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October 23, 2019

Lauren Hollenbeck, Senior Planner
City of Camas
Development Review Services
616 NE Fourth Avenue
Camas, Washington 98607

Regarding: **Haley Short Plat
Short Subdivision Submittal**

Ms. Hollenbeck,

For the proposed Haley Short Plat project, please find all required plans, documents, and fees included for the following applications:

- Short Subdivision Review
- SEPA
- Shoreline Permit
- Critical Areas Review
- Archaeological Predetermination
- Tree survey

This application proposes to subdivide a 1.46± acre parent parcel into two lots pursuant to Short Subdivisions (CMC 17.09). The proposed Short Plat will create one new single-family residential lot and utilize an existing private road for access.

The project site is located (Tax Lot 127155-000) is located at 4550 SE 5th Avenue, Camas, WA, in the SE ¼ of Section 8, Township 1N, Range 3E of the Willamette Meridian. The lot is zoned Single-Family Residential (R-15), with a Comprehensive Plan designation of Single Family Low (SFL).

Submittal Requirements Checklist

Per the general application requirements of CMC 18.55.110 and requirements for a Preliminary Short Plat CMC section 17.09.030. All copies have been submitted at the time of application.

- Completed **Application** and fees.
- **List of permits** included in this narrative.
- **Certified Mailing List** showing the properties within a 300' radius of the project parcels. Mailing Labels are attached separately.
- A **Narrative** follows this section.
- **Preliminary Proposed Plat plans** included in this submittal:
 - **Existing Conditions Plan**
 - **Preliminary Plat**
- **Preliminary Stormwater Plans & Report**
- **Tree Survey**
- Reduced **site development plans** (& vicinity map) are included in the Proposed Plat plan set. Full-size plans attached separately.
- A copy of the **Preapplication meeting notes**.
- **SEPA Checklist**.
- An **Archaeological Predetermination and Survey** is included.
- A **Fish & Wildlife Habitat Conservation Areas Critical Areas Report** is attached.
- A **Slope Stability Assessment** is attached
- Three (3) hard copies submitted at the permit counter and in electronic format.

We ask for the assistance of Staff in processing this application within the minimum time line. The Applicant and Consultants are committed to facilitating the efforts of Staff by providing their services as needed. Please contact **Chris Baumann**, Planning Solutions, Inc., **360/750-9000**, with any request for assistance.

NARRATIVE:

The following responses, as well as the entire submittal, are intended to demonstrate compliance with the corresponding section of code.

Existing Use

The project site is located (Tax Lot 127155-000) is located at 4550 SE 5th Avenue, Camas, WA. One single family residence currently exists on the site.

Site Description

The site currently consists of one tax lot located in the SE ¼ of Section 8, Township 1N, Range 3E of the Willamette Meridian with approximately 1.46± acres of land. The site is located within the City Limits of Camas, Washington and is zoned Single-family Residential (R-15) under CMC 18.05 with a Comprehensive Plan Zone Designation of (SFL).

The project site is bordered by S.W. 5th Avenue and the S.P & S. Railroad Right-of-Way to the north. The abutting properties to the east and west are both zoned R-15 with single family uses. The Columbia River borders the site to the south.

Vegetation on the site consists of lawn areas, several black cottonwoods on the southern portion of the property and two Douglas-fir trees within the northern portion of the site. Blackberry occurs along the shoreline of the Columbia River.

The site slopes from north to south at ±20% along the northerly 1/3 of the site and is mostly flat (±2%) within the middle portion, and then slopes down ±25% to the top bank of the Columbia river.

The site's soils appear to contain Non-Hydric, Newberg Silt Loam (NbB) soils.

There are no mapping indicators for wetlands on the site.

The 100-year flood plain boundary of the Columbia River exists along the southern edge of the property.

Proposed Project

This application proposes a two-lot short plat. The new lot is proposed to be short platted from the existing 1.46± acre single-family lot. Access for both lots is from the existing private road, SW 5th Avenue. The existing single-family residence on the site will remain on lot 2 of the short plat and a new home with associated infrastructure will be constructed on lot 1.

