

January 21, 2021

Sarah Fox
City of Camas Senior Planner
Community Development Department
612 NE Fourth Avenue
Camas, WA 98607

**Re: File No. PA20-48 - Discover Recovery's Conditional Use Application for a
Convalescent Home Use**

Dear Sarah Fox:

Discover Recovery submits a conditional use application for a change of use from assisted living use to convalescent home use on land designated R-12 ("Application"). The subject property is located at 2213 NW 23rd Avenue, in the City of Camas, Washington. Enclosed to this Application includes a completed general application form along with required materials in accordance with the Pre-application Notes dated December 10, 2020, as follows:

- 1) General application form and appropriate fee; and
- 2) Narrative Description with attached exhibits.

If you have any questions, please contact me by phone at (202) 379-8359 or by e-mail at Thomas@telloshealth.com. Thank you for your time and consideration.

Sincerely,

Thomas Feldman



Community Development Department | Planning
616 NE Fourth Avenue | Camas, WA 98607
(360) 817-1568
Permits@CityofCamas.us

General Application Form

Case Number: PA20-48

Applicant Information

Applicant/Contact: Tom Feldman Phone: (202) 379-8359
Address: c/o Perkins Coie, Attn: Nikesh Patel Thomas@telloshealth.com
Street Address *E-mail Address*
1120 N.W. Couch Street, 10th floor, Portland, OR 97209-4128
City *State* *ZIP Code*

Property Information

Property Address: 2213 NW 23rd Avenue 124783000
Street Address *County Assessor # / Parcel #*
Camas WA 98607
City *State* *ZIP Code*
Zoning District R-12 Site Size 2.39 acres

Description of Project

Brief description: Conditional use application for convalescent home use on land designated R-12.

Are you requesting a consolidated review per CMC 18.55.020(B)? YES ☐ NO ☒
Permits Requested: ☐ Type I ☐ Type II ☒ Type III ☐ Type IV, BOA, Other

Property Owner or Contract Purchaser

Owner's Name: Foyt Jack Phone: ()
Last *First*
5619 N Classen Blvd, Oklahoma City, OK 73118
Street Address *Apartment/Unit #*
E mail Address: jcfoyt@gmail.com
City *State* *Zip*

Signature

I authorize the applicant to make this application. Further, I grant permission for city staff to conduct site inspections of the property.

Signature: [Signature] Date: 1/21/2021

Note: If multiple property owners are party to the application, an additional application form must be signed by each owner. If it is impractical to obtain a property owner signature, then a letter of authorization from the owner is required.

Date Submitted: _____ Pre-Application Date: _____

Staff: _____ Related Cases # _____

☐ Electronic
Copy
Submitted

Validation of Fees



Community Development Department | Planning
616 NE Fourth Avenue | Camas, WA 98607
(360) 817-1568
Permits@CityofCamas.us

General Application Form

Case Number: PA20-48

CUP21-01

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Property Owner or Contract Purchaser

Owner's Name: Foyt Jack Phone: ()
Last First
5619 N Classen Blvd, Oklahoma City, OK 73118
Street Address Apartment/Unit #
E mail Address: jcfoyt@gmail.com
City State Zip

Signature

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Signature:  Date: 1/21/2021

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Date Submitted: 1/21/21	Pre-Application Date:
Staff: SF	Related Cases # PA20-48
<input checked="" type="checkbox"/> Electronic Copy Submitted	Validation of Fees

Revised: 01/22/2019

2213 NW 23rd Ave, Camas, WA -
Narrative in Support of the Conditional Use Application
Proposed by Discover Recovery
for Application No. PA20-48
Dated January 21, 2021

Discover Recovery (“Applicant”) submits this narrative with respect to its request for approval of a conditional use permit for a maximum 15-bed convalescent home use on land designated R-12 (“Application”). The subject property is located at 2213 NW 23rd Avenue, in the City of Camas (“City”), Washington (“Property”).

This document summarizes and analyzes the subject Property, the proposed use on the Property, and how the Applicant satisfies applicable criteria subject to the Application. As provided below, the Application is subject to criteria in Title 18 of Camas Municipal Code (“CMC”), specifically including but not limited to: Chapter 18.07 (Use Authorization); Chapter 18.45 (Conditional Use Permit); and Chapter 18.55 (Administrative Procedures). The purpose of this summary is to request authorization of the Application and to provide relevant information to assist the City during its conditional use review of the Application under applicable standards.

I. Executive Summary.

Applicant’s proposed 15-bed convalescent home use is a conditional use on the subject Property zoned R-12. Applicant will provide full-time care and treatment for individuals seeking to recover from disorders in the abuse of drugs, alcohol, and other substances. Applicant will also provide a safe and holistic setting staffed with medical and clinical professionals to help those who are suffering from substance use disorders. As explained below, based on the reasons and evidence provided, the proposed convalescent home use satisfies all applicable approval criteria subject to this Application.

II. Background Property Information.

The Property is 2.39 acres in lot size and consists of a single parcel on developed land. The Property is currently in use as a 15-bed assisted living facility. Previously, the Property received approval for a bed and breakfast and events use, under a conditional use permit, with 8 rooms and parking spaces for guests and events. *See* CUP98-06. Thereafter, the Property received approval with conditions to change from a bed and breakfast use to a 15-bed assisted living facility with 19 parking spaces for employees and residents. *See* CUP13-04. Applicant’s proposal is to change the current use on the Property into a maximum 15-bedroom convalescent home use.

Further, the Property is located in the City and subject to City zoning and land use regulations. The Property is sited in the R-12 base zone. This zone is intended for single-family dwellings with densities of three to four dwelling units per acre. The zone is designated for areas with steep topography for greater flexibility in site layout, and where potential hazards do not exist. The

average lot size is twelve thousand square feet. CMC 18.05.040. The Property is not located within any City overlay zoning designation.

R-12 is a residential zone that permits many residential use designations including, but not limited to: adult family home, residential care facility, supported living arrangement, or housing for the disabled, assisted living, and a nursing, rest or convalescent home. CMC 18.07.040 - Table 2. In relevant part, in the R-12 zone, a nursing, rest or convalescent home is a conditional use, as is the current assisted living use. CMC 18.07.040 - Table 2.

III. Proposal.

Applicant will provide accommodations for up to 15 individuals and full-time care and treatment for individuals seeking to recover from disorders in the abuse of drugs, alcohol, and other substances. The Application does not propose any exterior changes or additions on the Property. While some minor interior upgrades may be made (deferred maintenance, painting), the change in use will not require any modifications to the exterior of the building or expansions to its footprint.

Applicant's proposed use on the Property constitutes a convalescent home. A nursing, rest or convalescent home is defined as: "an establishment which provides full-time care for three or more chronically ill or infirm persons. Such care shall not include surgical, obstetrical or acute illness services." CMC 18.03.030. "Convalescent" is not defined by the Code, so its common meaning is used to guide interpretation of the term. As provided in Webster's dictionary, "convalescent" means "recovering from sickness or debility: partially restored to health or strength."¹ Further, the ordinary meaning of "convalesce" means "recovering from sickness or debility."² In sum, the goal of a convalescent home is to simply get a patient well enough to return home.

Specifically, Applicant will provide care and treatment services for up to 15 individuals seeking to recover from the abuse of drugs, alcohol, and other substances. Applicant's care and treatment services do not include surgical, obstetrical, or acute illness services. Rather, Applicant focuses on providing a therapeutically planned living and rehabilitative intervention environment for the treatment of individuals. As such, Applicant will provide services to support the needs of individuals struggling with substance abuse disorders. Accordingly, the proposed use is characterized as a "convalescent home" consistent with City code.

¹ "Convalescent," Webster's Dictionary, <https://www.merriam-webster.com/medical/convalescent#:~:text=1%20%3A%20recovering%20from%20sickness%20or,convalescent%20stages%20a%20convalescent%20ward>.

² "Convalesce," Webster's Dictionary, <https://www.merriam-webster.com/dictionary/convalesce>.

IV. Conditional Use Application Requirements.

i. Procedure.

Pursuant to CMC 18.55.030(C), a conditional use application is subject to a Type III procedure, including public notice and a hearing. Compliance with this process will ensure that this criterion is met.

ii. Application Requirements.

Pursuant to CMC 18.55.100, the Application will be filed with the planning department office on forms provided by the City. The Application will be accompanied by the appropriate filing fee and all necessary supporting documentation and information sufficient to demonstrate compliance with all applicable approval criteria. Compliance with these application requirements will ensure that this criterion is met.

iii. Submittal Requirements.

CMC 18.55.110(A)-(H) sets forth required information to be submitted for this Application. Applicant has submitted a complete and accurate Application, including supporting documentation. This Application thereby satisfies all applicable submittal requirements. The submittal requirements and responses to each requirement are set forth below.

18.55.110 APPLICATION—REQUIRED INFORMATION

A. A copy of a completed city application form(s) and required fee(s);

RESPONSE: The Application will include a completed general application form provided by the City and will be accompanied by the applicable filing fee.

B. A complete list of the permit approvals sought by the applicant;

RESPONSE: Applicant submits this Application seeking the approval of a conditional use permit to authorize the operation of a convalescent home on the Property. No other permit approvals are sought by the Applicant.

C. A current (within thirty days prior to application) mailing list and mailing labels of owners of real property within three hundred feet of the subject parcel, certified as based on the records of Clark County assessor;

RESPONSE: The Application includes a current mailing list and mailing labels of owners of real property within three hundred feet of the subject Property, certified as based on the records of Clark County assessor. The list and labels are attached as Exhibit A. The list and labels were prepared within thirty days prior to the filing of this Application.

