



May 04, 2022

Madeline Sutherland
City of Camas Community Development
616 NE 4th Avenue
Camas, WA 98607

RE: Camas Height Subdivision (SUB21-01) Public Comment Response

Dear Ms. Sutherland:

This letter is in response to the public comments submitted for the Camas Heights Subdivision (SUB21-01). This response will specifically address comments in Exhibits 24, 25, 26, 27/28, 29, 37, and 38. Please place this letter into the record for the Camas Heights Subdivision.

Exhibit 24 – Public Comment e-mail from Kim Bowman (Bingham)

Exhibit 8 raises concerns about speed and safety on NE 28th Street, tree removal, lot size and open space, and stormwater management.

The applicant understands the concern regarding speeding and safety on NE 28th Street. Unfortunate speeding is not an issue the Applicant can control and is an enforcement issue that should be brought to the attention of the City of Camas Police Department. Additionally, any concerns on school bus stop locations should be brought to the attention of the Camas School District so they can review the stop location and determine if it is the safest location. The applicant will provide half-width frontage improvements along the site frontage of NE 28th Street. The improvements will include a 6-foot sidewalk and 23-foot half width pavement for vehicle travel.

The applicant understands the concerns regarding tree removal. Currently there are 236 trees on site with a trunk diameter at breast height of 6 inches or greater. The majority of these trees are clumped in the northeast and southeast corners of the site. The proposed development will provide over 600 new trees (as required by code at 20 tree units per acre) with the development that will be dispersed across the site, including in a large open space along the north site boundary, and open spaces in the southeast and southwest corners of the site, street trees, and trees planted on the private lots.

The proposed lots meet or exceed the size and setback requirements for the R-10 zoning district, utilizing density transfer provision for the protection of critical areas and open space. Tract J is proposed to be a park for the community, Tract A will provide passive open space with wetland buffer enhancement and oak mitigation, and Tracts F, H, and M will provide passive open space for planting of new trees and oak mitigation.

Stormwater generated from the proposed development will be collected on site and conveyed to treatment and detention facilities. Treated stormwater will then be released at reduced flows allowed Chapter 14 of the Camas Municipal Code. The City has reviewed the preliminary stormwater plan and agrees that the development can meet all the requirements of the City of Camas. The City will review the final stormwater plan to ensure that stormwater from the development will not impact the neighboring parcels prior to approving the project for construction.

Exhibit 25 – Public Comment e-mail from Gordon Comegys

Exhibit 25 raises concerns about traffic in the vicinity of the development.

The responses to Exhibit 25 below were provided by the Applicant's Traffic Engineer and included in this response letter.

Page 11 and Figure 3- Trip Distribution

The 10% distribution for 232nd Ave / SE Leadbetter St doesn't seem correct. In the middle of this leg is the North Shore Blvd providing the only access to/from Lacamas Lake Elementary School. Most of this traffic since the school was opened has been on 232nd Ave from 28th St and not from Leadbetter. The 232nd Ave / SE Leadbetter St should be divided into two legs separated by North Shore Blvd and it seems that the percent distribution between these two legs should be different.

Response: The distribution used in the Traffic Study is consistent with what other studies in the Green Mountain area have used. Camas staff reviewed and approved the distribution as part of the scoping process for the study. The study does show 10 percent of the traffic continuing through towards downtown Camas. More likely, some of this traffic is traveling to/from the school as noted in the comment, particularly during the morning. However, the assumption of the traffic continuing through to the next study area intersection is a more conservative approach to the analysis since volumes would be higher at the Leadbetter and Everett intersection.

Page 19- Crash History Review

Historical data used in the study ends in December 2019, so this only contains one year of data after Lacamas Lake Elementary School was opened, which seems too limited. Also, the data won't include the numerous unreported close calls. One of the problems for drivers is that the NE 28th St eastbound 40 mph speed limit ends slightly before NE 232nd Ave which makes it difficult for drivers getting on 28th St from 232nd Ave to predict the speed of oncoming eastbound traffic since the speed now increases to 50 mph. Another problem is the NE 28th St westbound 50 mph speed limit east of NE 232nd Ave is downhill which tends to increase speed and also makes the need for westbound cars to stop more difficult when cars are stopped waiting to turn south on 232nd Ave.

Response: Crash history review typically examines the most recent five years of data. Only complete years are used in the evaluation. It generally takes the state agency compiling the data about a year to compile the data in part because it must wait for all crash reports to be completed and submitted by local jurisdictions. At the time of the analysis, the most recent five years of complete data was 2015 through 2019.

