



*Practical expertise. Exceptional results.*

222 E. Evergreen Blvd.  
Vancouver, WA 98660  
360-695-1385

## Narrative

### Existing Site Conditions

The project site is located near the intersection of NW Hood Street and NW 18<sup>th</sup> Avenue. The site address is 1811 NW Hood Street, Camas, Washington, 98607. The property is further described as Tax Lot 76 (assessor's tax parcel 127415-000) and Tax Lot 106 (assessor's tax parcel 127440-000) located in the NE and NW  $\frac{1}{4}$  of Section 09, Township 1 North, Range 3 East of the Willamette Meridian, Clark County, Washington.

The project site is approximately 6.08 acres according to a survey by Olson Engineering, Inc. and zoned R-7.5. An existing home and two outbuildings are located on the site. The City of Camas classifies steep slopes and wetlands as critical areas and both have been identified on the project site. Please refer to the Geotechnical Site Investigation Report prepared by Columbia West Engineering, Inc. dated January 4, 2021 for more information on onsite slopes and soils. Refer to the Wetland Delineation and Assessment dated June 14, 2021 prepared by Olson Environmental, LLC for more information on onsite wetlands and buffers.

### Proposed Development

The Applicant, Modern Dwellings, LLC, is proposing to divide approximately 6.08 acres into 18 single-family residential detached lots in two phases in the R-7.5 zone using the density transfer provisions in the Camas Municipal Code (CMC). An existing home and outbuilding is proposed to remain on one of the lots (Lot 18) as shown on the plans. The second outbuilding is proposed to be removed/demolished.

Two phases are proposed at this time as shown on the plans. Construction would likely begin immediately upon approval of all permits. Full buildout of the project could take up to several years. Please refer to the plans included in this application for more information on the proposed lots and utility layout.

### Permit Approvals Requested

The Applicant seeks approval of the following permits:

- Preliminary Subdivision Approval
- Critical Areas Geologic Hazards Approval
- Critical Areas Wetland Permit Approval
- Deviation Approval

- Exception Approval
- Archaeological Predetermination
- SEPA Determination
- Phasing Approval

## **Compliance with RCW 58.17.110 (Platting)**

Under the provisions of RCW 58.17.110, the legislative body must find that the proposed subdivision is in the public interest and that adequate public services can be provided. The following findings address this requirement:

- The project implements existing Comprehensive Plan designations and zoning and the site is located within Camas' urban growth area.
- The Comprehensive Plan encourages development within the urban growth areas as opposed to development outside urban areas.
- The Comprehensive Plan encourages growth in areas that are already urbanized where infrastructure improvements can easily be extended and in urbanizing areas with existing infrastructure capacity.
- This project can be adequately served by emergency services. Fire flow is adequate to serve the site. Fire hydrants will be installed as required by the Fire Marshal.
- The City of Camas indicates water is available to the site and has sufficient capacity to serve this site.
- The City of Camas indicates sanitary sewer is available to the site and has sufficient capacity to serve this site.
- Stormwater runoff from the site will be managed in accordance with the City's stormwater ordinance. Refer to the Preliminary Stormwater Report for details.
- Improvements will be constructed in compliance with the City of Camas' development regulations.
- This project will generate impact fees and System Development Charges to offset impacts.
- This project will contribute to an increased tax base.
- Adjacent roads will be improved as shown on the plans which will provide a benefit to the public and adjacent properties.
- Sidewalks will be constructed in compliance with the Camas Design Standards as shown on the plans which will provide for the safety of pedestrians and children and provide pedestrian connections through the site.
- This proposed land division will promote the general welfare of the City of Camas by complying with all applicable statutes, regulations, and ordinances.

## **Compliance with the Camas Municipal Code**

### **Streets, Sidewalks and Public Places – Title 12**

#### **Gates and Other Barriers – CMC 12.36**

A gated entry is proposed for the subdivision. A turnaround is proposed adjacent to the gate as shown on the plans.

### **Public Services – Title 13**

#### **Water**

The site is within the City of Camas water district and connection to public water is proposed for this land division. The Preliminary Stormwater and Utility Plan identifies how water mains will be extended from Hood Street through the site with individual water services provided to each proposed lot as shown on the plans. The City has sufficient water capacity to serve this project. Fire flow is adequate to serve the site. Additional fire hydrants will be installed as required by the Fire Marshal. System Development Charges (SDCs) and permit fees will be paid as required.

#### **Sanitary Sewer**

The site is within the City of Camas sanitary sewer district and connection to public sanitary sewer is proposed for this land division. The Preliminary Stormwater and Utility Plan identifies how a new pressure sewer main will be extended from Hood Street through the site and all proposed lots will be served with a pressure service sewer lateral. STEP tanks and associated pump systems will be installed on each proposed lot.

#### **Refuse Collection and Disposal**

Solid waste and recyclables shall be typical of other residential developments with individual households placing solid waste and recyclables at the curb on a weekly basis. The proposed cul de sac will allow for garbage and recycling trucks to turn around.

### **Stormwater Provisions – Title 14**

#### **Stormwater Control – CMC 14.02**

Stormwater and Erosion Control Plans will be prepared and implemented in accordance with the Camas Municipal Code. The Applicant will pay associated fees.

