

Christopher and Susan Reive

1829 NW Columbia Summit Dr.
Camas, WA 98607

Via email to: rmaul@cityofcamas.us

August 23, 2022

City of Camas
Community Development Department
Attention: Robert Maul, Planning Manager
616 NE Fourth Ave
Camas, WA 98607

RE: Hood Street Subdivision Preliminary Plat Application
City of Camas File No. SUB22-01

Dear Mr. Maul:

We agree with and join the comments and argument of Mr. and Mrs. Vartanian's August 23, 2022 letter to the City responding to the Olson Engineering, Inc. ("Olson") Memos, dated and filed in this case on August 16, 2022. In addition to the Vartanian's observations, we add that Applicant's reliance on CMC 16.53.050 D(1)(a)(ii) is misplaced for at least the following reasons.

Olson simply declares that a plat modification which might result in a reduction of up to two (2) lots out of an existing total of the 18 currently proposed makes the entire project "not feasible to construct". Such a bald statement, without more to support it, is not sufficient to establish such a claim as fact. Without more, there is no basis for a critical review of its reasonableness. CMC Chapter 16.53's comprehensive scope demonstrates the importance placed on wetlands preservation and protection. Any showing that this concern must be entirely ignored due solely to the cost of compliance should be substantial. Merely stating that an unquantified and not-so-obvious economic consequence arising solely from compliance with the Code's wetlands protections provisions will result in an entire project that is "not feasible to construct", without more to substantiate that conclusion, does not make it true or satisfy the requirement contemplated by the Code. We submit that it is just as reasonable to conclude, in contrast to Olson's unsubstantiated statement, that the economic "feasibility" of the proposed Hood Street Subdivision project is impacted as much (or more) by external and independent economic factors entirely outside the scope of CMC Chapter 16.53. Olson's statement ignores such likely impacts, and offers nothing else to support its conclusions.

Moreover, at this particular site the potential for a reduction in the number of lots where the wetlands B & C are located because of reasonable wetlands investigation and mitigation requirements does not arise in a regulatory vacuum. Adjustment to the size of at least the currently proposed lots 5, 6, 8, and 9 (where wetlands B & C are located) is required in this case by CMC 18.09.080(B) ("beveling"), regardless of the presence of wetlands. And, this beveling

requirement is not subject to the exceptions to compliance described in CMC 16.53.050 D(1)(a)(ii). Beveling is mandatory in this case, without regard to the economic consequence asserted by Olson or the goal statement of the City's existing Comprehensive Plan. As a result, the relevance of Olson's stated opinions in this particular case is suspect, at best.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher L. Reive". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Christopher L. Reive

Cc: Madeline Sutherland, Planner via email at MSutherland@cityofcamas.us
Steven Morasch via email at stevem@landerholm.com
Kenneth Vartanian via email at kenvart@comcast.net