

**STATEMENT OF CODE COMPLIANCE
TYPE III CONDITIONAL USE PERMIT, MINOR DESIGN REVIEW,
& CRITICAL AREA REVIEW APPLICATION
AT&T WCF—PS25 CAMAS SCHOOL RELO**

Submitted to City of Camas, WA
Planning Division

AT&T's application (the "Application") for a new wireless communication facility ("WCF" and/or "Facility") in the Single Family Residential (R-7.5) zone is subject to and complies with the following applicable provisions of Title 16, Title 17 and Title 18 of the Camas Municipal Code ("CMC"), which are addressed in this Statement of Code Compliance in the following order:

I. ZONING

- Chapter 18.07 Use Authorization
 - 18.07.040 Table 2 – Residential and multifamily land uses

II. WCF DEVELOPMENT & DESIGN REGULATIONS

- Chapter 18.35 Wireless Communication Facilities

III. GENERAL DEVELOPMENT STANDARDS

- Chapter 18.09 Density and Dimensions
 - 18.09.040 Density and dimensions – Single-family residential zones
 - 18.09.110 Height - Exception

IV. CRITICAL AREAS

- Chapter 16.51 General Provisions for Critical Areas
 - 16.51.070 Critical Areas – Regulated
 - 16.51.090 Applicability
 - 16.51.130 Review Required
 - 16.51.140 Critical Area Reporting Evaluation – Requirements
- Chapter 16.57 Frequently Flooded Areas
 - 16.57.030 Critical Area Report – Additional Requirements
 - 16.57.050 Performance Standards – General Requirements
- Chapter 16.59 Geologically Hazardous Areas
 - 16.59.010 Designation of Geologically Hazardous Areas
 - 16.59.020 Designation of Specific Hazard Areas
 - 16.59.060 Critical Area Report Requirements for Geologically Hazardous Areas
 - 16.59.070 Critical Area Report Requirements for Specific Hazards
- Chapter 16.61 Fish and Wildlife Habitat Conservation Areas
 - 16.61.020 Critical Area Report – Requirements for Habitat Conservation Areas

V. REVIEW PROCEDURES

- Chapter 16.07 SEPA Categorical Exemption and Threshold Determinations
 - 16.07.020 Exemption Levels
- Chapter 18.19 Design Review
 - 18.19.020 Scope

- 18.19.040 Design Review Committee
- 18.19.050 Design Principals
- 18.19.070 Application Requirements
- **Chapter 18.43** **Conditional Use Permits**
 - 18.43.030 Application
 - 18.43.050 Criteria
- **Chapter 18.55** **Administration and Procedures**
 - 18.55.020 Determination of proper procedure type
 - 18.55.060 Preapplication conference meeting – Type II, Type III
 - 18.55.110 Application – Required Information

PLEASE NOTE: AT&T's responses to applicable provisions are indicated below in *bold italicized blue text*. Any reference to an "Attachment" is in reference to an attachment included in AT&T's application for the proposed Facility.

I. ZONING

Chapter 18.07 – Use Authorization

18.07.040 – Table 2 – Residential and multifamily land uses

Authorized Uses in Residential and Multifamily Zones

Communication and Utilities	R	MF
Wireless communication facility	Refer to Chapter 18.35	

Applicant Response: AT&T is proposing to install a stealth wireless communication facility in the form of a faux bell tower. Pursuant to CMC 18.35.030, Table 2 CMC 18.35-2, a WCF located on a parcel zoned Residential subject to a Type III Review. Please see AT&T's responses to CMC 18.35 herein.

II. WCF DEVELOPMENT AND DESIGN STANDARDS

Chapter 18.35 – Wireless Communication Facilities

18.35.010 – Purpose.

The purpose of this chapter is to provide a uniform and comprehensive set of standards for the development, siting and installation of wireless communication facilities. These regulations are intended to protect the public health, safety and welfare of the residents of Camas, to preserve community character and protect aesthetic quality in accordance with guidelines and intent of federal regulations and to encourage siting in preferred locations to minimize aesthetic impacts and to minimize the intrusion of towers into residential areas (R, MF zones) and gateways as designated on the City of Camas Zoning Map.

Applicant Response: AT&T acknowledges and understands the purpose and intent of CMC Chapter 18.35.

18.35.030 – Towers.

- A. Towers shall be located only in those areas and pursuant to the process described in CMC Tables 18.35-1 and 18.35-2, provided that towers that are proposed to be located in a residential zone or within one hundred fifty feet of a residential zone shall be subject to the siting priorities set forth for preferred tower locations in CMC 18.35.050.

Applicant Response: Table 18.35-1 is OMITTED – Not applicable. The proposed WCF is located in a residential zone and is subject to Table 18.35-2 herein.

[Selected portion of Table 18.35.2 relating to the residential zoning designation]

Table CMC 18.35-2 New Wireless Communication Tower Criteria Allowed by Type III Conditional Use Permit				
Zone Category	Located in Public Right-of-Way (ROW)	Maximum Tower Height	Stealth Design	Setback from Property Lines ^[2] (does not apply within ROW)
All R, MF, MX, DC ^[1]	No	60'	Required	20'

^[1] All new towers in a residential zone or within fifty feet of a residential zone shall require stealth design.

^[2] See exceptions for locations adjacent to a residence in CMC 18.35.070(B).

Applicant Response: AT&T is proposing to install a stealth RF transparent structure in the form of a faux bell tower, which is 60ft in height. The WCF will be located on a parcel zoned R-7.5 and is subject to a Type III Review.

18.35.040 – Colocation of antennas, DAS, and small wireless facilities.

[CMC 18.35.040 is OMITTED]

Applicant Response: Not applicable. AT&T is proposing a new freestanding macro wireless facility.

18.35.050 – Tower, sharing, collocation and preferred tower locations.

A. Tower Sharing and Collocation. New WCF facilities must, to the maximum extent feasible, collocate on existing towers or other structures to avoid construction of new towers, unless precluded by zoning constraints such as height, structural limitations, inability to obtain authorization by the owner of an alternative location, or where an alternative location will not meet the service coverage or other objectives of the applicant. Applications for a new tower must address all existing towers or structures of a similar height within one-half mile of the proposed site as follows:

1. By providing evidence that a request was made to locate on the existing tower or other structure, with no success; or
2. By showing that locating on the existing tower or other structure is infeasible.

Applicant Response: Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, for demonstration of AT&T's compliance with this requirement. As detailed within these documents, AT&T considered (1) existing tower and (2) existing utility poles for collocation. However, none of the options were feasible for meeting AT&T's coverage objectives in a less obtrusive manner than the proposed stealth structure.

B. All new wireless telecommunication towers shall be designed and built to accommodate collocation or additional loading. For the purposes of this provision, this means that the tower shall be designed specifically to accommodate no less than the following equipment, in addition to the applicant's proposed equipment:

1. Twelve antennas with a float plate wind-loading of not less than four square feet per antenna;
2. A standard mounting structure, standoff arms, platform or other similar structure designed to hold the antennas;
3. Cable ports at the base and antenna levels of the tower; and
4. Sufficient room within or on the tower for twelve runs of seven-eighths-inch coaxial cable from the base of the tower to the antennas.

Applicant Response: Due to the stealth nature of the tower, there will be limitations for how many other carriers can collocate on the tower. However, the stealth tower has been designed to accommodate at least one additional carrier. In addition, AT&T is providing a future 200 sq. ft. area within AT&T's equipment room beneath the tower, which will provide adequate space for a future carrier's ground equipment. Please see Attachment 19—Zoning Drawings, Sheet A2.0 for demonstration of the proposed design.

- C. New towers shall be prohibited in all R and MF zones unless such a prohibition would prohibit or have the effect of prohibiting wireless service under the Federal Telecommunication Act.

