

Carey Certo

From: Myles X <mylesoncraigslis@gmail.com>
Sent: Monday, August 24, 2026 11:25 AM
To: Community Development Email
Subject: Re: Say NO to the Proposed Uhacz Subdivision

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Hi Carey,

After having the weekend to maul over this soon-to-be tawdry, real estate abomination I would actually like to amend my public statement. Please see below:

Dear Members of the Camas City Council:

Re: Uhacz Subdivision — File No. SUB26-1011

I write not in a spirit of obstruction, but in furtherance of that rigorous, evidence-based scrutiny which is *de rigueur* for an application of this character: the proposed Uhacz Subdivision, comprising thirty-two (32) single-family lots upon approximately 6.98 acres zoned R-6.

I do not gainsay that residential development of this general density may be facially permissible under the R-6 designation, nor that the City labors under an obligation to accommodate growth. The question properly before the Council, however, is not whether such density is permissible as a matter of zoning classification, but whether this particular application, situated upon this particular parcel, satisfies every substantive standard governing transportation, emergency access, drainage, pedestrian circulation, and the reasonable expectations of the surrounding milieu. Permissibility in the abstract is not, and cannot be treated as, a proxy for adequacy in application — the two inquiries share no common *raison d'être*.

I. Transportation and Emergency Access

The traffic analysis must transcend average daily trip generation and confront peak-period conditions — most acutely, the confluence of subdivision-generated traffic with existing school arrival and dismissal congestion. Paramount among my concerns is whether queuing at points of ingress and egress would impede fire apparatus, ambulances, or other first responders. Emergency access is not a quotidian traffic-engineering nicety amenable to *laissez-faire* treatment; it is a public-safety exigency, and a network efficacious under average conditions may nonetheless prove wanting at precisely those intervals when access is most urgently required. I request an affirmative finding — grounded in peak-condition analysis, not comfortable averages — that emergency access shall remain assured.

II. Pedestrian and Student Safety

The subdivision must be assessed as an integral component of the extant pedestrian network, not considered in splendid isolation. Vehicular ingress and egress alone do not constitute adequate infrastructure; safe, continuous circulation for pedestrians, cyclists, and schoolchildren must equally be demonstrated. Where gaps or conflicts obtain along established or foreseeable school-route corridors, the Council should condition approval upon such sidewalks, crossings, illumination, or traffic-calming measures as a genuine remedy requires.

III. Open Space and Livability

A meaningful distinction — too often elided — obtains between land merely undeveloped and land that functions as usable recreational open space. A drainage tract, a precipitous slope, a residual strip of landscaping: none, by its bare existence, discharges the open-space demand attendant upon thirty-two new households. I do not ask the City to exceed its statutory competence; I ask only that it determine, without recourse to naïveté, whether the proposal furnishes open space commensurate with the overall density of the newly proposed community.

IV. Stormwater and Drainage

The conversion of some seven acres to intensive residential use will, of necessity, augment impervious surface and perturb existing drainage regimes. The administrative record must affirmatively demonstrate — and not merely presume from the *fait accompli* of a submitted stormwater plan — that the proposed system adequately addresses on-site detention, conveyance, downstream capacity, erosion, and long-term maintenance.

V. Grading, Geotechnical Conditions, and Adjacent-Property Impacts

Where the site requires substantial grading, slope modification, or retaining structures, the Council's inquiry must reach beyond mere engineering feasibility to whether construction and subsequent operation might occasion instability, erosion, or drainage harm to neighboring parcels. Instability attributable to negligent siting ought not, *après coup*, be recast as an act of God or *force majeure*; any necessary geotechnical or retaining-wall requirements should be reduced to specific, enforceable conditions of approval.

VI. Cumulative Effects

I urge the Council, above all else, to weigh these impacts cumulatively rather than piecemeal. Thirty-two lots generate, *en masse*, not merely thirty-two structures but a concomitant increment in vehicular and pedestrian traffic, in emergency-access demand, and in pressure upon existing public facilities. A proposal may satisfy each discrete regulatory threshold considered in isolation while nonetheless producing cumulative impacts materially inconsonant with the character of the surrounding milieu — which is precisely the *raison d'être* of site-specific review.

VII. Requested Findings

I respectfully request that the administrative record affirmatively establish:

1. That the existing transportation network can safely accommodate anticipated traffic, including during peak school periods;

2. That emergency-vehicle access will remain assured notwithstanding peak-period congestion;
3. That safe, continuous pedestrian connections to surrounding streets, schools, and parks will be provided;
4. That usable open space is commensurate with the proposed density;
5. That stormwater and drainage impacts upon neighboring and downstream properties have been adequately mitigated;
6. That grading and geotechnical conditions will not impose unreasonable risk upon adjacent properties;
7. That existing infrastructure and public facilities suffice to serve the development; and
8. That any deficiency identified is remedied through specific, enforceable conditions precedent to approval, rather than conditions imposed *après coup*.

I contend, rather, that on the record *en l'état*, the applicant has failed to substantiate that this particular subdivision, at this particular density, may be accommodated safely and responsibly — and that, given the extent of the deficiencies canvassed above, the appropriate *démarche* is not further deferral but denial. To approve this application now, upon an incomplete record, would be to treat the eventual resolution of material questions as a *fait accompli*, when in truth they remain wholly unresolved.

I therefore respectfully recommend that the Council reject the application as presently constituted, anything less would fail to accord this application the site-specific scrutiny that its scale and intensity deserve.

Respectfully,

An exhausted and perplexed citizen of Camas