



---

## 3. Narrative

---

---



# Camas Heights Type III Subdivision

**Date:** October 2021

**Submitted to:** City of Camas  
Community Development Department  
616 NE Fourth Avenue  
Camas, WA 98607

**Applicant:** Lennar Northwest, Inc.  
11807 NE 99th Street  
Vancouver, WA 98682  
Ryan Selby  
(360) 258-7900  
ryan.selby@lennar.com

**AKS Job Number:** 8468



---

**Table of Contents**

**I. Executive Summary ..... 2**

**II. Site Description/Setting ..... 2**

**III. Applicable Review Criteria ..... 2**

CITY OF CAMAS COMPREHENSIVE PLAN GOALS ..... 3

REVISED CODE OF WASHINGTON ..... 6

    Title 58 RCW – Boundaries and Plats ..... 6

        Chapter 58.17 RCW ..... 6

CITY OF CAMAS CODE ..... 6

    Title 5 – Business Taxes, Licenses and Regulations..... 6

        5.45 Telecommunications ..... 6

    Title 12 – Street, Sidewalks and Public Places ..... 6

        12.24 Street Names..... 6

    Title 14 – Stormwater Provisions ..... 6

        14.02 Stormwater Control ..... 7

    Title 15 – Buildings and Construction ..... 7

        15.04 Building Code ..... 7

    Title 16 – Environment..... 7

        16.07 SEPA Categorical Exemption and Threshold Determinations ..... 7

        16.31 Archaeological Resource Preservation ..... 8

        16.51 General Provisions for Critical Areas..... 8

        16.53 Wetlands ..... 9

        16.59 Geologically Hazardous Areas..... 9

    Title 17 – Land Development ..... 11

        17.11 Subdivisions ..... 11

        17.19 Design and Improvements Standards ..... 14

        17.21 Procedures for Public Improvements..... 17

    Title 18 – Zoning..... 18

        18.07 Use Authorization..... 18

        18.09 Density and Dimensions..... 18

        18.11 Parking..... 22

        18.13 Landscaping ..... 22

        18.15 Signs..... 28

        18.17 Supplemental Development Standards..... 29

        18.45 Variances. .... 29

        18.55 Administration and Procedures..... 29

**IV. Conclusion ..... 30**

---

---

# Camas Heights Type III Subdivision

**Submitted to:** City of Camas  
Community Development Department  
616 NE Fourth Avenue  
Camas, WA 98607

**Applicant:** Lennar Northwest, Inc.  
11807 NE 99th Street  
Vancouver, WA 98682  
Ryan Selby  
(360) 258-7900  
ryan.selby@lennar.com

**Property Owners:** Hang Fung Enterprises  
PO Box 872744  
Vancouver, WA 98687

**Applicant's Consultant:** AKS Engineering & Forestry, LLC  
9600 NE 126<sup>th</sup> Avenue, Suite 2520  
Vancouver, WA 98682

Contact(s): Michael Andreotti, RLA  
Email: Andreottim@aks-eng.com  
Phone: (360) 882-0419

**Site Location:** 22630 NE 28<sup>th</sup> Street  
Camas, WA 98607

**Clark County Parcels:** 173157000

**Site Size:** ±37.27 acres (± 1,623,311 square feet)

**Land Use Districts:** Residential - 10,000 (R-10)



---

## I. Executive Summary

Through this application, Lennar Northwest, Inc. (Applicant) requests approval from the City of Camas (City) to subdivide the subject site, described below, into 121 single-family lots for the future construction of detached single-family homes. The development will gain access from NE 28<sup>th</sup> Street along the site frontage and the extension of N 87<sup>th</sup> Avenue into the site, providing access to the individual lots with an internal street network. There are two wetlands on site, one which is proposed to be protected and one to be filled. Impacts to the wetlands will be mitigated accordingly.

In addition to this narrative, the application package includes the materials necessary for the City to review and approve this submittal, including Preliminary Plans, Stormwater Technical Information Report (TIR), Geotechnical Site Investigation Report, Traffic Impact Study, Critical Areas Report, and a State Environmental Policy Act (SEPA) checklist.

The highlights of this project that will be discussed further in this narrative include:

- Platting of 121 single-family lots.
- Construction of the public internal street network for lot access and circulation.
- Protection or mitigation of impacts to existing critical areas.
- Construction of water, sanitary sewer, and stormwater utilities for the development.

The project is to be constructed in a maximum of 3 phases as follows:

- Phase 1 – Construct 43 lots, development access from NE 28<sup>th</sup> Street/N 87<sup>th</sup> Avenue, and necessary roadways and utilities.
- Phase 2 – Construct 42 lots and necessary roadways and utilities.
- Phase 3 – Construct 36 lots and necessary roadways and utilities.

The written narrative includes findings of fact demonstrating that the application complies with all applicable approval criteria. These findings are supported by substantial evidence, including Preliminary Plans and other written documentation. This information, which is included in this application package, provides the basis for the City to approve the application.

## II. Site Description/Setting

The subject site consists of one parcel and is ±37.27 acres in size. The site is addressed 22630 NE 28<sup>th</sup> Street, Camas, WA 98607. The property is identified as Clark County Parcel Number 173157-000 of the northwest ¼ of Section 21, Township 2 North, Range 3 East, Willamette Meridian. The site is zoned Residential – 10,000 (R-10) with an Airport Overlay – Zone C. The property is in use as a single-family residence and for agricultural hay production. The site has an existing single-family dwelling with an attached garage, barn, milk house, shed, and general-purpose structure. The structures are located near the west property line approximately halfway up the property line.

Neighboring properties are R-10 to the north and northwest, Agriculture-20 (AG-20) to the east, Rural-5 (R-5) to the south, and Residential 6,000 (R-6) to the west. Properties to the east and south are developed with large-lot single-family homes, properties to the west are developed, or being developed, as single-family homes, and the property to the north is currently under construction for future single-family homes. Properties to the east and south are in unincorporated Clark County outside of the urban growth boundary.

The site has frontage on NE 28<sup>th</sup> Street along the south boundary and N 87<sup>th</sup> Avenue is stubbed to the site from the west. NE 28<sup>th</sup> Street is identified as a three-lane Arterial (per City of Camas Transportation Comprehensive Plan Map) and is currently developed with travel lanes and ±37-foot paved width and 40-foot half-width right-of-way. Frontage improvements will be provided with the development. N 87<sup>th</sup> Avenue is classified as a Local/Sprinklered street with a 52-foot-wide right-of-way containing 28 feet of pavement, 7-foot planter strips, and 5-foot detached sidewalks. N 87<sup>th</sup> Avenue will be extended into the site.

The site is hilly and increases in elevation and slope steepness from the southwest to the north, with areas of steep slopes in the north portion of the site. The site is mostly covered in grass and shrubs and contains several trees. Two wetlands are located in the southern portion of the site. The west wetland extends off site to the west, and the east wetland is fully within the project parcel. The Clark County Geographic Information Services (GIS) MapsOnline database shows an archaeological predictive ranging from Low to Moderate-High across the site. According to the City of Camas CARA Map, the site is not within a City of Camas mapped Critical Aquifer Recharge Area (CARA). All critical areas will be discussed in further detail later in this narrative.

**III. Applicable Review Criteria**

**CITY OF CAMAS COMPREHENSIVE PLAN GOALS**

- **Citywide Land Use Goal: Maintain a land use pattern that respects the natural environment and existing uses while accommodating a mix of housing and employment opportunities to meet the City’s growth projections.**

**Response:** The subject site is zoned for residential development (R-10). There is substantial demand for single-family housing in the City of Camas. The proposed subdivision provides the necessary infrastructure and supplies in-demand housing products at a density consistent with the site and surrounding zoning, while maintaining or mitigating impacts to existing critical areas and providing natural area tracts on site. Therefore, the proposed development is consistent with the adopted comprehensive plan.

