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January 18th, 2021

Camas Planning Commission  
616 NE 4<sup>th</sup> Ave.  
Camas, WA 98607

RE: Annual Code Amendments

Camas Planning Commission and Community Development Staff,

I am writing to you on behalf of the Building Industry Association of Clark County to provide input on the recently proposed annual code amendments for the City of Camas. Some of the amendments outlined within the document are a cause for concern for the industry. Although we agree with the motives behind the amendments, we would like to see more flexibility in implementation.

**1. Pedestrian connectivity and pedestrian mid-way connections:**

A major goal within Camas' comprehensive plan is to create livable, connected neighborhoods. This is an important goal, but the current amendments place an unreasonable burden on private development without public investment, which will undoubtedly increase the cost of housing in the City of Camas. Moreover, the code contradicts itself by only requiring pedestrian connectivity in CMC 17.19.030.D.5- Tract, block, and lot standards. However, the addition of bicycle connection is added in CMC 17.19.040.B.10.b.iii- infrastructure standards, which states, "a direct pedestrian **and** bicycle connection shall be provided to the nearest available street or pedestrian oriented use." These are labeled as mid-way pedestrian connections throughout the document, and we believe the additional requirement of bicycle connection should be eliminated. Bicycle and pedestrian collisions can be serious, and City Staff relayed there would be no bike lane requirements. Bicycle connection is referenced in cul-de-sac connections but not block connections. Implementing some consistency here would be an improvement unless the cul-de-sac connection has different design standards.

Through researching the Camas municipal code, the 300-foot length limit on cul-de-sacs and dead-end streets is clearly defined, but the 600-foot block standard is less clear. "Block lengths shall not exceed the maximum access spacing for the roadway class per the city's design standards manual." We would like clarity from City Staff on where the 600-foot block length standard is within code. Right of way and pavement width were in the design manual, but length was more elusive.

Also, within 17.19.040.B.10.b.ii - Infrastructure standards there is flexibility on cul-de-sac standards: "may be denied unless topographic or other physical constraints prohibit achieving this standard." As an industry we would like to see the same language applied to both midway pedestrian connection standards which state, CMC 17.19.040.B.10.b.i. "if block lengths greater than 600-feet are approved pursuant to CMC 17.19.040.B.10.b.iii., a midway pedestrian connection shall be provided **unless topographic or other physical constraints prohibit achieving this standard.**" And CMC 17.19.040.B.10.b.iii "When cul-de-sacs or dead-end streets are permitted that are over 300 feet, a direct pedestrian and bicycle connection shall be provided to the nearest available street or pedestrian oriented use. **unless topographic or other physical constraints prohibit achieving this standard.**" The code should be consistent in the flexibility afforded to cul-de-sacs, permanent dead-end streets, and blocks whether that be length standards or pedestrian connection standards.

The deviation process costs both City Staff and private construction professionals time and money. Keeping the code consistent is important, and the City of Camas will still retain control of the process and our members will adhere to design standards. If our members exceed the 600-foot block length and provide a pedestrian connection, will no other road modifications be required? The two key questions are this: at what block length should a pedestrian connection be required? And how wide should said connection be? The goal of this letter is to start the conversation and provide industry perspective on the costs and processes associated with these annual code amendments.

Moreover, there are existing examples of pedestrian connections throughout the City of Camas that make more sense for pedestrian use. The Parker Estates pedestrian connection is functional and doesn't take nearly as much space as the proposed connections within the code. The Parker Estates pedestrian connection is a little over 5ft wide while the proposed pedestrian connections within the code are 10 ½ ft wide with the Kate's Cove connection being cited as an example. Will this 10 ½ ft width be required for both cul-de-sac and block pedestrian connections? Dedicating double the space for these connections will increase the cost of housing. Developers will pass on the additional cost of connections onto the cost of the lots, which builders purchase and pass on that cost to their clients. The commission should consider changing the standard to something like the Parker Estates example because it achieves the intent of the code, decreases costs, and provides ample opportunity for neighborhood connectivity.

## **2. Sewer lateral requirements - infrastructure standards:**

CMC 17.19.040.C.2.- Infrastructure standards state, "Duplex, tri-plex, and townhome units shall each have a dedicated sewer lateral, unless otherwise approved by Operations Utility Manager." As an industry, we agree with the requirement for townhomes given that product type. However, the Camas housing options study clearly underlined the importance of duplexes, triplexes, and other middle housing options in addressing housing affordability in the City of Camas. Requiring a dedicated lateral for each unit would profoundly increase the cost of construction. If a technician can read the sub-meter and access is granted, there is no reason for such a requirement. This could be achieved through a written agreement at point of sale or as a condition of permit issuance. Controlling the cost of middle housing options i.e., duplexes, triplexes, ADUS, etc. is imperative if the City of Camas is going to provide more affordable housing options for a diverse and growing population.

### **3. Code conflicts:**

The elimination of code interpretation for Type 1 land use applications is concerning. While Type 1 applications are administrative in nature, we believe that code interpretation is a vital tool for communication and a public service to folks who don't know the process just as much as those who do. If this is a matter of staff time, how many requests for type 1 interpretation came through Camas Community Development in 2021? The industry wants to be assured that this won't represent a breakdown in communication going forward.

We applaud the efforts of the Planning Commission and staff in considering these annual amendments. Our association and its members want to build livable communities so people can achieve the American dream and build generational wealth. Communication with our local jurisdictions is vital and our industry appreciates the opportunity to provide input.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Wood". The signature is written in a cursive, flowing style.

Justin Wood  
Government Affairs Manager