D. A complete and detailed narrative description that describes the proposed development, existing site conditions, existing buildings, public facilities and services, and other natural features. The narrative shall also explain how the criteria are or can be met, and address any other information indicated by staff at the preapplication conference as being required;

RESPONSE: The Application provides a complete and detailed narrative description in support of Applicant's conditional use permit. This narrative describes the proposed development, existing site conditions, existing buildings, other features applicable to the proposal. Further, this narrative explains how the Applicant meets or will meet applicable criteria under Title 18 of the CMC and addresses other required information indicated by the City planning staff at the preapplication conference. Accordingly, Applicant satisfies this criterion.

E. Necessary drawings in the quantity specified by the director;

RESPONSE: A drawing of the site plan of the Property is attached to this Application as Exhibit B.

F. Copy of the preapplication meeting notes (Type II and Type III);

RESPONSE: A copy of the preapplication meeting notes is attached to this Application as Exhibit C.

G. SEPA checklist, if required;

RESPONSE: The Application is exempt from submittal of a State Environmental Policy Act (SEPA) checklist. *See* Exhibit C. This criterion does not apply to this Application.

H. Signage for Type III applications and short subdivisions: Prior to an application being deemed complete and Type III applications are scheduled for public hearing, the applicant shall post one four-foot by eight-foot sign per road frontage. The sign shall be attached to the ground with a minimum of two four-inch by four-inch posts or better. The development sign shall remain posted and in reasonable condition until a final decision of the city is issued, and then shall be removed by the applicant within fourteen days of the notice of decision by the city. The sign shall be clearly visible from adjoining rights-of-way and generally include the following:

- 1. Description of proposal,**
- 2. Types of permit applications on file and being considered by the City of Camas,**
- 3. Site plan,**
- 4. Name and phone number of applicant, and City of Camas contact for additional information,**

5. If a Type III application, then a statement that a public hearing is required and scheduled. Adequate space shall be provided for the date and location of the hearing to be added upon scheduling by the city.

RESPONSE: Prior to the Application being deemed complete and scheduled for public hearing, Applicant will post a one four-foot by eight-foot sign per road frontage on the Property consistent with the requirements under CMC 18.55.110(H). In accordance with the requirements under CMC 18.55.110(H)(1)-(5), Applicant will post a development sign on the Property as depicted in Exhibit D. The signage will remain posted by the Applicant and in reasonable condition until a final decision of the City is issued. Applicant will then remove the signage within fourteen days of the notice of the decision by the City.

Accordingly, Applicant will ensure that this criterion is satisfied by complying with these requirements.

iv. Approval Criteria.

CMC 18.43.050(A)-(E) sets forth the approval criteria applicable to this Conditional Use Application. This Application satisfies all applicable approval criteria. The criteria and responses to the criteria are set forth below.

18.43.050 CRITERIA

A. The proposed use will not be materially detrimental to the public welfare, or injurious to the property or improvements in the vicinity of the proposed use, or in the district in which the subject property is situated;

RESPONSE: All residential zones allow convalescent home uses as conditional uses per CMC Section 18.07.040. Conditional uses are for “unique types of land uses which, due to their nature, require special consideration of the impact on the neighborhood and land uses in the vicinity.” CMC 18.43.010. The proposal will be compatible with residential uses surrounding the Property. The proposal will operate at acceptable levels of traffic and will minimize and limit noise impacts in the vicinity of the Property. As further explained below, the proposed convalescent home use will not be materially detrimental to the public welfare, or injurious to the Property or improvements in the vicinity of the Property, or in the surrounding district of the Property.

The proposed use is not detrimental to the residential uses in the surrounding area of the Property. Rather, the proposed convalescent home use is compatible to the surrounding residential uses and is similar to established residential businesses in the surrounding area of the Property. *See Exhibit E*. Further, the proposed use is not detrimental or injurious to the existing Property. The existing configuration of the current assisted living use provides separate living units and is conditionally approved as a 15-bed assisted living facility. Applicant will similarly provide accommodations for up to 15 individuals along with minor interior renovations in its operation as a convalescent home use. Therefore, the impacts and activities of the proposed convalescent home use will likely be equivalent to the existing assisted living facility.

Additionally, the proposed use is not expected to have any significant off-site impacts as demonstrated in response to CMC 18.43.050(d). With the change of use, traffic impacts will not significantly increase or be materially detrimental to the surrounding area. In fact, the traffic study forecasts that the proposed use will have no substantive transportation capacity or concurrency impacts at the site driveways or nearby intersections. Exhibit F. Further, even when the proposed convalescent home is operating during overnight hours, the traffic study forecasts only two daily trips in total. Exhibit F. Similarly, noise impacts of the proposed convalescent home will also be minimal and limited. Applicant will apply mitigation measures by limiting daily overnight trips and delivery services. Exhibit F. Rules of operation will also prevent vehicular use and parking by residents and prevent visitors from visiting residents during their occupancy. Exhibit F.

For these reasons, the conversion to a convalescent home facility will not be materially detrimental to the public welfare or decrease safety in the surrounding area of the Property. Accordingly, the City should find that Applicant satisfies this criterion.

B. The proposed use shall meet or exceed the development standards that are required in the zoning district in which the subject property is situated;

RESPONSE: Applicant's proposed use meets or exceeds applicable development standards of the R-12 zoning district for setbacks, landscaping, and parking. Applicant's proposal demonstrates compliance with applicable development standards, as follows.

- Setbacks: The existing building subject to the proposed use meets or exceeds the development standards for setbacks. As provided in CMC 18.09.040 - Table 2, applicable minimum setbacks for residential lots consisting of 15,000 or more square feet, include: 30' from front yard, 15' from side yards, and 35' from rear yard. Under the present circumstances, the Property is 2.39 acres in lot size and consists of a single parcel on developed land. The front of the building is setback approximately 90' from the front line, the rear is approximately 100' to the nearest rear property line, the west property line is approximately 40' to the nearest building, and the east side property line is approximately 50' to the building. See Exhibit B. Therefore, Applicant's proposed use satisfies applicable standards for setbacks.
- Landscaping: The Property has adequate landscaping to comply with CMC Chapter 18.13. Existing landscaping on the Property will be retained. Applicant is not proposing any improvements to the site including perimeter improvements such as fencing. Further, no expansion or alteration to the building is proposed, therefore additional landscaping is not required per CMC 18.030. Accordingly, Applicant satisfies applicable landscaping standards.
- Parking. The site has approximately 75 parking spaces. CMC 18.11.130 does not expressly provide parking requirements for convalescent home uses. However, the provision provides parking requirements for residential care facility/assisted living uses.

Applicant's proposed use is most similar to a residential care facility/assisted living use. Parking requirements for residential care facility/assisted living use, per CMC Section 18.11.130, are one space per two beds, and one space per day shift employee. As a result, with 75 parking spaces, there is adequate parking available on site for 15 beds and for medical staff and clinical professionals. Therefore, Applicant's proposal satisfies applicable parking standards.

In sum, the Applicant's proposed convalescent home use meets or exceeds required development standards of the R-12 zoning district for setbacks, landscaping, and parking. Applicant does not anticipate any exterior changes to the building. The Applicant is working with the City's building and fire departments to comply with City requirements. Applicant has also been working with the Washington State building inspector, and the Washington State Department of Health to assure the change of use meets all state requirements. Accordingly, the City should find that Applicant's proposed use complies this criterion.

C. The proposed use shall be compatible with the surrounding land uses in terms of traffic and pedestrian circulation, density, building, and site design;

RESPONSE: The proposed use of this Property will change from a full-time assisted living facility to a full-time convalescent home use. As explained below, the proposed use is compatible with surrounding land uses in terms of traffic circulation, density, building, and site design.

As demonstrated in response to CMC 18.43.050(D), traffic will likely be similar to the assisted housing use as previously approved on the Property. The proposed convalescent home is anticipated to generate an overall reduction in weekday daily trips with an increase of up to three weekday AM peak hour and two weekday PM peak hour trips. As reflected in the traffic study, the proposed use will have no substantive transportation capacity or concurrency impacts at the site driveways or nearby intersections. Exhibit E. As such, the proposed use is compatible with traffic circulation and will not significantly enhance vehicular or pedestrian traffic in the surrounding area.

Additionally, the proposed convalescent home use is compatible with the uses in the surrounding area of the Property. The surrounding area is located inside the UGB and the neighboring area is illustrated in Exhibit E. Specifically, the established residential businesses in the surrounding area of the Property, include:

- Camas Hills Care Home (east of Property) - Assisted Living Facility
- Kent Place (east of Property) - Assisted Living Facility
- Julia's Hands of Care (northeast of Property) - Massage Therapy

See Exhibit E. Further, north of the Property consists of single-family residences and approximately two miles southeast of the Property is Prestige Care & Rehabilitation—a skilled

nursing center. Exhibit E. As a result, the surrounding area has developed with a range of similar residential uses as the proposed use.

Finally, the building on the Property is an existing structure, and Applicant is not proposing any exterior changes or additions. A site plan of the Property is attached to this Application as Exhibit B. While some minor interior upgrades may be made (deferred maintenance, painting), the change in use will not require any modifications to the exterior of the building or expansions to its footprint. Therefore, the proposed use will remain compatible with the surrounding land uses in terms of building and site design.

Accordingly, the proposed use is compatible with the surrounding land uses. For the reasons stated above, the City should find that Applicant satisfies this criterion.

