located within the Airport Overlay Zone C. An aviation easement is required to be recorded on the title that provides notice that the property is located within an air traffic area per CMC 18.34.020.B and included as a note on the final plat. Prior to building permit submittal, the applicant should consider construction techniques that would decrease the noise associated with the airport per CMC 18.34.080.A.

FINDINGS: Staff concurs that the proposed subdivision, as conditioned, can or will meet the requirements of Camas Municipal land development and zoning code including other relevant local regulations.

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

[Traffic Impact Analysis]: An original TIA, dated August 18, 2010, was prepared by Mackenzie with data from the 8th Edition (ITE) Manual and addressed the original CJ Dens preliminary plat application for 297 single-family lots. The revised CJ Dens preliminary plat application is for 152 single-family lots. The applicant submitted a *Trip Update Letter*, dated October 21, 2020, and prepared by Mackenzie, with data from the 10th Edition of the Institute of Transportation Engineer's (ITE) *Trip Generation Manual*, which addresses the trip generation changes between the 2010 TIA and the 2020 TIA.

The original 2010 TIA was prepared in accordance with a preliminary plat proposal for 297 single-family dwelling units, which resulted in 2,831 ADTs. Per *Table 1 – Trip Generation Comparison* of the 2020 TIA, there is a reduction of 105 fewer AM Peak Hour trips and 128 fewer PM Peak Hour trips, which results in a projected 1,528 ADTs with the revised preliminary plat proposal of 152 single-family dwelling units.

[Trip Distribution & Assignment]: The 2020 trip distribution assumed the same distribution as shown in the 2010 TIA with the exception that the number of access locations to the proposed development has been reduced from four to two. One access location is via SE Leadbetter Road and the second location is via the northern most end of N Adams Street, which was constructed with the Deerhaven subdivision.

[Sight Distance Analysis]: The posted speed limit on SE Leadbetter Road is 40 MPH. Per the 2010 TIA, speed studies were conducted near the proposed access which indicated that the 85th percentile speed was 49 to 50 MPH and based on AASHTO, using a design speed of 50 MPH, the minimum sight distances were 555-feet to the west for left-turns and 480-feet to the east for right-turns is recommend for vehicles exiting the subdivision onto SE Leadbetter.

The 2010 TIA reviewed the access location onto SE Leadbetter Road and states that adequate site distances can be provided within the vision clearance triangles at the proposed access location with vegetation management, limited sight grading, and signage locations in accordance with the City's code requirements as described in CMC 18.13 Landscaping and CMC 18.17 Supplement Development Standards.

[Turn Lane Warrants]: The City follows AASHTO recommendations for turn lanes on two-way local roadways, such as SE Leadbetter Road. Per the 2010 TIA, "except in special cases with exceptional volumes, AASHTO does not recommend turn lanes be provided on rural local roads ... nor for urban local roads" except for in commercial areas. As the exceptions for urban and rural turn lanes do not apply for

the proposed development, dedicated turn lanes are not warranted on SE Leadbetter Road at the access location.

FINDING: Staff finds that this development can or will meet any impacts identified by the transportation impact study.

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

A Homeowner's Association (HOA) will be required for this development. Conditions, Covenants, and Restrictions (CC&Rs) are to be submitted to the city for approval, prior to final plat approval, in order to ensure there adequate and appropriate measures are in place for the perpetual maintenance of private trails, retaining walls, fencing, landscaping on all tracts and street trees, private parking areas, active and passive recreational amenities, private roads, and the stormwater detention/treatment systems.