Applicant Response: AT&T currently has a WCF located on the Garver Theater building rooftop, zoned R-7.5, located approximately .1-miles northeast of the proposed WCF at 1612 NE Garfield St. The Camas School District no longer allows any wireless facilities on their buildings; therefore, AT&T must relocate. Camas School District has extended AT&T's current agreement to stay on Garver Theater until 11/1/28 or until the site can be relocated. AT&T must relocate in the immediate area to minimize disruption to its existing service. The area is mostly residential, and locating a new facility further south will provide limited coverage replacement due to the drop in elevation.

AT&T's RF engineers performed an RF engineering study—considering multiple objectives—to determine the approximate new site location and antenna height required to best fulfill the service objectives within the Targeted Service Area. From this study, AT&T's RF engineers identified a "search ring" area, where a new wireless facility may be located to provide effective service in the Targeted Service Area. The primary objective for this site is to replace the existing Facility's coverage. It is important to note that AT&T's network in the area has developed around the existing site location, and replacing the site with a tower at the nearest possible location to the existing site minimizes disruption to the wireless network. Moving the search ring too far in any direction could disrupt existing coverage leaving gaps in coverage that do not exist today or interfere with other existing sites built around the existing facility. In addition to ensuring there are no significant gaps in coverage left with the removal of the Facility on Garver Theater, this proposed Facility will provide additional capacity and coverage enhancement within the City of Camas to include schools, residences, businesses, and Highway 14 (the Targeted Service Area).

Radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas. Accordingly, the proposed new WCF is geographically located within the identified Search Ring to maximize the coverage and signal dominance within the Targeted Service Area. Please see Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of AT&T's service objectives within the Targeted Service Area.

The majority of the parcels with the Targeted Search Ring and within one-half mile are zoned Residential and Downtown Commercial (DC). Most of the parcels in the DC zone are not adequate to accommodate a tower due to the size of the parcel and/or due to the available space. The subject parcel is zoned R-7.5; however, the use is a religious facility. The proposed stealth design compliments the existing use, and no wireless equipment will be visible to the surrounding area. As noted in the Alternative Site Analysis included in Attachment 5, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, there are no other feasible locations either available or sufficient to meet AT&T's service objectives for the relocated WCF.

- D. Preferred Tower Locations. All new towers in residential (R, MF) zones or within one hundred fifty feet of a residential zone shall require a demonstration that the tower will be sited in the most preferred zoning district/area that will address a defined service coverage or other allowable objective based upon the following priorities, ordered from most-preferred (1) to least-preferred (7):
1. City-owned or operated property, facilities and rights-of-way excepting therefrom, right-of-way and city facilities located in residential zones (R, MF zones) or gateways designated on the zoning maps of the City of Camas, and where the tower will not be located within one hundred fifty feet of a residential zone;
 2. HI, I, LIBP zones;

3. BP zones;
4. RC and CC zones;
5. NC and DC zones;
6. City-owned or operated property (not right-of-way) and facilities in any zone, as long as less than fifty percent of height of the tower is visible as viewed from a public street, public open areas (e.g. fields, playgrounds, parking areas), or property that is being used for residential purposes;
7. Parcels of land in residential zones (R, MF zones) if otherwise mandated under CMC 18.35.050.C.

Applicant Response: Please see the Alternative Site Analysis in Attachment 5, as well as Attachment 4—AT&T Radio Frequency (RF) Justification. As this proposed Facility is meant to provide both coverage replacement and enhancement, the Search Ring is focused on a specific area leaving fewer options for placement. As detailed in the Alternative Sites Analysis, the chosen location within the R-7.5 is the best location to meet AT&T's service objectives, have adequate space to locate a new Facility, and construct a stealth structure that blends with the current use of the property while still providing a valuable service to the surrounding community.

18.35.051 – Application review timeframes.

Instead of the generally applicable review timeframes in CMC Chapter 18.55, the following timeframes apply to the review of WCFs:

- A. The following application review timeframes for wireless communication facilities include any other required permit review or process:
 1. Sixty days for collocations of small wireless facilities on existing structures;
 2. Ninety days for collocations of facilities, other than small wireless facilities, on existing structures;
 3. Ninety days for new construction of small wireless facilities; and
 4. One hundred fifty days for new construction of facilities, other than small wireless facilities
- B. If an initial application for small wireless facilities is deemed incomplete in a written notice within ten days of application submittal, and the written notice clearly and specifically identifies the missing documents or information, the review timeframe will be reset at the beginning of the applicable review timeframe upon submittal of the missing documents and information (the resubmitted application).
- C. If an initial application for other wireless facilities is deemed incomplete in a written notice within thirty days of application submittal, and the written notice clearly and specifically identifies the missing documents or information, the review timeframe will pause (not reset) until the missing information is submitted (the resubmitted application).
- D. If a resubmitted application for wireless facilities, including small wireless facilities, is deemed incomplete in a written notice within ten days of application resubmittal and the written notice clearly and specifically identifies the missing documents or information based on the original notice of incompleteness, the review timeframe will pause (not reset) until the missing information is submitted.
- E. Pre-applications are encouraged but not required.

Applicant Response: AT&T acknowledges and understands the application review timeframes. AT&T is proposing a new tower, which has a review timeline of 150 days.

18.35.060 – Application submittal requirements.

In addition to the application materials required elsewhere in the CMC, Type II and Type III applications submitted under this chapter shall include the following materials, as applicable to the type of use or facility proposed:

- A. Requirement for FCC Documentation. The applicant shall provide a copy of:
1. Documentation for FCC license submittal or registration; and
 2. The applicant's FCC license or registration.

Applicant Response: Please see Attachment 10—AT&T FCC License for a demonstration of AT&T's compliance with this requirement.

- B. Speculation. No application shall be accepted, approved, constructed or maintained for a speculation tower, i.e., solely from an applicant that simply constructs towers and leases tower space to service providers, but is not a service provider. An application made on behalf of a service provider and consented to by the service provider would not be considered to be a speculation tower.

Applicant Response: Not applicable. AT&T is not proposing a speculation tower.

- C. Site Plans. Complete and accurate plans and drawings to scale, prepared, signed and sealed by a Washington-licensed engineer, land surveyor and/or architect, including:
1. Plan views and all elevations before and after the proposed construction with all height and width measurements called out;
 2. A depiction of all proposed transmission equipment;
 3. A depiction of all proposed utility runs and points of contact; and
 4. A depiction of the leased or licensed area with all rights-of-way and/or easements for access and utilities in plan view.

Applicant Response: Please see Attachment 19—Zoning Drawings for a demonstration of AT&T's compliance with this requirement.

- D. Visual Analysis. A color visual analysis that includes to-scale visual simulations that show unobstructed before-and-after construction daytime and clear-weather views from at least four angles, together with a map that shows the location of each view. The applicant shall provide an analysis of alternative sites within and outside of the city that are capable of meeting the service provider's service objectives with an equivalent or lesser visual impact.

Applicant Response: Please see Attachment 7—Photo Simulations for a visual representation of the proposed tower. Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of the alternate locations evaluated and the reasons why they were deemed infeasible to meet AT&T's service objectives.

- E. Statement of Purpose/RF Justification for WCF. A clear and complete written statement of purpose shall minimally include: (1) a description of the technical objective to be achieved; (2) a to-scale map that identifies the proposed site location and the targeted service area to be benefited by the proposed project; and (3) if the purpose of the facility is to provide coverage, full-color signal propagation maps with objective units of signal strength measurement that show the applicant's current service coverage levels from all adjacent wireless sites without the proposed site, predicted service coverage levels from all adjacent wireless sites with the proposed site, and predicted service coverage levels from the proposed site without all adjacent wireless sites. These materials shall be reviewed and signed by a Washington-licensed professional engineer or a qualified employee of the applicant. The qualified employee of the applicant shall submit his or her qualifications with the application.

