



2. Land Use Narrative



Stella Ridge Type III Subdivision

Date: September 2025

Submitted to: City of Camas
Community Development Department
616 NE 4th Avenue
Camas, WA 98607

Applicant: Allied Development, LLC
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AKS Job Number: 12107



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Property Owners:	Daley Dennis PO BOX 757 Rancho Santa Fe, CA 92067
Applicant's Consultant:	AKS Engineering & Forestry, LLC 9600 NE 126 th Avenue, Suite 2520 Vancouver, WA 98682 Contact(s): Michael Andreotti, RLA Email: andreottim@aks-eng.com Phone: (360) 882-0419
Site Location:	4511 NW 18 th Avenue Camas, WA 98607
Clark County Parcels:	125193-000, 986055-381, and 125185-000
Site Size:	±24.41 acres (±1,063,300 square feet)
Land Use Districts:	Multifamily Residential-18 (MF-18)



I. Executive Summary

Through this application, Allied Development, LLC (Applicant), requests approval from the City of Camas (City) to subdivide the subject site (described below) into a 158-lot subdivision (Stella Ridge Subdivision) for the future construction of 158 single-family homes. The subdivision will gain access from NW Brady Road and NW 20th Avenue from the east and NW 18th Avenue from the south. Access to the individual lots will be provided through an internal street network that is being constructed with this project. Each lot will be provided with sanitary sewer, stormwater, and water service connections. Other dry utilities will also be provided for each lot. 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, Transportation Impact Study, Archaeological Predetermination, Critical Areas Assessment and Preliminary Mitigation Plan, Title Report, Pre-Application Conference Report, Mailing Labels, and State Environmental Policy Act (SEPA) checklist.

The highlights of this project, which will be discussed further in this narrative, include the following:

- Subdivision with 158 single-family lots
- 5.97 acres of open space for protection of critical areas.
- Construction of stormwater, parking, and private street tracts to serve the subdivision
- Construction of an internal street network to serve the subdivision.
- Construction of all necessary utilities needed to serve the development.

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 three parcels and is ±24.41 acres in size. The site is addressed as 4511 NW 18th Avenue, Camas, WA 98607. The property is identified as Parcel Numbers 125193-000, 986055-381, and 125185-000 of the Southeast Quarter of Section 5, Township 1 North, Range 3 East; Northeast Quarter of Section 8, Township 1 North, Range 3 East; Southwest Quarter of Section 4, Township 1 North, Range 3 East, Willamette Meridian. The site is zoned Multifamily Residential-18 (MF-18) and is currently vacant. Properties to the northeast of the site are zoned Light Industrial Park/Business Park (LI/BP). The properties northwest and west of the site are zoned Business Park (BP). South of the site, across NW 18th Avenue, are properties zoned Residential-7,500 (R-7.5). South of the site, across NW 20th Avenue are properties zoned Community Commercial (CC). East of the site, across NW Brady Road, are properties zoned Residential-6,000 (R-6). The parcels to the north and northwest are currently vacant. Parcels west of the site are in use as a light industrial campus. The parcels to the south across NW 18th Avenue and NW 20th Avenue are in use as a single-family residential. The parcels east of the site across NW Brady Road are in use as a single-family residential and a stormwater facility. The parcel east of the site along NW 18th Avenue is in use as a City water tower.

The site fronts NW Brady Road to the east, and NW 18th Avenue and NW 20th Avenue to the south. Access to the site is currently gained from NW 20th Avenue and NE 18th Avenue. NW Brady Road is classified as a 3-Lane Arterial road with a minimum 75.5-foot existing right-of-way, 8-foot attached sidewalk, and 46-foot paved width along the site frontage. NW 20th Avenue is classified as a 2-Lane Local/Sprinklered street

with a 52-foot existing right-of-way, 28-foot paved surface, and 5-foot detached sidewalk on the south side. NE 18th Avenue is classified as 2-Lane Collector with an existing 40-foot right-of-way and varied pavement width along the site frontage.

The site has rolling terrain that generally slopes from the south to the northeast. According to Clark County Geographic Information Services (GIS), no parts of the site have slopes greater than 15 percent and there are no areas of potential instability identified on-site. The existing vegetation on-site consists of grasses and shrubs, with deciduous and evergreen trees clustered in the middle of the site. AKS Engineering & Forestry, LLC (AKS) performed a Critical Areas Assessment for the site and identified three wetlands on site. The archaeological predictive for the site is low-moderate to moderate-high, and there are mapping indicators for archaeological site buffers on-site. All critical areas will be discussed in further detail later in this narrative.

III. Applicable Review Criteria

City of Camas Municipal Code

Title 12 Streets, Sidewalks and Public Places

Chapter 12.24 - Street Names

(...)

Response: All planned streets have been named according to the City of Camas *Street Naming Manual* (October 2010) and as identified in the pre-application report. Street names depicted on the Preliminary Plans are placeholders, and final road names will be determined prior to final platting.

Chapter 12.44 - Complete Streets Policy

(...)

12.44.030 - Policy.

(...)

F. Complete streets design recommendations will be incorporated into all publicly and privately funded projects as appropriate. The following complete streets components must be evaluated and considered in all phases of transportation project planning, design, construction, and operation:

1. Sidewalks and crosswalks.
2. Roadway and pedestrian scale lighting.
3. Bicycle accommodation.
4. Landscaping.
5. Use of raised medians for traffic safety, traffic flow and pedestrian refuge.
6. Adequate buffer areas for pedestrian safety, drainage and landscaping.
7. Lane widths appropriately sized for use and context of surrounding land uses.
8. On-street parking where appropriate for surrounding land uses.
9. Signage.

10. Level of connectivity to the existing transportation network.

Response: All roads within the project have been designed to comply with the City of Camas Complete Streets Policy. Sidewalks, crosswalks, roadways, landscaping, lighting, parking, signage, and other transportation facilities will be constructed to meet Camas Municipal Code (CMC).

Title 13 Public Services

Division I Water

Chapter 13.52 - Water System Development Charges

(...)

Response: It is understood that System Development Charges (SDCs) and connection fees described in this chapter apply to this project and that payment of the fees is required prior to connection. Water mains will be extended into the site, and each lot will be provided a service lateral from the main.

Division II Sewer System

Chapter 13.72 - Sewer Service Development Charge

(...)

Response: It is understood that SDCs and connection fees described in this section apply to this project and that payment of the fees is required prior to connection. Sanitary sewer mains will be extended into the site, and each lot will be served by a service lateral.

Title 14 Stormwater Provisions

Chapter 14.02 - Stormwater Control

(...)

Response: The stormwater generated by the proposed site improvements will be collected on-site and conveyed to two stormwater facilities for mechanical treatment and detention. The stormwater facilities will be privately owned and maintained by the homeowners' association (HOA). The stormwater improvements are designed to follow the pre-developed drainage pattern, flowing to the ultimate discharge point in the northeast corner of the site to be released via outfall and energy dissipator at approved rates. All proposed stormwater improvements are designed per City of Camas standards and the Washington State Department of Ecology (ECY) 2024 Stormwater Management Manual for Western Washington (SWMMWW). Refer to the Preliminary Stormwater Technical Information Report (TIR) and Preliminary Plans included with this application for more information.

Chapter 14.06 - Erosion and Sediment Control

(...)

14.06.030 - Applicability.

Any person proposing to undertake any land-disturbing activity, with the exception of any small parcel development, shall be required to meet the following standards:

- A. Submit an erosion prevention/sediment control plan in compliance with this chapter which shall set forth the proposed erosion prevention/sediment

control measures and shall further satisfy the criteria of the standard details and specifications for erosion prevention/sediment control plans. The plan shall be submitted and approved by the city prior to the commencement of any land-disturbing activity. In addition, an erosion prevention/sediment control plan shall be submitted and approved by the city prior to the commencement of clearing, grading, fill, excavation, demolition, or construction related to any land development which requires a city permit, requires city approval, or is otherwise subject to SEPA review including, but not limited to, the following:

1. Subdivisions;
- (...)

Response: This application is for a Type III Subdivision within the City of Camas; therefore, an Erosion and Sediment Control Plan is required. A Preliminary Erosion Control Plan is included in the Preliminary Plans. A detailed and site-specific Erosion Control Plan will be provided with final construction plans for review and approval by the City.