Staff finds a condition of approval is required that plat notes be added to the face of the final plat outlining the responsibility for ownership and maintenance of Tracts A – T as follows:

- Tracts A, B, and S are 'Natural Area' Tracts that are to be owned by the HOA. These tracts are to remain in a natural state. Any maintenance activities within the natural area tracts, including removal of invasive species and dead or dying trees, will require prior approval from the City.
- An easement is hereby granted to the City of Camas for ownership and maintenance of the T-3 trail located in Tracts A and B.
- Tracts C, D, G, J, N, O, and P are Private Parking areas that are to be owned and maintained by the HOA.
- Tracts E, K, L, and M are Private Access Roads that are to be owned and maintained by the HOA.
- Tracts F, H, I, and Q are Open Space Tracts, which are intended for passive and recreational uses, and are to be owned and maintained by the HOA.
- Tract R is a Stormwater Facility Tract to be owned and maintained by the HOA, with right-of-entry granted to the City for inspection purposes.
- Tract T consists of right-of-way that is dedicated to the City of Camas for future roadway improvements.

FINDING: Staff finds the applicant should place notes on the face of the plat as describes above that identifies the specific ownership and maintenance responsibilities for all tracts. The applicant should also submit to the City for review and approval a copy of the CC&Rs prior to final plat approval.

9. Appropriate provisions in accordance with RCW 58.17.110, are made for (a) the public health, safety, and general welfare, and (b)The public use and interest will be served by the platting of such subdivision and dedication;

The applicant is proposing privately owned and maintained tracts for natural area tracts, landscaping, a stormwater facility and private roads. Furthermore, the applicant is providing adequate and appropriate utilities for stormwater, water, and sanitary sewer that will be dedicated to the public. The applicant will also provide sidewalks with the proposed street construction for adequate pedestrian mobility.

FINDINGS: As discussed throughout this report, staff finds that the subdivision can be conditioned to provide the appropriate provisions for public health, safety, general welfare include serving the public use and interest.

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 RCW36.70B.030.

FINDINGS: Staff concurs that the proposed subdivision, as conditioned, can or will meet the requirements of RCW 58.17 and other applicable state and local laws that are in at the time of final platting. The final plat will be processed in accordance with the requirements of CMC 17.21.060.

TEMPORARY USE PERMIT (TUP20-05)

CMC CHAPTER 18.47

CMC Chapter 18.47.050 Criteria for Approval:

- 1. The temporary use will not be materially detrimental to the public health, safety or welfare, not injurious to property or improvements in the immediate vicinity;**

FINDINGS: Rock excavation is required as part of the site grading due to the existing shallow base rock. Opposed to hauling multiple truck loads of rock from the site, the applicant is proposing to use the excavated rocks for construction on site that requires the operation of a temporary mobile rock crusher. The temporary mobile rock crusher is proposed to be placed away from nearby residences and as such will not be materially detrimental to the public health, safety or welfare, nor injurious to property or improvements in the immediately vicinity. Prior to mobilization of the mobile rock crusher, the applicant should receive approval from Community Development Engineering for the placement of the equipment on site.

- 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 Chapter 18.07 "Use Authorization";**

FINDINGS: Although the temporary mobile rock crusher is not compatible with the residential zoning district and nearby properties, the temporary use will only be used during site construction and located away from residential properties.

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

FINDINGS: Although the temporary mobile rock crusher is generally not compatible in intensity and appearance with existing land uses in the immediate vicinity, the temporary use will only be used during site construction and located away from residential properties.

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

FINDING: Structures are not proposed with the temporary mobile rock crusher. Therefore, this criterion is not applicable.

- 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;**

FINDING: Parking will be available on-site during construction for the use of the temporary mobile rock crusher and will not occupy required off-street parking areas for nearby uses.

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

FINDING: The temporary mobile rock crusher will be used during site construction and may operate between the hours of 7am-7pm Monday-Friday and 7am-5pm Saturday, with no

operation on Sundays and Holidays, as outlined in CMC Chapter 9.32.050 or as approved by the City Engineer.

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

FINDINGS: The applicant indicated noise generated from the temporary mobile rock crusher will not be greater than noises to be expected during site construction and will be located away from nearby residences. The temporary mobile rock crusher will not generate any light or glare.