- **Neighborhood Goal: Create vibrant, stable, and livable neighborhoods with a variety of housing choices that meet all stages in the life cycle and the range of affordability.**

**Response:** The proposed subdivision will provide a mix of lot sizes creating a neighborhood with a mix of single-family home options. The proposed lots meet the requirements of the R-10 zone, using the density transfer option for sites with critical areas, which provides housing types consistent with the overall comprehensive plan.

- **Natural Environment Goal: Develop an interconnected network of parks, trails, and open space to support wildlife corridors and natural resources and enhance the quality of life for Camas residents and visitors.**

**Response:** The Applicant proposes to create one large natural area tract that will maintain and protect the westernmost wetland and create open space tracts along the north property line and south of NE Country View Circle (off-site private road) to protect existing trees protect existing trees to the greatest extent practicable and provide open space area for new tree planting. An open space tract is also provided in the southeast corner to provide a park for the development.

- **Residential Mixed-Use Goal:** To foster economically and socially diverse mixed neighborhoods as the foundation for a healthy city, which includes meeting the multi-modal transportation, housing, employment, education, recreation, and health needs of the citizens.

**Response:** The proposed subdivision will provide a mix of lot sizes creating a neighborhood with a mix of single-family home options. The proposed lots meet the requirements of the R-10 zone, using the density transfer option for sites with critical areas, which provides housing types consistent with the overall comprehensive plan.

- **Citywide Housing Goal:** Maintain the strength, vitality, and stability of all neighborhoods and promote the development of a variety of housing choices that meet the needs of all members of the community.

**Response:** The proposed subdivision will provide a mix of lot sizes creating a neighborhood with a mix of single-family home options. The proposed lots meet the requirements of the R-10 zone, using the density transfer option for sites with critical areas, which provides housing types consistent with the overall comprehensive plan.

- **Affordable Housing Goal:** Create a diversified housing stock that meets the needs of all economic segments of the community through new developments, preservation, and collaborative partnerships.

**Response:** The proposed subdivision will provide a mix of lot sizes creating a neighborhood with a mix of single-family home options. The proposed lots meet the requirements of the R-10 zone, using the density transfer option for sites with critical areas, which provides housing types consistent with the overall comprehensive plan.

- **Environmental Stewardship Goal:** To preserve Camas’ natural environment by developing a sustainable urban environment and protecting habitat and vegetation corridors.

**Response:** The proposed subdivision will provide one large natural area tract to protect the westernmost wetland, and tracts to protect some existing trees on site. Along with these protections, additional trees will be installed in the large open spaces, street trees will be installed with the roads and trees and shrubs will be installed in the smaller open space tracts to help create a sustainable urban environment. See the Tree Plan, Tree Report, and Landscape Plans included with this application for more information.

- **Critical Area Goal:** To preserve, maintain, and restore the City’s critical areas to protect their function and values.

**Response:** The proposed subdivision will provide a large natural area tract to protect the westernmost wetland. There will be no direct impact to the westernmost wetland. The eastern wetland is proposed to be filled; however appropriate mitigation will occur.

- **Shoreline Goals (as provided in the Camas Shoreline Master Program):**

**Response:** The proposed subdivision is not within any shoreline designation, therefore will not impact any shorelines.

- **Street Goal:** Streets will function for all users including bicyclists, pedestrians, transit users, and motorists.

**Response:** All streets within the development will be designed to City standards and include sidewalks for pedestrians. With the streets' low traffic volume, bicyclists will be able to share the roadway with motorists. Bicycle lanes will be provided on the north side of NE 28<sup>th</sup> Street. There is currently no public transit service to the area.

- **Walking, Bicycling, and ADA Mobility Goal:** The needs of bicyclists, pedestrians, transit users, and accessibility (ADA-compliant) will be considered in all street improvements and will be integrated in all collector and arterial roadway projects, including regular safe street crossings.

**Response:** The subdivision is providing sidewalks along all streets within the development as well as along the north side of NE 28<sup>th</sup> Street with frontage improvements.

- **Design and Low-Impact Development Goal:** The transportation system will be designed to support community character and environmental policies.

**Response:** All roads within the development are proposed with 52-foot-wide rights-of-way to help reduce impacts to the critical areas. The width will also help to calm traffic and create a neighborhood that supports walkability and community.

- **Safety and Traffic Calming Goal:** Design and construct safe transportation facilities that meet applicable requirements.

**Response:** All roads within the subdivision are designed to City standards and proposed as 52-foot-wide roads with 28-foot paved surfaces. The road layout is generally designed as a grid, and parking will be allowed on one side of the street. These design elements will help with traffic calming and create a safe transportation facility.

- **Transportation Demand Management Goal:** Transportation planning will achieve the efficient use of transportation infrastructure, increase its person carrying capacity, and accommodate and facilitate future growth consistent with land use objectives.

**Response:** The subdivision proposes a road layout that will have carrying capacity for the proposed neighborhood and utilizes the provided connection from the neighborhood to the west.

- **Concurrency and Level of Service Goal:** The City will maintain the adopted LOS standards for all arterials, transit routes, and highways.

**Response:** A traffic study is included with this application which shows that the proposed development meets level of service standards.

- **Parks and Recreation Goal:** Preserve and enhance the quality of life in Camas through the provision of parks, recreation programs, recreational facilities, trails, and open spaces.

**Response:** The proposed subdivision will include a large open space for passive recreation as well as an open space tract to provide a park for the development.

- **General Utility Goal:** Provide utility services to all businesses, residents, and properties in the City limits. In urban areas, eliminate private water and sewer/septic systems, including wells used only for irrigation.

**Response:** All new lots will be provided with public water and sewer service from existing lines within NE 28<sup>th</sup> Street.



---

**REVISED CODE OF WASHINGTON**
**Title 58 RCW – Boundaries and Plats**
**Chapter 58.17 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 schoolgrounds, 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.

**Response:** Through compliance with all of the City of Camas regulations relating to the subdivision standards, utility infrastructure, transportation, payment of impact fees, preservation of open spaces and natural areas, and further implementation of the County's Comprehensive Plan, this project supports the public's health and serves the public interest. Therefore, this application meets the requirements of RCW 58.17.110 as demonstrated through this narrative and the accompanying submittal materials.

**CITY OF CAMAS CODE**
**Title 5 – Business Taxes, Licenses and Regulations**
**5.45 Telecommunications**
**5.45.365 Location of facilities.**

**Response:** All electric, cable, or telecommunication lines installed with the development will be located underground. The final locations of these utilities will be determined with final construction plans. This standard is met.

**Title 12 – Street, Sidewalks and Public Places**
**12.24 Street Names**

**Response:** The proposed streets have been named according to the City of Camas Street Naming Manual. N 85<sup>th</sup> Avenue, N 86<sup>th</sup> Avenue, N 87<sup>th</sup> Avenue, N 88<sup>th</sup> Avenue, and N 90<sup>th</sup> Avenue numerical street names based on adjacent development to the west. N Dimmick Street, N Edwina Street, N Farrell Street, N Garver Street and N Hollingsworth Street are alphabetical continuing backwards from N Indigo Circle from the west, named for important women in Camas and Washington state history. This standard is met.

- Dimmick – Carolyn Dimmick – first woman to be a Justice of the Washington State Supreme Court.