Preliminary Plat Approval Criteria - CMC 17.09.030D: (Camas code verbiage in *italics*)

Criteria for Preliminary Short Plat Approval. The community development director or designee shall base their decision on an application for preliminary plat approval on the following criteria:

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

The project site is zoned R-15 which is in conformance with the site's comprehensive plan designation of SFL. Adopted City plans are not applicable to this site.

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

Water

Public water is not available to this site and will not be available in the foreseeable future. The existing residence on the project site is connected to a shared well located on the neighboring property to the east. Lot 2 of the proposed short plat will contain the existing residence, which is to remain, and will continue to be connected to the existing well on the neighboring property to the east. A new well is proposed for lot 1 of the proposed short plat. The new well is proposed within the south-eastern portion of proposed lot 1. Clark County Health Department approval will be obtained prior to drilling the new well.

Storm Drainage

The project's storm drainage measures have been designed, in conformance to CMC 14.02 Stormwater Control, by the project civil engineer, Steve Hale of Hale Development Services. A preliminary stormwater plan and preliminary stormwater report have been included with this application.

The southerly $\pm 35'$ of the parcel is within the 100-year floodplain and the entire site presently drains to the Columbia River. The Columbia River is a flow control exempt waterbody as Referenced in SWMMWW, Flow Control Exempt Surface Waters, Appendix I-E (page 133).

Preliminary stormwater plan (sheet 5) shows the contributing basin boundary for the proposed driveway for lot 1. A bioretention planter is proposed for treatment of the runoff from the proposed driveway. A roof drain lateral is to be supplied as shown on the

stormwater plan, with an outfall rip rap pad and flow spreader to be installed approximately 6 feet from top bank of the river.

The land disturbing activities are to include installation of a driveway and a residential home on lot 1. There are no improvements proposed for lot 2. The lot 1 preliminary proposal estimates that the new lot could generate as much as 8,500 square feet (sf) of total impervious pollution generating surfaces, 5,200 sf of possible residential building area and 3,300 sf of driveway (impervious). The estimated total impervious area for lot 1 is greater than 5,000 sf, triggering the water quality requirements. The stormwater requirements for water quantity (detention) are not triggered because this project drains into a flow control exempt waterbody, the Columbia River. The proposed project is to meet the runoff treatment (water quality) by utilizing a bioretention planter to treat the runoff from the driveway and a portion of the paved existing private access road. The project will create more than 5,000 square feet of impervious surfaces and must comply with Minimum Requirements #1 through #9 for the new hard surfaces and the converted vegetated areas.

Erosion Control

The project's storm drainage and erosion control measures have been designed, in conformance to CMC 14.06 Erosion and Sediment Control, by the project civil engineer, Steve Hale of Hale Development Services. A preliminary grading & erosion control plan has been included with this application.

Sanitary Sewage Disposal

Public sanitary sewer is not available to this site and will not be available in the foreseeable future. The existing residence on the project site is connected to an existing septic system. Lot 2 of the proposed short plat will contain the existing residence, which is to remain, and will continue to be connected to its existing septic system. A new septic system is proposed for lot 1 of the proposed short plat. The new septic system is proposed within the northern portion of lot 1. Clark County Health Department approval will be obtained prior to installation of the new septic system.

- 3. Provisions have been made 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;*

The project site is accessed via an existing private road, SW 5th Avenue. Water & sanitary sewer utilities are described above and electric services is available to the site. Street lighting, street trees and other improvements per the six-year street plan & Camas Design Standard Manual are not applicable to this site.

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

No dedication or reservations are required for this project site. Any required easements will be recorded with the final plat.

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

Traffic trips generated by the project site are less than 199 vehicles per day thus a traffic study is not required.

6. *The design, shape and orientation of the proposed lots are appropriate to the proposed use for which the lots are intended;*

The proposed lots have been designed per the R-15 zoning standards. Proposed lot 2 will contain the existing residence on the site while a new residence will be constructed on lot 1.

7. *Provisions are made for the maintenance of commonly owned private facilities;*

A maintenance agreement exists for the existing shared well serving the existing residence on the site and the neighboring property to the east.