In the current plans stormwater runoff from the onsite pavement, sidewalks, driveways, and landscape areas will be collected in catch basins and routed to bioretention cells (Contech Stormfilter or similar) for treatment. Roof downspouts and low point crawl space drains will be routed via individual lateral connections directly to an underground detention pipe. Quantity control requirements will be met with an underground detention pipe. Release of stormwater will be at or below predeveloped rates.

The stormwater facilities will be designed to meet the requirements of the City of Camas Stormwater Ordinance and Washington State Department of Ecology standards. The stormwater facilities including Tract "A" will be privately owned and maintained by a Homeowner's Association (HOA) created for the subdivision. Stormwater inspection easements will be granted to the City of Camas as required.

Temporary sedimentation devices will be implemented to treat runoff throughout the construction process and will be removed once construction is completed and the site is fully stabilized. Proposed erosion control measures may include, but are not limited to, temporary sediment ponds/traps, silt fencing, inlet protection, and construction entrances among other erosion control best management practices. The erosion control measures will be designed during final engineering.

Calculations and information regarding the drainage facilities are included in the Preliminary Stormwater Report. Refer to the Preliminary Utility and Stormwater Plan for more information regarding stormwater quality treatment and quantity control.

#### **Illicit Discharges, Dumping and Illicit Connections – CMC 14.04**

The project will not illicitly discharge or dump any material to the stormwater system.

#### **Erosion and Sediment Control – CMC 14.06**

Erosion and sediment control plans will be developed as part of the final civil engineering plan submittal meeting the provisions of this section.

### **Environment – Title 16**

#### **State Environmental Policy Act (SEPA) - CMC 16.01 - 16.19**

The project meets the thresholds for requiring a SEPA review. A SEPA checklist has been submitted with this application. The lead agency is the City of Camas. The Applicant is not aware of any potential significant adverse environmental impacts that would necessitate the lead agency to impose any substantive SEPA

mitigation measures in excess of those already provided for in the Camas Municipal Code. A Determination of Non-Significance (DNS) is anticipated for this project. A letter was submitted along with this application requesting early notice if the City of Camas believes a Determination of Significance is likely.

### **Archaeological Resource Preservation - CMC 16.31**

According to Clark County GIS data, the site has a low to moderate probability of containing cultural or archaeological findings. An archaeological predetermination was prepared by Applied Archaeological Research dated December 7, 2017. The predetermination indicates that no historic or cultural artifacts were found and that no further work is required. The report was submitted to local Native American Tribes. If any cultural artifacts are discovered during construction on the site, work in the immediate area will stop and appropriate federal, state, county and tribal agencies will be contacted.

### **Public View and Open Space Protection – CMC 16.33**

The proposed development is not anticipated to interfere with any public views of the Columbia or Washougal Rivers, Lacamas Lake or Mt. Hood from scenic view points or land planned for inclusion in the open space network.

The proposed development is located near the top of Prune Hill and the slope generally falls to the south and west. View corridors in the general area are in the same directions. The existing subdivision to the north is located at a higher elevation and while the new homes will be visible from the adjacent lots view corridors will be maintained. The project includes two open space tracts located in the middle of the project for a total of 0.56 acres of open space. These central open space tracts are located on either side of the private road tract as shown on the plans. The open space tracts and road tract will allow for an open view corridor from NW Hood Street. The remainder of the site drops away. There are no known historic sites or structures on or adjacent to the subject property.

### **Historic Preservation - CMC 16.35**

Per GIS data, there are no known historic sites within the development or adjacent to this project so this section does not apply.

### **General Provisions for Critical Areas- CMC 16.51**

All general provisions related to Critical Areas, as applicable, have been addressed in this application.

**Vegetation Removal Permit - CMC 16.51.125**

A report from a certified arborist addressing the significant trees located on the project site is included with this application. Please refer to the Tree Survey prepared by Olson Environmental, LLC, dated June 15, 2021, for more information.

**Wetlands - CMC 16.53**

One onsite wetland has been identified on the site by Olson Environmental, LLC and is labeled Wetland "A" on the Existing Conditions Plan. Wetland "A" is a Category 4 Wetland and subject to a 50 foot buffer for high intensity use per Camas Municipal Code (CMC) 16.53.040. The City of Camas, the Department of Ecology and the Corps of Engineers have the final authority for determining wetland boundaries, types, and buffers.

Reasonable efforts have been made during the design phase to avoid, reduce, and mitigate impacts to the critical areas. The road and lot layout was designed to minimize, to the extent reasonable, possible impacts to critical areas. In order to reduce wetland impacts on this site alternate designs were implemented for this property. The majority of the wetland will be retained within Tract "B" as shown on the plans.

A very small portion of the onsite wetland (approximately .09 acres) is proposed to be filled as shown on the plans. In addition to the steps that were taken to avoid and minimize impacts, mitigation in the form of the purchase of mitigation bank credits consistent with the City's wetland ordinance is proposed for the unavoidable wetland impacts associated with this project. Proposed wetland and buffer impacts have been addressed in a mitigation plan consistent with Camas Code. The mitigation plan also describes efforts made to avoid, minimize and mitigate impacts to these critical areas.

Please refer to the Wetland Delineation and Assessment, dated June 14, 2021 and Preliminary Wetland Mitigation Plan dated August 31, 2021 prepared by Olson Environmental, LLC for additional information regarding onsite wetlands and buffers and proposed wetland mitigation.