Applicant Response: Please see Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of AT&T's compliance with this requirement.

- F. Design Justification. A clear and complete written analysis that explains how the proposed design complies with the applicable design standards under this chapter to the maximum extent feasible. A complete design justification must identify all applicable design standards under this chapter and provide a factually detailed reason why the proposed design either complies or cannot feasibly comply.

Applicant Response: Please see Attachment 2—Project Narrative and applicant's responses within this Statement of Code Compliance for demonstration of compliance with this requirement.

- G. Collocation and Alternative Sites Analysis.

1. All Towers. All applications for a new tower must demonstrate that collocation is not feasible, consistent with CMC 18.35.050.

Applicant Response: AT&T considered (3) collocation options that were not technically feasible. Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, for detailed demonstration that there are no feasible existing wireless communication facilities or structures for collocation.

2. Towers in a Residential Zone or Within One Hundred Fifty Feet of a Residential Zone.
 - a. For towers in or within one hundred fifty feet of a residential zone, the applicant must address the city's preferred tower locations in CMC 18.35.050 with a detailed explanation justifying why a site of higher priority was not selected. The city's tower location preferences must be addressed in a clear and complete written alternative site analysis that shows at least five higher ranked, alternative sites considered that are in the geographic range of the service coverage or other objectives of the applicant, together with a factually detailed and meaningful comparative analysis between each alternative candidate and the proposed site that explains the substantive reasons why the applicant rejected the alternative candidate. An applicant may reject an alternative tower site for one or more of the following reasons:
 1. Preclusion by structural limitations;
 2. Inability to obtain authorization by the owner;
 3. Failure to meet the service coverage or other objectives of the applicant;
 4. Failure to meet other engineering requirements for such things as location, height and size;
 5. Zoning constraints, such as the inability to meet setbacks;
 6. Physical or environmental constraints, such as unstable soils or wetlands; and/or
 7. Being a more intrusive location based on physical features and land uses on the site or in the surrounding area despite the higher priority in this chapter as determined by the planning director or hearing examiner, as applicable.

Applicant Response: AT&T considered (19) alternative locations for a new Facility. Please see Attachment 5—Alternative Sites Analysis, as well as Attachment 4—AT&T Radio Frequency (RF) Justification, for demonstration of these alternate locations and the reasons why they were deemed infeasible to meet AT&T's service objectives.

- b. A complete alternative sites analysis provided under this subsection (G)(2) may include less than five alternative sites so long as the applicant provides a factually detailed written rationale for why it could not identify at least five potentially available, higher ranked, alternative sites.

Applicant Response: AT&T identified, evaluated, and considered more than (5) alternative sites. See Attachment 5—Alternative Sites Analysis and Attachment 4 – RF Justification.

3. Required description of service objectives. For purposes of disqualifying potential collocations and/or alternative sites for the failure to meet the applicant's service objectives the applicant will provide:
 - a. A description of its objective;
 - b. Detailed technical maps or other exhibits with clear and concise RF data, or other relevant information to illustrate or explain that the service objective is not met using the alternative (whether it be collocation or a more preferred location); and
 - c. A description of why the alternative (collocation or a more preferred location) does not meet the objective.

Applicant Response: Please see Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of AT&T's compliance with this requirement.

- H. DAS and Small Wireless Facilities. As outlined in CMC 18.35.010, the city encourages, but does not require, the use of DAS and small wireless facilities. Each applicant will submit a statement that explains how it arrived at the structure and design being proposed.

Applicant Response: Not applicable. The proposed WCF is not a DAS or small wireless facility. The proposed Facility will be replacing coverage lost with the removal of the existing Facility on Garver Theater. If a replacement Facility is not constructed, there would be a significant gap in coverage (including minimal to no 4G & 5G voice service, as well as inadequate LTE service) within the Targeted Service Area (see Figure C, Attachment 4 – RF Justification). Given the scope of coverage lost, a new macro Facility is the most appropriate to replace the loss of coverage.

- I. Radio Frequency Emissions Compliance Report for WCF. A written report, prepared, signed and sealed by a Washington-licensed professional engineer or a competent employee of the applicant, which assesses whether the proposed WCF demonstrates compliance with the exposure limits established by the FCC. The report shall also include a cumulative analysis that accounts for all emissions from all WCFs located on or adjacent to the proposed site, identifies the total exposure from all facilities and demonstrates planned compliance with all maximum permissible exposure limits established by the FCC. The report shall include a detailed description of all mitigation measures required by the FCC.

Applicant Response: Please see Attachment 6—AT&T RF Safety Compliance Statement for demonstration of AT&T's compliance with this requirement. The proposed Facility will comply with all limits set by the FCC. Additionally, under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv).

- J. Noise Study. A noise study, prepared, signed and sealed by a Washington-licensed engineer, for the proposed WCF and all associated equipment demonstrating compliance with CMC 9.32.050 Public Disturbance Noises.

Applicant Response: Please see Attachment 8—Noise Study for demonstration of AT&T's compliance with this requirement.

- K. Collocation Consent for WCFs. A written statement, signed by a person with the legal authority to bind the applicant and the project owner, which indicates whether the applicant is willing to allow other transmission equipment owned by others to collocate with the proposed wireless communication facility whenever technically and economically feasible and aesthetically desirable.

Applicant Response: Please see Attachment 9—AT&T Collocation Statement for demonstration of AT&T's compliance with this requirement.

- L. Other Published Materials. All other information and/or materials that the city may, from time to time, make publicly available and designate as part of the application requirements.

Applicant Response: AT&T acknowledges, understands, and intends to comply with this provision. However, AT&T believes they have provided all necessary documentation to demonstrate compliance with local, state, and federal law for a siting a new communications facility.

18.35.070 – General development standards applicable to WCFs.

The following criteria shall be applied in approving, approving with conditions or denying a WCF that is subject to a Type II or III review procedure. Unless otherwise provided in this chapter, WCF construction shall be consistent with the development standards of the zoning district in which it is located.

A. Tower Height. Refer to CMC Tables 18.35-1 and 2.

Applicant Response: Pursuant to CMC Table 18.35-2, the maximum tower height allowed in a residential zone is 60ft. AT&T is proposing to install a 60ft stealth RF transparent structure, designed to mimic the brick façade of the existing church. At the request of the property owner, a faux bell tower with a spire and cross will be installed above the RF transparent structure. The proposed overall height to the top of the cross is 88ft. No wireless facilities will be installed above 60ft. Pursuant to CMC 18.09.110, a church spire is exempt from the height limitation of the underlying zone. Planning staff confirmed this height exception during the pre-application meeting conducted on May 4, 2023. Please see Attachment 14—Pre-Application Notes and Attachment 19—Zoning Drawings, Sheet A1.0, for demonstration of AT&T's proposed design.

1. Setback Requirements. Refer to CMC Tables 18.35-1 and 2 for towers. All equipment shelters, cabinets or other on-the-ground ancillary equipment shall be buried or meet the setback requirement of the zone in which located.

Applicant Response: All proposed ground equipment will be located within the base of the faux bell tower and not visible to the public. AT&T proposes to install three (3) equipment racks within an enclosed equipment room at the base of the structure. The equipment racks are for a power rack, backup battery rack and a miscellaneous rack. Only those items typically found on a Utility H-frame will be located on the wall/ ground on the south side of the structure (e.g., meter base, generator plug, fiber demarcation box (Flex 12)). A HVAC outdoor condensing unit will also be installed on the wall/ground on the south side of the structure.

Please see Attachment 14—Pre-Application Notes and Attachment 19—Zoning Drawings, Sheets A1.0, A2.0 and A3.0 for demonstration of AT&T's proposed design.

