

**Christopher and Susan Reive**

1829 NW Columbia Summit Dr.

Camas, WA 98607

Via email to: [MSutherland@cityofcamas.us](mailto:MSutherland@cityofcamas.us)

July 1, 2022

City of Camas  
Community Development Department  
Attention: Madeline Sutherland, Planner  
616 NE Fourth Ave  
Camas, WA 98607

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

Dear Ms. Sutherland:

We write in response to the above referenced Preliminary Plat Application. The public hearing for the proposed plat is currently noticed for July 7, 2022 at 5:00pm.

We own the real property located immediately north of proposed Lot 9 and a portion of proposed Lot 8 as shown on the Hood Street Subdivision application. Our address is 1829 NW Columbia Summit Dr., Camas, WA, and our property is further identified as Clark County Property ID# 90264226.

We join the separate comments previously filed by our neighbors, Kenneth & Karen Vartanian and Gordon & Cathy Fogg, objecting to the City's approval of the Preliminary Plat as proposed. Their objections focus on the substantial permanent negative burden approval of the setbacks proposed by the applicant would place on all of our adjacent properties. We agree with their concerns and join their objection to plat approval on those grounds. We believe others share our concerns and additional objections either have or will be filed.

Of course, there would be little need for the compressed setbacks if the applicant's Preliminary Plat observed and complied with Camas Municipal Code (CMC) 18.09.080(B). But it does not.

The proposed Lots 5, 6, 8 and 9 are all shown to be 9,000 sq. ft. CMC 18.09.080(B) declares, in its entirety:

*“B. When creating new lots via short plats or subdivisions that are adjacent to a different residential zone designation, the new lots along that common boundary shall be the maximum lot size allowed for the zone designation of the new development (if a lower density adjacent zone), or the minimum lot size allowed for the zone designation of the new development (if a greater density adjacent zone), as based on **CMC 18.09.040 Table 2, Section A**. In applying this section, where a land division is required to increase the size of lots, the land division may utilize the density transfer provisions provided for in **CMC Section 18.09.060**.” (Emphasis in **bold** added).<sup>1</sup>*

We are informed that the zone designation for Hood Street Subdivision is R-7.5. The adjacent Columbia Summit Estates is zoned R-12, which is “a lower density adjacent zone”. The maximum lot size for Zone R-7.5 in **Table 1, Section A** of CMC 18.09.040 is 12,000 sq ft. We note that Table 2 in CMC 18.09.040 does not reference maximum or minimum lot size at all, and has no Section A (or B, or C). We also note that the lot size proposed by the applicant (9,000 sq ft) is applicable to Table 1, Section B, which references “Density Transfer Lots”. Assuming that CMC 18.09.080(B) intends to reference Table 1, it is specific to Section A, not Section B.

Regardless of the confusion in the code provision described above, the proposed new lots 5, 6, 8 and 9 are located along the “common boundary” of the adjacent developments. The clear intent of the City’s beveling code provision is exemplified by our circumstance. Our lot is approximately 15,750 sq ft. The proposed lot 9 would be less than 60% in comparative size, and the building once constructed would be pushed up immediately against our fence along our southern boundary and could be 35ft tall. The density transition shock from one property to the next would be severe, and it is clearly the intent of the beveling provision to minimize this consequence.

Properly interpreted, the language and intent of CMC 18.09.080(B) is unequivocal and binding on the applicant and the City. Lots located adjacent to properties in Columbia Summit Estates “shall be” 12,000 sq. ft. Proposed lots 5, 6, 8 and 9 do not meet this requirement. Therefore, and in addition to the specific setbacks objections we have joined, we also object to approval of the Hood Street Subdivision Preliminary Plat for so long as these lots, or any adjacent lots subsequently proposed by the applicant, are deficient in this regard.

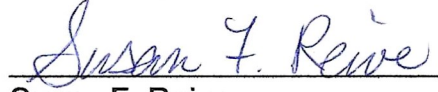
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<sup>1</sup> The source of this quote is [http://camas-wa.elaws.us/code/coor\\_title18\\_ch18.09\\_sec18.09.040](http://camas-wa.elaws.us/code/coor_title18_ch18.09_sec18.09.040). Given the error discussed, *supra*, we acknowledge that the original code language may not contain the same error.

Thank you for considering these objections. We look forward to a decision on the application that addresses our issues and complies with all applicable City code requirements.



Christopher L. Reive



Susan F. Reive

Cc: Robert Maul via email at [rmaul@cityofcamas.us](mailto:rmaul@cityofcamas.us)