Title 15 Buildings and Construction

Chapter 15.04 - Building Code

15.04.010 - Adoption of referenced codes.

(...)

Response: This application is for a Type III Subdivision, and no structures are proposed with this application. Future single-family residences will be constructed on the lots created with this application. Those structures will be reviewed during the building permit review process. All future buildings will receive building permit approval prior to construction.

15.04.030 - Amendments to the referenced codes.

The adopted codes are amended as follows:

(...)

D. International Fire Code.

1. A new subsection is added to Section 907.1.1 to provide as follows:

(...)

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.
- b. A permit shall be obtained from the fire department prior to engaging in activities, operations, practices, or functions as specified in Section 105 of the fire code.

(...)

Response: There is an existing fire hydrant at the intersection of NW 20th Avenue and NW Brady Road in the northwest quadrant of the intersection. There is also an existing fire hydrant on the north side of NW 18th Avenue just to the east of the site. Fire hydrants are planned throughout the site and will be installed during construction. All planned fire hydrants within the subdivision will meet spacing requirements and all future homes in the development will be provided with fire sprinklers, as required by the City of Camas. Emergency access for all lots in the site will be from the existing and planned public streets. This project will comply with all other requirements of the International Fire Code (IFC) as adopted and amended by the City of Camas.

Chapter 15.17 - Automatic Fire Sprinklers

(...)

Response: This application is for a 158-lot subdivision, and no buildings are proposed at this time. All future homes in the subdivision will be provided with fire sprinklers as required by the City of Camas. This project will comply with all other requirements of the International Fire Code (IFC) as adopted and amended by the City of Camas.

Chapter 15.50 - Clearing and Grading

Response: Site clearing, grading, and excavation are required for the construction of this project; therefore, a Grading Permit is required. Grading plans are included in the Preliminary Plans and grading plans will be included in the engineering plans for final approval by the City.

Title 16 Environment

Chapter 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):

Project Types	Exempt Levels in 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: This project is for a Type III Subdivision for the creation of 158 single-family residential lots; therefore, this project is not exempt from the State Environmental Policy Act (SEPA). A SEPA checklist has been prepared and is included with this application.

16.07.040 - Environmental checklist.

(...)

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



Chapter 16.31 - Archaeological Resource Preservation

(...)

16.31.070 - Predetermination report required.

(...)

Response: This site is greater than 5 acres in size and according to Clark County GIS, the site's mapped archaeological probability is between low-moderate and moderate-high; therefore, an Archaeological Predetermination Report is required for this project. An Archaeological Predetermination Report was completed by Applied Archaeological Research, Inc. (AAR) on September 11, 2025. That report is included in this application. AAR completed a field survey and a records review was performed for records on file at the Department of Archaeology and Historic Preservation (DAHP). AAR did not identify any archaeological recourse and no structures greater than 45 years in age or structures that meet the requirements for listing in the National Register of Historic Places exist on site. Refer to the Archaeological Predetermination Report included with this application for more information.

Chapter 16.51 - General Provisions for Critical Areas

(...)

16.51.090 - Applicability.

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

(...)

H. Subdivision;

Response: This application is for a Type III Subdivision, for the creation of 158 single-family residential lots; therefore, this project is subject to the criteria, guidelines, conditions, and requirements of this chapter. AKS has prepared a Critical Areas Assessment and Preliminary Mitigation Plan for the site. Critical area protection, impacts, and mitigation are described in the Critical Areas Assessment and Preliminary Mitigation Plan.

(...)

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 Assessment and Preliminary Mitigation Plan was completed by AKS for the subject site. This report includes details on the protection, impacts, and mitigation of impacts for the on-site critical areas. Refer to the Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

16.51.160 Mitigation requirements.

- A. The applicant shall avoid all impacts that degrade the functions and values of a critical area or areas. Unless otherwise provided in these provisions, if alteration to the critical area is necessary, all adverse impacts to or from critical areas and management zones resulting from a development proposal or alteration shall be mitigated in accordance with an approved critical area report and SEPA documents.

(...)

Response: Wetland and wetland buffer impacts will occur with this project. The impacts are unavoidable due to City requirements for site access and circulation, grading, minimum lot dimensions, and required density. Wetland buffer reduction, wetland buffer averaging, and wetland mitigation, will be provided as identified in the Critical Areas Assessment and Preliminary Mitigation Plan. Refer to the Preliminary Plans and Critical Areas Assessment and Preliminary Mitigation Plan included with this application for more information.

Chapter 16.53 - Wetlands

(...)

Response: AKS prepared a Critical Areas Assessment and Preliminary Mitigation Plan for the site. The assessment identified three on-site wetlands, identified as Wetland A, B, and C. Wetland A is a Category III, seasonally saturated PEM wetland with an 80-foot high intensity land use water quality buffer, located in the eastern portion of the site. Wetland B is a Category IV, isolated seasonally saturated PEM wetland with a 50-foot high intensity land use water quality buffer, located in the western portion of the site. Wetland C is a Category III, isolated seasonally saturated PFO/PEM wetland with an 80-foot high intensity land use water quality buffer, location in the center of the site. The majority of Wetland A and Wetland C will be protected with the project, and a portion of Wetland A and Wetland B will be filled for the site to meet transportation and circulation requirements. The application will also utilize buffer reduction and buffer averaging to complete the project. Mitigation will be provided for all critical area impacts of the project. Refer to the Critical Areas Assessment and Preliminary Mitigation Plan included in this application for additional information.

Chapter 16.55 - Critical Aquifer Recharge Areas

(...)

16.53.030 Critical area report—Additional requirements for wetlands.

Response: AKS completed a Critical Areas Assessment and Preliminary Mitigation Plan that is included in the application package. Impacts to critical areas will occur on-site with this project and mitigation for these impacts is provided in the report. Refer to the Critical

Areas Assessment and Preliminary Mitigation Plan included in this application for additional information.

16.53.040 Standards.

(...)

B. Wetland Buffers.

Buffers. Wetland buffer widths shall be determined by the responsible official in accordance with the standards below:

1. All buffers shall be measured horizontally outward from the delineated wetland boundary or, in the case of a stream with no adjacent wetlands, the ordinary high water mark as surveyed in the field.
2. Buffer widths are established by comparing the wetland rating category and the intensity of land uses proposed on development sites per Tables 16.53.040-1, 16.53.040-2, 16.53.040-3 and 16.53.040-4. For Category IV wetlands, the required water quality buffers, per Table 16.53.040-1, are adequate to protect habitat functions.

Response: Wetland A is a Category III, seasonally saturated PEM wetland with an 80-foot high intensity land use water quality buffer, located in the eastern portion of the site. Wetland B is a Category IV, isolated seasonally saturated PEM wetland with a 50-foot high intensity land use water quality buffer, located in the western portion of the site. Wetland C is a Category III, isolated seasonally saturated PFO/PEM wetland with an 80-foot high intensity land use water quality buffer, location in the center of the site. The application will utilize buffer reduction and buffer averaging to complete the project. Mitigation will be provided for all critical area impacts of the project. Refer to the Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

16.53.050 Wetland permits.

A. General.

(...)

Response: Road construction, construction of stormwater facilities, and residential lots will occur within portions of the wetlands and their buffers. Therefore, a wetland permit is required with this project. Refer to the Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

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: AKS has prepared a Critical Areas Assessment and Preliminary Mitigation Plan that is designed to satisfy the requirements of this section. Wetland B and a small portion of Wetland A will be filled with this project due to planned transportation and circulation improvements. As allowed by CMC 16.53.050, wetland buffer reduction and wetland buffer averaging are planned to avoid impacts to Wetland C and the protected portion of Wetland A. Wetland fill will be required for Wetland B due to unavoidable impacts for transportation and circulation. Mitigation will be provided for the necessary wetland fill. Refer to the Preliminary Plans and Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

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:

(...)