**Critical Aquifer Recharge Area - CMC 16.55**

According to the City of Camas' CARA Map, the site is not located within a Wellhead Protection Area so this section does not apply.

**Frequently Flooded Areas - CMC 16.57**

According to Clark County GIS, the site is not located within a floodplain or floodway area. Therefore, this section does not apply.

### **Geologically Hazardous Areas - CMC 16.59**

The site has GIS mapping indicators for slopes greater than 15% which indicates potential landslide hazard areas within portion of the property. Columbia West Engineering, Inc. prepared a geotechnical report for the site dated January 4, 2021. The geotechnical report states “Based upon the results of slope reconnaissance, subsurface exploration, and site research, slopes on the subject site do not appear to meet the definition of a landslide hazard according to Camas Municipal Code.” Refer to the geotechnical report for more information.

### **Fish and Wildlife Habitat Conservation Areas – CMC 16.61**

According to Clark County GIS data, there are no mapping indicators that indicate any fish or wildlife habitat conservation areas on site. This was confirmed by Olson Environmental, LLC during their site investigation. Therefore, this chapter does not apply.

## **Land Development – Title 17**

### **Dedications – CMC 17.01.040**

There are proposed right-of-way dedications along NW Hood Street and NW 16<sup>th</sup> Avenue associated with this project. Public easements for pedestrian connections are proposed along the south side of Lot 11 and Tract “A” and within Tract “H.” Refer to the plans for more information.

### **Boundary Line Adjustments – CMC 17.07**

There are no proposed boundary line adjustments.

### **Short Subdivisions – CMC 17.09**

This project is not a short subdivision, so this chapter does not apply.

### **Subdivisions – CMC 17.11**

The application shall be processed as a Type III decision subject to the provisions of CMC Chapter 18.55.

### **Criteria for Preliminary Plat Approval – CMC 17.11.030**

Pre-application conference notes were issued for the existing home on November 6, 2020 and a virtual pre-application conference was held for the proposed subdivision on November 4, 2021. Copies of the Pre-application Conference Notes are included with this application.

This application contains the required information listed in CMC 17.11.030B for a technically complete application.

The proposed subdivision complies with the approval criteria listed in CMC 17.11.030D as summarized below and within other parts of this Narrative.

*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;*

The proposed subdivision is consistent with the goals and policies of the Comprehensive Plan. The development site is zoned for residential development and located within the Camas Urban Growth Area. Urban services such as public sewer and water will be available to the site with construction of the subdivision. Street improvements will be built as part of this project. Additional sidewalks will be provided at the time of development to contribute to a system of fully connected streets, pedestrian access ways and cross circulation. Improvements will be made as indicated on the Preliminary Plat.

The development site includes critical areas. One onsite Category 4 wetland has been identified and will be retained in an onsite open space tract labeled as Tract "B" as shown on the plans. Another open space tract labeled as Tract "D" is proposed with this project. Walking trails and sidewalks for pedestrian connections throughout the site are proposed as shown on the plans. This is consistent with the goals of the Parks and Open Space Comprehensive Plan which encourages the preservation and protection of natural open space and critical areas.

The road curvature and cul de sac design will provide traffic calming measures.

- 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;*

Improvements for water, storm drainage, erosion control, and sanitary sewer have been proposed and are consistent with the Camas Design Standards Manual as described elsewhere in this narrative. Refer to the Preliminary Utility and Stormwater Plan, the Preliminary Grading Plan and the Preliminary Stormwater Report for more information.



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;*

Half-width road improvements are proposed for NW 16th Avenue along the site's southern frontage. According to the Pre-application Conference Report, NW 16<sup>th</sup> Avenue is required to be constructed to the City of Camas' 3 Lane Collector/Arterial Standard (Drawing ST5).

Half-width road improvements are proposed for NW Hood Street along the site's easterly frontage. According to the Pre-application Conference Report, NW Hood Street is required to be constructed to the City of Camas' 3 Lane Collector/Arterial Standard (Drawing ST5).

The proposed new internal streets have been designed per the Camas Design Standard Manual. The Applicant does not propose to connect to existing NW 17<sup>th</sup> Avenue on the west side as the existing topography and existing physical barriers preclude an automobile connection from occurring. Since the road is not proposed to connect through the site, the cul-de-sac length does exceed the 300-foot maximum cul-de-sac length. This will be addressed later in the narrative. A pedestrian connection is proposed from the end of the cul-de-sac to NW 17th Ave as shown on the plans.

The project will not meet the intersection spacing requirement along NW Hood Street as the situation is unavoidable. There is no location on NW Hood Street that can provide access to the project and still maintain the required intersection spacing. This will be addressed later in the narrative.

A deviation is proposed to allow the driveway to the existing home to be relocated to Tract "F" as shown on the Preliminary Plat. This will be addressed later in the narrative.

Two private roads are proposed for internal access and circulation throughout the site. The first private road is NW 17<sup>th</sup> Avenue is proposed to be constructed to the City of Camas' Private Road Standards (Drawing PVT4). The second private road is labeled as Tract "C" and is proposed to be constructed to the City of Camas' Private Road Standards (Drawing PVT1).

Off-site sidewalk construction along NW 16th Avenue is proposed as shown on the plans. The additional sidewalk will ensure safe walking conditions for students who walk from the proposed subdivision to Prune Hill Elementary School.