D. Appropriate measures have been taken to minimize the possible adverse impacts that the proposed use may have on the area in which it is located;

RESPONSE: The proposed convalescent home use will minimize the traffic and noise impacts to the area. The proposed use is not expected to have significant off-site impacts. Functionally, the impacts of the convalescent home use will likely be equivalent to the existing assisted living use and substantially less than the prior bed and breakfast and events use. As explained below, Applicant's proposed use will operate at acceptable levels of service and Applicant will minimize potential traffic and noise impacts to the area:

- Traffic Impacts. As explained in Exhibit F, the proposed convalescent home is anticipated to generate approximately 36 daily trips, with only about four trips in total from nursing staff from 7AM to 7PM and 7PM to 7AM and the remaining trips during ordinary business hours. Even when the proposed convalescent home is operating during overnight hours, the traffic study forecasts only two daily trips in total. Exhibit F. The proposed convalescent home is anticipated to generate an overall reduction in weekday daily trips, with a slight increase of up to three weekday AM peak hour and two weekday PM peak hour trips. Exhibit F. Transportation to and from the facility and to and from certain off-site activities will be provided for the convalescent home residents. Further, rules of operation will prevent residents at the facility from parking or using vehicles during their occupancy. As reflected in the findings of the traffic study, the proposed use will have no substantive transportation capacity or concurrency impacts at the site driveways or nearby intersections. Exhibit F. Accordingly, the proposed use will operate with acceptable levels of traffic without any substantive impacts to the nearby area.
- Noise Impacts. While the proposed convalescent home will operate 24 hours Monday through Sunday, noise impacts associated with the facility will be minimal and will be limited, as follows:
 - a. only two daily trips are forecasted to occur during overnight operational hours;
 - b. delivery services will be provided during limited operational hours;

- c. rules of operation will prevent residents at the facility from parking or using vehicles during their occupancy; and
- d. rules of operation will prevent visitation by family and friends of residents during their occupancy.

See Exhibit F. With limited daily trips during overnight operational hours, limited delivery services, and rules of operation limiting the use of vehicles, the proposed convalescent home minimizes and limits noise impacts.

Accordingly, Applicant has taken appropriate measures to minimize possible adverse impacts that the proposed use may have on the surrounding area of the Property. For the reasons stated above, the City should find that the Applicant satisfies this criterion.

E. The proposed use is consistent with the goals and policies expressed in the comprehensive plan;

RESPONSE: Applicant's proposed convalescent use is consistent with applicable goals and policies in the City's 2035 Comprehensive Plan. The goal and policies applicable to the Applicant's proposed use are set forth in italics and are addressed below:

2.4.3 Senior and Special Needs Housing

Senior and Special Needs Housing Goal H-3: Encourage and support a variety of housing opportunities for those with special needs, particularly those with challenges relating to age, health, or disability.

Senior and Special Needs Housing Policy H-3.1: Encourage special needs and senior housing to be dispersed throughout the community and close to public transportation, shopping, medical clinics, and other essential services.

Response: The existing configuration of the current assisted living provides separate living units. Applicant will provide accommodations for up to 15 individuals along with minor interior renovations in its operation as a convalescent home use. By providing these living units and treatment services for individuals seeking to recover from disorders in the abuse of drugs, alcohol, and other substances, Applicant helps and supports those who are suffering from substance use disorders. Additionally, the proposed convalescent home use is located within the City's urban growth boundary, with close access to medical clinics, shopping, and other essential services. See Exhibit E.

Accordingly, Applicant's proposed convalescent home use will further this Goal and will be consistent with this Policy.

Senior and Special Needs Housing Policy H-3.2: Encourage and support social and health service organizations that offer programs and facilities to help persons with special needs remain in the community.

Response: Applicant will provide accommodations for up to 15 individuals along with minor interior renovations in its operation as a convalescent home use. By providing living units for individuals seeking to recover from disorders in the abuse of drugs, alcohol, and other substances, Applicant helps and supports those who are suffering from substance use disorders. Additionally, Applicant will provide a safe and holistic setting staffed with medical and clinical professionals to help those who are suffering substantive abuse orders. Therefore, the proposed convalescent home use is consistent with this Policy.

Senior and Special Needs Housing Policy H-3.3: Treat residential structures occupied by persons with disabilities the same as residential structures occupied by a family or by non-disabled unrelated individuals.

Response: Applicant will provide accommodations for up to 15 individuals along with minor interior renovations in its operation as a convalescent home use. Applicant will provide living units for individuals seeking to recover from disorders in the abuse of drugs, alcohol, and other substances. Applicant will also provide a safe and holistic setting to help those who are suffering substantive abuse orders. By providing housing and holistic care to individuals suffering from substance abuse disorders, Applicant will not discriminate or treat occupants unjustly or differently as any family or non-disabled individuals occupying a residential structure. Therefore, the proposed convalescent home use is consistent with this Policy.

Senior and Special Needs Housing Policy H-3.4: Support and encourage the development of smaller (less than 1,000-square foot), single-story houses through the Multi-Family Cottage Overlay or other tools.

Response: Applicant is not proposing a new development of a single-story house through the Multi-Family Cottage Overlay or other tools. Rather, the existing configuration of the current assisted living provides separate living units. The building footprint of the Property will not be expanded by the proposed use. Applicant will similarly provide living units in its operation as a convalescent home use to individuals suffering from the abuse of drugs, alcohol, and other substances. Applicant thereby supports and encourages housing opportunities by providing these living units for individuals seeking to recover from substance abuse. Accordingly, Applicant's proposed use is not inconsistent with this Policy.

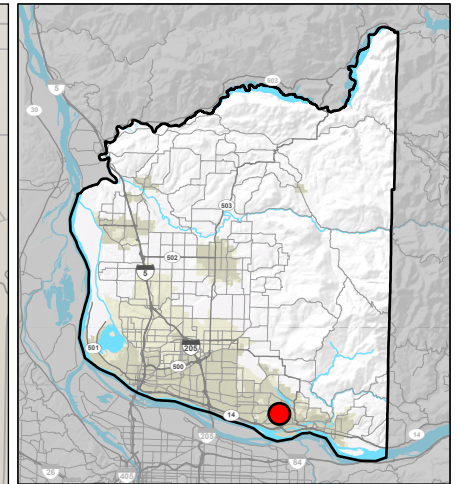
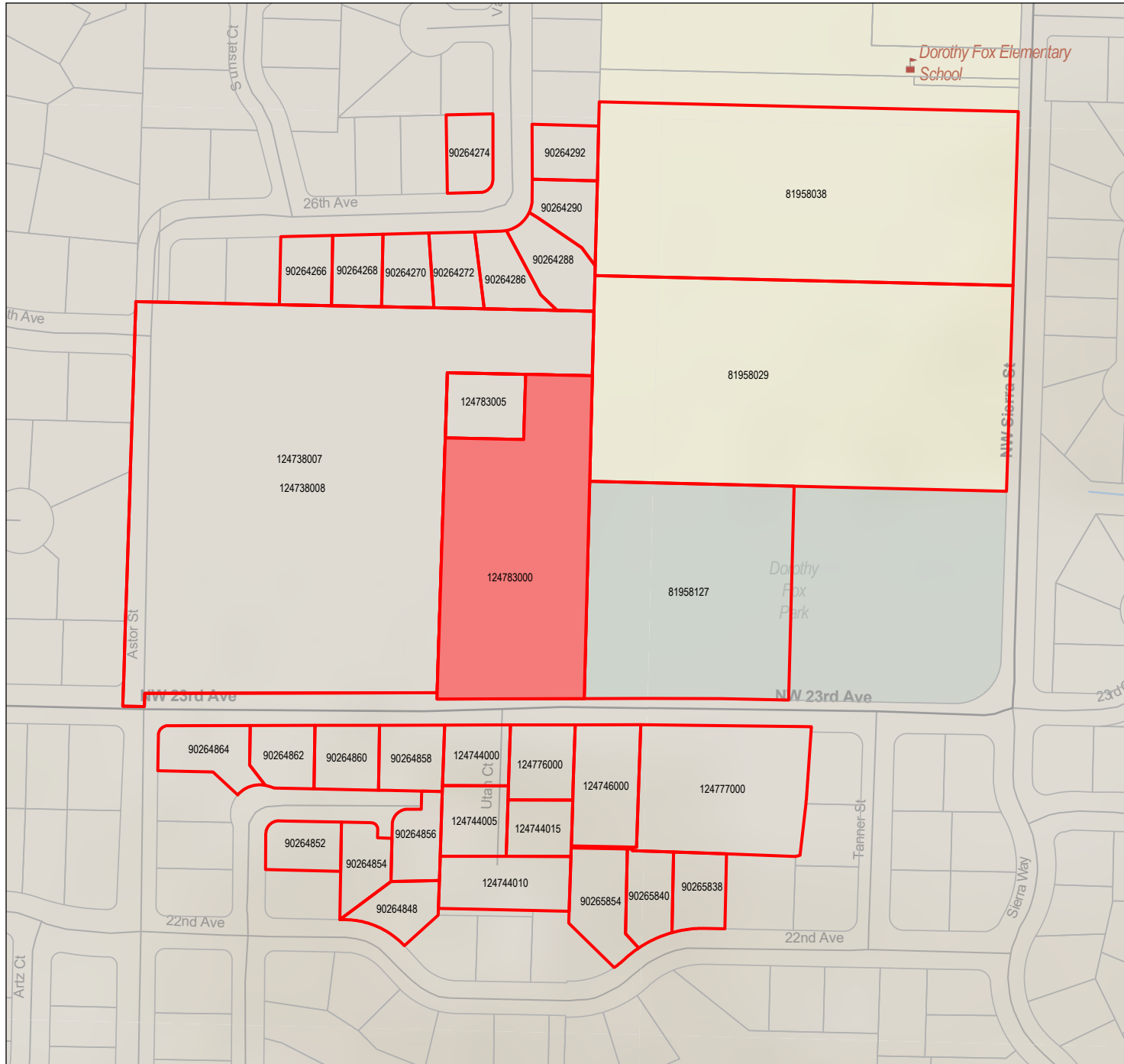
F. Any special conditions and criteria established for the proposed use have been satisfied. In granting a conditional use permit the hearings examiner may stipulate additional requirements to carry out the intent of the Camas Municipal Code and comprehensive plan.