1. **Buffer Reduction Incentives.** Standard buffer widths may be reduced under the following conditions, provided that functions of the post-project wetland are equal to or greater after use of these incentives.
 - a. **Lower Impact Land Uses.** The buffer widths recommended for proposed land uses with high-intensity impacts to wetlands can be reduced to those recommended for moderate-intensity impacts if both of the following criteria are met:
 - i. A relatively undisturbed, vegetated corridor at least one hundred feet wide is protected between the wetland and any other priority habitats that are present as defined by the Washington State Department of Fish and Wildlife [8]; and
 - ii. Measures to minimize the impacts of the land use adjacent to the wetlands are applied, such as infiltration of stormwater, retention of as much native vegetation and soils as possible, direction of noise and light away from the wetland, and other measures that may be suggested by a qualified wetland professional.
 - b. **Restoration.** Buffer widths may be reduced up to twenty-five percent if the buffer is restored or enhanced from a pre-project condition that is disturbed (e.g., dominated by invasive species), so that functions of the post-project wetland and buffer are equal or greater. To the extent possible, restoration should provide a vegetated corridor of a minimum one hundred feet wide between the wetland and any other priority habitat areas as defined by the Washington State Department of Fish and Wildlife. The habitat corridor must be protected for the entire distance between the wetland and the priority habitat area by some type of permanent legal protection such as a covenant or easement. The restoration plan must meet requirements in subsection D of this section for a mitigation plan, and this section for a critical area report.
 - c. **Combined Reductions.** Buffer width reductions allowed under subsections (C)(1)(a) and (C)(1)(b) of this section may

be added provided that minimum buffer widths shall never be less than seventy-five percent of required buffer width for all Categories I and II, or less than fifty feet for Category III wetlands, and twenty-five feet for all Category IV wetlands.

Response: Buffer reduction and buffer averaging is planned for Wetland A and C buffers. The application will generally direct noise and light away from the wetland and rear yard fences will be constructed with the homes to help prevent intrusion into the protected wetlands by pets. The reduced buffer will also be restored by removing invasive species and installing native plant species. Refer to the Preliminary Plans and Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

2. **Buffer Averaging.** Averaging buffers is allowed in conjunction with any of the other provisions for reductions in buffer width (listed in subsection (C)(1) of this section) provided that minimum buffer widths listed in subsection (C)(1)(c) of this section are adhered to. The community development department shall have the authority to average buffer widths on a case-by-case basis, where a qualified wetlands professional demonstrates, as part of a critical area report, that all of the following criteria are met:
 - a. The total area contained in the buffer after averaging is no less than that contained within the buffer prior to averaging;
 - b. Decreases in width are generally located where wetland functions may be less sensitive to adjacent land uses, and increases are generally located where wetland functions may be more sensitive to adjacent land uses, to achieve no net loss or a net gain in functions;
 - c. The averaged buffer, at its narrowest point, shall not result in a width less than seventy-five percent of the required width, provided that minimum buffer widths shall never be less than fifty feet for all Category I, Category II, and Category III wetlands, and twenty-five feet for all Category IV wetlands; and
 - d. **Effect of Mitigation.** If wetland mitigation occurs such that the rating of the wetland changes, the requirements for the category of the wetland after mitigation shall apply.

Response: Buffer averaging is planned for the impacted portions for Wetland A and Wetland C buffers. The application will impact ±11,222 square feet of buffer and will average in ±18,906 square feet of buffer. The proposed buffer will be not less than 75 percent of the required width. Refer to the Preliminary Plans and Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

(...)

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: No stormwater facilities are proposed in the buffers. Refer to the Preliminary Plans and Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

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: One planned road, NW Tidland Street, will cross the buffer for Wetland C. Buffer averaging will be used to replace the impacted buffer. Refer to the Preliminary Plans and Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

Chapter 16.59 - Geologically Hazardous Areas

(...)

Response: A Geotechnical Soil Analysis Report was completed by Columbia West on May 28, 2025. Site and soil conditions are detailed in that Geotechnical Soil Analysis Report. Refer to the Geotechnical Soil Analysis Report included with this application for more information.

Chapter 16.61 - Fish and Wildlife Habitat Conservation Areas

(...)

Response: AKS prepared a Critical Areas Assessment and Preliminary Mitigation Plan for the site and determined that no fish and wildlife habitat conservation areas exist within the project boundary. Refer to the Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

Title 17 Land Development

Chapter 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 pre-application conference was held on April 3, 2025, and the meeting notes for the pre-application conference were issued on April 14, 2025. The Pre-Application Conference Report is included with this application.



- 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:
 - a. A plat map meeting the standards identified in CMC Section 17.01.050,
 - b. Owners of adjacent land and the names of any adjacent subdivisions,
 - c. Lines marking the boundaries of the existing lot(s) (any existing lot to be eliminated should be a dashed line and so noted),
 - d. Names, locations, widths and dimensions of existing and proposed public street rights-of-way and easements and private access easements, parks and other open spaces, reservations and utilities,
 - e. Location of existing and proposed sidewalks, street lighting and street trees,
 - f. Location, footprint and setbacks of all existing structures on the site,
 - g. Lot area and dimensions for each lot,
 - h. Location of proposed new property lines and numbering of each lot,
 - i. Location of the proposed building envelopes and sewer tanks,
 - j. Location, dimension and purpose of existing and proposed easements. Provide recorded documents that identify the nature and extent of existing easements,
 - k. Location of any proposed dedications,
 - l. Existing and proposed topography at two-foot contour intervals extending to five feet beyond project boundaries,
 - m. Location of any critical areas and critical area buffers to indicate compliance with all applicable provisions of the critical areas legislation,

- n. Description, location and size of existing and proposed utilities, storm drainage facilities and roads to service the lots,
 - o. Location of all existing fire hydrants within five hundred feet of the proposal; and
 - p. Show location and height of proposed retaining walls. Provide cross sections for retaining walls over four-feet in height.
7. For properties with slopes of ten percent or greater a preliminary grading plan will be required with the development application that shows:
 - a. Two-foot contours,
 - b. The proposed lots and existing topography,
 - c. The proposed lots with proposed topography, and
 - d. Total quantities of cut and fill;
 8. Preliminary stormwater plan and preliminary stormwater technical information report (TIR). The preliminary stormwater TIR is to be prepared in accordance with Ecology's latest edition Stormwater Management Manual for Western Washington (SWMMWW);
 9. For properties with development proposed on slopes of ten percent or greater a preliminary geotechnical report will be consistent with CMC Chapter 16.59;
 10. Clark County assessor's maps which show the location of each property within three hundred feet of the subdivision;
 11. Applicant shall furnish one set of mailing labels for all property owners as provided in CMC Section 18.55.110;
 12. Complete and submit a transportation impact study to determine the adequacy of the transportation system to serve a proposed development and to mitigate impacts of the proposal on the surrounding transportation system; and
 13. A narrative addressing ownership and maintenance of open spaces, stormwater facilities, public trails and critical areas, and the applicable approval criteria and standards of the Camas Municipal Code. It should also address any proposed building conditions or restrictions.
 14. An engineering estimate of costs for site improvements, both public and private.

(...)

Response: This application is for a Type III Subdivision for the creation of 158 single-family residential lots. This application package contains all the requirements listed in CMC 18.55.110 and the materials listed in this section including, Preliminary Plans that contain an Existing Conditions Plan, Vicinity Map, Preliminary Subdivision Plat, a Preliminary Composite Utility Plan, a Preliminary Tree Preservation and Removal Plan, a Preliminary Street Lighting Plan, a Preliminary Grading, Demolition, and Erosion Control Plan, a Preliminary Stormwater Plan, and a Preliminary Circulation Plan. Additionally, a SEPA checklist, an Archaeological Predetermination Report, a Stormwater TIR, a Geotechnical Soil Analysis

Report, a Transportation Impact Study, a Critical Areas Assessment and Preliminary Mitigation Plan, a Title Report, a Preliminary Tree Report, Mailing Labels, a Pre-Application Conference Report, and this Narrative are included in the application.

- 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: The planned subdivision has been designed to meet all applicable goals of the Camas Comprehensive Plan. This project will provide stormwater, sewer, and water services for each lot in the planned subdivision. Additionally, roads, franchise utilities, street trees and landscape strips, street lighting, and pedestrian and circulation routes will be provided with this subdivision. These planned improvements will assist in serving the site, while mitigating impacts to the surrounding area. This project will provide housing and open space areas for the community by creating 158 single-family residential lots and a large open space tract for the protection of on-site critical areas. The planned open space tract will assist in blending the natural and built environments. A Transportation Impact Study has also been prepared.