2. Notwithstanding the setbacks provided for in Tables 18.35-1 and 2, when a tower is located adjacent to a parcel zoned for residential (R, MF zones), the minimum setback from the lot line for a new tower must be equal to the height of the proposed tower, unless the setback is waived by the owner of the residentially zoned parcel.

Applicant Response: As shown on Sheet A1.0 in Attachment 19—Zoning Drawings, the tower meets the required setbacks from three of the four property lines. The tower is setback more than 60ft to the eastern and western property lines. In addition, the tower is setback 40ft to the northern property line and more than 60ft to the residentially zoned parcel on the north side of NE 14th Avenue, which the parcel fronts onto. The tower does not meet the required setback to the southern property line, which is proposed at 2ft 1in. Please note, the chain-link fence for the subject parcel is located 22ft 6in south of the rear property line and the tower is 24ft 7in from the chain-link fence. The City of Camas owns the residential zoned parcel to the south, which encompasses Mill Ditch Open Space and is heavily vegetated. In discussions with staff at the pre-application meeting, the city is willing to waive the one-to-one setback as long as all the other tower setbacks are met. AT&T respectfully requests the City of Camas waive the 60ft tower setback to the southern property line. Please see Attachment 18—Setback Waiver Correspondence regarding this request.

B. Landscaping. All landscaping shall be installed and maintained in accordance with this chapter. Existing on-site vegetation shall be preserved to the greatest extent reasonably possible and/or improved, and

disturbance of the existing topography shall be minimized. The approval authority may grant a waiver from the required landscaping based on findings that a different requirement would better serve the public interest.

1. Tower bases, when fenced (compounds), or large equipment shelters (greater than three feet by three feet by three feet), shall be effectively visually softened through the planting of a fifteen-foot perimeter planting to include a combination of groundcover, shrubs and trees, or as otherwise required based on the underlying zone or street standard.
2. If fencing is installed, it shall consist of decorative masonry or wood fencing. In commercial districts other than the DC zone, and industrial zones, three strands of barbed wire may be placed atop a lawful fence if the fence is not visible from an adjacent street or is placed behind a sight-obscuring fence or wall. Electrified fences are not permitted in any zone. Razor or concertina wire is not allowed.
3. Applicant shall demonstrate an irrigation plan is designed and will be in place to ensure the full establishment of plantings for two years.

Applicant Response: The proposed WCF will be installed in an existing parking lot abutting the eastern building façade, which will require the existing shrubs to be removed. No equipment shelters are proposed. Three (3) equipment racks will be installed within a secured equipment room beneath the tower base, therefore, no fence is needed or proposed around the structure. In addition, to maintain the existing parking spaces and circulation on-site to the greatest extent possible, no landscaping is proposed around the structure. Please see Attachment 19—Zoning Drawings, Sheets A1.0, A2.0 and A3.0 for demonstration of AT&T's proposed design.

- C. Visual Impact. All WCFs in residential zones and within one hundred fifty feet of residential zones, including equipment enclosures, shall be sited and designed to minimize adverse visual impacts on surrounding properties and the traveling public to the greatest extent reasonably possible, consistent with the proper functioning of the WCF. Such WCFs and equipment enclosures shall be integrated through location and design to blend in with the existing characteristics of the site. Such WCFs shall also be designed to either resemble the surrounding landscape and other natural features where located in proximity to natural surroundings, or be compatible with the urban, built environment, through matching and complimentary existing structures and specific design considerations such as architectural designs, height, scale, color and texture, and/or be consistent with other uses and improvements permitted in the relevant zone. If a new tower is proposed, the applicant must demonstrate the need for a new tower and why alternative locations cannot be used to meet the applicant's service objective.

Applicant Response: The proposed WCF is located on a residentially zoned parcel that is occupied by a religious facility. The proposed WCF has been designed to minimize adverse visual impacts to surrounding properties to the greatest extent feasible while maintaining proper functioning of the WCF. The proposed design is discussed in 18.35.070.D herein. Please see Attachment 7—Photo Simulations and Attachment 19—Zoning Drawings, Sheet A3.0, for a visual representation of the proposed tower. Please see the Alternative Site Analysis in Attachment 5, as well as Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of the alternate locations evaluated and the reasons why they were deemed infeasible to meet AT&T's service objectives.

- D. Use of Stealth Design/Technology. The applicant shall make an affirmative showing as to why they are not employing stealth technology. More specifically:
 1. Stealth design is required in residential zones and to the extent shown in Tables 18.35-1 and 2. Stealth and concealment techniques must be appropriate given the proposed location, design, visual environment, and nearby uses, structures, and natural features. Stealth design shall be designed and constructed to substantially conform to surrounding building designs or natural settings, so as to be visually unobtrusive. Stealth design that relies on screening wireless communications facilities in order to

reduce visual impact must screen all substantial portions of the facility from view, to the extent technically feasible. Stealth and concealment techniques incorporating faux-tree designs are limited to trees native to the Pacific Northwest.

Applicant Response: To mitigate visual impact, AT&T is proposing to install a 60ft stealth RF transparent structure in the form of a faux bell tower. The faux bell tower will have a spire and cross installed above the RF transparent structure at the request of the property owner (the height to the top of the cross is 88ft). This addition will complement the existing spire on top of the existing church building. The 60ft structure will be treated with brick veneer to match the existing building. In addition to screening the antennas, the proposed equipment racks will be located beneath the structure within an equipment room that will be accessed by a locked door on the southern side of the structure.

The proposed design for the WCF will be in line with the existing steeple for balance and will include arches on the eastern and northern elevations to match those on the building. To accommodate adequate space for a future wireless carrier's equipment inside the tower and within the equipment room, the footprint of the structure is the minimum size that is feasible. Please see Attachment 2—Project Narrative, Attachment 7—Photo Simulations, and Attachment 19—Zoning Drawings, Sheet A3.0, for further discussion and demonstration of the proposed design and AT&T's compliance with this requirement.

- E. Lighting. For new wireless communication support towers, only such lighting as is necessary to satisfy FAA requirements is permitted. All FAA-required lighting shall use lights that are designed to minimize downward illumination. Security lighting for the equipment shelters or cabinets and other on-the-ground ancillary equipment is also permitted as long as it is down shielded to keep light within the boundaries of the site. Motion detectors for security lighting are encouraged in residential, R and MF zones or adjacent to residences.

Applicant Response: AT&T is not proposing any illumination for the proposed Facility. AT&T will comply with any lighting requirements recommended by the FAA, as applicable.

- F. Signage. No facilities may bear any signage or advertisement(s) other than signage required by law or expressly permitted/required by the city.

Applicant Response: AT&T is not proposing any additional signage other than that required by applicable state and federal laws.

- G. Code Compliance. All facilities shall at all times comply with all applicable federal, state and local building codes, electrical codes, fire codes and any other code related to public health and safety.

Applicant Response: The proposed WCF will comply with all applicable federal, state and local codes and ordinances related to building, development, fire, health, and safety. Please see Attachment 19—Zoning Drawings for demonstration of AT&T's intent to comply with this requirement.

- H. Building-Mounted WCFs.

[Section 18.35.070.H is OMITTED – Not applicable]

- I. WCFs in the Public Rights-of-Way. Except for DAS and small wireless facilities, which are subject only to applicable Public Works design standards, WCFs in the public rights-of-way shall meet the following:

[Section 18.35.070.I is OMITTED – Not applicable]

- J. Accessory Equipment. All equipment shall be located or placed in an existing building, underground, or in an equipment shelter that is (a) designed to blend in with existing surroundings, using architecturally compatible construction and colors; and (b) located so as to be unobtrusive as possible consistent with the proper functioning of the WCF.