A review of the data in the appendix shows two crashes reported in 2015, one crash reported in 2016, one crash reported in 2017, no crashes reported in 2018, and two crashes reported in 2019. At this time, the crash occurrences are randomly distributed across the analysis period. The data is not sufficient to show a strong trend towards increased crash frequency. As time progresses, a trend may become apparent. If so, it is likely attributable to both the presence of the school and the growing presence of housing as the Green Mountain area develops.

The crash review can only be based on reported data. Near collisions, or "close calls," are anecdotal and not documented.



The comments about speeds on NE 28th Avenue are accurate. As development in the Green Mountain Area, the City of Camas may conduct studies to demonstrate that slower speeds on this corridor are warranted.

General Observations

After Lacamas Lake Elementary school opened, a dramatic increase in peak NE 232nd Ave traffic between 28th St and North Shore Blvd occurred. The speed limit stayed at 45 mph rather than matching the 35 mph North Shore Blvd limit. More close calls and incidents have happened at the NE 28th St and NE 232nd Ave intersection than the limited historical data used for the report. Residents on the east side of 232nd Ave can't safely cross NE 232nd Ave to retrieve their USPS mail during the peak times. Here are three ideas to consider to help mitigation.

- 1. Lower the NE 232nd Ave 45mph speed limit to 35mph (to match N Shore Blvd)*
- 2. Create crosswalks on NE 232nd Ave at NE 16th St and NE 22nd St*
- 3. Lower the NE 28th St 50 mph speed limit east of 232nd Ave to 40 mph to match the 40 mph limit west of 232nd Ave, or create a roundabout at this intersection.*

Response: These are all ideas that the City of Camas may consider as improvements to their transportation system but not projects that can be implemented by the proposed development.

Exhibit 26 – Public Comment e-mail from Shannon Crouse

Exhibit 26 raises concerns over tree removal and open space, lot size and setbacks, stormwater management.

The proposed lots meet or exceed the size and setback requirements for the R-10 zoning district, utilizing density transfer provision for the protection of critical areas and open space. All lots within the development will be the same size or larger than the lots abutting the sites west boundary, and transition lots at the maximum allowed lot size are provided on the east boundary. The proposed lots will be constructed to the west property line, just as the lots of Green Mountain were built to the east property line. The rear yard setback will be 15 feet, as agreed upon with the City utilizing density transfer standards. It is anticipated that a privacy fence will be built along the rear property lines, but there are not code requirements for buffers between single-family residential developments. The City review process ensures development does not negatively impact neighboring parcels and all structures built on site will be required to meet all City of Camas requirements.

The proposed Holt development discussed in the comment had more critical areas on site that required protection and was developed utilizing the optional Planned Residential Development, which generally requires additional open space for great flexibility in lot development. Open space is proposed with Camas Heights. Tract J is proposed to be a park for the community, Tract A will provide passive open space with wetland buffer enhancement and oak mitigation, and Tracts F, H, and M will provide passive open space for planting of new trees and oak mitigation.

The applicant understands the concerns regarding tree removal. Currently there are 236 trees on site with a trunk diameter at breast height of 6 inches or greater. The majority of these trees are clumped in the northeast and southeast corners of the site. The proposed development will provide over 600 new trees



(as required by code at 20 tree units per acre) with the development that will be dispersed across the site, including in a large open space along the north site boundary, and open spaces in the southeast and southwest corners of the site, street trees, and trees planted on the private lots.

Stormwater generated from the proposed development will be collected on site and conveyed to treatment and detention facilities. Treated stormwater will then be released at reduced flows allowed Chapter 14 of the Camas Municipal Code. The City has reviewed the preliminary stormwater plan and agrees that the development can meet all the requirements of the City of Camas. The City will review the final stormwater plan to ensure that stormwater from the development will not impact the neighboring parcels prior to approving the project for construction.

Exhibit 27/28 – Public Comment e-mail from Joe and Sharon Conn

Exhibits 27/28 raises multiple concerns regarding the development. The concerns will be addressed individually as numbered in the comment e-mail.

1. The first item raises concerns regarding stormwater management and discharge.

Stormwater generated from the proposed development will be collected on site and conveyed to treatment and detention facilities. Treated stormwater will then be released at reduced flows allowed Chapter 14 of the Camas Municipal Code. The City has reviewed the preliminary stormwater plan and agrees that the development can meet all the requirements of the City of Camas. The City will review the final stormwater plan to ensure that stormwater from the development will not impact the neighboring parcels prior to approving the project for construction.

2. The second item raises concern over a rise in the groundwater.

The proposed stormwater detention pond will hold water long enough for it to be discharged at rates approved by the City. Based on the geotechnical report submitted with the application, infiltration rates are negligible on the site, and groundwater change will be negligible due to the stormwater management.