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 planned subdivision will provide stormwater management, and water and sanitary sewer utilities. The stormwater generated by the proposed site improvements will be collected on-site and conveyed to two stormwater facilities for mechanical treatment and detention. The stormwater facilities will be privately owned and maintained by the homeowners' association (HOA). The stormwater improvements are designed to follow the pre-developed drainage pattern, flowing to the ultimate discharge point in the northeast corner of the site to be released via outfall and energy dissipator at approved rates. All proposed stormwater improvements are designed per City of Camas standards and the ECY 2024 SSWMMWW.

Water service for the site will be provided with a new proposed water main that will be looped through the site and tied into existing City of Camas water mains in NW 20th Avenue, NW 18th Avenue, and NW Brady Road. All lots will be provided with individual water meters and services, and all water improvements will be designed and constructed per City of Camas Engineering standards.

Sanitary sewer service for the project will be provided by new proposed sanitary sewer mains on-site, with existing connection points to the south in NW 20th Avenue and to the northwest in NW Brady Road. Service laterals for each lot will be provided via these mains, with each lot to be served with an on-lot Septic Tank Effluent Filter (STEF) tank system

constructed with the home-build. All sanitary sewer improvements will be designed and constructed per City of Camas Engineering standards.

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: All planned roads meet or exceed the standards of the City of Camas six-year street plans and the Camas Design Standards Manual. All public roads within the planned subdivision will be constructed to 2-Lane Local/Sprinklered standards with a 52-foot-wide right-of-way, a 28-foot-wide paved surface, and 7-foot-wide planter strips and 5-foot-wide sidewalks on both sides of the road. NW 20th Avenue will be extended into the site, fully constructed to the 2-Lane Local/Sprinklered standards within the site's boundary, and the existing partially improved north half of NW 20th Avenue will be improved with a 7-foot-wide planter strip and 5-foot-wide sidewalk along the site's frontage. Half-width improvements will be provided for NW 18th Avenue to a 2-Lan Collector standard. Improvements will include a 10-foot right-of-way dedication, 18-foot half-width pavement, 6-foot planter strip, and 6-foot detached sidewalk. Planter strips are provided along public streets for street trees and street lighting. A Preliminary Landscape Plan, Preliminary Tree Preservation and Removal Plan, and a Preliminary Street Lighting Plan are included in the Preliminary Plans. Provisions have been made for utilities, as shown in the Utility Plans that are included in the Preliminary Plans. Refer to the Preliminary Plans included with this application for more information.

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

Response: The planned subdivision will dedicate right-of-way for three new public streets within the project site. NW 20th Avenue, an existing public road, will be extended into the site. Ten feet of right-of-way will be dedicated for NW 18th Avenue. y. Three private street tracts will be created to provide access to lots on-site. A 6-foot private utility easement (PUE) will be provided along the frontage of each lot with the final plat. Refer to the Preliminary Plans included with this application for more information.

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

Response: As indicated on the Preliminary Plans submitted with this application, all lots are oriented to front a public right-of-way or private street tract and are appropriately shaped to allow for future home construction. Refer to the Preliminary Plans included with this application for more information.

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

Response: As described and depicted in the plans and documents submitted with this application, this project complies with all requirements of the CMC and other relevant regulations. Refer to the submitted application materials and this narrative for more information.

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

Response: The Applicant's transportation engineering consultant, Kittelson & Associates, prepared a Transportation Impact Study (TIS). Trip generation was calculated for the 158-lot subdivision using the *ITE Trip Generation Manual 11th Edition*. The TIS states the project will generate 1,537 Average Daily Trips (ADT) with 113 a.m. peak hour trips and 153 p.m. peak hour trips. The TIS provides recommends a stop sign be installed on the NW Umatilla Street (Street A in the report recommendations) south bound approach to NW 18th Avenue and maintain vision clearance at all intersection with the development. The TIS also identified seven City of Vancouver proportional share intersection fees to be paid. Refer to the TIS included with this application for more information.

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

Response: All tracts within the subdivision will be owned and maintained by the HOA. Ownership and maintenance responsibility will be identified on the final plat.

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 proposed development meets all applicable goals of the Camas Comprehensive Plan. The development will protect existing trees on-site to the greatest extent practicable, provide planting of new trees, protect critical areas, and provide mitigation for necessary impacts. The development will construct a street network to provide for vehicle and pedestrian circulation and provide safe walking routes to the school south of the site and nearby parks. The planned project will also pay all applicable impact fees. Refer to the Proposed Development Plans included with this application for more information.

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: All plans and documents submitted with this application meet the requirements of this section.

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:

A. The phasing plan includes all land contained within the approved preliminary plat, including areas where off-site improvements are being made.

Response: This application is for a Type III Subdivision for the creation of 158 single-family residential lots, built in up to two phases. A Phasing Plan is included in the Preliminary Plans that are included with this application. Refer to the Preliminary Plans included with this application for additional information.

B. The sequence and timing of development is identified on a map.

Response: A Phasing Plan is included in the Preliminary Plans which identifies the first and second phases. It is anticipated that the phases will be constructed in numerical order; however, there is potential that the order of phase construction could change, or phases could be combined during final engineering. Refer to the Preliminary Plans included with this application for additional information.

C. Each phase shall consist of a contiguous group of lots that meets all pertinent development standards on its own. The phase cannot rely on future phases for meeting any city codes with the exception of storm drainage facilities. Storm drainage must be adequate for each phase, and the stormwater plan must adequately meet the needs of the entire development. Storm drainage facility must be included in the first phase.

Response: Each phase of this project has been designed to be constructed as a complete standalone project. Refer to the Preliminary Plans included with this application for additional information.

D. Each phase provides adequate circulation and utilities. Public works has determined that all street and other public improvements, including but not limited to erosion control improvements, are assured. Deferment of some improvements may be allowed pursuant to CMC Chapter 17.21.

(...)

Response: Each phase of this project has been designed to be constructed as a complete standalone project. Adequate circulation and utilities will be provided for each phase. Refer to the Preliminary Plans included with this application for additional information.

Chapter 17.19 - Design and Improvement Standards

(...)

17.19.020 - Improvements, supervision, inspections and permits 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: Paved streets, complete with curbs, gutters, and sidewalks will be constructed with this project. All lots will be provided with all required utilities, including sanitary sewer, water, and other private utilities. Streetlights, fire hydrants, and mail service delivery boxes will also be constructed with this project. All planned improvements are shown in the Preliminary Plans that are included with this application. There are no existing wells on-site or septic systems that serve the subject site.

17.19.030 - Tract, block and lot standards.

A. Environmental Considerations.

Response: The Applicant proposes to create ±260,070 square feet of open space for the protection of critical areas and natural vegetation. Wetlands A and C on-site will be protected in the open space tract, as many of the existing trees as practicable will also be protected in the open space tract. All other vegetation outside of the improvement area will be protected. Refer to the Proposed Development Plans included with this application for more information.

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 planned subdivision includes two-tiered blocks where practicable. Lots in the center of the project area will generally create a two-tiered block. The site is bound by NW 20th Avenue and NW 18th Avenue to the south and NW Brady Road to the east. These existing public roads and adjacent critical areas and boundaries prevent two-tiered blocks in these locations. North and west of the site are parcels zoned BP and LI/BP; therefore, no new single-family lots will be constructed on those lots. Along the east boundary is a City owned property with a water tower. For these reasons, single-tiered blocks are proposed along the west, north, and east boundaries of the site. Refer to the Preliminary Plans included with this application for more information.

C. Compatibility with Existing Land Use and Plans.

1. Buffer Between Uses. Where single-family residential lots are to be adjacent to multiple-family, commercial or industrial land use districts, and where natural separation does not exist, adequate landscape buffer strips and/or solid fences for purposes of buffering sound, restricting access, pedestrian safety and privacy shall be provided.
2. Conformity with Existing Plans. The location of all streets shall conform to any adopted plans for streets in the city. The proposed

land use shall respond to and complement city ordinances, resolutions and comprehensive plans.