Street lighting is proposed along all public and private streets. Street trees are proposed as shown on the Preliminary Landscape Plan. Refer to the plans for more information on proposed roads and improvements.

Public water and sanitary sewer is proposed to serve the lots in the subdivision consistent with the Camas Design Standards.

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

According to the survey research, there is no evidence of a formal road establishment for NW Hood Street so the existing right-of-way is unknown for that road. Right of way dedications are proposed for both NW Hood Street and NW 16th Avenue in order to complete half-width road frontage improvements. Right of way dedication of 37 feet is proposed for NW Hood Street and right of way dedication of an additional 17 feet is proposed for NW 16<sup>th</sup> Avenue.

According to the survey research a 30 foot strip along the north line of the project site was originally part of a larger road establishment. In 1877, Clark County Road Book 1, Page 360 established the location of a 60 foot wide road with 30 feet on the project site and 30 feet on the site to the north.

The subdivision located immediately north of the subdivision site discloses the original road establishment and says a road vacation was requested in conjunction with that plat. A letter from the City of Camas recorded under AFN 9303100296 states that the road established in Road Book 1, Page 360 has been "vacated and accepted by the City of Camas" and refers to the plat of Columbia Summit II, Phase 1. It's unclear from the wording of the letter whether or not the entire right of way was officially vacated or merely the portion lying within Columbia Summit II, Phase 1. The Applicants request the City review the prior road vacation file and (if necessary) vacate the portion of the road located on the project site.

Easements are proposed for stormwater, joint access and pedestrian access as shown on the plans. Utility easements that fall outside public rights of way will be provided as required by the utility purveyors. Additional easements that are required and not shown with the preliminary plans will be addressed during Final Engineering.

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

The design, shape and orientation of the proposed lot layout was dictated by existing conditions including the location of the existing home, required road improvements, the existing wetland, existing topography, zoning standards and the overall site configuration. The proposed lots comply with the City of Camas' density transfer provisions in the R-7.5 zoning district. The lots comply with the minimum lot size of 5,250 SF and the maximum lot size of 9,000 SF with the exception of Lot 18. Lot 18 includes the existing home and is allowed to exceed

the maximum lot size per CMC 18.09.040 Table 1 and the Pre-application Conference Notes.

Reduced front and rear building setbacks are proposed for the lots as allowed in CMC 18.09.060D as shown on the Preliminary Plat. All proposed lots have an adequate building envelope to accommodate a 40 foot by 40 foot dwelling as required in CMC 17.19.030D. Therefore, the proposed lots are appropriate for the proposed residential uses.

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

The proposed subdivision complies with Camas development and zoning codes as demonstrated elsewhere in this narrative and on the plans.

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

According to the Hood Street Subdivision Traffic Impact Study submitted with this application, all the study intersections are projected to operate at acceptable levels of service. Therefore, no off-site mitigation is required. Refer to the Traffic Impact Study dated January 26, 2022 prepared by H. Lee & Associates, PLLC, which has been submitted with this application.

Traffic impact fees will be imposed as a condition of approval, which also provides mitigation for any impacts created by development of this property.

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

The proposed stormwater facility located in Tract "B" and the stormwater drainage systems on the lots will be privately owned and maintained by a Homeowner's Association (HOA) created for the development. Stormwater easements are proposed for backyard storm drains. The private roads and open space tracts will be owned and maintained by the HOA as well. The ownership and maintenance of these tracts will be addressed in the final HOA and CCRs for the proposed development. These documents will be submitted to the City during the final plat process.

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 school bus shelter/stops, and for students who walk to and from school, and;*

The proposed subdivision is compatible with surrounding uses and is not detrimental to the public health, safety or general welfare of adjacent uses or properties. Roads and public access ways will be constructed and connected, thus improving existing public roads and providing enhanced cross circulation.

Utilities will be extended to serve the proposed lots. The Applicant will make all necessary improvements to connect this development to public services. The City of Camas indicates the proposed project is within their water and sanitary sewer service area. Increased runoff will be treated, thus protecting ground water supply and integrity. Contributions will be made toward the costs of transportation, parks, and schools in the form of impact fees and system development charges.

The Camas School District indicates that bus transportation will be provided for students who attend Camas High School, Hayes Freedom High School, Discovery High School, Odyssey Middle School and Skyridge Middle School. Students who attend Prune Hill Elementary School will be required to walk to school. Please refer to the email from the Camas School District included with this application for more information.

Sidewalks exist along NW 16<sup>th</sup> Ave. from Prune Hill Elementary School to just west of the project frontage. Sidewalks will be installed along the project frontage and offsite for approximately 150' to allow for safe walking conditions to Prune Hill Elementary School. Please refer to the email from the School District for more details about their intended transportation plan for students.

*b. The public use and interest will be served by the platting of such subdivision and dedication;*

Refer to the prior section of this narrative addressing RCW 58.17.110 and the findings that the subdivision is in the public interest.

*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*

The application and plans are consistent with the comprehensive plan and all environmental ordinances. The project is not located within a shoreline area.