Applicant Response: AT&T proposes to install three (3) equipment racks within an enclosed equipment room at the base of the structure that will be accessed by a locked door on the southern side of the structure. The equipment racks are for a power rack, backup battery rack and a miscellaneous rack. Only those items typically found on a Utility H-frame will be located on the wall/ ground on the south side of the structure (e.g., meter base, generator plug, fiber demarcation box (Flex 12)). A HVAC outdoor condensing unit will also be installed on the wall/ground on the south side of the structure. Please see Attachment 19—Zoning Drawings, Sheets A1.0, A2.0 and A3.0 for demonstration of the proposed equipment location.

- K. Spacing of Towers. Towers shall maintain a minimum spacing of one-half mile, unless it can be demonstrated that physical limitations (such as topography, terrain, tree cover or location of buildings) in the immediate service area prohibit adequate service by the existing facilities and that collocation is not feasible under CMC 18.35.050.

Applicant Response: There is one existing tower within one-half mile of the proposed WCF. See Attachment 5—Alternative Sites Analysis and Attachment 4—AT&T Radio Frequency (RF) Justification. As noted within these documents, collocation at this location is infeasible due to the location's lower elevation and distance outside the Search Ring unless the height was increased significantly.

- L. Site Design Flexibility. Individual WCF sites vary proximity to adjacent buildings, existing trees, topography and other local variables. By mandating certain design standards, there may result a project that could have been less intrusive if the location of the various elements of the project could have been placed in more appropriate locations within a given site. Therefore, the WCF and supporting equipment may be installed so as to best camouflage, disguise them, or conceal them, to make the WCF more closely compatible with and blend into the setting and/or host structure, upon approval by the approval authority. The design flexibility allowed under this subsection includes additional height for a tower located within tall trees on (i) city property or (ii) other parcels at least five acres in size, so that the impact of the tower may be minimized by the trees while still allowing for the minimum clearance needed for the tower to achieve the applicant's coverage or other objectives. A formal exception from standards under CMC 18.35.090 is not required for proposals meeting this subsection by being a less intrusive design option.

Applicant Response: AT&T evaluated multiple parcels within the Targeted Search Ring and deemed the proposed location the most feasible location for AT&T's proposed Facility. Four (4) parcels owned by the city that contain tall trees were evaluated and deemed insufficient to meet AT&T's service objectives. Therefore, the proposed location is the most feasible location and has been designed as a stealth facility compatible with the existing use of the property. Please see Attachment 5—Alternative Site Analysis and Attachment 4—AT&T Radio Frequency (RF) Justification for demonstration of the alternate locations evaluated and the reasons why they were deemed infeasible to meet AT&T's service objectives.

- M. Structural Assessment. The applicant of a proposed tower shall have a structural assessment of the tower conducted by a professional engineer, licensed in the State of Washington, which shall be submitted with the application for a building permit and demonstrate the structural stability and carrying capacity for antennae.

Applicant Response: A structural analysis of the proposed tower with a minimum of two (2) RAD centers will be provided with the building permit.

18.35.080 – Regulations for facilities subject to conditional use permit.

- A. Approval Criteria. In addition to the development standards in this chapter and the approval criteria in CMC 18.43.050, the following additional approval criteria apply:
1. The need for the proposed tower shall be demonstrated if it is to be located in a residential zone or within one hundred fifty feet of an existing residential lot. An evaluation of the operational needs of the wireless communications provider, alternative sites, alternative existing facilities upon which the

proposed antenna array might be located, and collocation opportunities on existing support towers within one-half mile of the proposed site shall be provided. Evidence shall demonstrate that no practical alternative is reasonably available to the applicant.

Applicant Response: AT&T currently has a WCF on the Garver Theater building rooftop located at 1612 NE Garfield St approximately .1-mile northeast of the proposed WCF. The Camas School District no longer allows any wireless facilities on their buildings; therefore, AT&T must relocate. Camas School District agreed to allow AT&T to stay on their building until a relocation site is constructed.

AT&T's network of facilities in the area has been developed around the existing site location, and replacing the site with a tower at a nearby location minimizes disruption to the wireless network. As such, AT&T must relocate in the immediate area to minimize disruption to its existing service. Moving the site too far from the existing Facility could disrupt existing coverage leaving significant gaps that do not exist today.

As noted in Attachment 5—Alternative Site Analysis and Attachment 4—AT&T Radio Frequency (RF) Justification, there are no other feasible locations either available or sufficient to meet AT&T's service objectives for the relocated WCF. Please also see Attachment 4—AT&T Radio Frequency (RF) Justification for further information regarding the operational needs of AT&T and the relocated WCF.

2. The proposed tower satisfies all of the provisions and requirements of this chapter.

Applicant Response: Please see applicant's responses herein for demonstration the proposed tower satisfies all the provisions and requirements of this chapter.

- B. Public Notice. In addition to the notice of hearing requirements of CMC [18.55](#), for proposals in residential zones and within one hundred fifty feet of a residential zone, the mailed public notice should include a black and white architectural elevation and color photo simulation renderings of the proposed WCF.

Applicant Response: AT&T understands and intends to comply with the above provision.

18.35.090 – Exception from standards.

[Section 18.35.090 is OMITTED. AT&T is not seeking an exception from the standards.]

18.35.100 – Final inspection.

- A. A certificate of occupancy will only be granted upon satisfactory evidence that the WCF was installed in substantial compliance with the approved plans and photo simulations.
- B. Failure to Comply. If it is found that the WCF installation does not substantially comply with the approved plans and photo simulations, the applicant shall immediately make any and all such changes required to bring the WCF installation into compliance.

Applicant Response: AT&T acknowledges, understands, and intends to comply with the above provision.

18.35.110 – Maintenance.

- A. All wireless communication facilities must comply with all standards and regulations of the FCC and any other State or federal government agency with the authority to regulate wireless communication facilities.
- B. The site and the wireless communication facilities, including all landscaping, fencing and related transmission equipment must be maintained at all times in a neat and clean manner and in accordance with all approved plans.
- C. All graffiti on wireless communication facilities must be removed at the sole expense of the permittee after notification by the city to the owner/operator of the WCF.

- D. If any FCC, state or other governmental license or any other governmental approval to provide communication services is ever revoked as to any site permitted or authorized by the city, the permittee must inform the city of the revocation within thirty days of receiving notice of such revocation.

Applicant Response: AT&T acknowledges, understands, and intends to comply with the above provision.

18.35.120 – Discontinuation of use.

- A. Any wireless communication facility that is no longer needed and its use is discontinued shall be reported immediately by the service provider to the community development director. Discontinued facilities shall be completely removed within six months and the site restored to its pre-existing condition.
- B. There shall also be a rebuttable presumption that any WCF that is regulated by this chapter and that is not operated for a period of six months shall be considered abandoned. This presumption may be rebutted by a showing that such WCF is an auxiliary back-up or emergency utility or device not subject to regular use or that the WCF is otherwise not abandoned. For those WCFs deemed abandoned, all equipment, including, but not limited to, antennas, poles, towers, and equipment shelters associated with the WCF shall be removed within six months of the cessation of operation. Irrespective of any agreement among them to the contrary, the owner or operator of such unused facility, or the owner of a building or land upon which the WCF is located, shall be jointly and severally responsible for the removal of abandoned WCFs. If the WCF is not thereafter removed within ninety days of written notice from the city, the city may remove the WCF at the expense of the property owner and WCF owner. Both owners are jointly and severally liable for the city's removal costs, including all costs and attorneys' fees. If there are two or more wireless communications providers collocated on a single support structure, this provision shall not become effective until all providers cease using the WCF for a continuous period of six months.

Applicant Response: AT&T acknowledges and understands the above provision.

18.35.130 – Independent technical review.