3. **Other City Regulations.** All land use shall comply with all adopted city regulations. In the event of a conflict, the more restrictive regulation shall apply.

(...)

Response: Rear yard solid fences will be constructed with future homes to provide separation from the residential lots and the business park/light industrial zoning and uses to the north and west and the water tower parcel to the east. NW 20th Avenue is stubbed to the east boundary of the site and will be extended into the site to provide connection to the internal street network. Street connections will also be made to NW 18th Avenue and NW Brady Road. Planned public roads that will circulate through the site have been designed to conform with existing City street standards. Refer to the Preliminary Plans included with this application for additional information.

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: Each lot has been designed to front and have access onto a public or private road. Refer to the Preliminary Plans included with this application for additional information.

2. **Side Lot Lines.** The side lines of lots should generally run at right angles to the street upon which the lots face as far as practical, or on curved streets they shall be radial to the curve;

Response: Lots within the planned subdivision generally have their side lot lines at right angles to the road upon which they front. Refer to the Preliminary Plans included with this application for additional information.

3. **Building Envelopes.** No lot shall be created without a building envelope of a size and configuration suitable for the type of development anticipated:
 - a. For single-family residential zones, a suitable size and configuration generally includes a building envelope capable of siting a forty-foot by forty-foot square dwelling within the building envelope,
 - b. For multi-family zones, a suitable size and configuration generally includes a building envelope of twenty feet by forty feet.
 - c. Other factors in considering the suitability of the size and configuration of any residential lot include the presence of, or proximity to critical areas, adjoining uses or zones, egress and ingress, and necessary cuts and fills;

Response: Building envelopes, in the form of setbacks, are depicted on the Preliminary Plans. Refer to the Preliminary Plans included with this application for additional information.

4. Where property is zoned and planned for commercial or industrial use, in conformance to the intent of the comprehensive plan, other

lot dimensions and areas may be permitted at the discretion of the approval authority;

Response: The project site is zoned MF-18; therefore, this standard does not apply.

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: No flag lots are planned with this project; therefore, this standard does not apply.

6. Double Frontage Lots. Residential lots which have street frontage along two opposite lot lines shall be avoided, except for double frontage lots adjacent to an arterial or collector, which must comply with the following design standards:
(...)

Response: No double frontage lots are planned with this subdivision; therefore, this standard does not apply.

- E. Tracts and Trails.
(...)

Response: This site is not located in the area of an officially designated trail, and no trails are planned within the on-site open space tracts; therefore, the standards of this section do not apply.

- F. Landscaping.
 1. Each dwelling unit within a new development shall be landscaped with at least one tree in the planting strip of the right-of-way, or similar location in the front yard of each dwelling unit, with the exception of flag lots and lots accessed by tracts. Required trees shall be a minimum two-inch diameter at breast height (dbh) to create a uniform streetscape (dbh is four and one-half feet above the ground as measured from upside of tree).
 2. The city council finds that the existing mature landscaping of trees, and shrubs provide oxygen, filter the air, contribute to soil conservation and control erosion, as well as provide the residents with aesthetic and historic benefits. For these reasons, the city encourages the retention of existing trees that are not already protected as significant trees under the Camas Municipal Code. Generally, the city may allow the tree requirements under subsection (F)(1) of this section to be reduced at the request of the developer, by a ratio of two new trees in favor of one existing tree, provided such trees have been identified on approved construction plans.
 3. Prior to final acceptance of any land development, the land developer shall install trees adjacent to or within all common areas and landscape tracts as specified in the Camas Design Standards Manual.
 4. Street trees adjacent to individual lots must be installed prior to final occupancy or secured or bonded, and installed prior to expiration of the two-year warranty period, whichever comes first.
 5. Landscaping shall conform to plant criteria in the Camas Design Standards Manual. Any planting of trees or shrubs within the right-

of-way or vision clearance area must be shown on the construction drawings for approval.

6. Storm drainage facilities, pump stations and other visible facilities shall be required to include a ten foot L2 landscaped buffering in accordance with criteria in the Camas Design Standards Manual if within thirty feet of any street or accessory structure.

Response: One street tree is planned for each lot in the subdivision. Due to driveways, streetlights, and utilities, trees cannot be placed at 30 feet on center or directly in front of each lot throughout the project; however, the total number of required street trees are planned. The Applicant will retain as many existing trees as feasible. Street trees will be installed within the designed timeframe. Landscaping will conform to the Camas Design Standards Manual, and has been designed to not obstruct any vision clearance areas. All stormwater facilities in the planned subdivision have been designed with a 10-foot L2 landscape buffer as required. Refer to the Preliminary Plans included with this application for additional information.

- 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 6-foot-wide PUE along the front and street side property lines will be provided on the final plat. A 6-foot-wide PUE is shown on the Preliminary Plans. Refer to the Preliminary Plans included with this application for additional information.

- 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: Street lighting will be provided with this project. All lighting will be installed in conformance with City of Camas and Clark Public Utility standards. A Preliminary Street Lighting Plan is included in the Preliminary Plans. Refer to the Preliminary Plans included with this application for additional information.

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

Response: All streets in this project have been designed to conform to the guidelines and standards of the *City of Camas Neighborhood Traffic Management Plan* (March 2001). A Preliminary Circulation Plan is included in the Preliminary Plans, and a Transportation Impact Study was prepared for this project. Refer to the Preliminary Plans included with this application for additional information.

17.19.040 - Infrastructure standards.

- A. Private Street. Private street(s) may be authorized when all of the following occur:
 1. Allowing private streets in the area being developed will not adversely affect future circulation in neighboring lots of property or conflict with an existing adopted street plan;

Response: Three private streets are planned with this project. The private streets are labeled as Tract A, Tract D, and Tract G in the Preliminary Plans. Tract A will gain access from the corner of Whitman Street and NW 21st Avenue. Tract D will gain access from NW 21st Avenue, and Tract G will gain access from NW Tidland Street. Circulation is not required to the north or east and is not proposed through the critical area tract. Therefore, the private roads will not affect future circulation. Refer to the Preliminary Plans included with this application for more information.

2. Adequate and reasonable provisions are made for the ownership, maintenance, and repair of all utilities and the proposed private streets;

Response: All private street tracts will be owned and maintained by the HOA. A note describing private street ownership will be included on the final plat.

3. The proposed private streets can accommodate potential full (future) development on the lots or area being developed;

Response: Tract A will provide access to four lots. Tract D will provide access to two lots. Tract G will provide access to six lots and the stormwater facility in Tract F. No future lots beyond this subdivision will gain access from the private streets. The private streets have been designed to meet City standards based on the number of lots they provide access to and accommodate full development on the lots that will gain access from the private streets. Refer to the Preliminary Plans included with this application for more information.

4. Connect to no more than one public street, unless it is an alley;

Response: None of the planned private streets connect to more than one public street. Refer to the Preliminary Plans included with this application for more information.

5. Conform to the Camas Design Standard Manual;

Response: All private streets have been designed to comply with the City of Camas Design Standard Manual. Tract A will serve four lots and is 26 feet wide with no sidewalk planned. Tract B will serve two lots and is 20 feet wide with no sidewalk planned. Tract G provides access to six lots and is 216 feet long. Tract G is 42 feet wide with a 28-foot paved surface and sidewalk on one side. "No Parking" signs will be installed on one side of Tract G and on both sides of Tract A and Tract D. Refer to the Preliminary Plans included with this application for more information.

6. Alleys shall be privately owned and maintained;

Response: No alleys are planned with this project; therefore, this standard does not apply.

7. Access requirements for recycle service, garbage service, and emergency vehicles are provided;

Response: Garbage and recycling for lots on Tracts A and D will be collected at the right-of-way. Garbage and recycling for Tract G will occur at the lot front, with collection vehicles able to use the parking lots drive aisle in Tract H as a hammerhead turnaround. Refer to the Preliminary Plans included with this application for more information.

8. Provisions for adequate parking enforcement are recorded within a private covenant to ensure emergency vehicle access. These provisions shall be noted on the final plat, e.g. Towing service.

Response: A covenant providing provisions for parking enforcement will be recorded and will be noted on the final plat.