## **Design and Improvement Standards – CMC 17.19**

### **CMC 17.19.030 Tract, block and lot standards.**

*A. Environmental Considerations.*

*1. Critical Areas. Land that contains a critical area or its buffer as defined in Title 18 of this code, or is subject to the flood hazard regulations, shall be platted to show the standards and requirements of the critical areas.*

Critical areas regulated by this chapter include wetlands (CMC Chapter 16.60) and geologically hazardous areas (CMC Chapter 16.90). The City of Camas classifies steep slopes and wetlands as critical areas and both have been identified on the project site.

The reports by Columbia West and OE LLC have identified all critical areas located on the proposed development site. The reports depict the location of the critical areas, the critical areas that are impacted by the project, the applicable critical area regulations and demonstrate how this application complies with those regulations through avoidance, mitigation or other code appropriate measures.

Please refer to the Geotechnical Site Investigation Report prepared by Columbia West Engineering, Inc. dated January 4, 2021 for more information on onsite slopes and soils. Refer to the Wetland Delineation and Assessment dated June 14, 2021 prepared by Olson Environmental, LLC for more information on onsite wetlands and buffers.

*2. Vegetation. In addition to meeting the requirements of CMC Chapter 18.31, Tree Regulations, every reasonable effort shall be made to preserve existing significant trees and vegetation, and integrate them into the land use design.*

A tree survey was performed and a report was prepared for the project site by Olson Environmental, LLC dated June 15, 2021. The City of Camas tree ordinance (CMC 18.31.080) requirements were addressed in the report by inventorying the trees and assessing their health/hazard potential. The tree survey recommended removing 5 trees which would suffer unavoidable root zone impacts during home/utility construction. Please refer to the Tree Survey Report by Olson Environmental, LLC dated June 15, 2021 included in this submittal for more details.

*3. Density transfers may be applicable if developer preserves critical areas. See Chapter 18.09 of this code.*

The Applicant is proposing to use density transfer provisions and plans to retain the wetland and buffer area located within Tract "B."

*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 city council may approve a single tier.*

Due to the size, shape, and width of the subject site, zoning standards and adjacent roads the project development is not able to provide blocks with two tiers of lots. Lots will flank the single access road on either side.

*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.*

The project is not located adjacent to multi-family, commercial or industrial land use districts so this chapter does not apply.

*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.*

The City's Transportation Plan doesn't identify any proposed arterials through the subject property. The Applicant has proposed a cul-de-sac which extends to the west from Hood Street. However, steep slopes and/or existing built elements preclude providing automobile connection all the way through the site. The Applicant proposes two pedestrian connections. One pedestrian connection that will connect to NW 16th Avenue to the south and one that will connect to NW 17th Avenue to the west.

NW Hood Street and NW 16th Avenue are identified as 2 or 3 lane Arterials and since there is no evidence of a formal road establishment for NW Hood Street, the existing right-of-way is unknown.

Half-width road improvements are proposed for NW 16th Avenue along the site's southern frontage. According to the Pre-application Conference Report, NW 16<sup>th</sup> Avenue is required to be constructed to the City of Camas' 3 Lane Collector/Arterial Standard (Drawing ST5).

Half-width road improvements are proposed for NW Hood Street along the site's easterly frontage. According to the Pre-application Conference Report, NW Hood Street is required to be constructed to the City of Camas' 3 Lane Collector/Arterial Standard (Drawing ST5).

Two private roads are proposed for internal access and circulation throughout the site. The first private road is NW 17<sup>th</sup> Avenue is proposed to be constructed to the City of Camas' Private Road Standards (Drawing PVT4). The second private

road is labeled as Tract "C" and is proposed to be constructed to the City of Camas' Private Road Standards (Drawing PVT1).

Off-site sidewalk construction along NW 16th Avenue is proposed as shown on the plans. The additional sidewalk will ensure safe walking conditions for students who walk from the proposed subdivision to Prune Hill Elementary School.

Street lighting is proposed along all public and private streets. Street trees are proposed as shown on the Preliminary Landscape Plan. Refer to the plans for more information on proposed roads and improvements.

The proposed single family residential land uses comply with Camas development and zoning codes and the Comprehensive Plan.

*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);*

All proposed single-family residential lots will have access onto a private road tract.

*2. Side Lot Lines. The side lines of lots shall 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;*

The proposed side lot lines of the single-family residential lots will run at right angles as much as possible. The proposed side lot lines of single-family residential lots on curved streets run radial to the curve as much as possible.

*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 detached housing, 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,*

The proposed lots comply with the City of Camas' density transfer provisions in the R-7.5 zoning district. The lots comply with the minimum lot size of 5,250 SF and the maximum lot size of 9,000 SF with the exception of Lot 18. Lot 18 includes the existing home and is allowed to exceed the maximum lot size per CMC 18.09.040 Table 1 and the Pre-application Conference Notes.

Reduced front and rear building setbacks are proposed for the lots as allowed in CMC 18.09.060D as shown on the Preliminary Plat. All proposed lots are configured to have an adequate building envelope to accommodate a 40 foot by 40 foot dwelling as required in CMC 17.19.030D.

*b. 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;*

The zoning of adjacent properties, right of way dedications, topography and critical areas all factored in to the lot design. Refer to the Preliminary Plat submitted with this application for detailed 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 city council;*

There is no property zoned for commercial or industrial use within the project area. Therefore, this section does not apply.

