

Carey Certo

From: Dan Linder <dlinder@linderlabs.com>
Sent: Friday, July 29, 2022 4:57 PM
To: Community Development Email
Subject: Opposing Camas Station Development
Attachments: Hearings Examiner Input - Daniel Linder.pdf

WARNING: This message originated outside the City of Camas Mail system. DO NOT CLICK on links or open attachments unless you recognize the sender and are expecting the content. If you are unsure, click the Phish Alert button to redirect the email for ITD review.

Please find attached my final input on the Camas Station Development.

Thank you -

Daniel Linder

3702 NW 27th Ave., Camas

July 29, 2022

Dear Hearings Examiner Turner,

You are charged with applying the Conditional Use Permit process as defined in the Camas Municipal Code (Chapter 18.43) [1] and our city's comprehensive plan, "Camas 2035: A Comprehensive Plan to guide future growth and development for the City of Camas" [2]. Our city chose this staff-planned and attorney-arbitrated approach back in the early aughts to remove politics from land use decisions. It remains unclear to me what effect public input would have had at any earlier point in this process. Certainly, the first meeting advertised on the signage at the parcel site was yours, of July 26, 2022. This means that most citizens are only giving their input after tens of thousands of dollars have been spent on studies, after city staff have signed off on endless documentation, and after all parties have become so invested in the completion of the project that the only way out is identifying a violation of statute.

One oddity of this project is that we have this parcel, zoned "CC" - Community Commercial, nestled in the elbow of a larger commercial zone, zoned "RC" - Regional Commercial. The applicant pointed out during the hearing, somewhat adversarially I might note, that he could just locate his development on one of those parcels. He doesn't, of course, because the corner lot is the most desirable for raising visibility and awareness of his businesses. But what was intended by the architects of our Comprehensive Plan in making this parcel Community Commercial? Community Commercial is a very rare designation in Camas. On page 29 of the Comprehensive Plan, I count fewer than 20 Community Commercial Zones. They differ from Regional Commercial in preferring durable goods and professional services over consumables. RC allows for fast-food restaurants, CC prefers dine-in. RC allows full-scale grocers, CC prefers neighborhood-scale grocers. RC allows Taverns, CC prefers brew-pubs. And indeed, RC allows service stations and auto garages, CC makes them conditional.

Given the rarity of Community Commercial designation in the Comprehensive Plan, I think we should be slow and deliberate when granting Conditional Use, as well as being judicious in how we gauge the side-effects of diverging from the Plan. To this end, I propose that the Camas Station development fails at least four of the tests of 18.43.050 - points (A), (C), (D), and (E):

18.43.050 (A): "The proposed use will not be materially detrimental to the public welfare, or injurious to the property or improvements in the vicinity of the proposed use, or in the district in which the subject property is situated; "

Several community members have provided citations for the crime brought by gas stations with convenience stores. They are a popular target for robbery. They introduce Underground Storage Tanks which will inevitably leak and require remediation, perhaps as early as 2030, when Washington State will end the sale of new gasoline automobiles. They produce blowing refuse. In a district of residential neighborhoods, parks, and schools, a gas station will be a blight on the landscape.

18.43.050 (C): “The proposed use shall be compatible with the surrounding land uses in terms of traffic and pedestrian circulation, density, building, and site design; “

Amy Linder has provided a very thorough look at the current traffic and pedestrian situation around Prune Hill Elementary. After having read the entirety of the City’s and Developer’s position, one would never even realize there is a school across the street, aside from a “Recreational Facility” known as Prune Hill Sports Park. A gas station is fundamentally incompatible with a residential district with schools and parks - it will provide zero benefit to the schools, while providing a target requiring constant remediation by the city and school district.

18.43.050 (D): “Appropriate measures have been taken to minimize the possible adverse impacts that the proposed use may have on the area in which it is located; “

None of the City’s or Developer’s application materials even acknowledge the school and park in any meaningful way, much less any adverse impacts their project may pose. Perhaps the one measure I can credit is the suggestion that right-turn-only exits will be provided, presumably barring left turns in from Brady, which itself means that customers who miss the 16th Ave entrance will then pull a (possibly illegal) U-turn with student pedestrian traffic present to get back to the Project.

18.43.050 (E): “The proposed use is consistent with the goals and policies expressed in the comprehensive plan; “

I believe the intention of Community Commercial development was to act as a back-stop of sorts against car-culture. The Comprehensive Plan is full of aspirational language such as “Camas is a well-planned and connected city where residents enjoy pedestrian and bicycle paths between neighborhoods and to downtown.” Of our area of Camas, it says, “Professional office, medical and industrial uses will typify western Camas, with retail businesses supporting the large campus firms.” The vision is of taking your lunch break from one of the semiconductor campuses with your work buddies to go grab a sit-down lunch nearby, not the promise of never having to drive more than 2,000 feet to fill your gas tank.

In reading through Camas Municipal Code 18.07.030 [3] - Commercial Land Use Tables, I find I am unable to find a less suitable use of this parcel of land, either permitted or conditionally permitted, aside from perhaps “Railroad tracks and facilities” (another potential Conditional use!) Thus, I feel this development fails this point as well.

Thank you for your time and commitment to our City,

Daniel Linder
3702 NW 27th Ave, Camas

[1]

https://library.municode.com/wa/camas/codes/code_of_ordinances?nodeId=TIT18ZO_CH18.43_COUSPE_18.43.115RE

[2]

https://www.cityofcamas.us/sites/default/files/fileattachments/community_development/page/5841/compplan2016.pdf

[3]

https://library.municode.com/wa/camas/codes/code_of_ordinances?nodeId=TIT18ZO_CH18.07_USAU