B. Streets.

1. Half Width Improvement. Half width improvements, when determined appropriate by the City Engineer, shall include utility easements, pedestrian pathway, storm water drainage, street lighting and signage, environmental permits, provisions for mitigation improvements and mitigation areas as necessary, bike lanes, and improvements to the centerline of the right-of-way as necessary to provide the minimum structural street section per the Camas Design Standard Manual.

Response: No half-width streets are proposed with the subdivision. Frontage improvements will be constructed for NW 18th Avenue and sidewalk and planter strip will be construction on the existing frontage of NW 20th Avenue when homes are constructed. Refer to the Preliminary Plans included with this application for more information.

2. Streets abutting the perimeter of a development shall be provided in accordance with CMC 17.19.040(B)(1) above, and the Design Standard Manual. Additional paving may be required to ensure safe and efficient roads to exist to serve the land development and provide bike lanes.

Response: No roads are planned abutting the perimeter of the development. Refer to the Preliminary Plans included with this application for more information.

3. The city engineer may approve a delay of frontage street improvements for development proposals under any of the following conditions:

Response: No delay in frontage improvements is requested; therefore, this standard does not apply.

4. In the event the frontage improvement is delayed, the owner must provide an approved form or financial surety in lieu of said improvements.

Response: No delay in frontage improvements is requested; therefore, this standard does not apply.

5. Dedication of additional right-of-way may be required for a development when it is necessary to meet the minimum street width standards or when lack of such dedication would cause or contribute to an unsafe road or intersection.

Response: The site has frontage on NW Brady Road to the east, and NW 18th Avenue and NW 20th Avenue to the south. NW Brady Road is classified as a 3-Lane Arterial and has a minimum 75.5-foot existing right-of-way along the site frontage, no additional dedication is required. NW 20th Avenue is classified as a 2-Lane Local/Sprinklered street with a 52-foot existing right-of-way, no additional right-of-way dedication is required. NE 18th Avenue is classified as 2-Lane Collector with an existing 40-foot right-of-way, 10 feet of right-of-way will be dedicated to provide the required 30-foot right-of-way half width. Refer to the Preliminary Plans included with this application for more information.

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.

Response: NW 20th Avenue is an existing public road that is stubbed to the east boundary of the site. NW 20th Avenue will be extended into the site and be improved to City of Camas Street Detail ST3 standards. Refer to the Preliminary Plans included with this application for more information.

7. **Names.** All street names, street numbers, and building numbers shall be assigned in accordance with CMC 12.24

Response: All planned streets have been named according to the City of Camas *Street Naming Manual* (October 2010) and as identified in the pre-application report. Street names depicted on the Preliminary Plans are placeholders, and final road names will be determined prior to final platting.

8. **Right-of-way, tract and pavement widths for streets shall be based on Table 17.19.040-1 and Table 17.19.040-2.**

Response: The site has frontage on NW Brady Road to the east, and NW 18th Avenue and NW 20th Avenue to the south. NW 20th Avenue is also stubbed to the site's east boundary. The planned subdivision will extend NW 20th Avenue into the site, construct three new public roads (NW Umatilla Street, NW Tidland Street, and NW 21st Avenue), and provide half-width frontage improvements for NW 18th Avenue.

NW Brady Road is classified as a 3-Lane Arterial and has a minimum 75.5-foot existing right-of-way along the site frontage, 46-foot existing paved width, and 8-foot attached sidewalk along the site frontage. No additional dedication or improvements are required.

Existing NW 20th Avenue is classified as a 2-Lane Local/Sprinklered street with a 52-foot existing right-of-way, 28-foot existing paved width, and a 7-foot planter and 5-foot detached sidewalk on the south side of the road. No additional right-of-way dedication is required and the 7-foot planter strip and 5-foot detached sidewalk will be constructed with the homes on the north side of the road.

NE 18th Avenue is classified as 2-Lane Collector with an existing 40-foot right-of-way and varying pavement width. The Applicant will dedicate an additional 10 feet of right-of-way to provide the required 30-foot right-of-way half width and construction 18-feet of half-width pavement, 6-foot planter strip, and 6-foot sidewalk along the site frontage.

The extension of NW 20th Avenue, NW Umatilla Street, NW Tidland Street, and NW 21st Avenue will be constructed to City of Camas Street Detail ST3 with a 52-foot-wide right-

of-way, a 28-foot-wide paved surface, and 7-foot-wide planter strips and 5-foot-wide sidewalks on both sides of the road. Refer to the Preliminary Plans included with this application for more information.

9. **Intersections.** Any intersection of streets that connect to a public street, whatever the classification, shall be at right angles as nearly as possible, shall not exceed fifteen degrees, and not be offset insofar as practical. All right-of-way lines at intersections with arterial streets shall have a corner radius of not less than twelve feet.

Response: All planned intersections are at right angles, or as close to right angles as possible. Offset intersections are not planned with this project. Refer to the Preliminary Plans included with this application for more information.

10. **Street Layout.** Street layout shall provide for the most advantageous development of the land development, adjoining area, and the entire neighborhood. Evaluation of street layout shall take into consideration potential circulation solutions for vehicle, bicycle and pedestrian traffic, and, where feasible, street segments shall be interconnected.

- a. **Circulation Plan.** Applicants shall submit a circulation plan at application which includes the subject site and properties within six hundred feet of the proposed development site. The plan shall incorporate the following features both on-site and off-site:
 - i. The circulation plan shall be to an engineering scale at one inch = one hundred feet or the scale may be increased or decreased at a scale approved by the director;
 - ii. Existing and proposed topography for slopes of ten percent or greater, with contour intervals not more than ten feet;
 - iii. Environmental sensitive lands (geologic hazards, wetlands, floodplain, shoreline, etc.);
 - iv. Existing and proposed streets, bicycle/pedestrian pathways, trails, transit routes; and
 - v. Site access points for vehicles, pedestrians, bicycles, and transit.

Response: A Preliminary Circulation Plan meeting these standards is provided in the Preliminary Plans that are included with this application. The planned street network provides internal circulation and connections to existing infrastructure. Pedestrian circulation will be provided through the street network via sidewalks. On-site critical areas are contained within an open space tract that is depicted on the Preliminary Plans. Circulation is not proposed to the north or west as those properties are zoned LI or BP/LI and access to those parcels will be from NW 18th Avenue or NW Brady Road. Refer to the Preliminary Plans included with this application for more information.

- b. **Cross-circulation shall be provided that meets the following:**
 - i. **Block lengths shall not exceed the maximum access spacing standards for the roadway class per the**

city's design standards manual. If block lengths greater than six hundred feet are approved pursuant to CMC Section 17.19.040.B.10.b.iii., a midway pedestrian connection shall be provided.

Response: Planned blocks are less than 600 feet in length, except where critical areas and tree protection areas and neighboring property constraints make block lengths less than 600 feet long impractical. Tract C is a planned open space tract for critical area and tree protection, which creates block lengths greater than 600 feet from NW Brady Road to NW Tidland Road. Due to the critical area protection, the block length in these areas cannot be reduced. No circulation is proposed or required to the west along NW Umatilla Street; therefore, the block length is greater than 600 feet long. Pedestrian connection is not necessary between the residential subdivision and the existing business. All other blocks within the project area are less than 600 feet in length. Refer to the Preliminary Plans included with the application for more information.

- ii. Culs-de-sac and permanent dead-end streets over three hundred feet in length may be denied unless topographic or other physical constraints prohibit achieving this standard.

Response: No dead-end streets over 300 feet in length or cul-de-sacs are planned with this project; therefore, this standard does not apply. Refer to the Preliminary Plans included with this application for more information.

- iii. When culs-de-sac or dead-end streets are permitted that are over three-hundred feet, a direct pedestrian and bicycle connection shall be provided to the nearest available street or pedestrian oriented use. Pedestrian connections need to meet Design Standards Manual for ADA accessibility in accordance with PROWAG and ADAAG.

(...)

Response: No dead-end streets over 300 feet in length or cul-de-sacs are planned with this project; therefore, this standard does not apply. Refer to the Preliminary Plans included with this application for more information.

- d. Where critical areas are impacted, the standards and procedures for rights-of-way in the critical areas overlay zone shall be followed.