- Edwina – Marjorie Edwina Pitter King – first African American woman to serve as a Washington State legislator.
- Farrell – Rose Farrell – Rose and Charlie Farrell operated the first grocery in Camas.
- Garver – Joyce Garver – Beloved art and drama teacher in the Camas School District
- Hollingsworth – Dorothy Hollingsworth – Civil rights activist who served on the State Board of Education.

Title 14 – Stormwater Provisions

14.02 Stormwater Control

**Response:** Stormwater runoff generated by the proposed development will be collected on site and conveyed to a stormwater wetpond in Tract B, located on the southwest portion of the property, for treatment and detention prior to being discharged to Wetland A at rates permitted by Camas Municipal Code (CMC). The stormwater system is designed per the Stormwater Management Manual for Western Washington. See the Preliminary Stormwater Technical Information Report (TIR) and Preliminary Plan included with this application for more information. This standard is met.

Title 15 – Buildings and Construction

15.04 Building Code

15.04.030 Amendments to the referenced codes

D International Fire Code

12 Permits shall be obtained from the fire department as follows:

a Except for one and two-family dwellings and as specified in Section 105 of the building code and Section 105R in the International Residential Code no building or structure regulated by the building and/or fire code shall be erected, constructed, enlarged, altered, repaired, moved, removed, converted or demolished unless a separate permit for each building or structure has first been obtained from the fire department.

**Response:** The project will comply with the International Fire Code adopted and amended by the City of Camas. This standard is met.

Title 16 – Environment

16.07 SEPA Categorical Exemption and Threshold Determinations

16.07.020 Exemption Levels

A The city establishes the following exempt levels for minor new construction based on local conditions, which is consistent with WAC 197-11-800(1):

16.07.020 Table 1	
Project Types	Exempt Levels and Camas
Single-family residential	Up to 9 dwelling units
Multifamily residential	Up to 9 dwelling units
Agricultural structures	Up to 30,000 square feet
Office, school, commercial, recreational, service or storage buildings (including associated parking lots)	Up to 30,000 square feet and associated parking lots of up to 40 spaces.
Parking lots not associated with a structure	Up to 20 parking spaces
Landfills and excavation	Up to 500 cubic yards

**Response:** The project includes 121 single family residential lots, and therefore is not considered exempt. A SEPA checklist has been prepared and is included in this application. This standard is met.

16.07.040 Environmental Checklist

**Response:** A SEPA checklist has been prepared and submitted with this application. The lead agency for this application is the City of Camas. This standard is met.

16.31 Archaeological Resource Preservation

16.31.070 Predetermination Report Required

**Response:** An Archeological Predetermination is required for this application has been completed by Applied Archaeological Research, Inc. (AAR), dated September 2, 2021, and is included with this application. This standard is met.

16.31.160 Notification to Tribes.

**Response:** An archaeological predetermination was completed by AAR, and notification has been provided to appropriate Tribes in accordance with this section. A copy of the email sent to the Tribes is included with this application. This standard is met.

16.51 General Provisions for Critical Areas

16.51.090 Applicability.

**Response:** This application is for a Type III Subdivision. Therefore, the standards of this section apply.

The following proposed activities are subject to the criteria, guidelines, report requirements, conditions, and performance standards in this title:

**Response:** The project is an application for a 121-lot subdivision; therefore, it is subject to the criteria, guidelines, report requirements, conditions and performance standards of this title. This standard is met.

16.51.130 Review Required

- A Review and evaluate the critical area report;
- B Determine whether the development proposal conforms to the purposes and performance standards of these provisions;
- C Assess potential impacts to the critical area and determine if they are necessary and unavoidable; and

D Determine if any mitigation proposed by the applicant is sufficient to protect the functions and values of the critical area and public health, safety, and welfare concerns consistent with the goals, purposes, objectives, and requirements of these provisions.

**Response:** A Critical Areas Report and Buffer Modification Plan were completed by AKS Engineering and Forestry, LLC (AKS). The report includes details on indirect impacts to Wetland A and direct impacts to Wetland B, which is proposed to be filled, and mitigation of the impacts of this fill. This standard is met.

16.51.160 Mitigation Requirements

**Response:** The applicant proposes direct impacts to Wetland B. Wetland B is proposed to be filled, with the impacts of the fill mitigated through the purchase of wetland mitigation bank credits. See the Preliminary Plans and Critical Areas Report and Buffer Modification Plan included with this application for more information. This standard is met.

16.53 Wetlands

16.53.020 Rating System

**Response:** The site contains two wetlands. Wetland A is a ±1.77-acre Category IV wetland located in the southwest portion of the property which extends off site to the west. Wetland B is a ±0.15-acre Category IV wetland located in the southeast portion of the property. This standard is met.

16.53.030 Critical Area Report – Additional Requirements for Wetlands

**Response:** A Critical Areas Assessment and Preliminary Mitigation Plan (CAA) meeting the requirements of this section was prepared by AKS, dated October 2021. The report is included with this application. This standard is met.

16.53.040 Standards

B Wetland Buffers

**Response:** According to the Critical Areas Report, Wetland A and B are classified as Category IV PEM Slope wetlands with a habitat score of 5, requiring a high intensity land use buffer of 50 feet.

16.53.050 Wetland Permits

A. General.

**Response:** This application proposes modifying the high intensity land use buffer of Wetland A through buffer averaging, and filling Wetland B. Therefore, a wetland permit is required. A Critical Areas Assessment and Preliminary Mitigation Plan is included with this application. This standard is met.

B. Standards—General. Wetland permit applications shall be based upon a mitigation plan and shall satisfy the following general requirements:

- 1. The proposed activity shall not cause significant degradation of wetland functions;

- 2 The proposed activity shall comply with all state, local, and federal laws, including those related to sediment control, pollution control, floodplain restrictions, stormwater management, and on-site wastewater disposal.

**Response:** The proposed development activity will have no impact to the habitat within Wetland A. Erosion control plans will be included in the final construction plans for sediment and pollution control. A Preliminary Stormwater Plan is included with the application detailing how the Applicant proposes to manage stormwater. No on-site wastewater will be disposed of in the wetlands. This standard is met.

- C. **Buffer Standards and Authorized Activities.** The following additional standards apply for regulated activities in a wetland buffer to ensure no net loss of ecological functions and values:

3. **Stormwater Facilities.** Stormwater facilities are only allowed in buffers of wetlands with low habitat function (less than four points on the habitat section of the rating system form); provided, the facilities shall be built on the outer edge of the buffer and not degrade the existing buffer function, and are designed to blend with the natural landscape. Unless determined otherwise by the responsible official, the following activities shall be considered to degrade a wetland buffer when they are associated with the construction of a stormwater facility:

**Response:** Wetland A has a habitat rating of 5, therefore, stormwater facilities are not allowed within the wetland buffers. However, permanent encroachment into the outer edge of the 50-foot buffer is required for grading related to the stormwater facility. Buffer averaging will be used to mitigate this impact. This standard is met.

4. **Road and Utility Crossings.** Crossing buffers with new roads and utilities is allowed provided all the following conditions are met:
- a. Buffer functions, as they pertain to protection of the adjacent wetland and its functions, are replaced; and
  - b. Impacts to the buffer and wetland are minimized.