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

CMC Title 16 – Environment

SEPA

A State Environmental Policy Act (SEPA) form is included with this submittal. A determination of non-significance is expected.

Archaeological

An Archaeological Predetermination Survey has been prepared for this project and has been included with this submittal. No historic or prehistoric archaeological materials were observed, and no further work is recommended.

Critical Areas

An Environmental Constraints Assessment, Critical Areas Report and a Slope Stability Assessment have been included with this submittal.

Frequently Flooded Areas: Per SMP Appendix C Section 16.57.020.D no new lots (or construction) are proposed within the frequently flooded areas.

Geological Hazard Areas: Slopes in excess of 15% (approximately 20%) existing along the northern boundary of the site and along the southern boundary at the bank of the Columbia River. The slope along the northern boundary contains existing SE 5th Avenue, existing driveways and existing septic drainfields. No new building construction is proposed in this area. The southern slope is the bank of the Columbia River and no new construction is proposed within this slope area. A Slope Stability Assessment has been included with this submittal.

Fish & Wild Habitat Conservation Areas: The Columbia River is located immediately south of the project site. The Applicant is proposing to reduce the 150-foot riparian buffer adjacent to the Columbia River to 75 feet as allowed under SMP 16.61.040(D)(4) Alternative Mitigation for Stream Buffers which states: *The requirements set forth in this section may be modified at the City of Camas' discretion if the applicant demonstrates the greater habitat functions of a per function basis, can be obtained in the affected drainage basin as a result of alternative mitigation measures.*

The project has avoided all direct impacts to the Columbia River. However, the project is proposing to reduce the riparian habitat buffer to provide for the existing Lot 2 residence and the building area for Lot 1 as allowed under SMP. These habitat impacts will be compensated through enhancement of riparian habitat on-site along the shoreline of the Columbia River. The project is proposing to reduce the 150-foot riparian zone of the Columbia River to allow for the construction of a house on Lot 1 and to maintain the house and landscaped area on Lot 1. According to SMP Table 6-1 the residential building setback in the medium intensity designated shoreline is 35 feet. The Applicant is proposing to reduce the riparian buffer to 75 feet as allowed under SMP 16.61.040(D)(3)(4). Currently a manufactured home, car port, and compacted gravel occur within the 150-foot riparian buffer. Due to presence of impervious surfaces and lack of any vegetation in this area it provides a fragmented riparian habitat function and is

considered functionally isolated. This 4,860 ft² area is therefore not included in the buffer reduction calculations.

According to WDFW (Riparian Ecosystems 2018) typical riparian system functions include stream temperature modification, water purification, floodwater storage, stream channel stabilization, woody debris recruitment, and provided areas for fish and wildlife movement. Currently the buffer reduction area consists of a house and gravel driveway and parking area in the northwest portion of the reduction area (4,860 ft²). The remainder of the riparian buffer reduction area (15,078 ft²) is maintained lawn. One black cottonwood tree is within the buffer reduction area and this tree will not be removed as a result of the short plat. Based on these existing conditions, the reduction area provides minimal riparian habitat function for any of the above described functions. To compensate for this buffer reduction, the Applicant is proposing to plant the 20,080 ft² area between the OHWM and the 75-foot reduced riparian buffer. This area is maintained lawn with several black cottonwood trees. No shrub layer exists in this area. This planting will consist of a native tree and shrub planting that will provide a diverse plant community, increased structure and an overall lift in habitat functions over the existing parklike setting. The enhanced buffer is adjacent to the Columbia River which will provide a corridor for wildlife to move freely through this area to access the river and other habitats that may occur on adjacent properties. In addition to the planting, the Applicant will remove and maintain existing non-native aggressive plant species from the enhancement area and along the shoreline. The proposed planting plan details are specified within the submitted Critical areas report.

CMC Title 17 – Land Development

This project has been designed in accordance of the provisions of CMC Title 17. The applicable sections are discussed below.

Chapter 17.01.040 Dedications

No dedications, public streets, tracts or public trails are proposed by this short plat.

Chapter 17.01.050 Survey Content

The submitted preliminary plat and existing conditions plans have been developed in accordance with these standards.