RESPONSE: For the reasons presented and the evidence provided in the Application, Applicant understands that the proposed convalescent home use at the subject Property satisfies applicable criteria. If the City's Hearings Examiner stipulates any additional requirements or conditions of approval, Applicant will comply.

V. Conclusion.

For the reasons presented and based upon the evidence provided, the City should find that the proposed use satisfies applicable approval criteria in the CMC. Accordingly, the City should approve this conditional use Application, and authorize the operation of the convalescent home use on the Property under a new conditional use permit.

EXHIBIT A



**PID(s): 124783000,
300-Foot Buffer**

KEY

- Subject Property
- Buffer Selection
- Parcels



NOTE: Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.



Owner Name	Mailing Address
ALAKA CHRISTOPHER O	2253 NW 22ND CIR, CAMAS, WA, 98607
BALDWIN CHRISTOPHER DANIEL	2334 NW 26TH AVE, CAMAS, WA, 98607
CAMAS SCHOOL DISTRICT #117	841 NE 22ND AVE, CAMAS, WA, 98607
CITY OF CAMAS	616 NE 4TH AVE, CAMAS, WA, 98607
CORSE BRADY W & CORSE JOY D	2237 NW 23RD AVE, CAMAS, WA, 98607
COWAN RICHARD & COWAN DOROTHEA	2232 NW 26TH AVE, CAMAS, WA, 98607
CRAIN CLAYTON & CRAIN SIHAYA	2237 NW 26TH AVENUE, CAMAS, WA, 98607
EBMEYER STEVEN H & EBMEYER CHERIE	2339 NW 22ND CIR, CAMAS, WA, 98607
FARRELL RICHARD C & FARRELL BONNY	2200 NW 26TH AVE, CAMAS, WA, 98607
FOYT JACK & FOYT CHRISTINE	5619 N CLASSEN BLVD, OKLAHOMA CITY, OK, 73118
GALOTTEANU MICHELLE & DUGUMA JIGSA A	2245 NW UTAH CT, CAMAS, WA, 98607
GUIRADO IVAN & GUIRADO SILVIA	2220 NW UTAH CT, CAMAS, WA, 98607
HANSON BRETT & HANSON JENNIFER	2167 NW 22ND AVE, CAMAS, WA, 98607
HARVEST COMMUNITY CHURCH	2436 NW ASTOR ST, CAMAS, WA, 98607
HEALY ROBERT & HEALY TERRY	2302 NW 26TH AVE, CAMAS, WA, 98607
HOOPER WILLIAM J & HOOPER JUDETH M	2316 NW 26TH AVE, CAMAS, WA, 98607
KRIEGER LUKE D	2321 NW 22ND CIR, CAMAS, WA, 98607
KULLBERG JAMES P TRUSTEE	2155 NW 22ND AVE, CAMAS, WA, 98607
MACKAY JOHN G 50%	4345 NW 16TH AVE, CAMAS, WA, 98607
MCCLANAHAN ERIN & MCCLANAHAN YOSHIE	2234 NW UTAH CT, CAMAS, WA, 98607
MUNSON JAE Y & WITHERSPOON BRITTEN C	2630 NW VALLEY ST, CAMAS, WA, 98607
NEIL MICHAEL B & NEIL KRISTEN N	2347 NW 22ND CIR, CAMAS, WA, 98607
PATARIA SIMAN PREET & PATARIA ARVINDER	1523 NW 33RD WAY, CAMAS, WA, 98607
PHILLIPS JAMES G & PHILLIPS SANDRA E TRUSTEES	2334 NW 22ND CIR, CAMAS, WA, 98607
QUINN JAMES & QUINN RACHELLE	2681 NE 26TH CIR, CAMAS, WA, 98607
REESE BARTON & REESE JESSICA	2242 NW 26TH AVE, CAMAS, WA, 98607
ROBINSON JOHN H & ROBINSON SUSAN H	2302 NW 22ND CIR, CAMAS, WA, 98607
ROGERS JAMES P & ROGERS HANNAH M	2237 NW UTAH ST, CAMAS, WA, 98607
RUDY KEVIN M & LUNDBERG-RUDY SENJA R	2314 NW 22ND CIRCLE, CAMAS, WA, 98607
TENNANT JOHN R & TENNANT MICHELLE	2622 NW VALLEY ST, CAMAS, WA, 98607
WILLIAMS DANIEL & WILLIAMS JANIS	2309 NW 22ND AVE, CAMAS, WA, 98607
WILLOW CREEK EST HOMEOWNERS	223 NW 22ND AVE, CAMAS, WA, 98607

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Washington Geographic Information System**

Number of Records 32

Number of Pages 1

Date Created 1/19/2021

Employee *Bob Pool*

Employee Name Bob Pool

PID	Situs Address			
124738008			WA	0
90264292	2630 NW VALLEY ST	CAMAS	WA	98607
90264268	2316 NW 26TH AVE	CAMAS	WA	98607
124738007	2436 NW ASTOR ST	CAMAS	WA	98607
90264860	2321 NW 22ND CIR	CAMAS	WA	98607
90264862	2339 NW 22ND CIR	CAMAS	WA	98607
90264864	2347 NW 22ND CIR	CAMAS	WA	98607
90264856	2302 NW 22ND CIR	CAMAS	WA	98607
90264852	2334 NW 22ND CIR	CAMAS	WA	98607
90264274	2237 NW 26TH AVE	CAMAS	WA	98607
90264286	2232 NW 26TH AVE	CAMAS	WA	98607
90264266	2334 NW 26TH AVE	CAMAS	WA	98607
81958029			WA	0
124783005	2237 NW 23RD AVE	CAMAS	WA	98607
81958038			WA	0
90264272	2242 NW 26TH AVE	CAMAS	WA	98607
124783000	2213 NW 23RD AVE	CAMAS	WA	98607
90264858	2253 NW 22ND CIR	CAMAS	WA	98607
124744015	2234 NW UTAH CT	CAMAS	WA	98607
90264854	2314 NW 22ND CIR	CAMAS	WA	98607
124746000	2154 NW 23RD AVE	CAMAS	WA	98607
124776000	2210 NW 23RD AVE	CAMAS	WA	98607
90265854			WA	0
124744005	2237 NW UTAH CT	CAMAS	WA	98607
90265840	2167 NW 22ND AVE	CAMAS	WA	98607
90265838	2155 NW 22ND AVE	CAMAS	WA	98607
124744010	2220 NW UTAH CT	CAMAS	WA	98607
90264848	2309 NW 22ND AVE	CAMAS	WA	98607
90264290	2622 NW VALLEY ST	CAMAS	WA	98607
90264288	2200 NW 26TH AVE	CAMAS	WA	98607
90264270	2302 NW 26TH AVE	CAMAS	WA	98607
81958127	2121 NW 23RD AVE	CAMAS	WA	98607
124744000	2245 NW UTAH CT	CAMAS	WA	98607
124777000	2124 NW 23RD AVE	CAMAS	WA	98607