#### *E. Tracts and Trails.*

*1. If land division is located in the area of an officially designated trail, in accordance with the parks and recreation comprehensive plan, provisions shall be made for reservation of the right-of-way or for easements to the city for trail purposes.*

There are no known existing official trail connections on the project site. Therefore, this section does not apply.

#### *F. Landscaping*

*1. With the exception of flag lots, 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. 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).*

The proposed subdivision will provide one tree per lot as required. Street trees will be installed at the time of home construction and as a condition of final occupancy. Refer to the Preliminary Landscape Plan for more information on proposed trees and landscaping.

*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.*

The City of Camas tree ordinance (CMC 18.31.080) requirements are addressed with a tree survey that was performed for the entire project site. Please refer to the Tree Survey and Report prepared by Olson Environmental, LLC, included in this submittal for more details.

*3. Tree planting when required as a vegetative buffer, shall be according to city requirements and of a species approved in the Camas Design Standard Manual.*

No landscape buffers are required, therefore this section does not apply.

*4. The tree planting shall be the responsibility of the land developer and shall be installed prior to final plat approval (unless bonded).*

The Applicant understands that any street trees required on site will be the financial responsibility of the Applicant and plans to provide a financial bond for the trees. In order to avoid damage to the trees during home construction the trees will be installed prior to final occupancy.

*5. Landscaping shall conform to plant criteria in the Camas Design Standard Manual. Any planting of trees or shrubs within the right-of-way or vision clearance area will be shown in order to demonstrate compliance with height restrictions.*

All final landscape plans will comply with the Camas Design Standard Manual plant criteria. Plantings within the right-of-way or vision clearance area will be shown to demonstrate compliance with height or vision restrictions.

*6. Storm drainage facilities, pump stations and other visible facilities shall be setback a minimum of thirty feet from any street or accessory structure and be landscaped in accordance with criteria in the Camas Design Standard Manual.*

The stormwater facility is proposed to be underground and will not need to be vegetated. Therefore, this section does not apply.

*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.*

All utility easements that are needed/required for the design will be addressed at the time of final engineering and final plat review.

*H. Watercourse Easements. Where a development is traversed by a watercourse, drainageway, channel or stream, there shall be provided a stormwater easement or drainage right-of-way conforming substantially with the lines of such watercourse and such further width as will be adequate for the purpose. Streets parallel to major watercourses may be required.*

There are no known streams or creeks on the project site. Therefore, this section does not apply.

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

All street signs will be addressed at the time of final engineering on a Signing and Striping Plan for the project. Signs will be installed at the developer's cost during site construction.

*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.*

Conceptual street lighting is shown on the Preliminary Plat. All street lighting will be addressed at the time of final engineering. Street lights will be installed at the developer's cost during site construction.

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

All residential streets, as proposed, conform to the guidelines and standards of the city neighborhood traffic management plan. Roads have been designed to operate at their designated speed and volume and designed for current and future vehicular and pedestrian circulation. The road curvature and cul de sac design will provide traffic calming measures. Refer to the Preliminary Plat for more information.

Access to the site is located at a position where drivers can attain appropriate vision clearance when entering/exiting NW Hood Street.

#### **CMC 17.19.040 Infrastructure Standards.**

Half-width road improvements are proposed for NW 16th Avenue along the site's southern frontage. According to the Pre-application Conference Report, NW 16<sup>th</sup>

Avenue is required to be constructed to the City of Camas' 3 Lane Collector/Arterial Standard (Drawing ST5).

Half-width road improvements are proposed for NW Hood Street along the site's easterly frontage. According to the Pre-application Conference Report, NW Hood Street is required to be constructed to the City of Camas' 3 Lane Collector/Arterial Standard (Drawing ST5).

Two private roads are proposed for internal access and circulation throughout the site. The first private road is NW 17<sup>th</sup> Avenue is proposed to be constructed to the City of Camas' Private Road Standards (Drawing PVT4). The second private road is labeled as Tract "C" and is proposed to be constructed to the City of Camas' Private Road Standards (Drawing PVT1).

Off-site sidewalk construction along NW 16th Avenue is proposed as shown on the plans. The additional sidewalk will ensure safe walking conditions for students who walk from the proposed subdivision to Prune Hill Elementary School.

Street lighting is proposed along all public and private streets. Street trees are proposed as shown on the Preliminary Landscape Plan. Refer to the plans for more information on proposed roads and improvements.

**B.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.

**B.10.b.** Cross-circulation shall be provided that meets the following:

ii. Cul-de-sacs and permanent dead-end streets over three hundred feet in length may be denied unless topographic or other physical constraints prohibit achieving this standard. When cul-de-sacs or dead-end streets are permitted, a direct pedestrian or bicycle connection shall be provided to the nearest available street or pedestrian oriented use.

As discussed previously in the narrative the internal private access road (NW 17<sup>th</sup> Avenue) is proposed as a cul-de-sac and does not connect to NW 17<sup>th</sup> Avenue

on the west. The pre-application report cites code sections 17.19.040.B.6. and 17.19.040.B.10.b.ii. in reference to the street layout and subdivision design (listed for reference above).