3. The third item raises concerns about stormwater management.

Stormwater generated from the proposed development will be collected on site and conveyed to treatment and detention facilities. Treated stormwater will then be released at reduced flows allowed Chapter 14 of the Camas Municipal Code. The City has reviewed the preliminary stormwater plan and agrees that the development can meet all the requirements of the City of Camas. The City will review the final stormwater plan to ensure that stormwater from the development will not impact the neighboring parcels prior to approving the project for construction.

Stormwater from NE 28th Street will be collected in the street and conveyed into the existing stormwater system in NE 28th Street to the west of the site.

4. The fourth item raises concerns of stormwater management during “sever rain conditions”.

The Applicant understands the concern with stormwater overflow in large storm events. The storm system is design to manage stormwater up to 50-year storm events. In larger storm events, there is potential that the storm system could reach capacity and overflow. In that event, the



overflow is designed to overflow runoff into the natural drainage path. Additionally, the stormwater system cannot feasibly be constructed to contain the severest of storm events, and as with current conditions, there is potential that a large enough storm event could potentially overwhelm the drainage. The system will be designed to meet Chapter 14 of the Camas Municipal Code, which meets the State of Washington Department of Ecology Clean Water Act requirements for stormwater systems.

5. The fifth item raises concerns regarding concerns over the size Lot 8.

Per City of Camas code section 18.03.040, lot depth means the horizontal distance from the midpoint of the front lot line to the midpoint of the rear lot line. The distance from the from the midpoint of the front lot line to the midpoint of the rear lot line is 90.98 feet, which meets the 90-foot minimum requirement for density transfer lots in the R-10 zoning district. The proposed development meets or is conditioned to meet all current City of Camas Standards.

6. The sixth item raises concerns regarding safety of access from the development onto NE 28th Street.

According to the Transportation Impact Study included with the application, sight distance from the development access exceeds 600 feet in both directions, which is greater than the minimum requirements. Additionally, the development meets intersection spacing to the greatest extent practicable, given the development is required to have two access points, and the only other access option is the extension of N 87th Avenue into the site from the development.

- 7, 8, and 10. The seventh, eight, and tenth items raises concerns regarding construction access, site fencing during construction, and dust control.

An erosion control plan will be provided for review and approval with the final engineering plans. The erosion control plan will identify the installation of a new construction entrance meeting current best management standards, to be located off NE 28th Street at the proposed permanent site access, as well as any other suggested erosion control measures for the site. Erosion control measures will vary by season, but will address items such as dust control, sediment laden runoff control, and tracking of dirt and debris from the site. Erosion control fencing will also be installed to protect all downhill properties during construction.

9. This ninth item raises concerns regarding construction hours and noise.

Per City of Camas code, construction can occur between 7 a.m. and 7 p.m. Monday through Friday and between 7 a.m. and 5 p.m. on Saturdays. Construction is not allowed on Sundays or New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, or Christmas Day.

Exhibit 29 – Additional Public Comment e-mail from Joe and Sharon Conn

Exhibit 29 reraises the original concerns from Exhibits 27/28.

The responses to Exhibits 27/28 generally address all the concerns above. The Applicant will not have construction plans approved without first showing that the development can meet all requirements of the City of Camas, and the project has been conditioned as such in the Staff Report. Through the preliminary land use process, the Applicant must show the City the their proposal is feasible within the current code. While the final details of the stormwater management are not fully designed at land use, it



has been shown that a stormwater system and be fully designed to prevent the proposed development from impacting the neighboring parcels. It should be noted, that part of the stormwater management criteria within Chapter 14 of the Camas Municipal Code is to maintain the existing flow path for stormwater to the greatest extent practicable.

Exhibit 37 – Public Comment e-mail from Alicia King

Exhibit 37 reraises the concerns regarding tree and wetland/habitat removal and specific goals of the City of Camas Comprehensive Plan.

The response will first address the numbered comprehensive plan statutory goals identified in the public comment.