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Number of Records 34

Number of Pages 1

Date Created 1/19/2021

Employee *Bob Pool*

Employee Name Bob Pool

HARVEST COMMUNITY CHURCH
2436 NW ASTOR ST
CAMAS, WA 98607

MUNSON JAE Y & WITHERSPOON
BRITTEN C
2630 NW VALLEY ST
CAMAS, WA 98607

HOOPER WILLIAM J & HOOPER
JUDETH M
2316 NW 26TH AVE
CAMAS, WA 98607

HARVEST COMMUNITY CHURCH
2436 NW ASTOR ST
CAMAS, WA 98607

KRIEGER LUKE D
2321 NW 22ND CIR
CAMAS, WA 98607

EBMEYER STEVEN H & EBMEYER
CHERIE
2339 NW 22ND CIR
CAMAS, WA 98607

NEIL MICHAEL B & NEIL KRISTEN N
2347 NW 22ND CIR
CAMAS, WA 98607

ROBINSON JOHN H & ROBINSON
SUSAN H
2302 NW 22ND CIR
CAMAS, WA 98607

PHILLIPS JAMES G & PHILLIPS
SANDRA E TRUSTEES
2334 NW 22ND CIR
CAMAS, WA 98607

CRAIN CLAYTON & CRAIN SIHAYA
2237 NW 26TH AVENUE
CAMAS, WA 98607

COWAN RICHARD & COWAN
DOROTHEA
2232 NW 26TH AVE
CAMAS, WA 98607

BALDWIN CHRISTOPHER DANIEL
2334 NW 26TH AVE
CAMAS, WA 98607

CAMAS SCHOOL DISTRICT #117
841 NE 22ND AVE
CAMAS, WA 98607

CORSE BRADY W & CORSE JOY D
2237 NW 23RD AVE
CAMAS, WA 98607

CAMAS SCHOOL DISTRICT #117
841 NE 22ND AVE
CAMAS, WA 98607

REESE BARTON & REESE JESSICA
2242 NW 26TH AVE
CAMAS, WA 98607

FOYT JACK & FOYT CHRISTINE
5619 N CLASSEN BLVD
OKLAHOMA CITY, OK 73118

ALAKA CHRISTOPHER O
2253 NW 22ND CIR
CAMAS, WA 98607

MCCLANAHAN ERIN &
MCCLANAHAN YOSHIE
2234 NW UTAH CT
CAMAS, WA 98607

RUDY KEVIN M & LUNDBERG-RUDY
SENJA R
2314 NW 22ND CIRCLE
CAMAS, WA 98607

PATARIA SIMAN PREET & PATARIA
ARVINDER
1523 NW 33RD WAY
CAMAS, WA 98607

QUINN JAMES & QUINN RACHELLE
26811 NE 26TH CIR
CAMAS, WA 98607

WILLOW CREEK EST HOMEOWNERS
223 NW 22ND AVE
CAMAS, WA 98607

ROGERS JAMES P & ROGERS
HANNAH M
2237 NW UTAH ST
CAMAS, WA 98607

HANSON BRETT & HANSON
JENNIFER
2167 NW 22ND AVE
CAMAS, WA 98607

KULLBERG JAMES P TRUSTEE
2155 NW 22ND AVE
CAMAS, WA 98607

GUIRADO IVAN & GUIRADO SILVIA
2220 NW UTAH CT
CAMAS, WA 98607

WILLIAMS DANIEL & WILLIAMS JANIS
2309 NW 22ND AVE
CAMAS, WA 98607

TENNANT JOHN R & TENNANT
MICHELLE
2622 NW VALLEY ST
CAMAS, WA 98607

FARRELL RICHARD C & FARRELL
BONNY
2200 NW 26TH AVE
CAMAS, WA 98607

HEALY ROBERT & HEALY TERRY
2302 NW 26TH AVE
CAMAS, WA 98607

CITY OF CAMAS
616 NE 4TH AVE
CAMAS, WA 98607

GALOFTEANU MICHELLE & DUGUMA
JIGSA A
2245 NW UTAH CT
CAMAS, WA 98607

MACKAY JOHN G 50%
4345 NW 16TH AVE
CAMAS, WA 98607

EXHIBIT B

SLATER
ARCHITECTURE

8900 NE Livingston
Mtn Rd
Camas, WA 98607

Phone:
(360) 817-2737

Fax:
(360) 817-2733

SEAL:

SITE PLAN
PRE-APPLICATION SUBMITTAL FOR:
DISCOVER RECOVERY
CITY OF CAMAS
CAMAS, WASHINGTON

ISSUE DATE:

1-20-21

REVISION:

JOB NO: -

PRE-APPLICATION

THIS DOCUMENT, AS AN
ASSIGNMENT OF PROFESSIONAL
SERVICE, IS THE PROPERTY
OF SLATER ARCHITECTURE,
P.C. AND IS NOT TO BE USED IN
ANY PROJECT OR FOR ANY
OTHER PROJECT OR CLIENT
WITHOUT THE WRITTEN
AUTHORIZATION OF SLATER
ARCHITECTURE, P.C.

SHEET NO:

A-1

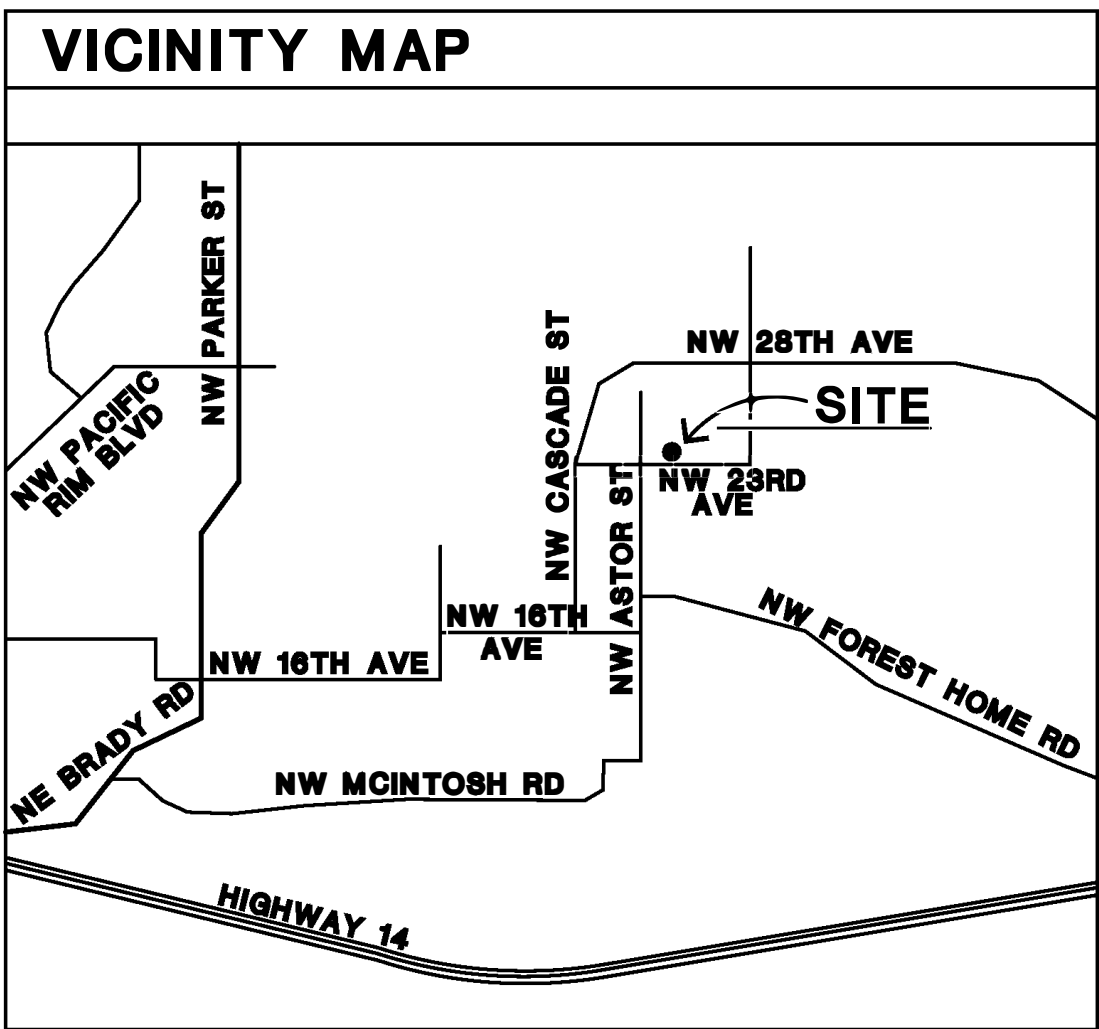
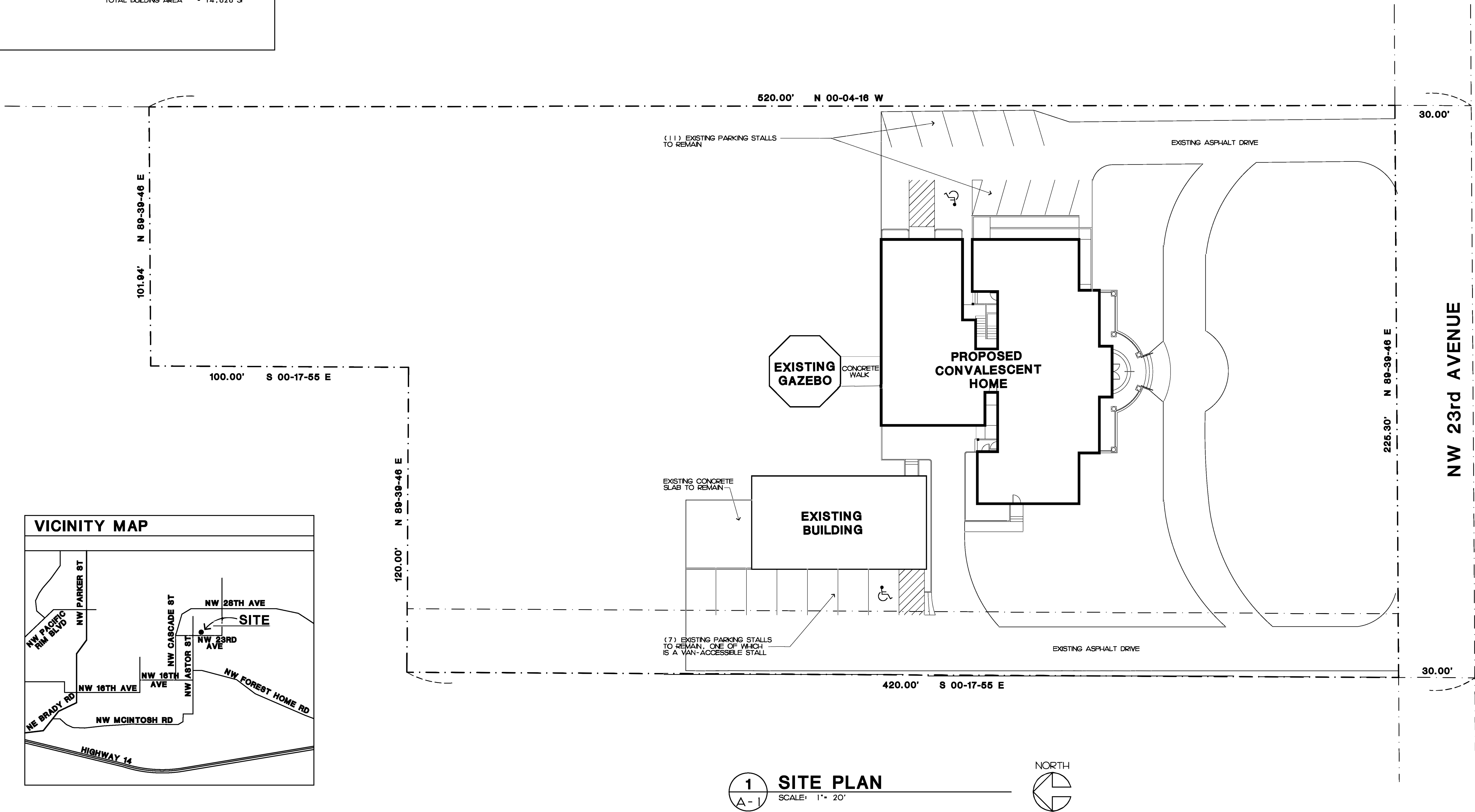
SITE
PLAN