CMC Chapter 18.47.060 Time limitation:

A temporary use is valid for up to 180 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.

FINDING: Staff finds the temporary use is valid for 180 days. The applicant may request a 60-day extension per CMC 18.47.060. The temporary mobile rock crusher must be removed per CMC 18.47.080 at the expiration of the permit.

PUBLIC COMMENTS

As of the writing of this staff report, staff received one public comment concerning traffic impacts that were addressed by City Engineering (Exhibit 25).

CONCLUSION

Based on the above findings and discussion provided in this staff report, staff concludes that CJ Dens Subdivision (SUB20-02) should be approved, because it does comply with the applicable standards if all the conditions of approval are met.

RECOMMENDATION

Staff recommends APPROVAL of the preliminary plat of CJ Dens Subdivision (SUB20-02) subject to the following conditions of approval *in addition to* the conditions of the SEPA (SEPA20-17) permit:

CONDITIONS OF APPROVAL

Standard Conditions:

1. Engineering site improvement plans shall be prepared in accordance with the City of Camas Design Standards Manual (CDSM) and CMC 17.19.040.
2. The engineering site plans shall be prepared by a licensed civil engineer in Washington State and submitted to the City's Community Development (CDev) Engineering for review and approval.
3. Community Development (CDEV) Engineering shall collect a total 3% plan review and construction inspection (PR&CI) fee for the proposed development.
 - a. A preliminary construction estimate shall be submitted to CDEV Engineering prior to, or with, submittal of plans for first review. Payment of the 1% plan review (PR) fee shall be due prior to the start of the plan review process.
 - b. Payment of the 2% construction inspection (CI) fee shall be due prior to construction plan approval and release of approved plans to the applicant's consultant. Under no circumstances will the applicant be allowed to begin construction prior to construction plan approval.

4. Installation of public improvements shall be in accordance with CMC 17.21 Procedures for Public Improvements.
5. Existing water wells, septic tanks and septic drain fields shall be properly abandoned and/or decommissioned in accordance with State and County guidelines prior to final plat approval.
6. Any entrance structures or signs proposed or required for this project will be reviewed and approved by the City. All designs will be in accordance with applicable City codes. The maintenance of the entrance structure will be the responsibility of the homeowners.
7. The applicant will be responsible for ensuring that private utilities; underground power, telephone, gas, CATV, street lights, and associated appurtenances are installed.
8. A 6-foot private utility easement (PUE) shall be located outside of the right-of-way on public streets and outside of the tracts on private streets.
9. A draft street lighting plan shall be submitted for review prior to final plan submittal to Clark Public Utility.
10. The applicant will be required to purchase all permanent traffic control signs, street name signs, street lighting and traffic control markings and barriers for the improved subdivision.
11. Final plat and final as-built construction drawing submittals shall meet the requirements of the CMC 17.11.060, CMC 17.01.050, and the Camas Design Standards Manual.
12. The applicant shall remove all temporary erosion prevention and sediment control measures from the site at the end of the two-year warranty period, unless otherwise directed by the Public Works Director.
13. In the event any item of archaeological interest is uncovered during the course of a permitted ground disturbing action or activity, all ground disturbing activities shall immediately cease, and the applicant shall notify the City and the Department of Archaeology and Historic Preservation (DAHP).
14. A homeowner's association (HOA) will be required and a copy of the CC&Rs for the development will need to be submitted to the City for review and approval. Specifically, the applicant will need to make provisions in the CC&Rs for ownership and maintenance of the private storm drainage systems, open spaces, retaining walls, fencing, walls, landscaping, irrigation, private roads, and tracts or easements outside of the City's right-of-way if applicable. Further, all necessary easements and dedications should be noted on the final plat.
15. Accessory dwelling units shall not be precluded from CC&R's.
16. The applicant shall take appropriate measures to ensure landscaping success for a minimum of three years after issuance of Certificate of Occupancy. If planting fail to survive, the property owner shall promptly replace them.
17. Automatic fire sprinklers installed per NFPA 13D or 13R shall be required in all new residential structures.
18. Provisions for parking enforcement acceptable to the Fire Marshal shall be included in the CC&Rs at the time of final platting.
19. Building permits shall not be issued until this subdivision has been granted Final Acceptance and the Final Plat is approved and recorded by the Planning, Engineering, Building and Fire Departments.