**Response:** No roads or utilities are proposed to cross Wetland A or its buffer. This standard does not apply.

- D. **Standards—Wetland Activities.** The following additional standards apply to the approval of all activities permitted within wetlands under this section:

1. Sequencing. Applicants shall demonstrate that a range of project alternatives have been given substantive consideration with the intent to avoid or minimize impacts to wetlands. Documentation must demonstrate that the following hierarchy of avoidance and minimization has been pursued:

**Response:** According to the CAA, avoidance to Wetland B is impractical, and impacts to Wetland A will be avoided.

There are no practical alternatives to avoid impacts to Wetland B. To provide the housing densities consistent with the City’s Growth Management Act (GMA) to increase affordable housing, and provide a safe internal street network consistent with the City’s transportation plan and emergency vehicle standards, filling Wetland B is necessary. Wetland B is a small, isolated wetland with non-native vegetation, no woody vegetation, and provides low functional opportunity to the local watershed. Mitigation will be provided through the purchase of wetland bank credit, and the development opportunity provided by filling Wetland B results in an overall beneficial use of resources for the local area. See the Wetland Avoidance Sequencing section of the CAA for more information.

Impacts to Wetland A are avoided through site plan design. Buffer averaging will be used to mitigate for any impacts grading encroachment, and no loss of wetland functions will occur. This standard is met.

**16.59 Geologically Hazardous Areas**

**Response:** A Preliminary Geotechnical Engineering Report was completed by GeoPacific Engineering, Inc. (GeoPacific), on March 8, 2021. Site investigation into hazards associated with steep slopes found that the project is feasible with the grades on site. No evidence of unstable soil conditions was found within the development area. Please refer to the Geotechnical report included with this application. This standard is met.

**Title 17 – Land Development**

**17.11 Subdivisions**

**17.11.030 Preliminary subdivision plat approval.**

**A Preapplication.**

- 1 In accordance with CMC Chapter 18.55 the applicant must proceed with the formal preapplication process prior to application submittal review.
- 2 The applicant shall submit to the community development department the preapplication form and copies of their proposal drawn to an engineer scale on paper, showing lot sizes, topography, and overall lot dimensions.

**Response:** A preapplication conference was held on January 15, 2021. This standard is met.



- B** Application. In addition to those items listed in CMC 18.55.110, the following items are required, in quantities specified by community development department, for a complete application for preliminary subdivision approval. Items may be waived if, in the judgment of the community development director or designee, the items are not applicable to the particular proposal:
- 1 Completed general application form as prescribed by the community development director, with the applicable application fees;
  - 2 A complete and signed SEPA checklist. The SEPA submittal should also include a legal description of the parcel(s) from deed(s);
  - 3 Complete applications for other required land use approvals applicable to the proposal;
  - 4 A vicinity map showing location of the site;
  - 5 A survey of existing significant trees as required under CMC Section 18.13.045;
  - 6 All existing conditions shall be delineated. Site and development plans shall provide the following information:

**Response:** This application submitted for preliminary subdivision plat approval contains all the required information listed in this section. This standard is met.

- D** Criteria for Preliminary Plat Approval. The hearings examiner decision on an application for preliminary plat approval shall be based on the following criteria:
- 1 The proposed subdivision is in conformance with the Camas comprehensive plan, parks and open space comprehensive plan, neighborhood traffic management plan, and any other city adopted plans;

**Response:** As stated previously, the proposed subdivision meets all applicable goals of the Camas Comprehensive Plan. The development will include passive and active open space and protect existing trees on site to the greatest extent practicable. The development will provide traffic circulation by constructing a new access on NE 28<sup>th</sup> Street, extending N 87<sup>th</sup> Avenue into the site, and building internal circulation for the development. This standard is met.

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

**Response:** The proposed subdivision will provide water and sanitary sewer connections for each proposed lot. The sanitary sewer will connect to the existing sanitary sewer line in NE 28<sup>th</sup> Street and the existing main in N 87<sup>th</sup> Street will be extended into the site. The water main will connect to the existing main in NE 28<sup>th</sup> Street and the existing main in N 87<sup>th</sup> Street will be extended into the site. Stormwater will be collected and treated on site and

discharged to an on-site wetland. A preliminary erosion control plan is included with this application. A more detailed and site-specific erosion control plan will be provided with final construction plans. This standard is met.

3 Provisions have been made for road, utilities, street lighting, street trees and other improvements that are consistent with the six-year street plan, the Camas Design Standard Manual and other state adopted standards and plans;

**Response:** The applicant proposes roads meeting the standards of the City and the Camas Design Standards Manual. Planting strips are provided for street trees and street lighting is included in the design. Provisions have been made for utilities, as shown in the plans included with this application. This standard is met.

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

**Response:** All needed easements and reservations are shown on the plans submitted with this application. This standard is met.

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

**Response:** As shown on the plans submitted with this application, all lots are oriented fronting a street or access tract and are shaped appropriately to allow home construction. This standard is met.

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

**Response:** As shown in the plans and documents submitted with this application, the subdivision complies with all requirements of the CMC and other relevant regulations. This standard is met.

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

**Response:** The Applicant’s Transportation Engineering Consultant, Lancaster Mobley, prepared a Transportation Impact Study (TIS). The TIS determined that a subdivision with up to 123-lots would generate 1,220 average daily trips with 90 a.m. peak hour trips and 121 p.m. peak hour trips. Appropriate provisions will be made for recommended mitigation measures. See the TIA included with this application for additional information. This standard is met.

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

**Response:** The tracts included in the subdivision will be maintained by the homeowners’ association. This standard is met.



- 9 Appropriate provisions, in accordance with RCW 58.17.110, are made for:
  - a The public health, safety, and general welfare and for such open spaces, drainage ways, streets, or roads, alleys or 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 conditions at schools bus shelter/stops, and for students who walk to and from school, and
  - b The public use and interest will be served by the platting of such subdivision and dedication;

**Response:** As stated previously, the subdivision is providing in-demand single-family housing. The development includes roads meeting City standards and open space tracts are provided to protect Wetland A and native vegetation and provide recreational opportunities. Water and sanitary sewer will be provided to each lot. Provisions for stormwater collection and treatment will also be provided. This standard is met.

- 10 The application and plans shall be consistent with the applicable regulations of the adopted comprehensive plans, shoreline master plan, state and local environmental acts and ordinances in accordance with RCW 36.70B.030.

**Response:** The plans and documents submitted with this application meet the requirements of this section. This standard is met.

- 17.11.040 Phasing. The subdivider may develop and record the subdivision in phases. Any phasing proposal shall be submitted for review at preliminary plat. In addition to meeting criteria in CMC Chapter 18.23, approval of the phasing plan shall be based upon making the following findings:

**Response:** The proposed development includes up to three phases. Phase 1 will be constructed first, providing two access points for the development. While three phases of the project are proposed, this does not preclude the developer from submitting multiple phases for approval under a single final engineering application.

- Phase 1 – Construct 43 lots, development access from NE 28<sup>th</sup> Street/N 87<sup>th</sup> Avenue, and necessary roadways and utilities.
- Phase 2 – Construct 42 lots and necessary roadways and utilities.
- Phase 3 – Construct 36 lots and necessary roadways and utilities.

17.19 Design and Improvements Standards

- 17.19.020 Improvements, supervision, inspections and permit required.

A. Required Improvements.



1. Every developer shall be required to grade and pave streets and alleys, install curbs and gutters, sidewalks, monuments, sanitary and storm sewers, water mains, fire hydrants, street lights and street name signs, underground transmission lines, provide and install centralized mail delivery boxes as determined by the U.S. Postal Service, together with all appurtenances in accordance with specifications and standards in the Camas Design Standards Manual, the six-year street plan, and other state and local adopted standards and plans as may be applicable.
2. Other improvements installed at the option of the developer shall conform to city requirements.
3. Existing wells, septic tanks and septic drain fields shall be abandoned, in accordance with state and county guidelines regardless of lots or properties served by such utility unless otherwise approved by public works director.