SITE PLAN
DISCOVER RECOVERY

CITY OF CAMAS

CAMAS, WASHINGTON

PROJECT INFORMATION	
OWNER:	THOMAS FELDMAN 2213 NW 23RD AVENUE CAMAS, WASHINGTON 98607
ARCHITECT:	SLATER ARCHITECTURE - LISA SLATER 8900 NE LIVINGSTON MTN RD CAMAS, WASHINGTON 98607 (360) 817-2737 lisa@slaterarchitecture.com
SITE ADDRESS:	2213 NW 23RD AVENUE CAMAS WASHINGTON 98607
PARCEL NUMBER:	124783000
LOT SIZE:	2.39 ACRES
EXISTING ZONING:	R-12
SQUARE FOOTAGE CALCULATIONS:	EXISTING UPPER FLOOR • 4,256 SF EXISTING MAIN FLOOR • 6,927 SF EXISTING BASEMENT • 3,443 SF TOTAL BUILDING AREA • 14,626 SF



1 SITE PLAN
SCALE: 1" = 20'



EXHIBIT C



Pre-application Notes

File: #PA20-48

Date: December 10, 2020

To: Thomas Feldman thomas@telloshealth.com

Staff Contacts: Robert Maul, Planning Manager; Sarah Fox, Senior Planner; Randy Miller, Fire Marshal; Anita Ashton, Engineering Project Manager

Property Location: 2213 NW 23rd Ave., Camas, WA 98660

Tax Accounts: 2.39 acres at Tax Parcel #124783-000

Zoning: R-12

Description: Applicant proposes to change the use of the property from an assisted care facility to a "convalescent home". Building footprint will not be expanded, however interior renovations will be needed. A conditional use permit (CUP) will be required.

NOTICE: Notwithstanding any representation by City staff at a pre-application conference, staff is not authorized to waive any requirement of the City Code. Any omission or failure by staff to recite to an applicant all relevant applicable code requirement shall not constitute a waiver by the City of any standard or requirement. Any changes to the code or other applicable laws, which take effect between the pre-application conference and submittal of an application, shall be applicable. [CMC 18.55.060 (D)].

The Camas Municipal Code (CMC) is online as follows:

https://library.municode.com/wa/camas/codes/code_of_ordinances

Land Use Fee Estimates:

Type III Permit	Fees as of Dec. 2020*
Conditional Use Permit	\$4,256

*It is likely that the fees will increase on January 1, 2020. Fees are calculated at time of application.

Planning Division

A Conditional Use Permit is a Type III application, which means that it will require a public hearing before the Hearings Examiner. As discussed at the meeting, the general timeframe for processing of your application to a final decision includes the following steps: (1) Technically Complete Determination (7-28 days); (2) Notice of Application will be sent to adjacent properties (within 14 days); (3) Notice of Hearing will be sent two weeks in advance of meeting date; (4) Decision will be mailed to adjacent property owners (1-2 weeks after hearing); (5) Appeals of the decision (14-21 days).

CMC Section 18.55.110 provides a list of materials that must be submitted for a complete application for Type III permits. Those items are as follows, specific to your proposal:

- General application form and appropriate fees

- Narrative that describes the proposal and responds to each of the criteria at CMC Section 18.43.050 (A-F)
- Drawing of site and any proposed improvements
- Copy of pre-application notes
- This proposal is **exempt** from submittal of a State Environmental Policy Act (SEPA) checklist
- Mailing labels for properties within 300-feet of the subject site, as provided (and certified) by the Clark County Assessor's office.
- 4' x 8' Sign installed at road frontage. The sign shall be attached to the ground with a minimum of two four-inch by four-inch posts or better. The development sign shall remain posted and in reasonable condition until a final decision of the city is issued, and then shall be removed by the applicant within fourteen days of the notice of decision by the city. The sign shall be clearly visible from adjoining rights-of-way and generally include the following:
 - Description of proposal
 - Type of permit application being considered by the City of Camas
 - Site plan
 - Name and phone number of applicant [*Could include website address in order to provide more information*]
 - City of Camas contact for additional information [Sarah Fox, Senior Planner 360.513.2729]
 - Statement that a public hearing is required and will be scheduled. Leave space on the sign for the date of the hearing to be added upon scheduling by the city.

The applicant's proposal to add privacy fencing would "exceed development standards" of the zone and should be described in full in response to "B" of CMC Section 18.43.050. Additional guidance regarding criterion "E" of CMC Section 18.43.050, "*The proposed use is consistent with the goals and policies of the comprehensive plan*" is provided below:

The city's comprehensive plan, Camas 2035, includes goals and policies for Special Needs Housing at Chapter 2. The city's comprehensive plan, "Camas 2035", is available online at: <http://www.cityofcamas.us/images/DOCS/PLANNING/REPORTS/camas2035/camas2035compplan.pdf>

2.4.3 Senior and Special Needs Housing

Senior and Special Needs Housing Goal

H-3: Encourage and support a variety of housing opportunities for those with special needs, particularly those with challenges relating to age, health, or disability.

Senior and Special Needs Housing Policies

H-3.1: Encourage special needs and senior housing to be dispersed throughout the community and close to public transportation, shopping, medical clinics, and other essential services.

H-3.2: Encourage and support social and health service organizations that offer programs and facilities to help persons with special needs remain in the community.

H-3.3: Treat residential structures occupied by persons with disabilities the same as residential structures occupied by a family or by non-disabled unrelated individuals.

H-3.4: Support and encourage the development of smaller (less than 1,000-square foot), single-story houses through the Multi-Family Cottage Overlay or other tools.

Fire Department

Randy Miller

No building or structure regulated by the building and/or fire code shall be erected, constructed, enlarged, altered, repaired, moved, converted or demolished unless a separate permit for each building or structure has first been obtained from the CWFMO Camas Municipal Code 15.04.030.D.12.a

Any inadvertent omission or failure to site or include any applicable codes or code language by the Fire Marshal's office or the City shall not be considered a waiver by the applicant. Please don't hesitate to contact the FMO if you have any questions. FMO@cityofcamas.us

1) Change of Use and or Tenant Improvement permit required with the Fire Marshal's Office located at 605 NE 3rd. Contact the FMO at 360-834-6191 OR FMO@cityofcamas.us for submittal information. These plans are submitted simultaneously to the FMO and the Building Department.

Potential Deferred Submittals depending on the chosen direction of the project

2) Separate Permit required with the fire marshal's office for any new fire alarm system or if there are any changes, alterations, additions, deletions etc. to any existing Fire Alarm System. Minimum requirements shall be NICET III for design and NICET II and or factory trained (provide documentation) for acceptance testing. Design per NFPA 72. If a system upgrade is required, a voice evacuation system is highly recommended.

3) If the current underground supply is not adequate to meet potential changes and or additions, a Separate Permit with the Fire Marshal's office will be required for an NFPA 24 Underground Fire Sprinkler Mains. (Washington State Licensed Level "U" required for onsite installation) This work shall be performed by a level "U" licensed company. A third party sign off or third party overseer is prohibited as confirmed by the State Fire Marshal's office and the City of Camas Attorney's office.

4) The Fire Department Connection (FDC) shall be within 75 feet of a hydrant. Some flexibility may be allowed in existing non-conforming conditions and in the downtown core area.

5) Separate Permit with the Fire Marshal's office required for any new NFPA 13 Fire Sprinkler System or if there are any changes, alterations, additions deletions etc. to an existing system. WA State Licensed Fire Sprinkler Contractor required with appropriate NICET Levels.

6) Separate Permit with the Fire Marshal's office required for the NFPA 17A, UL 300 Commercial Cooking Hood Suppression system(s).

7) Separate permit with the Fire Marshal's office Required for any emergency Generator installed. NFPA 110.

8) Separate permit with the FMO required for any Carbon Dioxide (CO2 System) for bulk use/storage or "Dewar" tank use.

9) Any delayed egress system requires a separate permit with the FMO.

10) Permit required for any medical gas/piping use.

11) Other FMO permits not listed may apply to this project.

12) Contact the Fire Marshal's office at 360-834-6191 for permit submittal questions.

13) Fire Marshal Permit Applications are available at <http://www.cityofcamas.us/images/DOCS/FIRE/FMO/FORMS/firepermitapp17.pdf> Or the Permit Application can be picked up at the FMO located at 605 NE 3rd Ave, currently by appointment.

14) To request permit inspections, contact the Fire Marshal's Office via Camas Connect. Otherwise, call our inspection line at 360-834-6191 x1.

15) Do not contact the building department with questions regarding Fire Marshal Pre-App Review or Permit/Review notes. The Fire Marshal's Office contact information is included in this review.

Building Division

Bob Cunningham

1. Any alteration to the structures will be reviewed under the most current building codes as adopted by The State of Washington.
2. The proposed use classification would be a Group R4 occupancy.
3. A code analysis and plans shall be prepared by an architect licensed by the State of Washington. The code analysis shall address types of occupancy, type of construction, fire separation distance, building height, allowable area, Fire Life Safety elements and the ADA requirements.
4. The structural drawings and calculations shall be prepared and stamped by a Professional Engineer licensed by the State of Washington.
5. The application shall be reviewed and approved by the Washington State Department of Health.
6. If applicable a Health Department permit is required.
7. Any alteration to the fire suppression and or fire alarm systems shall be in accordance with IBC and other applicable code standards, all fire suppression and or fire alarm systems shall be reviewed by the Camas Fire Marshal's office.