Special Conditions:

Planning

20. The SEPA MDNS mitigation measures shall be complied with (city file no. SEPA20-17).
21. Best Management Practices (i.e. erosion control measures) shall be implemented throughout project construction.
22. Upon construction completion, areas of temporary disturbance shall be revegetated with native vegetation to pre-disturbance conditions.
23. Temporary construction fencing shall be installed prior to construction that clearly marks in the field the critical area buffers and remain in place throughout permitted construction activities.
24. Trees identified for preservation and removal shall comply with the recommendations of the Arborist Report.
25. Trees proposed for retention on lots shall install tree protection fencing on the outer perimeter of the critical root zone during construction.
26. Any additional tree removal shall require an updated arborist report for City review and approval prior to removal.
27. The model home/sales office shall be closed upon the construction of the last residential structure of each phase.
28. An aviation easement shall be recorded on the title that provides notice that the property is within an air traffic area.
29. Prior to rock blasting and crushing, the applicant shall contact the Fire Marshall's office for required permits.
30. Prior to mobilization of the mobile rock crusher, the applicant shall receive approval from Community Development Engineering for the placement of the mobile rock crushing equipment on site.
31. The temporary mobile rock crusher shall be removed per CMC 18.47.080 upon the expiration of the permit.

Prior to Final Engineering plan approval:

Planning

32. Prior to final engineering plan approval, the applicant shall submit to the City for review and approval a final mitigation plan per CMC 16.53.050.E.3 that also addresses the following:
 - a. Any trees proposed for removal within a critical area buffer shall be replaced at a mitigation ratio of 2:1.
 - b. Proposed mitigation for trail impacts to Stream 3.
 - c. Proposed mitigation for the culvert stormwater improvements under SE Leadbetter Road that discharge Lacamas Lake.
33. The applicant shall comply with the geotechnical report recommendations to minimize any potential hazards associated with construction.

34. The T-3 public access trail shall be generally located within Tracts A and B as shown on the preliminary plat and installed in a manner to avoid the removal of existing healthy trees where feasible. The following trail features shall be shown on the engineering plans and the final plat:
 - a. A 6-8 foot wide compact gravel trail with a maintenance vehicular turnaround at the west end of the trail.
 - b. Directional trail signage shall be provided and approved by the City.
35. The applicant shall show the proposed driveway locations for each lot to ensure that street trees are not impacted.
36. Prior to engineering plan approval, a final landscape, tree and vegetation plan consistent with the landscaping standards in CMC 18.13 shall be submitted to the City for review and approval to include the following but not limited to:
 - a. The stormwater facility located in Tract R shall be landscaped with a L2 landscape buffer at its lot lines.
 - b. Parking lot areas shall be screened at all perimeters with a minimum 5-foot width of landscaping.
 - c. Plants utilized shall be per the approved City's Tree list in the Camas Design Manual. Plants not on the approved City list, characteristic cards shall be submitted to the City for review and approval.
 - d. The planting specifications and landscape notes in the Camas Design Manual shall be included on the final landscape plan.
 - e. Irrigation shall be noted on the final landscape plan.
37. The applicant shall submit a final plan and specifications for the public outlook structure and play amenities in Tract I.
38. Prior to engineering plan approval, a revised clearing and grading plan with wall profiles and specifications shall be submitted in compliance with CMC 18.17.060 *Retaining walls*.