Although the city intends for city staff to review administrative matters to the extent feasible, the city may retain the services of an independent, radio frequency technical expert of its choice to provide technical evaluation of permit applications for WCFs, including administrative and conditional use permits but not including applications for small wireless facilities within the right-of-way. The technical expert review may include, but is not limited to (a) the accuracy and completeness of the items submitted with the application; (b) the applicability of analysis and techniques and methodologies proposed by the applicant; (c) the validity of conclusions reached by the applicant; and (d) whether the proposed WCF complies with the applicable approval criteria set forth in this chapter. The applicant shall pay the objectively reasonable and actual cost for any independent consultant fees, along with applicable overhead recovery, through a deposit, estimated by the city, paid within ten days of the city's request. When the city requests such payment, the application shall be deemed incomplete for purposes of application processing timelines. In the event that such costs and fees do not exceed the deposit amount, the city shall refund any unused portion within thirty days after the final permit is released or, if no final permit is released, within thirty days after the city receives a written request from the applicant. If the costs and fees exceed the deposit amount, then the applicant shall pay the difference to the city before the permit is issued.

Applicant Response: AT&T acknowledges and understands the above provision.

18.35.140 – Exempt facilities.

[Section 18.35.140 is OMITTED – Not applicable]

18.35.150 – Indemnification.

Each permit issued shall have as a condition of the permit a requirement that the applicant defend, indemnify and hold harmless the city and its officers, agents, employees, volunteers, and contractors from any and all liability,

damage, or charges (including attorneys' fees and expenses) arising out of claims, suits, demands, or causes of action as a result of the permit process, granted permit, construction, erection, location, performance, operation, maintenance, repair, installation, replacement, removal, or restoration of the WCF on city property or in the public right-of-way.

Applicant Response: AT&T acknowledges and understands the above provision.

III. GENERAL REQUIREMENTS

Chapter 18.09 – Density and Dimensions

18.09.040 – Density and dimensions – Single-family residential zones

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Table 2 – Building Setbacks for Single-Family Residential Zones

Lot Area	15,000 or more sq. ft.
Minimum front yard (feet)	30'
Minimum side yard (feet)	15'
Minimum side yard flanking a street and corner lot rear yard (feet)	15'
Minimum rear yard (feet)	35'

[Selected portion of Table 2 applicable to the subject parcel size]

Applicant Response: The proposed Facility is located on an existing 18,295 sq. ft. parcel flanking two streets and an open space ditch. All ground equipment will be internal to the proposed stealth bell tower. As such, the setbacks for the proposed Facility are pursuant to CMC Table 18.35-2 and CMC 18.35.070.A.2. Please see Attachment 19—Zoning Drawings, Sheet A1.0 for demonstration of AT&T's design.

18.09.110 – Height – Exception.

The following type of structures or structural parts are not subject to the building height limitations of the code: tanks, church spires, belfries, domes, monuments, fire and hose towers, observation towers, transmission towers, wind turbines, chimneys, flag poles (see setbacks at CMC Section 18.09130(G)), radio and television towers, masts, aerials, cooling towers, and other similar structures or facilities. The heights of telecommunication facilities are addressed in CMC [Chapter 18.35](#) Telecommunication Ordinance.

Applicant Response: AT&T is proposing a faux bell tower with a spire and cross on top of the stealth RF transparent structure. The RF transparent structure measures 60ft. At the request of the property owner, a church spire with bell and cross will be installed above the stealth structure. The overall height to the top of the cross is 88ft. No wireless facilities will be installed above 60ft, and thus meets the requirements of Table 18.35-2. As church spires are not subject to the building height limitations, the additional height to the top of the cross should be exempt from the height limits of the zone.

IV. CRITICAL AREAS

Chapter 16.51 – General Provisions for Critical Areas

16.51.070 – Critical areas – Regulated.

- A. Critical areas regulated by this chapter include wetlands (CMC [Chapter 16.53](#)), critical aquifer recharge areas (CMC [Chapter 16.55](#)), frequently flooded areas (CMC [Chapter 16.57](#)), geologically hazardous areas (CMC [Chapter 16.59](#)), and fish and wildlife habitat conservation areas (CMC [Chapter 16.61](#)).
- B. All areas within the city meeting the definition of one or more critical area, platted natural open space area, and conservation covenant areas, regardless of any formal identification, are designated critical areas and are subject to these provisions.

Applicant Response: Per the Clark County GIS mapping database, the subject parcel is located within frequently flooded areas, geologically hazardous areas and adjacent to fish and wildlife habitat conservation areas. Please see AT&T's responses to the applicable critical area sections herein.

16.51.090 – Applicability.

The following proposed activities are subject to the criteria, guidelines, report requirements, conditions, and performance standards in this title:

...

- D. Conditional use permit.

[The remainder of Section 16.51.090 is OMITTED – Not applicable]

Applicant Response: AT&T's proposed WCF requires a Conditional use permit and is subject to the requirements of this chapter.

16.51.130 – Review required.

Mapping. The approximate location and extent of critical areas are shown on critical area maps that are provided by interlocal contract by the Clark County Geographic Information Systems (a.k.a. "Maps Online"). These maps are to be used as a guide for the city, project applicants, and/or property owners, and may be continually updated as new critical areas are identified. They are a reference and do not provide a final critical area designation or delineation. If the proposed activity is within, adjacent to (within two hundred feet), or is likely to impact a critical area, the city shall require a critical area report from the applicant that has been prepared by a qualified professional. If the report concludes that there is a critical area present then the city of Camas shall:

- A. Review and evaluate the critical area report;
- B. Determine whether the development proposal conforms to the purposes and performance standards of these provisions;
- C. Assess potential impacts to the critical area and determine if they are necessary and unavoidable; and
- D. Determine if any mitigation proposed by the applicant is sufficient to protect the functions and values of the critical area and public health, safety, and welfare concerns consistent with the goals, purposes, objectives, and requirements of these provisions.

Applicant Response: Per the Clark County GIS mapping database, the subject parcel is located within frequently flooded areas, geologically hazardous areas and adjacent to fish and wildlife habitat conservation areas. Please see Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report and Attachment 13—Critical Areas Habitat Assessment.

16.51.140 – Critical area reporting evaluation – Requirements.

- A. Incorporating Best Available Science. The critical area report shall use scientifically valid methods and studies in the analysis of critical area data and field reconnaissance, and reference the source of science used. The critical area report shall evaluate the proposal and the likelihood of all probable adverse impacts to critical areas in accordance with these provisions.

- B. Minimum Report Contents. At a minimum, the report shall contain the following:
1. The name and contact information of the applicant, a description of the proposal, and identification of the permit requested;
 2. A copy of the site plan for the development proposal showing identified critical areas, management zones, property lines, limits of any areas to be cleared, and a description of the proposed stormwater management plan for the development and consideration of impacts to drainage alterations;
 3. The dates, names, and qualifications of the persons preparing the report, and documentation of any fieldwork performed on the site;
 4. Identification and characterization of critical areas, wetlands, water bodies, and management zones within the proposed project area;
 5. A description of reasonable efforts made to avoid, minimize, and mitigate impacts to critical areas;
 6. A proposal for financial guarantees to ensure compliance; and
 7. Any additional information required for the critical area, as specified in the corresponding chapter.
- C. Unless otherwise provided, a critical area report may be supplemented by or composed, in whole or in part, of any reports or studies required by other laws and regulations, or previously prepared for and applicable to the development proposal site, as approved by the director.

Applicant Response: Please see Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report and Attachment 13—Critical Areas Habitat Assessment.

16.51.160 – Critical area reporting evaluation – Requirements.

- A. The applicant shall avoid all impacts that degrade the functions and values of a critical area or areas. Unless otherwise provided in these provisions, if alteration to the critical area is necessary, all adverse impacts to or from critical areas and management zones resulting from a development proposal or alteration shall be mitigated in accordance with an approved critical area report and SEPA documents.
- B. Mitigation should be in-kind and on-site, when possible, and sufficient to maintain the functions and values of the critical area, and to prevent risk from a hazard posed by a critical area.
- C. Mitigation shall only be implemented after city approval of a critical area report that includes a mitigation plan; and mitigation shall be in accordance with the provisions of the approved critical area report.