**Response:** The site is currently used for a single-family residential home and for agricultural hay production. A septic system and water well are present on site and will be abandoned in accordance with state and county guidelines. The developer will construct paved streets with curbs, gutters, and sidewalks. All required utilities will be provided, including sanitary sewer, water, and other private utilities. See the plans included with this application for more information. This standard is met.

17.19.030 Tract, block and lot standards.

A. Environmental Considerations.

**Response:** The proposed development contains critical areas. The applicant proposes density transfer and will protect Wetland A on site. Regulations for platting and vegetation preservation are met. This standard is met.

B. Blocks. Blocks shall be wide enough to allow two tiers of lots, except where abutting a major street or prevented by topographical conditions or size of the property, in which case the approval authority may approve a single tier.

**Response:** The proposed development includes five blocks of two-tiered lots. All other lots are located along the perimeter of the site and are a single tier. This standard is met.

C. Compatibility with Existing Land Use and Plans.

**Response:** The proposed development is surrounded by single-family zoned properties to the north, south, and west. The properties to the east are zoned AG-20, however, are in use as single-family residential lots. The proposed streets conform to existing adopted plans and other adopted City regulations. This standard is met.

D. Lots. The lot size, width, shape and orientation shall conform to zoning provisions and the following:

1. Each lot must have frontage and access onto a public street, except as may otherwise be provided (e.g., approved private roads, access tracts);

**Response:** The majority of lots are accessed from proposed public street network. Several lots are accessed from the public street through tracts which will serve multiple lots (Lots 33 and 34 by Tract E, Lots 82 and 83 by Tract I, and Lots 113 and 114 by Track KI). This standard is met.

2. Side Lot Lines.

**Response:** Side lot lines generally are perpendicular to the street or radial to the curve the lot fronts on. This standard is met.

3. Building Envelopes.

**Response:** Building envelopes are shown on the preliminary plans and provide a minimum of a 40-foot by 40-foot envelope. This standard is met.

5. Flag lots, access tracts, and private roads may be permitted only when the community development director or designee finds the applicant meets the criteria listed hereinafter:

**Response:** The proposed development includes one flag lot, Lot 43, which has a minimum of twenty feet of width and will have a minimum of 12 feet of paved driveway width. This standard is met.

6. Double Frontage Lots.

**Response:** Lots 112 to 116 have frontage on both N 85<sup>th</sup> Avenue and NE 28<sup>th</sup> Street, and Lots 117 to 121 have frontage on both Edwina Street and Farrell Street. A 10-foot landscape tract is provided along Lots 112 to 121 on the NE 28<sup>th</sup> Street and Farrell Street frontages. A sight-obscuring fence will be constructed along the property line between the lots and the landscape tract. This standard is met.

E. Tracts and Trails.

**Response:** Ownership and responsibility for maintenance of tracts within the proposed development will belong to the homeowner's association and will be included in writing. This standard is met.

F. Landscaping.

**Response:** Each dwelling unit will include at least one tree in the planting strip of the right-of-way. The applicant will retain as many trees as feasible. Street trees will be installed within the designated timeframe. Landscaping will conform to the Camas Design Standards Manual and will not obstruct any vision clearance areas. This standard is met.

G. Non-City Utility Easements. Easements for electric lines or other public utilities may be required. Easements for utilities shall be a minimum of six feet in width and centered on front or side lot lines.

**Response:** A private utility easement will be provided along the front yard property lines and will be a minimum of six feet in width. This standard is met.

- I. **Street Signs.** The developer shall be responsible for the initial cost of any street name or number signs, or street markings, including installation thereof, that public works finds necessary for the development.

**Response:** The developer will provide for the initial cost of street name or number signs, street markings, and installation of those signs as public works finds necessary. This standard is met.

- J. **Lighting.** Street lighting shall conform to the Clark public utility standards and approved by the city. The developer shall bear the cost of the design and installation of the lighting system.

**Response:** The proposed development includes street lighting in conformance with Clark Public Utility standards. The developer will provide for the cost of the design and installation of the lighting system. This standard is met.

- K. **All residential streets shall conform to the guidelines and standards of the city neighborhood traffic management plan.**

**Response:** The proposed development includes new residential streets, which will conform to the guidelines and standards of the Neighborhood Traffic Management Plan. This standard is met.

17.19.040 **Infrastructure standards.**

**B. Streets.**

- 6. **Extension.** Proposed street systems shall extend existing streets at the same or greater width unless otherwise approved by the public works department and authorized by city council in approval of the plat.
  - a. Streets and pedestrian/bicycle paths shall be extended to the boundaries of the plat to ensure access to neighboring properties, unless the presence of critical areas or existing development render such extension infeasible. The design shall contribute to an integrated system of vehicular and pedestrian circulation.
  - b. Grading of steep topography may be necessary to achieve this objective.

17.21 **Procedures for Public Improvements**

**Response:** Cross circulation is provided to the development to the west through an extension of N 87<sup>th</sup> Avenue, and to the south to NE 28<sup>th</sup> Street through Farrell Street. Cross circulation is not provided to the north or east. Existing single-family homes to the east and a plat restriction prevent any connection to NE 232<sup>nd</sup> Avenue/NE County Drive, and a proposed development to the north preceding this application does not provide an opportunity to provide a connection. This standard is met.

17.21.030 Land Disturbing Activities – Erosion Prevention / Sediment Control

**Response:** Preliminary erosion control plans are included with this application. A more detailed and site-specific erosion control plan will be provided with final construction plans for sediment and pollution control. This standard will be met.

Title 18 Zoning

18.07 Use Authorization

18.07.040 Table 2– Residential and Multifamily Land Uses

**Response:** The proposed development is for 121 single-family dwelling detached residential lots in the R-10 zone. Per Table 2 – Residential and Multifamily Land Uses, the proposed use is permitted. This standard is met.

18.09 Density and Dimensions

18.09.040 Density and Dimensions – Single-family Residential Zones

18.09.040 Table 1: Density and Dimensions for Single-family Residential Zones <sup>1</sup>					
	R-6	R-7.5	R-10	R-12	R-15
<b>A. Standard New Lots</b>					
Maximum density (dwelling units/net acre)	7.2	5.8	4.3	3.6	2.9
Average lot area (square feet) <sup>4</sup>	6,000	7,500	10,000	12,000	15,000
Minimum lot size (square feet)	4,800	6,000	8,000	9,600	12,000
Maximum lot size (square feet) <sup>3</sup>	9,000	12,000	14,000	18,000	24,000
Minimum lot width (feet)	60	70	80	90	100
Minimum lot depth (feet)	80	90	100	100	100
Maximum building lot coverage <sup>5</sup>	40%	40%	35%	30%	30%
Maximum building height (feet) <sup>2</sup>	35	35	35	35	35
<b>B. Density Transfer Lots <sup>1</sup></b>					
Maximum density (dwelling units/net acre)	7.2	5.8	4.3	3.6	2.9
Minimum lot size (square feet)	4,200	5,250	7,000	8,400	10,500
Maximum lot size (square feet) <sup>3</sup>	7,200	9,000	12,000	14,400	18,000
Minimum lot width (feet) <sup>1</sup>	50	60	60	70	80
Minimum lot depth (feet) <sup>1</sup>	80	80	90	90	100
Maximum building lot coverage	40%	40%	40%	35%	35%
Maximum building height (feet) <sup>2</sup>	35	35	35	35	35

Table Notes:

1. For additional density and dimension provisions, see CMC Sections 18.09.060 through 18.09.180.
2. Maximum building height: three stories and a basement, not to exceed height listed.
3. For parcels with an existing dwelling, a one-time exception may be allowed to partition from the parent parcel a lot that exceeds the maximum lot size permitted in the underlying zone. Any further partitioning of the parent parcel or the oversized lot must comply with the lot size requirements of the underlying zone.