NW 17th Ave. dead ends into the project site on the west side. The internal roadway would need to connect with NW 17th Ave. to satisfy the extension requirement. Paragraph 6.a. requires the extension *“unless the presence of critical areas or existing development render such extension infeasible”*. Paragraph 10.b.ii. indicates *“...may be denied unless topographic or other physical constraints prohibit achieving this standard.”* In this case the existing development, topographic and physical constraints render such extension infeasible. A pedestrian connection to NW 17th Ave. is proposed with the project as required in paragraph ii. Further detail is provided below.

The elevation for NW 17th Ave. is approximately 7 feet below the southwest corner of the project site. The street is also aligned so the centerline matches the south property line of the project. Therefore, only about 14' of pavement and 26' of right of way about the southwest corner of the subject property. Because of the grade differential and existing road alignment, any extension of a road even at a reduced width of 20' would require constructing a portion of the road on the parcel at 1671 Juneau Ct. or on the parcel at 3445 NW 17th Ave. or both. The house on NW 17th Avenue is approximately 20' from the right of way so there is very little room to shift the road north and there is also a 5' retaining wall on the east property line of the lot. Given the location of the house and retaining wall and the need for additional right of way from the lot owner moving the road north isn't feasible.

Another option is to extend the road due east onto the Juneau Ct. lot and then curve it north to the project site. The house on Juneau Ct. is approximately 35' from its west property line so the road would need to immediately curve north to avoid it. This option would have significant grading impacts on the neighbor's lot and likely would impact the house. Based on those reasons this option isn't feasible either.

### **(B)(10)(e)**

Parking for each lot is proposed to be provided in either driveways and/or future garages. The average lot size in the proposed subdivision is 9,775 SF. Therefore, no additional off-street parking spaces are required for this project.

## **11. Access Management.**

*a. Access to all marginal access streets shall be restricted so as to minimize congestion and interference with the traffic carrying capacity of such street, and to provide separation of through and local traffic in accordance with CMC*

*17.19.030.D.6. The restrictions imposed shall be in accordance with the Camas Design Standards Manual.*

*b. The city engineer may grant exceptions to the access restriction policies and standards when no other feasible access alternative exists.*

The Applicant requests an exception from the minimum access spacing requirements for the proposed access (NW 17<sup>th</sup> Avenue) onto NW Hood Street. The minimum access spacing along NW Hood Street is 660 feet according to the Pre-application Conference Report. The length of Hood Street between NW 16<sup>th</sup> Ave. and NW 18<sup>th</sup> Ave. is approximately 670' so it isn't possible to locate a proposed intersection along the site frontage for access to the site that complies with this standard.

The proposed intersection is approximately 350 feet north of NW 16<sup>th</sup> Avenue and 320 feet south of NW 18<sup>th</sup> Avenue so it maximizes the available distance. There is adequate sight distance in both directions at the intersection to allow safe operation.

The project could have proposed primary access from NW 16<sup>th</sup> Avenue, however, this would also not comply with the 660 foot standard and has more potential for traffic conflicts. This location would be approximately 300' from NW Hood St., 100 feet from NW Illwaco St., 230 feet from NW Juneau Ct., and 400 feet from NW Klickitat St.

As discussed above, there is no other feasible access alternative so an exception to the access restriction policies and standards is requested for the site access onto NW Hood Street.

City of Camas Staff states that the driveway access from NW Hood Street for the existing home on Lot 18 shall be eliminated according to the Pre-application Conference Notes.

The Applicant requests a deviation to the City of Camas' Infrastructure standards to allow the existing driveway on Hood Street to be modified to connect to proposed NW 17th Avenue just east of the proposed gate as depicted in Tract "F" on the Preliminary Plat.

The existing topography of the site and development of the site make it impractical to construct a new driveway around the newly constructed house and through the backyard to the interior of the site. The home position and design isn't conducive to having the driveway connect to proposed NW 17th Avenue further into the interior of the proposed subdivision. There are also grading issues with making this connection that would likely result in eliminating a lot. The property owner also doesn't want to be part of the new subdivision or belong to the HOA. Hood Street as it currently exists is substandard and there has been a

driveway connection on it from the subject parcel for at least the last 40 years. The proposed subdivision will improve the Hood Street frontage bringing it up to City standards. This will make the roadway safer for both vehicles and pedestrians and make it function better. The completed project with the existing driveway or relocated driveway per the Preliminary Plat and improved Hood Street will be an improvement over the existing situation. Based on these considerations, the Applicant requests a deviation to allow the existing driveway on Hood Street to either remain as is or be modified as shown in Tract "F" on the Preliminary Plat.

### **Utilities – CMC 17.19.040 (C)**

The site is within the City of Camas water district and connection to public water is proposed for this land division. The Preliminary Stormwater and Utility Plan identifies how water mains will be extended from Hood Street through the site with individual water services provided to each proposed lot as shown on the plans. The City has sufficient water capacity to serve this project. Fire flow is adequate to serve the site. Additional fire hydrants will be installed as required by the Fire Marshal. System Development Charges (SDCs) and permit fees will be paid as required.

The site is within the City of Camas sanitary sewer district and connection to public sanitary sewer is proposed for this land division. The Preliminary Stormwater and Utility Plan identifies how a new pressure sewer main will be extended from Hood Street through the site and all proposed lots will be served with a pressure service sewer lateral. STEP tanks and associated pump systems will be installed on each proposed lot.

Stormwater and Erosion Control Plans will be prepared and implemented in accordance with the Camas Municipal Code. The Applicant will pay associated fees.