8. The proposed development site has been used partially for hay production in the past. However, the site was brought into the urban growth boundary and zoned residential based on the comprehensive plan. This means it was determined that this land was better suited for residential development over productive agricultural lands at the time it was zoned.
9. The proposed development will provide a park within the development along with open spaces to protect the large existing wetland and provide area of Oregon white oak mitigation on site. The habitat provided by the oak mitigation will be significantly more beneficial than protecting individual oaks in the long term. Wetland bank credits will also be purchased for the proposed wetland fill, that will provide significantly more beneficial wetland habitat than protecting the small, isolated wetland that does not contain habitat of local importance.
10. The development will provide new, more beneficial oak habitat along with protecting two large oaks where it is feasible; will purchase wetland bank credits to provide more beneficial wetland habitat to be constructed to mitigate the filling of a small, isolated wetland that does not contain habitat of local importance; and will protect a large existing wetland. The development will also provide for the planting of over 600 trees to offset the removal of 236 trees from the site.
11. Citizen involvement is encouraged through all development processes starting with when this parcel was brought into the urban grown boundary and zoned for residential use; when code language is modified to improve development; and with the opportunity for the public to provide comment during this land use process.
12. The proposed development will be constructing adequate public facilities and is required to study existing public facilities to ensure that they are able to handle the proposed development. The development will not be approved by the City unless adequate public facilities are provided for this development and provided to be expanded for future development.
13. An archaeological predetermination was completed by an archeologist, and it was determined that no lands, sites, or structures of historical or archaeological significance do not or are not likely to existing on the development site. The project is conditioned to report any items of archaeological significance that are uncovered during development in the even that something is found.

In addition to looking at these goals, the remaining goals cannot be ignored. These goals include providing for urban growth, reducing sprawl, providing for efficient transportation, and providing housing. The intent of the Growth Management Act and the Camas Comprehensive Plan is to meet and balance all of these goals, and at the development level that is accomplished with the urban

growth boundary, zoning designation, and development code. This project meets or is conditioned to meet all applicable codes, which in turn means that the development is meeting the intent of the Camas Comprehensive Plan and Growth Management Act.

The applicant understands the concerns regarding tree removal. Stating the removal of “2,022.5 tree units of 2,049.5” can be somewhat misleading as the tree unit values are a number provided through code language to give the City and developers a way to calculate the value of an existing tree, if saved, towards the requirement of a development to provide 20 tree units per acre. Currently there are 236 trees on site with a trunk diameter at breast height of 6 inches or greater. The majority of these trees are clumped in the northeast and southeast corners of the site. While the proposed development will remove the majority of these trees, it will also provide over 600 new trees (as required by code at 20 tree units per acre) with the development that will be dispersed across the site, including in a large open space along the north site boundary, and open spaces in the southeast and southwest corners of the site, street trees, and trees planted on the private lots. As with the Comprehensive Plan goals, the entirety of the development code must be considered when it comes to protecting trees. The trees removed are impacted by grading requirement for road and soil stability that are outside of the tree protection code requirements. In the case of this project, it would cost less for the developer if they could save the trees, but it is not feasible due to other requirements within the code. In the long term, 600 healthy trees dispersed through the development will provide greater benefit than protecting trees that are clumped together and potentially impacted by grading.

The applicant understands that protecting the Oregon white oak habitat is important. However, protecting the existing oaks would create many individual oak trees separated by housing and roads. This is not valuable Oregon white oak habitat. By removing a majority of the Oregon white oak and providing on-site mitigation at a ratio between 3:1 and 5:1 of the existing oak canopy, much more valuable Oak habitat will be created. The Applicant did originally propose to buy mitigation bank credits for the oaks, however, after discussions with the City and the Washington Department of Fish and Wildlife, on-site mitigation solutions were determined. A final mitigation plan will be provided for approval that will include the final proposed on-site mitigation.

The Applicant understands the concern with protecting wetlands, which is why they are proposing the protection of the wetland in the southwest corner of the site. Through site visits and development alternative review, it was determined that filling the wetland in the southeast portion of the site and providing mitigation through the purchase of mitigation bank credits would be the best design solution. The purchasing of credits will provide more significant habitat than protecting a small, isolated wetland that does not contain habitat of local importance.

Exhibit 38 – Public Comment e-mail from Madeline Lyne

Exhibit 38 raises the concerns regarding removal of Oregon white oak.

The applicant understands that protecting the Oregon white oak habitat is important. However, protecting the existing oaks would create many individual oak trees separated by housing and roads. This is not valuable Oregon white oak habitat. By removing a majority of the Oregon white oak and providing on-site mitigation at a ratio between 3:1 and 5:1 of the existing oak canopy, much more valuable Oak habitat will be created. The Applicant did originally propose to buy mitigation bank credits for the oaks, however, after discussions with the City and the Washington Department of Fish and Wildlife, on-site



mitigation solutions were determined. A final mitigation plan will be provided for approval that will include the final proposed on-site mitigation.

Sincerely,

AKS ENGINEERING & FORESTRY, LLC

A handwritten signature in blue ink, appearing to read 'Michael Andreotti', with a long horizontal flourish extending to the right.

Michael Andreotti, RLA

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