Chapter 17.09 Short Subdivisions

CMC Sections 17.09.030(B) and 17.09.030(D) are addressed earlier in this narrative and by the entire contents of this submittal.

Chapter 17.19 Design & Improvement Standards

This short plat has been designed in accordance with these standards as does not propose any deviations.

Chapter 17.21 Procedures for Public Improvements

The applicant understands these procedures for permitting and final approval and does not propose any deviations.

CMC Title 18 – Zoning

Chapter 18.05.040 Residential and Multifamily zones.

The project site is zoned R-15 and per CMC 18.05.040 single family dwellings will be proposed on the project lots. This two-lot short plat has been designed to meet the minimum density of 2 to 3 dwelling units per acre.

Chapter 18.09 Density and Dimensions

The project site is zoned R-15 and as noted below meets the R-15 single family density and dimensional standards as well as the setback standards noted in CMC 18.09.040.

Project Summary Table – R-15 Zoning Requirements		
Site Area	1.46± AC	
	Standard*	Proposed
Minimum Lot Size	12,000 SF	19,679 SF
Maximum Lot Size	24,000 SF	44,153 SF*
Minimum Lot Width	100 FT	101 FT
Minimum Lot Depth	100 FT	138 FT
Maximum Building Lot Coverage	30%	30% max
Maximum Building Height	35 FT	35 FT max**
Minimum Setbacks		
Front	30 FT	30 FT
Side	15 FT	15 FT
Street Side	30 FT	n/a
Rear	35 FT	35 FT

*Per CMC 18.09.040 Table 1, footnote 3 an exception to the maximum lot size is allowed due to the existence of a single-family residence on the project site that is being retained.

** to roof peak per Shorelines

Chapter 18.31.040 Procedures for Landscape, Tree & Vegetation Plans

No existing trees are proposed to be removed as part of this project. Per CMC 18.13.040.B a tree survey is not required.

Chapter 18.13.51 Minimum Tree Density Requirement

Per CMC 18.13.051 20 tree units per acre are required. This proposed short plat requires 29 tree units and provides 57 tree units via on site existing trees as noted below.

Site Area	Tree Units Req / Acre	Tree Units Required
1.46 AC	20 units / acre	29
Tree Species	Dia @ Breast Height (dbh)	Tree Units per CMC 18.13.051 Table 2
Douglas Fir (north part of lot - (Pseudotsuga menziesii))	12"	2
Douglas Fir (north part of lot - (Pseudotsuga menziesii))	12"	2
Black Cottonwood (south part of lot – Populus balsamifera)	36"	14
Black Cottonwood (south part of lot – Populus balsamifera)	30"	11
Black Cottonwood (south part of lot – Populus balsamifera)	24"	8
Black Cottonwood (south part of lot – Populus balsamifera)	24"	8
Black Cottonwood (south part of lot – Populus balsamifera)	20"	6
Black Cottonwood (south part of lot – Populus balsamifera)	20"	6
Total Tree Units		57

9. *That the plat meets the requirements of Chapter 58.17 RCW and other applicable state and local laws which were in effect at the time of preliminary plat approval.*

RCW 58.17.110

Approval or disapproval of subdivision and dedication -- Factors to be considered -- Conditions for approval -- Finding -- Release from damages.

(1) *The city, town, or county legislative body shall inquire into the public use and interest proposed to be served by the establishment of the subdivision and dedication. It shall determine: (a) If appropriate provisions are made for, but not limited to, the public health, safety, and general welfare, for open spaces, drainage ways, streets or roads, alleys, other public ways, transit stops, potable water supplies, sanitary wastes, parks and recreation, playgrounds, schools and school grounds, and shall consider all other relevant facts, including sidewalks and other planning features that assure safe walking conditions for students who only walk to and from school; and (b) whether the public interest will be served by the subdivision and dedication.*

The project site is accessed via an existing private road, SW 5th Avenue.

City of Camas water service is not available to the site. The western lot will utilized its existing shared well and a new well is proposed for the eastern lot.

City of Camas sewer service is not available to the site. The western lot will utilized its existing septic system and a new septic system is proposed for the eastern lot.