Engineering Division

Curleigh Carothers

1. Based on the ITE Trip Generation Manual (Manual), provide a traffic summary from a traffic engineer identifying the difference in vehicular trips between the current approved and the proposed use for AM Peak Hour, PM Peak Hour, and daily trips. If a use is not identified in the Manual, historic uses provided from a traffic engineer may be submitted for approval by the City.
2. Any additional new vehicular trips within the PM peak hour will be subject to Transportation Impact Fees at a rate of \$3,555 per trip (2021 rate.)
3. The applicant may be required to dedicate up to an additional 10 feet of right-of-way along NW 23rd Avenue.

EXHIBIT D

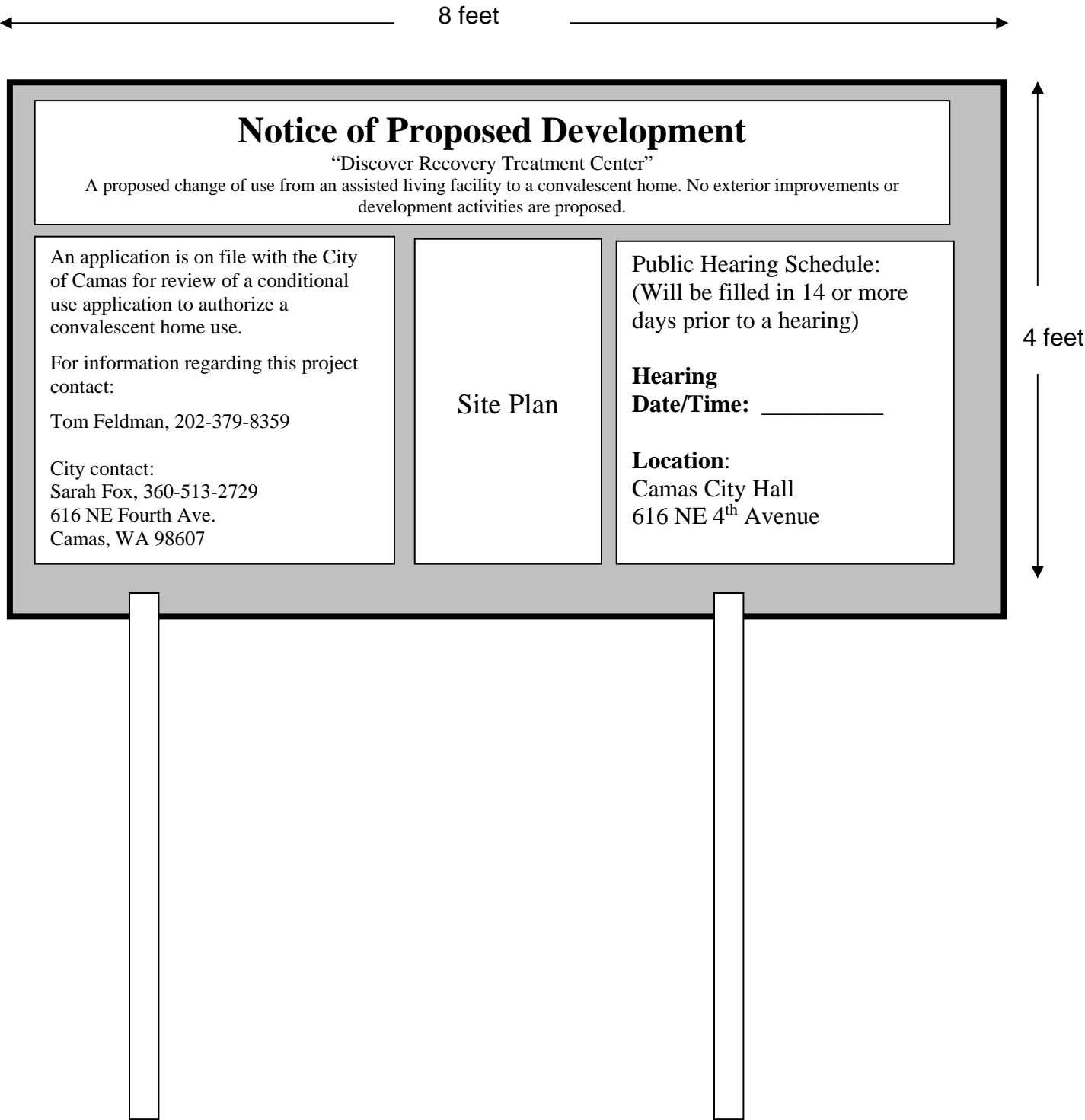
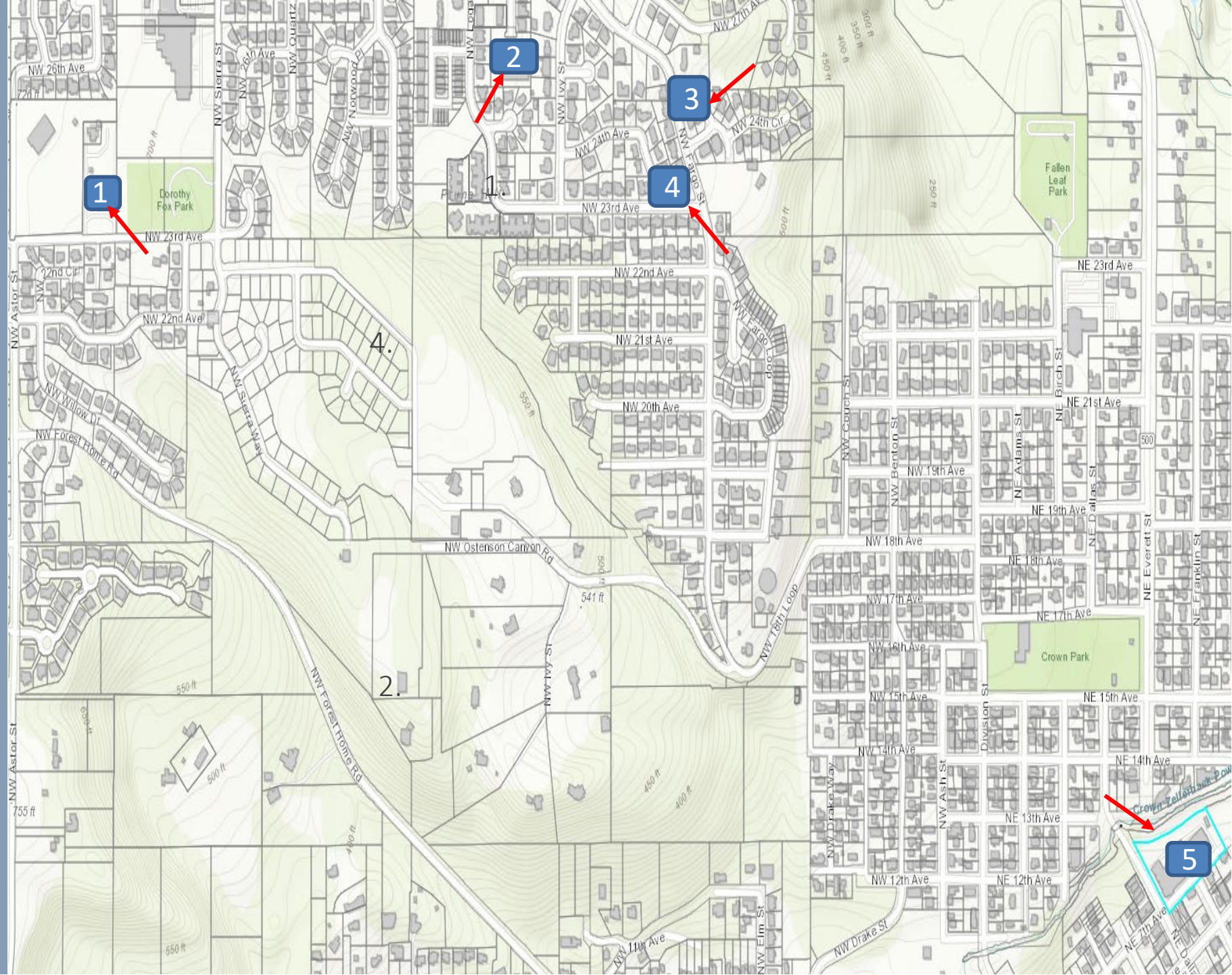


EXHIBIT E

1. FAIRGATE ESTATE LLC
2213 NW 23RD AVENUE
CAMAS,WA 98607
2. KENT PLACE
2647 NW KENT STREET
CAMAS, WA 98607
3. CAMAS HILLS CARE HOME
2432 NW FARGO ST
CAMAS,WA 98607
4. JULIE'S HANDS OF CARE
2308 NW GALAXY ST
CAMAS,WA 98607
5. PRESTIGE CARE & REHABILITATION
740 NE DALLAS STREET,
CAMAS,WA 98607



January 19, 2021

Project #: 26054

Curleigh Carothers
City of Camas
616 NE 4th Avenue
Camas, WA 98607

***RE: Trip Comparison for 2213 NW 23rd Avenue Conditional Use Permit Application
(Pre-application #PA20-48)***

Dear Curleigh,

Discover Recovery is applying for a Conditional Use Permit (CUP) to re-purpose the existing buildings located at 2213 NW 23rd Avenue to provide convalescent facilities. This letter provides a summary of the estimated trip generation under the existing assisted living use versus that proposed as part of the CUP. As documented herein, we anticipate the land use proposed with the CUP will result in a slight reduction in daily trips, an increase of up to three AM peak hour trips and an increase of up to two PM peak hours compared to the assisted living facility. This minor increase is not anticipated to result in any measurable capacity impacts at the site driveways or nearby intersections given an overall site trip generation of 6 or fewer trips during either the AM or PM peak hours.