Response: Roadway construction will impact critical areas with this project. AKS has prepared a Critical Areas Assessment and Preliminary Mitigation Plan, which includes information on the critical area impacts and mitigation. Refer to the Critical Areas Assessment and Preliminary Mitigation Plan included with this application for additional information.

- e. When the proposed development's average lot size is seven thousand four hundred square feet or less, one additional off-street parking space shall be required for every five units, notwithstanding the requirements of CMC Chapter 18.11. These spaces are intended to be located within a common tract.

(...)

Response: The project’s average residential lot size is less than 7,400 square feet; therefore, additional off-street parking is required. There are 158 single-family residential lots planned with this project; therefore, a total of 32 additional parking spaces is required for the site. Thirty-two additional parking spaces are planned with this project. Those parking spaces are distributed throughout the site in common tracts. Refer to the Preliminary Plans included with this application for more information.

12. **Street Design.** When interior to a development, publicly owned streets shall be designed and installed to full width improvement as a means of insuring the public health, safety, and general welfare in accordance with the city comprehensive plans. Full width improvements shall include utility easements, sidewalks, bike lanes as necessary, and control of stormwater runoff, street lighting, and signage, as provided below.

(...)

Response: All planned public streets within the project area have been designed to meet City of Camas design standards. All public roads are designed as City of Camas Street Detail ST3 with a 52-foot-wide right-of-way, a 28-foot-wide paved surface, and 7-foot-wide planter strips and 5-foot-wide sidewalks on both sides of the road. Street signage and lighting, stormwater facilities, and public utilities are also included in the street design. Refer to the Preliminary Plans included with this application for more information.

13. **Sidewalks shall be constructed as specified in Camas Design Standard Manual.** See Table 17.19.040-1 and Table 17.19.040-2 for dimensions.

(...)

Response: All planned public and private streets within the project area have been designed to meet City of Camas design standards and Table 17.19.040-1 and Table 17.19.040-2 of the CMC. Where sidewalks are planned, they have been designed to be constructed as specified in the Camas Design Standard Manual. Refer to the Preliminary Plans included with this application for more information.

- C. **Utilities.**

(...)

2. **Sanitary sewers shall be provided to each lot at no cost to the city and designed in accordance with city standards.**

(...)

Response: Sanitary sewer service for the project will be provided by new proposed sanitary sewer mains on-site, with existing connection points to the south in NW 20th Avenue and to the northwest in NW Brady Road. Service laterals for each lot will be provided via these mains, with each lot to be served with an on-lot STEF tank system constructed with the home-build. All sanitary sewer improvements will be designed and constructed per City of Camas Engineering standards. Refer to the Preliminary Plans included with this application for more information.

3. **Storm Drainage.** The storm drainage collection system shall meet the requirements of the city's officially adopted storm water standards.

(...)

Response: The stormwater generated by the proposed site improvements will be collected on-site and conveyed to two stormwater facilities for mechanical treatment and detention. The stormwater facilities will be privately owned and maintained by the HOA. The stormwater improvements are designed to follow the pre-developed drainage pattern, flowing to the ultimate discharge point in the northeast corner of the site to be released via outfall and energy dissipator at approved rates. All proposed stormwater improvements are designed per City of Camas standards and the Washington State Department of Ecology (ECY) 2024 Stormwater Management Manual for Western Washington (SWMMWW). Refer to the Preliminary Stormwater Technical Information Report (TIR) and Preliminary Plans included with this application for more information.

4. **Water System.**

(...)

Response: Water service for the site will be provided with new proposed water main looped through the site and tied into existing City of Camas water mains in NW 20th Avenue, NW 18th Avenue, and NW Brady Road. All lots will be provided with individual water meters and services, and all water improvements will be designed and constructed per City of Camas Engineering standards. Refer to the Preliminary Plans included with this application for more information.

Chapter 17.21 - Procedures for Public Improvements

(...)

17.21.030 - Land disturbing activities—Erosion prevention/ sediment control.

Any person, company, corporation, group, entity or jurisdiction proposing to commence any land-disturbing activity, shall be required to meet the following standards:

- A. Install all erosion prevention/sediment control measures required by the approved erosion prevention/sediment control plan prior to commencement of work.
- B. For all land-disturbing activities of an acre or more, furnish to the city an approved form of security in the amount of two hundred percent of the engineer's estimated cost of the erosion prevention/sediment control measures, including associated labor, shown on the approved erosion prevention/sediment control plan.
- C. Construct any storm drainage facilities required to detain and dispose of stormwater generated by the project, prior to commencement of work on other portions of the project. The city may require the construction of a temporary storm drainage facility that would bypass and protect the permanent facility until such time as the rest of the project is complete and ready for the permanent facility to be brought online.
- D. Implementation of erosion prevention/sediment control measures in addition to those measures approved on the erosion prevention/sediment control plan may be required to address weather-related problems and to assure compliance with local, state and federal requirements for water quality. Any proposed additional erosion prevention/sediment control measures must be approved by the city prior to use. The city shall have the right to issue a stop work order on all construction not related to erosion prevention/sediment

control until such time as acceptable prevention and control measures are implemented.

Response: A Preliminary Grading, Demolition, and Erosion Control Plan is included in the Preliminary Plans. A detailed and site-specific Erosion Control Plan will be provided with final construction plans for sediment and pollution control. Refer to the Preliminary Plans included with this application for more information.

Title 18 Zoning

Chapter 18.09 - Density and Dimensions

(...)

18.09.050 - Density and dimensions—Multifamily residential zones.

Table 1—Density and Dimensions for Multifamily Residential Zones	
	MF-18
Density	
Maximum density (dwelling units per net acre)	18
Minimum density (dwelling units per net acre)	6.0
Standard lots	
Minimum lot area (square feet)	2,100
Minimum lot width (feet)	26
Minimum lot depth (feet)	60
Maximum gross floor area (GFA) per dwelling unit (square feet)	No max
Setbacks	
Minimum front yard/at garage front (feet)	10/20
Minimum side yard (feet)	3 ^{Note 1}
Minimum side yard, flanking a street (feet)	15
Minimum rear yard	10
Lot coverage	
Maximum building lot coverage	65%
Building height	
Maximum building height (feet)	50 ^{Note 5}

Table Notes:

- 1. The non-attached side of a dwelling unit shall be three feet, otherwise a zero-lot line is assumed.
- 5. Maximum four stories but not to exceed height listed.

Response: The subject site is within the MF-18 zoning district. The gross area for the site is ±24.41 acres, and there are ±5.97 acres of open space tract area planned with this project, resulting in a net area of ±18.44 acres. In the MF-18 zoning district, the minimum required density is six units per net acre, and the maximum allowable density is 18 units per net acre. The required minimum density for the project is 111 units (6 units/acre x 18.44 acres) and the maximum allowable density for the project is 332 units (18 units/acre x 18.44 acres). This project will provide 158 detached single-family residential lots.

The minimum planned lot area is 3,000 square feet in size, with a minimum 30-foot width, and a minimum 100-foot depth. The lot are designed to allow for a minimum front yard setback of 10 feet, minimum garage setback of 20 feet, minimum side setback of 3 feet, minimum street side yard setback of 15 feet, and minimum rear yard setback of 10 feet. The planned lots are large enough for homes to be constructed meeting the maximum building lot coverage of 65 percent and the maximum building height of 50 feet. Lot

dimensions, setbacks, areas, and density statistics are depicted in the Preliminary Plans. Refer to the Preliminary Plans included with this application for additional information.

Chapter 18.11 - Parking

(...)

18.11.030 Location.

Off-street facilities shall be located as hereafter specified. Such distance shall be the maximum walking distance measured from the nearest point of the parking facility to the nearest point of the building that such facility is required to serve:

- A. For single-family or two-family dwelling and motels: on the same lot with the structure they are required to serve.
- B. For multiple dwelling, rooming or lodging house: two hundred feet.
- D. For uses other than those specified above: four hundred feet.

Response: All required parking spaces for the residential lots are located on the same lot as the residence. Refer to the Proposed Development Plans included with this application for more information.

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: Off-street parking will be provided for each future single-family home and will consist of garage and driveway spaces. Thirty-two additional off-street parking spaces will be provided in three common parking areas to serve residential parking needs. Refer to the Preliminary Plans included with this application for more information.