Engineering

39. Prior to final engineering plan approval, the applicant shall show the following onsite and offsite locations for traffic calming measures, on the final engineering plans.
 - a. The intersection of N 48th Avenue and N Adams Street; and
 - b. N Adams Street at the creek crossing in the Deerhaven subdivision.
 - c. Additional onsite traffic calming measures may be required. Applicant shall discuss with staff prior to final engineering plan approval.
40. Prior to final engineering plan approval, that the applicant shall be required to submit for review and approval the details for the shared waterline trench.
41. Prior to engineering plan approval, the applicant shall submit a final stormwater report (TIR) to the City for review and approval. The final TIR is to address the upsizing of the existing culverts located in the shoreline Jurisdiction.
42. The private stormwater easements located on Lots 12-22 and Lots 135-152 shall be owned and maintained by the HOA and to be shown on the final engineering plans and the final plat.

43. The applicant shall submit to the City, for review and approval a revised stormwater management plan for Lots 92-103. Said plan shall ensure that adjacent parcels and downstream drainageways and/or properties will not be negatively affected, per Camas Municipal Code (CMC) 14.02 and 17.19.040.C.
44. The applicant shall be required to locate any form of stormwater treatment in a dedicated Tract per CMC 17.19.040.C.a. Said requirement shall be addressed and identified prior to final engineering plan approval in the final engineering construction drawings and all new stormwater tracts are to be identified on the final plat.
45. Prior to final engineering plan approval, the applicant shall be required to submit the Erosion Sediment Control (ESC) plans, as a part of the site improvement plans, to the City for review and approval.
46. The applicant shall be required to provide an Erosion Control Bond, prior to final engineering plan approval and/or start of any land-disturbing activities.
47. Prior to final engineering plan approval and/or start of any land-disturbing activities a copy of the NPDES GCSW Permit and SWPPP are required to be submitted to Engineering.
48. The applicant has proposed four (4) private streets as described in the following tracts:
 - a. Tract E, the applicant shall provide a 6-foot wide easement in addition to Minimum Private Street Standard A. Said easement should be for emergency use.
 - b. Tract K, the applicant shall widen Tract K from 20-feet to 24-feet with a paved surface of 24-feet, beginning at the southern property line of Lot 89. The applicant shall design and construct a dead-end turnaround per CDSM with guardrail along the downslope radius and end of the road. Said design shall meet the weight requirements for a fire engine (38K pounds) and fire truck (62K pounds) fully loaded with water, equipment, and staff.
 - c. Tract L, the applicant shall provide a minimum 20-foot wide tract with a minimum 18-foot paved surface, and that the design for the retaining wall adjacent to the road meet the weight requirements for a fire engine (38K pounds) and fire truck (62K pounds) fully loaded with water, equipment, and staff. Additionally, staff recommends the applicant shall provide a 6-foot wide easement in addition to Minimum Private Street Standard A, along the frontage of Lots 100 and 101 that allows for deployment of fire engine outriggers and safe movement around the engine. Said easement shall be for emergency use.
 - d. Tract M, the applicant shall provide a minimum 20-foot wide tract, with a minimum 18-foot paved surface. Additionally, staff recommends that the applicant shall provide a 6-foot wide easement along the frontage of Lots 109 and 110, that allows for deployment of fire engine outriggers and safe movement around the engine. Said easement shall be for emergency use.
49. Prior to final engineering plan approval, the applicant shall work with staff to provide a minimum 25-foot curb radius or other approved designed access approach with thickened sidewalks, at the transitions from public road to provide road as follows:
 - a. Tract E: A 25-foot curb radius is required on the south side only adjacent to Lot 11.
 - b. Tract K: A 25-foot curb radius is required on the east side only adjacent to Lot 89. The access to Tract K is adjacent to private parking Tract J on the west side, therefore, the

applicant has proposed to construct a thickened driveway approach from the west side of Tract J to the east side of Tract K.