A Stormwater Report, stormwater plans and erosion control plans have been prepared by the project civil engineer Steve Hale that address the City of Camas's requirements. This report and plans has been included as part of the preliminary review package.

(2) *A proposed subdivision and dedication shall not be approved unless the city, town, or county legislative body makes written findings that: (a) Appropriate provisions are made for the public health, safety, and general welfare and for such open spaces, drainage ways, streets or roads, alleys, other public ways, transit stops, potable water supplies, sanitary wastes, parks and recreation, playgrounds, schools and school grounds and all other relevant facts, including sidewalks and other planning features that assure safe walking conditions for students who only walk to and from school; and (b) the public use and interest will be served by the platting of such subdivision and dedication. If it finds that the proposed subdivision and dedication make such appropriate provisions and that the public use and interest will be served, then the legislative body shall approve the proposed subdivision and dedication. Dedication of land to any public body, provision of public improvements to serve the subdivision, and/or impact fees imposed under RCW 82.02.050 through 82.02.090 may be required as a condition of subdivision approval. Dedications shall be clearly shown on the final plat. No dedication, provision of public improvements, or impact fees imposed under RCW 82.02.050 through 82.02.090 shall be allowed that constitutes an unconstitutional taking of private property. The legislative body shall not as a condition to the approval of any subdivision require a release from damages to be procured from other property owners.*

No dedication are required, the project site is accessed via an existing private road, SW 5th Avenue.

Camas Shoreline Master Program: (Camas code verbiage in *italics*)

The project site is located within the Medium Density shoreline designation where residential development is an allowed use.

Chapter 6.3.12 – Residential Development is addressed below.

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

No native vegetation is proposed to be removed as part of this 2-lot short plat. The project's storm drainage and erosion control measures have been designed, in conformance to CMC 14.06 Erosion and Sediment Control, by the project civil engineer, Steve Hale of Hale Development Services. A preliminary grading & erosion control plan has been included with this application.

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

No shoreline stabilization is proposed as part of this 2-lot short plat. In addition shoreline stabilization will not be required by the future residential construction as the existing residence is located 125' from the ordinary high water mark, and the second new residence will be constructed at least 75' from the ordinary high water mark.

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

No residential development is 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.

The future residence will not obstruct the view to the shoreline as the railroad right-of-way is located on the north side of the property on a levee like earthen structure; this right-of-way effectively blocks views of the shoreline from properties to the north. No view exist from the shoreline landward.

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

N/A. The western lot of this 2-lot short plat will contain an existing residence and the eastern lot will contain a new residence.

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.*

This 2-lot short plat has been designed in conformance with the City of Camas' R-15 zoning district. The new onsite sewage system proposed will be reviewed and approved by the Clark County Health Department prior to construction.

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

This project does not propose residential development or sewage disposal systems within floodways or channel migration zones.

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.*

No appurtenances, accessory uses, or facilities are proposed as part of this project.

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:*

This 2-lot short plat has been designed in conformance with the City of Camas' R-15 zoning district.

- 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.*

The future new residence on the new lot will be located and designed so as to not require flood hazard reduction measures.

b. Shoreline stabilization measures are not required.

Shoreline stabilization will not be required by the future residential construction as the existing residence is located 125' from the ordinary high-water mark, and the second new residence will be constructed at least 75' from the ordinary high water mark.

Summary

We believe the establishment of this project is in the best interest of the public as a whole. This project will fulfill goals identified within the Comprehensive Plan, such as providing low density residential lots. The development goals for the site will be fulfilled resulting in a broader tax base that will help furnish funding for projects enjoyed by the public as a whole.

We ask that Staff utilize this narrative to supplement the entire submittal in order to reach findings that will support a recommendation of Approval. Please give me a call with any question that you might have.

Please forward a copy of all correspondence to Planning Solutions, Inc. c/o **Chris Baumann**, PO Box 61406, Vancouver, WA 98666; Phone: 750-9000; email: chrisb@planningsolutionsinc.com

Sincerely,



Chris Baumann, LA
Planning Solutions, Inc.

attachments: Subdivision Submittal Plans & Documents