Applicant Response: Please see Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report and Attachment 13—Critical Areas Habitat Assessment. As detailed within these reports, the proposed development will have minimal impact on the existing critical areas if all recommended mitigation is undertaken.

Chapter 16.57 – Frequently Flooded Areas

16.57.030 – Critical area report – Additional requirements.

In addition to the items listed in CMC 16.51.140 Critical Area Reporting, the following is required:

- A. Prepared by a Qualified Professional. A frequently flooded areas report shall be prepared by a qualified professional who is a hydrologist, or engineer, who is licensed in the state of Washington, with experience in preparing flood hazard assessments.
- B. Area Addressed in Critical Area Report. The following areas shall be addressed in a critical area report for frequently flooded areas:
 1. The site area of the proposed activity;

2. All areas of a special flood hazard area, as indicated on the flood insurance rate map(s), within three hundred feet of the project area; and
 3. All other flood areas indicated on the flood insurance rate map(s) within three hundred feet of the project area.
- C. Flood Hazard Assessment Required. A critical area report for a proposed activity within a frequently flooded area shall contain a flood hazard assessment, including the following site- and proposal-related information at a minimum:
1. Site and Construction Plans. A copy of the site and construction plans for the development proposal showing:
 - a. Floodplain (one hundred-year flood elevation), ten- and fifty-year flood elevations, floodway, other critical areas, management zones, and shoreline areas;
 - b. Proposed development, including the location of existing and proposed structures, fill, storage of materials, and drainage facilities, with dimensions indicating distances to the floodplain;
 - c. Clearing limits; and
 - d. Elevation of the lowest floor (including basement) of all buildings, and the level to which any building has been floodproofed;
 2. Floodproofing Certificate (FEMA Form 81-65, most current edition). When floodproofing is proposed for a non-residential building, a certification by a registered professional engineer or architect that the floodproofing methods meet the requirements in CMC Section 16.57.050(F); and
 3. Watercourse Alteration. When watercourse alteration is proposed, the critical area report shall include:

[Section 16.57.030.C.3 is OMITTED – Not applicable]
- D. Information Regarding Other Critical Areas. Potential impacts to wetlands, fish and wildlife habitat, and other critical areas shall be addressed in accordance with the applicable sections of these provisions.

Applicant Response: Please see Attachment 12—Floodplain Report for demonstration of AT&T's compliance with the above provisions, as applicable. As detailed in this report, there is a low risk of property flooding.

16.57.050 – Performance standards – General requirements.

All Elevation Certificates (FEMA Form 81-31), floodproofing certificates for nonresidential structures (FEMA Form 81-65), documents, and records pertaining to the provisions of this ordinance shall be maintained by the city for public inspection.

- A. All Necessary Permits Shall be Obtained. Review all development permits to determine that all necessary permits have been obtained from those federal, state, or local government agencies from which prior approval is required. A development permit shall be obtained before construction or development begins within any frequently flooded area established in Section 16.57.010. The permit shall be for all structures, including manufactured homes, as set forth in the "definitions," and for all development, including fill and other activities, also as set forth in the "definitions."
- B. Application for Development Permit. Application for a development permit shall be made on forms furnished by the floodplain administrator and may include, but not be limited to, plans in duplicate drawn to scale showing the nature, location, dimensions, and elevations of the area in question; existing or proposed structures, fill, storage of materials, drainage facilities, and the location of the foregoing. Specifically, the following information is required:
 1. Elevation in relation to mean sea level, of the lowest floor (including basement) of all structures recorded on a current elevation certificate with subsection B. completed by the floodplain administrator.

2. Elevation in relation to mean sea level to which any structure has been floodproofed;
3. Where a structure is to be floodproofed, certification by a registered professional engineer or architect that the floodproofing methods for any nonresidential structure meet floodproofing criteria in Section 16.57.060(B);
4. Description of the extent to which a watercourse will be altered or relocated as a result of proposed development;
5. Where development is proposed in a floodway, an engineering analysis indicating no rise of the base flood elevation, and
6. Any other such information that may be reasonably required by the floodplain administrator in order to review the application.

Applicant Response: AT&T has submitted a complete Development Permit form. Please see Attachment 1a—Development Permit Form. See also Attachment 12—Floodplain Report.

[Section 16.57.050 C - H is OMITTED]

- I. Areas Without Base Flood Elevation Data. Where base flood elevation data is not available (Zone A), and there is insufficient data then a report shall be submitted by a qualified professional that includes analysis of historical data and field surveys to ensure the proposed structure is reasonably safe from flooding. The reports shall include reasonable mapping to ensure proposed buildings are safe from flooding and to demonstrate that the cumulative effect of the proposed development, when combined with all other existing and anticipated development, will not increase the water surface elevation of the base flood more than one inch at any point within the city limits.

Applicant Response: The subject parcel does not have an established base flood elevation. Please see Attachment 12—Floodplain Report for demonstration of AT&T's compliance with this provision.

[The remainder of Section 16.57.050 is OMITTED]

Chapter 16.59 – Geologically Hazardous Areas

16.59.010 – Designation of geologically hazardous areas.

Geologically hazardous areas include areas susceptible to erosion hazard, landslide hazard, seismic hazard, mine hazard and other geologic events. These areas pose a threat to the health and safety of citizens when incompatible development is sited in areas of significant hazard. Areas susceptible to one or more of the following types of hazards shall be designated as a geologically hazardous area:

- A. Erosion hazard;
- B. Landslide hazard;
- C. Seismic hazard; or
- D. Other geological events including, mass wasting, debris flows, rock falls and differential settlement.

Applicant Response: Per the Clark County GIS mapping database, the subject parcel is located within geologically hazardous areas; specifically, erosion hazard areas and steep slopes.

16.59.020 – Designation of specific hazard areas.

- A. Erosion Hazard Areas. Erosion hazard areas are areas where there is not a mapped or designated landslide hazard, but where there are steep slopes equal to or greater than forty percent slope. Steep slopes which are less than ten feet in vertical height and not part of a larger steep slope system, and steep slopes created through previous legal grading activity are not regulated steep slope hazard areas.

- B. **Landslide Hazard Areas.** Landslide hazard areas are areas potentially subject to landslides based on a combination of geologic, topographic, and hydrologic factors. They include areas susceptible because of any combination of bedrock, soil, slope (gradient), slope aspect, structure, hydrology, or other factors. Examples of these may include, but are not limited to the following:
1. Areas of previous slope failures including areas of unstable old or recent landslides;
 2. Areas with all three of the following characteristics:
 - a. Slopes steeper than fifteen percent,
 - b. Hillsides intersecting geologic contacts with permeable sediment overlying a low permeability sediment or bedrock, and
 - c. Any springs or ground water seepage;
 3. Slopes that are parallel or sub-parallel to planes of weakness, such as bedding planes, joint systems and fault planes in subsurface materials;
 4. Areas mapped by:
 - a. Washington Department of Natural Resources Open File Report: Slope Stability of Clark County, 1975, as having potential instability, historical or active landslides, or as older landslide debris, and
 - b. The Washington Department of Natural Resources Open File Report Geologic Map of the Vancouver Quadrangle, Washington and Oregon, 1987, as landslides;
 5. Slopes greater than eighty percent, subject to rock fall during earthquake shaking;
 6. Areas potentially unstable as a result of rapid stream incision, stream bank erosion, and stream undercutting the toe of a slope;
 7. Areas located in a canyon or on an active alluvial fan, presently or potentially subject to inundation by debris flows, debris torrents or catastrophic flooding.
- C. "Seismic hazard area" means an area subject to severe risk of damage as a result of earthquake-induced soil liquefaction, ground shaking amplification, slope failure, settlement, or surface faulting. Relative seismic hazard is mapped on the NEHRP site class map of Clark County, published by the Washington Department of Natural Resources.
- D. **Other Hazard Areas.** Geologically hazardous areas shall also include areas determined by the city to be susceptible to other geological events, including mass wasting, debris flows, rock falls, and differential settlement.