- c. Tract L: is adjacent to Lot 104, which consists of a narrow radius frontage. As such, the 25-foot curb radius is waived between Tract L and Lot 104, however the applicant has proposed to construct a continuous thickened driveway approach across Lot 104 to the south property line of Lot 100.
 - d. Tract M: A 25-foot curb radius is required on both sides of the private road, adjacent to Lot 109 on the east side and Lot 113 on the west side.
- 50. Prior to final engineering plan approval, the applicant shall provide no parking and towing signs (with phone numbers), for review and approval, as the city does not provide for towing on private roads.
 - 51. Prior to final engineering plan approval, the applicant shall show the private stormwater easements on the construction drawings.
 - 52. Street light locations shall be shown on the engineering and landscape plans prior to final engineering plan approval.
 - 53. Draft electrical plans for street lighting shall be submitted to the city for review and approval, prior to submittal to Clark Public Utilities. Additionally, any street lighting proposed for private streets shall be metered separately and shall be owned and maintained by the HOA.
 - 54. Street names shall be reviewed and approved by the Building Department prior to final engineering plan approval.

Prior to Final Plat approval:

Planning

- 55. A note shall be added to the face of the final plat that all required tree plantings shall be maintained in good health and shall be promptly replaced (within six months) if damaged or in poor health.
- 56. A note shall be added to the face of the final plat that Lots 135-152 shall direct outdoor lighting and speakers away from the wetland.
- 57. A note shall be added to the face of the final plat that tree topping is prohibited.
- 58. A conservation covenant shall be recorded with the County to ensure long-term preservation of the critical areas and their associated buffers, including maintenance of any mitigation actions per CMC 16.51.240, as well as trees to be retained on site. A copy of the recorded conservation covenant shall be submitted to the City prior to final plat approval.
- 59. A mitigation bond shall be posted in an amount deemed acceptable by the City to ensure the mitigation is fully functional per CMC 16.51.250.
- 60. The trail shall be constructed prior to final plat approval and owned and maintained by the City.
- 61. Building envelopes and setbacks shall be shown on the final plat.
- 62. A note shall be added to the face of the final plat that the lots within this subdivision are located within an air traffic area.
- 63. Notes shall be placed on the final plat that identifies the specific ownership and maintenance responsibilities for all tracts.

Engineering

64. The applicant shall provide an access and maintenance easement to the city over and under the sanitary sewer main located in the Utility Access Road located behind Lot 41 and Lots 44 thru 50. Said easement shall be dedicated with the final plat.
65. The applicant shall provide a minimum 15-foot wide access and maintenance easement to the city over and under the sanitary sewer main located in Tract B. Said easement shall be dedicated with the final plat.
66. The applicant shall provide an access and maintenance easement to the city over and under the sanitary sewer main located within Tracts E, K, L, and M. Said easement shall be dedicated with the final plat.
67. If there are any existing wells or septic systems, that prior to final plat approval, documentation be provided to engineering that said wells and/or septic systems have been properly abandoned.
68. The applicant shall provide private easements for stormwater lines. These easements shall be shown on the construction drawings and the final plat for recording.
69. The applicant shall submit to the City for review and approval a copy of the CC&R's.

Prior to Final Acceptance:

70. Permanent signs and fencing shall be installed at the edge of the critical area buffers per CMC 16.51.210.B and C. Sign and fencing specifications shall be submitted to the City for review and approval prior to installation.
71. Landscaping and irrigation adjacent to or within tracts shall be installed or bonded for as approved on the final landscape plans prior to final acceptance.

Prior to Building Permit approval:

72. The applicant shall consider construction techniques that would decrease the noise associated with the airport.

Prior to Final Occupancy:

73. Street trees with a minimum two-inch diameter at breast height and irrigation shall be installed or bonded for and located within the planter strip as approved on the final landscape plans prior to final occupancy. Specified trees shall be maintained in good health, and damaged or dying trees shall be promptly replaced (within six months) by the homeowner.
74. The applicant shall provide acceptable back flow device(s) (BFD) and yearly backflow testing for any private HOA irrigation service(s) proposed.
75. Prior to occupancy of each home with an irrigation system, the builder shall submit acceptable BFD testing for each irrigation meter installed and provide said testing results to the city.