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.

Use	Required Number of Off-Street Parking Spaces
Residential	
Single-family dwelling, duplex, rowhouse	2 per unit
Studio apartment	1
Apartment 1 bedroom/ 2+ bedrooms	1.5/2
Housing for elderly (apartment/unassisted)	.33 per unit
Retirement dwellings	2 per unit
Residential care facility/assisted living	1 per 2 beds + 1 per day shift employee

(...)

Response: The proposed application is for a 158-lot subdivision for the future construction of detached single-family homes. Two off-street parking spaces are required for each single-family dwelling unit. Each single-family lot will provide a minimum of two off-street parking spaces, with at least one driveway space and one garage space. Additionally, 32

off-street parking spaces are provided in common parking areas to meet the requirements of CMC 17.19.040.B.10.e. Refer to the Preliminary Plans included with this application for more information.

Chapter 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;
 2. Redevelopment including change of use when Site Plan Review is applicable (refer to Chapter 18.18 Site Plan Review);
 3. Parking lots with greater than four spaces;
 4. Development that is subject to Design Review (refer to Chapter 18.19 Design Review);
 5. Undeveloped property converting to an allowed use in the zone (e.g. infill lots); and
 6. Conditional uses. The standards for landscaping will be the same as the landscaping standards in commercial zones if conditional use will occur in a residential zone.

(...)

Response: This project is for a Type III Subdivision for the creation of 158 detached single-family residential lots; therefore, the requirements of this chapter apply.

18.13.040 - Procedure for landscape, tree and vegetation plans.

- 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.

Response: A tree survey was completed by AKS and is included in the Preliminary Tree Preservation and Removal Plans, which are included with this application. A Preliminary Landscape Plan is also included in the Preliminary Plans. Proposed plant type, size, and location are included in those plans. Refer to the Tree Report and Preliminary Plans included with this application for more information.

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

Response: A tree survey has been prepared by a certified arborist with AKS and is included with this application.

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 has been prepared by a certified arborist with AKS and is included with this application.

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 showing significant trees with location numbers has been completed by AKS and is shown on the Preliminary Tree Preservation and Removal Plans. Trees that will be protected and impacted with the project are identified on the Plans. Refer to the Preliminary Plans included with this application for more information.

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: A Tree Report and Preliminary Tree Preservation and Removal Plans have been completed by an arborist with AKS. The report and plans include the information noted above. Refer to Preliminary Plans and Preliminary Tree Preservation and Removal Plans included with this application for more information.

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: Street trees will be planted along all public streets within the subdivision. Landscaping will also be provided on the individual lots by the future homeowners and as landscape buffers around the stormwater facilities. Street trees, shrubs, and ground covers have been selected by a licensed landscape architect and have been selected to meet the standards of this section. Refer to the Preliminary Plans included with this application for more information.

- 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: All landscaping plants planned for use in this project are either native or adapted to the northwest climate. All plant materials will meet the requirements of this section. Refer to the Preliminary Plans included with this application for more information.

- 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 planned along all public streets within the project. Trees are designed to be spaced a minimum of 30 feet in the center where feasible. Due to driveways and utilities, there are areas where street trees cannot be installed at 30 feet on-center; however, one street tree is provided per single-family residential lot. Refer to the Preliminary Plans included with this application for more information.

- 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: None of the planned vegetation for the project is an invasive species. Refer to the Preliminary Plans included with this application for more information.

- 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 planned plant materials and planting sizes are shown on the Preliminary Plans included in the application package. Planting size is selected to provide the best opportunity for plant survival and integration into the overall site. Refer to the Preliminary Plans included with this application for more information.

- 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 planned plant materials and planting sizes are shown on the Preliminary Plans included in the application package. Planting size is selected to provide the best opportunity for plant survival and integration into the overall site. Refer to the Preliminary Plans included with this application for more information.

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 systems. All irrigation in common landscaped areas will be installed with the landscaping at the time of neighborhood construction and maintained by the HOA. All irrigation in planting strips adjacent to private lots will be installed with the home construction on that lot and be maintained by the property owner. All irrigation will be design-build by a landscape contractor.

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.

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: No existing trees will be used as street trees; therefore, this standard does not apply.

K. Vision clearance hazards shall be prohibited.

Response: No vision clearance hazards will be created with the planned landscape. Vision clearance triangles are depicted on the Preliminary Plans included with this application.

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

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:

(...)

Response: The subject site has a gross area of ±24.41 acres with ±5.97 acres planned for open space. This results in a net area of ±18.44 acres for tree density calculations. Twenty tree units per acre are required; therefore, 369 tree units are required (±18.44 acres x 20 trees units per acre). A total of 369 tree units are planned with this project. The total tree units include 76 existing trees, totaling 193 tree units and 176 proposed trees, totaling 176 tree units Refer to the Preliminary Plans and Tree Report included with this application for more information.

18.13.055 - Landscape buffering standards.

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

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
Multifamily 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: All planned lots in the subdivision have been designed as single-family residential lots. Single-family residences are not required to provide a landscape buffer.

18.13.060 - Parking areas.

A. Parking areas are to be landscaped at all perimeters.

Response: There are three parking area tracts planned within the site. All the planned parking area tracts have been designed with a landscaped perimeter. Refer to the Preliminary Plans included with this application package for additional information.

B. All parking areas shall provide interior landscaping for shade and visual relief.

Response: No parking lots with interior landscape areas are proposed with this project; therefore, this standard does not apply. Refer to the Preliminary Plans included with this application for additional information.

C. Parking lots shall include a minimum ratio of one tree per six parking spaces.



Response: Thirty-two off-street parking spaces are planned with this project in common area tracts. Tract E contains 10 parking spaces requiring two trees. Tract H contains 12 parking spaces requiring two trees. Tract E contains 10 parking spaces requiring two trees. Two trees are provided in each parking area tract. Refer to the Preliminary Plans included with this application for additional information.

D. Planter strips (medians) and tree wells shall be used within parking areas and around the perimeter to accommodate trees, shrubs and groundcover.

Response: The proposed parking areas do not include interior landscaping. No planter strips or tree wells are proposed. Refer to the Preliminary Plans included with this application for additional information.

E. Planter areas for trees must provide a minimum of five hundred cubic feet of soil, and shall provide eight-foot by eight-foot minimum of clear planting space. For other vegetative buffer areas a minimum of a five foot clear width must be provided.

Response: All tree planting areas are a minimum of 8 feet wide and contain a minimum of 500 cubic feet of soil. Refer to the Preliminary Plans included with this application for additional information.

F. Wheel stops should be used adjacent to tree wells and planter areas to protect landscaping from car overhangs.

Response: Curbs are proposed adjacent to planting areas to prevent vehicles from overhanging and damaging the plant material. Refer to the Preliminary Plans included with this application for additional information.

G. Curbed planting areas shall be provided at the end of each parking aisle to protect parked vehicles.

Response: Curbed planting areas are provided at the end of each parking aisle to protect parked vehicles. Refer to the Preliminary Plans included with this application for additional information.

H. No more than fifteen parking spaces shall be located in a row without a landscaped divider strip (See Figure 18.13.060-1).

Response: No more than 10 parking stalls are planned in a single row with this project. Refer to the Preliminary Plans included with this application for additional information.

Chapter 18.15 - Signs

Response: No signs are planned with this application. Any future sign will receive a sign permit prior to installation to ensure the sign meets the requirements of this chapter.

Chapter 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. Refer to the Preliminary Plans included with this application for additional information.

18.17.050 - Fences and walls.

Response: All future fences for the residential lots will not exceed 6 feet in height; therefore, permits will not be required for fences. Refer to the Preliminary Plans included with this application for additional information.

18.17.060 - Retaining walls.

Response: Retaining walls are proposed with the project. No walls are anticipated to be greater than six feet tall. Wall locations and heights are shown on the Preliminary Plans. Refer to the Preliminary Plans included with this application for additional information.

IV. Conclusion

The Applicant is proposing a 158-lot single-family subdivision meeting the requirements of the City of Camas MF-18 zoning district and other applicable portions of the City of 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 (Stella Ridge).