- 4. Average lot area is based on the square footage of all lots within the development or plat. The average lot size may vary from the stated standard by no more than five hundred square feet.
- 5. The maximum building lot coverage for single-story homes may be up to forty-five percent in R-6 and R-7.5 zones, and forty percent in R-10 and R-12 zones. To qualify for increased lot coverage, a single-story home cannot include a basement or additional levels.

**Response:** The proposed development contains critical areas, some of which will be protected with this development. Therefore, the lot dimensions listed under 18.09.040 Table 1, B. – Density Transfer Lots, are being applied to this application. The gross site area is ±37.27 acres. There are ±4.73 acres of land being set aside for critical and natural areas and open space. The net site area is therefore ±32.54 acres and the maximum allowed density for the site is 139 lots (32.54 x 4.3=139.92). The Applicant proposes 121 lots with a minimum lot area of 7,209 square feet and a maximum lot area of 12,000 square feet. All lots meet the minimum lot width of 60 feet and the minimum lot depth of 90 feet. Note that Lot 8 meets the minimum lot depth of 90 feet as defined in CMC 18.03.040 for lot depth. The applicant requests modified lot coverage and setback requirements using the lot standards flexibility allowed under 18.09.060. See the response to 18.09.060 for further details on negotiated lot standards. Building lot coverage and building height requirements will be reviewed at the time of building permit application. This standard is met.

18.09.040 Table 2: Building Setbacks for Single-Family Residential Zones <sup>1</sup>				
Lot Area	Up to 4,999 sq. ft.	5,000 to 11,999 sq. ft.	12,000 to 14,999 sq. ft.	15,000 or more sq. ft
Minimum front yard (feet) <sup>2</sup>	20	20	25	30
Minimum Side Yard (feet)	5	5	10	15
Minimum side yard flanking a street and corner lot rear yard (feet)	15	20	25	30
Minimum rear yard (feet)	20	25	30	35
Minimum lot frontage on cul-de-sac or curve (feet)	25	30	35	40

**Table Notes:**

- 1. Setbacks may be reduced to be consistent with the lot sizes of the development in which it is located. Notwithstanding the setbacks requirements of this chapter, setbacks and/or building envelopes clearly established on an approved plat or development shall be applicable.

**Response:** As part of the density transfer, the Applicant has requested flexibility in the setback requirement, which is discussed below in Section 18.09.060.D. See the Preliminary Plans included with this application for more detail. This standard is met.

- 18.09.060 **Density Transfers**
  - A **Purpose.** To achieve the density goals of the comprehensive plan with respect to the urban area, while preserving environmentally sensitive lands and the livability of the single-family residential neighborhoods, while also maintaining compatibility with existing residences.
  - B **Scope.** This section shall apply to new development in all residential (R) zoning districts.

- C Where a land division proposes to set aside a tract for the protection of a critical area, natural open space network, or network connector (identified in the city of Camas parks plan), or approved as a recreational area, lots proposed within the development may utilize the density transfer standards under CMC Section 18.09.040.B Table-1.
  
- D Where a tract under "C" above, includes one-half acre or more of contiguous area, the city may provide additional or negotiated flexibility to the lot size, lot width, lot depth, building setback, or lot coverage standards under CMC Section 18.09.040 Table 1 and 2. In no case shall the maximum density of the overall site be exceeded. A letter explaining the request for negotiated flexibility shall be submitted to the director for consideration. The city may also provide the landowner with:
  - 1 A credit against park and open space impact fees per Chapter 3.88; or
  - 2 Cash from the parks and open space impact fee fund or other public fund.

**Response:** This application proposes the use of density transfer due to the presence of critical areas on site. The Applicant proposes three natural area tracts to protect the critical and natural areas on site, totaling ±4.73 acres in size. Using the lot standards flexibility allowed under 18.09.060, the applicant is proposing adjustments to the standards in Table 18.90.040 Table 1 and Table 2. Proposed changes include increasing maximum lot coverage from 40 percent to 50 percent and decreasing front and rear setbacks from 20 and 25 feet to 15 feet each, respectively. The side setback is proposed to remain the same for the majority of the lots, however a decrease is proposed for all 12,000 square-foot lots (required lot size per 18.09.080.B) to match the rest of the development. The applicant also request a garage setback at 20 feet from the front property line. The table below shows the requested modifications to the standards. As part of the requested modification, the Applicant proposes to install trees within natural area and stormwater tracts and provide a small park for the development in the southeast corner of the site. See the Preliminary Plans included in with this application for more information. This standard is met.

Camas Heights Lot Standards (R-10)		
Standard	18.09.040 Table 1	Proposed
Maximum density (dwelling units/net acre)	4.3	No Change
Average lot area (square feet)	-	-
Minimum lot size (square feet)	7,000	No Change
Maximum lot size (square feet)	12,000	No Change
Minimum lot width (feet)	60	No Change
Minimum lot depth (feet)	90	No Change
Maximum building lot coverage	40%	50%
Maximum building height (feet)	35	No Change
Standard	18.09.040 Table 2	Proposed
Minimum front yard (feet)	20	15
Minimum front yard – Garage	5 feet (from front of dwelling)	20 feet from right-of-way
Minimum side yard (feet)	5/10*	5
Minimum side yard flanking a street and corner lot rear yard (feet)	10	No Change
Minimum rear yard (feet)	25	15
Minimum lot frontage on a cul-de-sac or curve (feet)	30	No Change

\*10-foot setback required for 12,000 square-foot lots.

**18.09.080 Lot Sizes**

- A** In planned residential developments with sensitive lands and the required recreational open space set aside, a twenty per-cent density bonus on a unit count basis is permitted. Density may be transferred for sensitive areas but the total lot count shall never exceed the number of lots established in the density standards established in CMC Section 18.23.040 "Density Standards."
- B** When creating new lots via short plats or subdivisions that are adjacent to a different residential zone designation, the new lots along that common boundary shall be the maximum lot size allowed for the zone designation of the new development (if a lower density adjacent zone), or the minimum lot size allowed for the zone designation of the new development (if a greater density adjacent zone), as based on CMC 18.09.040 Table 2, Section A. In applying this section, where a land division is required to increase the size of lots, the land division may utilize the density transfer provisions provided for in CMC Section 18.09.060.





**Response:** The proposed development abuts property zoned R-6 and R-10 to the west. The R-6 zone runs from the southwest corner north for approximately three-quarter of the parcel. Lots along the west property line that abut the R-6 zone (Lots 23 to 31) are required to be the minimum size allowed for the proposed development’s zoning (R-10), which is 8,000 square feet.

The proposed development abuts AG-20 to the east. Lots along the east property line are required to be the maximum size allowed for the proposed development’s zoning (R-10) as based on CMC 18.09.040 Table 2.B, which is 12,000 square feet. This standard is met.

18.11 Parking

18.11.100 Residential Parking. Residential off-street parking space shall consist of a parking strip, driveway, garage, or a combination thereof, and shall be located on the lot they are intended to serve.

**Response:** Residential off-street parking will be provided for each lot and will consist of a garage and driveway. This standard is met.

18.11.130 Standards. The minimum number of off-street parking spaces for the listed uses shall be shown in Table 18.11-1, Off-Street Parking Standards. The city shall have the authority to request a parking study when deemed necessary.