Proposed Plat Notes

1. A homeowner's association (HOA) will be required for this development. Copies of the CC&R's shall be submitted and on file with the City of Camas.
2. The homeowner's association (HOA) is responsible for maintaining all private roads and associated infrastructure in this subdivision, including but not limited to the pavement, curbs, sidewalks, walls, landscaping, street lights and storm drainage utilities.

3. All costs associated with the installation of the step systems for individual lots will be the responsibility of said individual lot owners.
4. An access and utility maintenance easement is provided to the City over the private street tracts for the inspection, maintenance and operation of said public water lines.
5. A right of entry is hereby granted to the City of Camas for the repair and maintenance of the individual S.T.E.F systems located on the lots within the plat.
6. The following setbacks shall apply: Front yard 10-feet, Front yard garage setback 20-feet, Rear yard 15-feet, Side yard 5-feet, Corner rear yard 5-feet, Side yard flanking a street 10-feet. Garage setback from front of the dwelling is 5-feet. Lot coverage is 50%.
7. The following front yard setbacks shall apply to Lots 31 and 32: Front yard 15-feet, Front yard garage setback 25-feet.
8. No further short platting or subdividing will be permitted once the final plat has been recorded.
9. A final occupancy permit will not be issued by the Building Department until all subdivision improvements are completed and accepted by the City.
10. The lots in this subdivision are subject to traffic impact fees, school impact fees, and park/open space impact fees. Each new dwelling unit will be subject to the payment of appropriate impact fees at the time of building permit issuance or as otherwise provided by the city.
11. Prior to the Building Department issuing a Certificate of Occupancy, each lot shall install a minimum of one 2" caliper tree to be located in the planter strip as specified on the plat. Specified trees shall be maintained in good health, and damaged or dying trees shall be promptly replaced (within six months) by the homeowner.
12. Automatic fire sprinkler systems designed and installed in accordance with NFPA 13D are required in all structures.
13. Illegally parked vehicles may be subject to towing or other private parking enforcement measures in accordance with the provisions outlined in the HOA documents.
14. Prior to occupancy for each home with an irrigation system, the builder shall submit acceptable back flow device (BFD) testing for each irrigation meter installed and provide said testing results to the City.
15. Lots 135-152 shall direct outdoor lighting and speakers away from the wetland.
16. Tree topping is prohibited.
17. The lots within this subdivision are located within an air traffic area.
18. Tracts "A", "B", and "S" are Natural Area Tracts that are to be owned by the HOA. These tracts are to remain in a natural state. Any maintenance activities within the natural area tracts, including removal of invasive species and dead or dying trees, will require prior approval from the City.
19. An easement is hereby granted to the City of Camas for ownership and maintenance of the T-3 trail located in Tracts A and B.
20. Tracts C, D, G, J, N, O, and P are Private Parking areas to be owned and maintained by the HOA.
21. Tracts E, K, L, and M are Private Access Roads to be owned and maintained by the HOA.
22. Tracts "F", "H", "I" and "Q" are Open Space Tracts, which are intended for passive and recreational uses, to be owned and maintained by the HOA.
23. Tract "R" is a Stormwater Facility Tract to be owned and maintained by the HOA with right-of-entry granted to the City for inspection purposes.

24. Tract "T" consists of right-of-way that is dedicated to the City of Camas for future roadway improvements.
25. The private stormwater easements, provided for the benefit of Lots 1 thru 12; Lots 74 thru 83; Lots 43 thru 62; Lots 88 thru 91; Lots 103 thru 108; Lots 112 thru 115; and within private road Tracts E, L, and M are to be owned and maintained by the applicable property owners.