In the current plans stormwater runoff from the onsite pavement, sidewalks, driveways, and landscape areas will be collected in catch basins and routed to bioretention cells (Contech Stormfilter or similar) for treatment. Roof downspouts and low point crawl space drains will be routed via individual lateral connections directly to an underground detention pipe. Quantity control requirements will be met with an underground detention pipe. Release of stormwater will be at or below predeveloped rates.

The stormwater facilities will be designed to meet the requirements of the City of Camas Stormwater Ordinance and Washington State Department of Ecology standards. The stormwater facilities including Tract "A" will be privately owned and maintained by an HOA created for the subdivision. Stormwater inspection easements will be granted to the City of Camas as required.

Temporary sedimentation devices will be implemented to treat runoff throughout the construction process and will be removed once construction is completed and the site is fully stabilized. Proposed erosion control measures may include, but are not limited to, temporary sediment ponds/traps, silt fencing, inlet protection, and construction entrances among other erosion control best management practices. The erosion control measures will be designed during final engineering.

Calculations and information regarding the drainage facilities are included in the Preliminary Stormwater Report. Refer to the Preliminary Utility and Stormwater Plan for more information regarding proposed utilities and stormwater quality treatment and quantity control.

### **Procedures for Public Improvements – CMC 17.21**

Erosion prevention/sediment control measures will meet City of Camas standards. Stormwater facilities will be installed meeting the requirements of the City of Camas and Washington State Department of Ecology.

## **Zoning – Title 18**

### **Zoning Map and Districts – CMC 18.05**

The site is located within the R-7.5 zoning district and has been designed in conformance with the density transfer provisions allowed in the underlying zoning district designation.

### **Use Authorization - CMC 18.07**

Single-family residential homes are a permitted use in the R-7.5 zone.

### **Density and Dimensions - CMC 18.09**

The proposed lots comply with the City of Camas' density transfer provisions in the R-7.5 zoning district. The lots comply with the minimum lot size of 5,250 SF and the maximum lot size of 9,000 SF with the exception of Lot 18. Lot 18 includes the existing home and is allowed to exceed the maximum lot size per CMC 18.09.040 Table 1 and the Pre-application Conference Notes.

According to the Pre-application Conference Notes, proposed lots that are adjacent to R-12 zoning need to be 9,000 SF. Lots 5, 6, 8, 9, 12 and 13 are 9,000 SF are shown on the plans. Lot 18 is adjacent to R-12 zoning and exceeds the maximum lot size in the zone as discussed above.

There is an existing driveway that slightly encroaches into the southeast corner of the project site. Lot 17 was designed to avoid this driveway.

Reduced front and rear building setbacks are proposed for the lots as allowed in CMC 18.09.060D as shown on the Preliminary Plat. All proposed lots have an adequate building envelope to accommodate a 40 foot by 40 foot dwelling as required in CMC 17.19.030D.

### **Parking - CMC 18.11**

Parking for each lot is proposed to be provided in either driveways and/or future garages. The average lot size in the proposed subdivision is 9,775 SF. Therefore, no additional off-street parking spaces are required for this project.

### **Landscaping – CMC 18.13**

Please refer to the Tree Survey prepared by Olson Environmental, LLC, dated June 15, 2021 for more information on existing significant trees located on the site.

A Preliminary Landscape Plan is included with this application that meets or exceeds the landscape, screening and buffering, and tree density requirements of 20 tree units per net acre. Street trees are proposed along NW 16<sup>th</sup> Avenue and NW Hood Street as shown on the Preliminary Landscape Plan. Refer to the Preliminary Landscape Plan for more information.

### **Signs – CMC 18.15**

The Applicant is not proposing any signs with this application.

### **Supplemental Development Standards – CMC 18.17**

Fencing will be required at the backs and/or sides of lots abutting critical areas (Lot 12) and shall be installed prior to final occupancy. All vision clearance requirements at intersections have been met.

### **Variances – CMC 18.45**

There are no variances proposed with this application.

### **Administration and Procedures – CMC 18.55**

This application is subject to a Type III Procedure. A Pre-application Conference was held November 4, 2021. This application contains the required information listed in CMC 18.55.110 for a technically complete application.



## **Transportation and Access**

A traffic study for the proposed development by H. Lee & Associates, PLLC, dated January 26, 2022, was submitted for review with this application. The traffic study indicates the property can be fully developed as proposed while maintaining acceptable levels of service.

The project includes 18 proposed lots with one existing home to remain for a total of 17 net new proposed lots/units. Estimated trip generation was based on the ITE's Trip Generation Manual, 11th Edition. It is estimated that the 17 net new proposed lots will generate approximately 160 new Average Daily Trips on the adjacent roadway system during a typical weekday, including 12 vehicle trips during the AM peak hour and 16 vehicle trips during the PM peak hour. Refer to the Traffic Study, provided by H. Lee and Associates, PLLC dated January 26, 2022, for more information. The traffic study indicates the property can be fully developed as proposed while maintaining acceptable levels of service and safety at the site access points.

Traffic impact fees will be imposed as a condition of approval, which also provides mitigation for any impacts created by development of this property.

### **Summary**

As demonstrated in this narrative and application, the proposed subdivision meets or exceeds the approval criteria listed in the Camas Municipal Code and Washington State Law and therefore should receive preliminary approval.