**Response:** Two off-street parking spaces are required for each single-family dwelling unit. Each lot will provide a minimum of two off-street parking spaces. This standard is met.

18.13 Landscaping

18.13.020 Scope

A Unless otherwise exempted, the standards of this chapter shall apply to any site to be developed. All applicable development activities shall be required to prepare a landscape plan and shall be required to meet the minimum tree density herein created.

B The standards of this chapter shall apply to the following:  
1 Commercial, industrial, governmental uses, and land divisions;

**Response:** This application is for a 121-lot subdivision and does not meet any of the exemptions listed in section 18.13.025 of the CMC. This chapter applies.

18.13.040 Procedure for Landscape, Tree and Vegetation Plan

A Applicants shall submit a detailed Landscape, Tree and Vegetation Plan with building and site improvement plans. Included in the plans (at a minimum) shall be type, size, and location of plants and materials.

B A tree survey must be included for any applicable development proposing to remove trees.

**Response:** A Tree Survey was completed by AKS and a detailed Landscape Plan and Tree Plan are included with this application. This standard is met.

## 18.13.045 Tree Survey

- A The applicant must submit a tree survey that is prepared by a certified arborist or professional forester.

**Response:** A tree survey (including plans and a Tree Report) have been prepared by a certified arborist with AKS and are included with this application. This standard is met.

- B A tree survey must contain the following:

## 1 Inventory

- a Map of the site, with tree locations numbered
- b Include all significant trees that will be impacted by the proposed development, which may include trees off-site if canopies overhang the subject property. Open space tracts to be set aside for conservation purposes do not need to be included in survey.
- c Provide the common and scientific name of inventoried trees.

**Response:** A tree inventory has been completed by AKS as part of the tree survey. Trees that will be protected and impacted with the project are identified on the plans and in the report. Multiple tracts are proposed to protect as many of the existing trees as practicable with the development. After the initial tree removal during site grading, trees that are to remain will be re-evaluated to determine if additional hazard trees need to be removed. See the Preliminary Plans and Report included with this application for more information. This standard is met.

## 2 Assessment

- a Size. Measure and provide the diameter at breast height (DBH).
- b Tree protection zone. (Refer to CMC 18.03.050 Environmental Definitions)
- c Tree health. An overall assessment of the trees structural stability and failure potential based on specific structural features (e.g. decay, conks, co-dominate trunks, abnormal lean) and rated as good, fair or poor.
- d Recommendation for preservation or removal. The recommendation will consider proposed grading, trenching, paving, fencing and other construction plans.
- e If hazardous, then an evaluation of hazardous trees will include a numerical value of hazard based on the following: failure potential; size of part most likely to

fail; and distance to target (e.g. new residence).

**Response:** The tree survey included in this application contains all information required in this section. After the initial tree removal during site grading, trees that are to remain may be re-evaluated to determine if additional hazard trees need to be removed. See the report and plans included with this application for more detail. This standard is met.

18.13.050 Standards for Landscape, Tree and Vegetation Plans

**B** Landscaping and trees shall be selected and located to deter sound, filter air contaminants, curtail erosion, minimize stormwater run-off, contribute to living privacy, reduce the visual impacts of large buildings and paved areas, screen, and emphasize or separate outdoor spaces of different uses or character.

**Response:** Existing trees and other vegetation are being preserved to the greatest extent practicable to prevent erosion, uptake stormwater, and contribute to living privacy. Additional landscaping, including a large number of new trees, is proposed to help provide privacy and protect from erosion. This standard is met.

**C** Landscape, Tree and Vegetation Plan must include a combination of trees, shrubs, and ground cover to achieve the purposes of this chapter.

1 Required landscaping shall be comprised of a minimum of sixty percent native vegetation (or adapted to northwest climate), or drought-tolerant vegetation, and fifty percent evergreen.

2 Deciduous trees shall have straight trunks, be fully branched, have a minimum caliper of two inches, be equivalent to a fifteen-gallon container size, and be adequately staked for planting.

3 Evergreen trees shall be a minimum of five feet in height, fully branched, and adequately staked for planting.

**Response:** Plants proposed in the landscape plan are either native or adapted to the northwest climate, and a majority are evergreen. All plant materials will meet the requirements of this section. See the Landscape Plan included with this application for more information. This standard is met.

**D** Street trees will be required as part of the frontage improvements. Species, size and spacing of the trees must be consistent with the Design Standards Manual. Unless otherwise specified, trees must generally be spaced thirty feet apart. Substitute varieties are subject to approval by the City of Camas.

**Response:** Street trees are proposed with this application meeting the requirements of this section. See the Landscape Plan included with this application for more information. This standard is met.

E Proposed vegetation cannot be an invasive species as listed within the most current edition of the Clark County Noxious Weed List (e.g. English Ivy cultivars).

**Response:** No proposed vegetation are invasive species. See the Landscape Plan included with this application for more information. This standard is met.

F Shrubs shall be a minimum of five-gallon pot size. Upright shrubs shall have a minimum height at planting of eighteen inches. Spreading shrubs at planting shall have a minimum width of eighteen inches (smaller shrub sizes may be approved where it is more appropriate within a particular landscape plan).

**Response:** All plant materials proposed will meet the requirements of this section. See the Landscape Plan included with this application for more information. This standard is met.

G Ground Cover, defined as living material and not including bark chips or other mulch, shall be from containers of one gallon or larger. Plants shall be planted and spaced in a triangular pattern which will result in eighty percent cover in three years. Lawn cannot be the primary ground cover within required landscape buffers unless approved for stormwater conveyance. Grass species, if used as ground cover, shall be native or drought-tolerant, and appropriate for the use of the area.

**Response:** All groundcover materials proposed will meet the requirements of this section. Proposed lawn is not located within any required buffer. See the Landscape Plan included with this application for more information. This standard is met.

H Appropriate measures shall be taken, e.g., installation of irrigation system, to assure landscaping success. If plantings fail to survive, it is the responsibility of the property owner to replace them.

**Response:** Landscaped areas will be irrigated with an automatic irrigation system or adequate manual irrigation system. All irrigation in landscape tracts will be installed with the landscape at the time of neighborhood construction and maintained by the homeowners' association. All irrigation in planting strips adjacent to private lots will be installed with the home construction on that lot and be maintained by that homeowner. All irrigation will be design-build by the landscape contractor. This standard is met.

I Required trees, as they grow, shall be pruned in accordance with the International Society of Arboriculture. The pruned tree will provide at least ten feet of clearance above sidewalks and fourteen feet above street roadway surfaces.

**Response:** All trees will be pruned to the appropriate height per this section. This standard will be met.

J Existing trees may be used as street trees if there will be no damage from the development which will kill or weaken the tree. Sidewalks of variable width and elevation may be utilized to save existing street trees, subject to approval by the city.

**Response:** Existing trees on site will be retained to the greatest extent practicable; however, none of those trees will be used as street trees. This standard does not apply.

**K** Vision clearance hazards shall be prohibited.

**Response:** No vision clearance hazards will be created with the proposed landscape. See the Landscape Plans included with this application for more detail. This standard is met.

**L** Street trees and other required landscaping which dies or is removed, must be replaced within one year of death or removal. Replacement street trees may be an alternative species from the city's recommended tree list, and may be in a different location as approved by the city.

**Response:** All required plant material that dies or is removed will be replaced per this section. This standard will be met.

**18.13.051 Minimum Tree Density Requirement**

**A** Tree Density. A minimum tree density per net acre is required and must be incorporated within the overall landscape plan. The tree density may consist of existing trees, replacement trees or a combination of existing and replacement trees, pursuant to the priority established in Section 18.13.052.