BACKGROUND

Today, the 2.39-acre property is the site of a 15-bed assisted living facility that is operating as a conditional use. Nineteen vehicular parking spaces are provided for employees and residents. This site is accessible via two driveways on NW 23rd Avenue.

Discover Recovery is proposing to change the current use into a convalescent home that will provide full-time care and treatment for individuals seeking to recover from disorders in the abuse of drugs, alcohol, and other substances. A maximum of 15 beds will be in use at any given time. The change in use will not require modifications to the exterior of the existing building or expansions to its footprint.

The *Trip Generation Manual* (10th Edition, published by the Institute of Transportation Engineers) does not contain a land use category that matches the anticipated operations under the proposed facility. To help assess the trip potential of the new site use, Discover Recovery provided the following information from another similar facility they operate:

- A minimum of one nurse will be on-site 24 hours per day, 7 days per week on a 12-hour shift. During the weekdays (i.e., 7 AM – 6 PM), the highest number of staff will be on-site.

- The facility will be staffed by three medical and clinical professionals, two food service/kitchen professionals, a maintenance person, one executive, and a patient admissions person weekdays.
- In addition to the facility staff, a medical doctor is expected to visit the site in the afternoon for approximately two hours on three days per week.
- Visitation by family and friends of the residents is not allowed at the facility at any time.
- Residents are not allowed to use or store a personal vehicle at the facility.
- New residents are transported to the site either by a family member/care giver or through a pick-up/drop-off by a site employee. The admission process typically occurs between 10:00 AM and 4:00 PM weekdays when an admissions staff member is on-site to facilitate the process. The resident departure process also only occurs via a pick-up by a family member/care giver or by transport to an off-site location from a facility staff member.
- The average resident stay is approximately 30 days and Discover Recovery representatives estimate they will average three resident departures and three resident arrivals per week when operating at capacity with all 15 beds occupied. Departures and arrivals may or may not occur on the same day depending on the availability of beds.
- Periodic supervised off-site resident group outings are anticipated up to 2-3 times per month on Saturdays or Sundays between 10:00 AM and 4:00 PM (after resolution of the current COVID-19 pandemic and a return to more typical conditions). The group outings will be organized and administered by the facility and would involve the use of a company vehicle (passenger van) that is stored on-site to transport the residents to and from the outing.
- Food supplies will be delivered once per week by Sysco. The Head Chef also typically conducts a grocery trip as needed on the way to work as part of their normal workday.
- FedEx, UPS, and the US Post Office will make daily deliveries. In addition, weekly refuse/recycling pickup will occur and specialized medical recycling is provided once per quarter.

Based on the information available from Discover Recovery, Table 1 summarizes the anticipated vehicular trip making associated with the new use.

Table 1. Anticipated Facility Operations

Personnel	Start Time	End Time	Day Of Week	Weekday Trips per Day	Weekday Peak Hour Trips		Notes
					7-9 AM	4-6 PM	
On-site Employees							
Day Shift Nurse	7:00 AM	7:00 PM	Daily	2 (1 in/1 out)	1 in	0	
Night Shift Nurse	7:00 PM	7:00 AM	Daily	2 (1 in/1 out)	1 out	0	
Medical/Clinician 1	8:00 AM	5:00 PM	Daily	2 (1 in/1 out)	1 in	1 out	
Medical/Clinician 2	10:00 AM	6:00 PM	Daily	2 (1 in/1 out)	0	0	Because the shift ends at 6 PM, no PM peak hour impact is anticipated
Executive	8:00 AM	5:00 PM	Monday-Friday	2 (1 in/1 out)	1 in	1 out	
Head Chef & one Kitchen Professional	6:30 AM	3:00 PM	Daily	4 (2 in/2 out)	1 in	0	Assume Head Chef arrives between 7-9 AM after grocery shopping whereas kitchen professional arrives at 6:30 AM
Maintenance	6:30 AM	2:30 PM	Monday-Friday	2 (1 in/1 out)	0	0	
Admissions	8:00 AM	5:00 PM	Monday-Friday	2 (1 in/1 out)	1 in	1 out	
Medical Doctor	1:00 PM	3:00 PM	Monday-Friday	2 (1 in/1 out)	0	0	Visits occur 3 times per week, departures occur before 4 PM
Other							
Resident Discharge	10:00 AM	4:00 PM	Daily	2 (1 in/1 out)	0	1 out	Average 3 discharges and 3 admission per week; thus typically one or less per day. Assume 1 discharge impacts PM peak
Resident Admission	10:00 AM	4:00 PM	Daily	2 (1 in/1 out)	0	0	
Resident group outings	10:00 AM	4:00 PM	Saturday or Sunday	0	0	0	May occur up to 3 times per month using on-site van driven by site staff
FedEx Delivery	Varies		Daily	2 (1 in/1 out)	0	1 in, 1 out	Assume 1 delivery during PM peak
UPS Delivery	Varies		Daily	2 (1 in/1 out)	0	0	
US Mail Delivery	Varies		Daily	2 (1 in/1 out)	0	0	
Refuse/recycle	Varies		1 day/ week	2 (1 in/1 out)	0	0	Service one time per week on a Monday-Friday
Food Service (Sysco)	Varies		1 day/ week	2 (1 in/1 out)	0	0	Delivery one time per week on a Monday-Friday
Medical recycle service	Varies		1 day/ quarter	2 (1 in/1 out)	0	0	Service occurs 1 day per quarter (4 times/year) Monday-Friday
Total on one typical weekday (Monday-Friday)				36*	5 in, 1 out	1 in, 5 out	

*Trip estimate conservatively assumes doctor visit (occurs three days per week), refuse/recycle service (occurs once per week), food service delivery (occurs once per week), and quarterly medical recycling service (occurs once every three months) all occur on the same day

TRIP GENERATION ESTIMATE

Trip generation estimates for the existing assisted living use were estimated using trip rates cited in the *Trip Generation Manual, 10th Edition* as published by the Institute of Transportation Engineers (ITE) in 2017. As noted previously, the *Trip Generation Manual, 10th Edition* does not have a directly comparable use to Discovery Recovery's operations but the description for a Nursing Home (Land Use 620) seems the most similar. Per the *Trip Generation Manual*, Nursing Homes are described as "any facility whose primary function is to provide care for persons who are unable to care for themselves. Examples of such facilities include rest homes and chronic care and convalescent homes. Skilled nurses and nursing aides are present 24 hours a day at these sites. Nursing homes are occupied by residents who do little or no driving; traffic is primarily generated by employees, visitors, and deliveries." This description appears to be similar to the anticipated operations in which traffic to the facility is primarily staff and service related. This use may overestimate anticipated operations in that it does include rates associated with visitor traffic whereby Discover Recovery does not allow visitors on-site.

Given the *Trip Generation Manual, 10th Edition* provides data specific to assisted living facilities and the data for nursing homes appears to be a reasonable proxy for the proposed convalescent home, we compared the change in site trip two ways: first based on the *Trip Generation Manual* data and then comparing to the trip rates projected in Table 1. Tables 2 and 3 show the trip generation estimates using the two approaches.

Table 2. Estimated Trip Generation using only ITE *Trip Generation Manual* Data

Land Use	ITE Code	Size	Daily	Weekday AM Peak Hour			Weekday PM Peak Hour		
				Total	In	Out	Total	In	Out
Existing Conditionally Approved Use									
Assisted Living	254	15 beds	40	3	2	1	4	1	3
Proposed Use									
Nursing Home	620	15 beds	46	3	2	1	3	1	2
Proposed Use – Existing Use			+6	0	0	0	-1	0	-1

Table 3. Estimated Trip Generation using Discover Recovery Data

Land Use	Data Source	Size	Daily	Weekday AM Peak Hour			Weekday PM Peak Hour		
				Total	In	Out	Total	In	Out
Existing Conditionally Approved Use									
Assisted Living	ITE Code 254	15 beds	40	3	2	1	4	2	2
Proposed Use									
Convalescent Home	Table 1	15 beds	36	6	5	1	6	1	5
Proposed Use – Existing Use			-4	3	3	0	2	-1	3

Comparison of Tables 2 and 3 both confirm that either data approach shows little to no change in vehicular trip-making between the existing assisted living facility and the proposed conditional use.

Considering the more use-specific data presenting in Table 3, the proposed CUP is estimated to result in four fewer daily trips, an increase of up to three AM peak hour trips and an increase of up to two PM peak hours compared to the existing assisted living facility. The actual number of CUP-generated daily trips is likely lower than shown in Tables 1 and 3 given the conservative assumption that doctor visits, refuse/recycle service, food service delivery, and quarterly medical recycling all occur on the same day.

CONCLUSIONS

Given the projected reduction in weekday daily trips and increase of up to three weekday AM peak hour and two weekday PM peak hour trips shown in Table 3 using the site-specific data, we conclude the proposed CUP should have no substantive transportation capacity or concurrency impacts at the site driveways or nearby intersections. The same conclusion can be reached using the *Trip Generation Manual* data shown in Table 2.

We trust this letter adequately addresses the potential change in trip generation associated with the proposed CUP. Please call us at (503) 535-7433 if you have questions or need additional information.

Sincerely,
KITTELSON & ASSOCIATES, INC.



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