18.13.051 Table 1: Required Tree Density		
Proposed Activity	Required Minimum Tree Density per Net Acre	Required Tree Replacement
New Development	20 Tree Units	20 Tree Units per acre
Residential	20 Tree Units	20 Tree Units per acre
Developed commercial and industrial properties	20 Tree Units	3 Tree Units for every 1 tree unit removed up to the minimum tree density per acre

**B** Tree Density Calculation. Specific instructions on how to perform tree density calculations are provided in the Design Standards Manual. "Tree Unit" is a unit of measurement based upon the size of the diameter of the tree measured at the breast height ("dbh"). New trees are given a value of one (1) Tree Unit, as they must be a minimum of 2" dbh when planted. Tree Unit values are summarized in the following Table:

18.13.051 Table 2: Tree Units for Existing Trees			
Diameter at Breast Height (DBH)	Tree Units	Diameter at Breast Height (DBH)	Tree Units
1" to 5"	1	31" to 32"	12
6" to 12"	2	33" to 34"	13
13" to 14"	3	35" to 36"	14
15" to 16"	4	37" to 38"	15
17" to 18"	5	39" to 40"	16
19" to 20"	6	41" to 42"	17
21" to 22"	7	43" to 44"	18
23" to 24"	8	45" to 46"	19
25" to 26"	9	47" to 48"	20
27" to 28"	10	49" to 50"	21
29" to 30"	11	For larger trees, allow a ½ tree unit for every additional inch of dbh.	

**Response:** The total site area is ±37.27 acres, with ±2.77 acres to be set aside as a natural area tract to protect the wetland on site. As no development activity will occur in this tract, the area has not been used for tree unit calculations. Therefore, there are ±34.50 net acres of developable land used in the calculation of the required tree density. The application is for a residential development; the applicant is required to provide 20 tree units per acre, for a total of 690 tree units (34.50 x 20). There are 27 tree units that are to be retained on site, as well as 280 proposed street trees and 383 proposed open space and private lot trees, for a total of 690 tree units. See the Tree Report and Preliminary Plans included with this application for more detail. This standard is met.

18.13.052 Tree and Native Vegetation Preservation

A When determining where to retain or plant trees, locations with healthy soils, native understory vegetation, and mature trees shall have priority when there are feasible alternative locations on site for proposed buildings and site improvements to achieve the minimum tree unit density per acre. This may require site redesign. Provided, where necessary, density transfer areas may be used to ensure protection and retention of trees.

**Response:** The trees proposed for retention are located in the proposed open space tracts. The trees in these areas are mature trees with a mix of understory vegetation. As many of the existing trees as practicable are proposed for retention. After the initial tree removal during site grading, trees that are to remain may be re-evaluated to determine if additional hazard trees need to be removed. This standard is met.

B In designing a development project and in meeting the required tree density, the applicant must provide a Landscape, Tree and Vegetation plan that retains healthy, wind firm trees in the following priority:

- 1 Trees located within critical area buffers. Trees must be identified within a protected tract.
- 2 Significant wildlife habitat, or areas adjacent and buffering habitat.
- 3 Significant trees that are greater than 36 inch dbh.

- 4 Groves of trees, or other individual healthy trees with the intent to retain must be located in separate tract if part of a land division, or other protective mechanism if other development type,
- 5 Trees, that if removed would cause trees on adjacent properties to become hazardous.

**Response:** The open tracts that are proposed contain the trees to remain on site. On-site trees were preserved to the greatest extent practicable. This standard is met.

**C Mitigation and Replacement.** In areas where there are currently inadequate numbers of existing trees to meet minimum tree density, where the trees are inappropriate for preservation, the soils are poor, or there are significant invasive species, then mitigation shall be required to meet the minimum tree density. The applicant's proposed location for replacement trees or mitigation shall be subject to the city's approval of the Landscape Plan. Replacement trees shall be planted in the following priority:

**Response:** Some existing trees will be preserved on site, however, it will not be enough to meet tree density requirements. The Applicant will be installing additional trees in the open space tracts, as well as street trees. See the Tree Report and Preliminary Plans included with this application for more information. This standard is met.

**18.13.055 Landscape Buffering Standards**

**A Landscape buffers shall be in compliance with the below referenced table:**

18.13.055 Table 1: Landscape Buffers								
Abutting Zone	Residential		Commercial		Business Park		Industrial	
Uses on Site	Not Separated by a Street	Separated by a Street	Not Separated by a Street	Separated by a Street	Not Separated by a Street	Separated by a Street	Not Separated by a Street	Separated by a Street
Multi-family Residential	5' L1	5' L1	10' L3	10' L2	10' L2	10' L2	10' L2 w/F2 Fence	10'L3
Commercial	10' L3	5' L2	5' L1	5' L2	5' L2	5' L2	10' L3	10'L2
Industrial	10' L2 w/F2 Fence	10' L2	10' L3	L2	10' L3	5' L2	5' L2	5'L1

**Response:** The proposed development is for 121 single-family lots. Therefore, based on 18.13.055 Table 1 – Landscape Buffers, there are no buffers required. This standard is met.

**18.15 Signs**

**Response:** No signs are proposed as part of this application. Any signs that will be installed will receive a sign permit prior to installation to ensure the sign meets the requirements of this chapter. This standard is met.

---

## 18.17 Supplemental Development Standards

### 18.17.030 Corner Lot Vision Clearance Area

**Response:** All corner lots will maintain a vision clearance area. No vehicle, fence, wall, landscaping, or other obstruction or planting will impede vision between a height of 42 inches and 10 feet above the sidewalk or 12 feet above the street. This standard is met.

### 18.17.050 Fences and Walls

**Response:** Fences are not proposed with this application. Fences installed by property owners will acquire the proper permits and meet the requirements of this section. This standard is met.

### 18.17.060 Retaining Walls

**Response:** Retaining walls are proposed with this application. Due to existing grades onsite, retaining walls up to 12 feet will be necessary for development. Retaining walls will be generally located on rear and side lot lines of some proposed lots. All walls along the boundary of the development will be interior-facing and not visible to the surrounding properties. Walls greater than 6 feet tall within the development will generally be screened from the right-of-way by future homes, reducing the visual impact of the walls at the rights-of-way. Additionally, landscaping will be provided for walls that are great than 6 feet tall and more visible at the right-of-way. This landscaping will be proposed with final engineering plans once final grading is determined. Therefore, since the walls that will be greater than 6-foot tall with either be interior-facing and not visible from the surrounding properties or generally screened from the right-of-way by future homes, and landscaping will be provided as needed, the Applicant request approval from the director to construct walls greater than 6 feet tall as allowed under this section.

## 18.55 Administration and Procedures

### 18.55.020 Determination of Proper Procedure Type

**Response:** This application is for a 121-lot single-family residential subdivision, and therefore requires a Type III application. A Type III application has been submitted. This standard is met.

### 18.55.060 Preapplication Conference Meeting – Type II, Type III

**Response:** This application requires a preapplication conference meeting, which was held on January 15, 2021. This standard is met.

### 18.55.110 Application – Required Information.

**Response:** The application submitted for the preliminary subdivision plat approval contains all the required information listed in this section. This standard is met.



---

**IV. Conclusion**

The Applicant is proposing a 121-lot single-family subdivision meeting the requirements of the City of Camas R-10 zoning and other applicable portions of the Camas Municipal Code.

The submittal requirements have been met and the required findings made for all applicable approval criteria. These findings serve as the basis for the City to approve the application and are supported by substantial evidence in the application materials. Therefore, the Applicant respectfully requests approval of the proposed project (Camas Heights Subdivision).