Applicant Response: The subject parcel is located adjacent to man-made steep slopes which were created for the construction of the canal located on the south side of the parcel. However, the proposed Facility will be constructed in a level parking lot. Please see Attachment 11—Geological Hazard Report.

16.59.060 – Critical area report requirements for geologically hazardous areas.

- A. Prepared by a Qualified Professional. A critical areas report for a geologically hazardous area shall be prepared by a qualified professional who is either a civil engineer with a geotechnical background, or a geologist, licensed in the state of Washington, with experience analyzing geologic, and where applicable, hydrologic and ground water flow systems.
- B. Area Addressed in Critical Area Report. The project area of the proposed activity shall be addressed in a critical area report for geologically hazardous areas.

- C. Geotechnical Evaluation and Assessment. Except as provided for in subsections D and E of this section, a critical area report for geologically hazardous areas shall first contain a site evaluation and, if required, an assessment of geological hazards.
1. Site Evaluation. A site evaluation shall include:
 - a. Identification of the geologically hazardous area including the type and extent of the geological hazard, and the reason the area is or is not likely to be impacted by the proposed development plan.
 - b. A description of the project including, where applicable:
 - i. Proposed structures;
 - ii. Proposed grading;
 - iii. Areas proposed for storage of materials;
 - iv. Proposed storm drainage areas;
 - v. Related project impacts which have a potential to adversely affect the geological hazard; and
 - vi. If available for the proposed activity, a site development plan may be included to illustrate proposed project impacts. The development plan when provided will show the geological hazard area, proposed site improvements, two-foot contours, proposed storm water treatment facilities, proposed or known existing septic drain fields, proposed stockpile areas, or proposed areas of mass grading.
 - c. Identification of proportionate and appropriate mitigation measures and a description of how they will adequately protect the proposed development, adjacent developments, and the subject geologically hazardous area.
 - d. A recommendation based on the proposed site activities of the level of study, construction monitoring, or site design changes which may be needed during the final design process.
 2. Geotechnical Assessment. If recommended by the site evaluation, or determined necessary by the city, a geotechnical assessment for geologically hazardous areas shall include the following site-and proposal-related information at a minimum:
 - a. Site Plans. The report shall include a copy of the site plans for the proposal showing:
 - i. The type and extent of geologic hazard areas, and any other critical areas, and management zones on, adjacent to, within three hundred feet of, or that are likely to impact the proposal;
 - ii. Proposed development, including the location of existing and proposed structures, fill, storage of materials, and storm drainage facilities, with dimensions indicating distances to hazard areas; and
 - iii. The topography, in two-foot contours, of the project area and all hazard areas addressed in the report.
 3. Assessment of Geological Characteristics. The report shall include an assessment of the geologic characteristics and engineering properties of the soils, sediments, and/or rock of the project area and potentially affected adjacent properties, and a review of the site history regarding landslides, erosion and prior grading. Soils analysis shall be accomplished in accordance with accepted taxonomic classification systems in use in the region.

The assessment shall include, but not be limited to:

 - a. A description of the surface and subsurface geology, hydrology, soils, and vegetation found in the project area, and in generally all hazard areas addressed in the report;
 - b. A detailed overview of the field investigations, published data, and references; data and conclusions from past assessments of the site; and site specific measurements, test, investigations, or studies that support the identification of geologically hazardous areas; and

- c. A description of the vulnerability of the site to seismic and other geologic events.
- 4. Analysis of Proposal. The report shall contain a geotechnical analysis, including a detailed description of the project, its relationship to the geologic hazard(s), and its potential impact upon the hazard area, the subject property, and affected adjacent properties.
- 5. Summary and Recommendation. The report shall make a recommendation for the minimum no disturbance management zone, or minimum building setback from any geologic hazard, or other appropriate mitigation measures based upon the geotechnical analysis.
- D. Incorporation or Acceptance of Previous Study. Where a valid geotechnical report has been prepared within the last five years for a specific site, and where the proposed land use activity and surrounding site conditions are unchanged, such report may be incorporated into or accepted as the required critical area report. The applicant shall submit a geotechnical assessment detailing any changed environmental conditions associated with the site.
- E. Where the applicant can demonstrate that the proposed project or activity has no direct impact on the identified geologically hazardous area, or that the site evaluation requirements above are not applicable to the proposed project or activity, the city may not require additional site assessment work or may limit the scoping of the site evaluation based on identified site specific geologic hazards.
- F. Mitigation of Long-Term Impacts. When hazard mitigation is required the mitigation plan shall specifically address how the activity maintains or reduces the pre-existing level of risk to the site and adjacent properties on a long-term basis (equal to or exceeding the projected lifespan of the activity or occupation). Proposed mitigation techniques shall be considered to provide long-term hazard reduction only if they do not require regular maintenance or other actions to maintain their function. Mitigation may also be required to avoid any increase in risk above the pre-existing conditions following abandonment of the activity.

Applicant Response: Please see Attachment 11—Geological Hazard Report for demonstration of AT&T's compliance with the above provisions.

16.59.070 – Critical area report requirements for specific hazards.

- A. Erosion and Landslide Hazard Areas. In addition to the basic geological hazard area report requirements, a report for an erosion hazard or landslide hazard area shall include the following information at a minimum:
 - 1. Site Plan. The report shall include a copy of the site plan for the proposal showing:
 - a. The height of slope, slope gradient, and cross section of the project area,
 - b. The location of springs, seeps, or other surface expressions of ground water on or within three hundred feet of the project area, or that have potential to be affected by the proposal, and
 - c. The location and description of surface water runoff;
 - 2. Geotechnical Analysis. The geotechnical analysis shall specifically include:
 - a. A description of the extent and type of vegetative cover,
 - b. An estimate of load capacity, including surface and ground water conditions, public and private sewage disposal systems, fills and excavations, and all structural development,
 - c. An estimate of slope stability and the effect construction and placement of structures will have on the slope over the estimated life of the structure,
 - d. An estimate of the bluff retreat rate that recognizes and reflects potential catastrophic events such as seismic activity or a one hundred year storm event,

- e. Consideration of the run-out hazard of landslide debris and/or the impacts of landslide run-out on down slope properties,
 - f. A study of slope stability, including an analysis of proposed angles of cut and fill, and site grading,
 - g. Recommendations for building limitations, structural foundations, and an estimate of foundation settlement, and
 - h. An analysis of proposed surface and subsurface drainage, and the vulnerability of the site to erosion;
3. Erosion and Sediment Control Plan. For any development proposal on a site containing an erosion hazard area, an erosion and sediment control plan shall be required. The erosion and sediment control plan shall be prepared in compliance with requirements set forth in CMC Chapter 15.32, CMC Chapter 17.21 and the city of Camas Design Standard Manual;
 4. Drainage Plan. The report shall include a drainage plan for the collection, transport, treatment, discharge, and/or recycle of water prepared in accordance with CMC Chapter 17.21 and the city of Camas Design Standard Manual;

Applicant Response: Please see Attachment 11—Geological Hazard Report for demonstration of AT&T's compliance with the above provisions. A Geotechnical Report and Erosion and Sediment Control Plan will be submitted with the Building Permit, as required by the City of Camas.

[The remainder of Section 16.59.070 is OMITTED – Not applicable]

Chapter 16.61 – Fish and Wildlife Habitat Conservation Areas

16.61.020 – Critical area report – Requirements for habitat conservation areas.

- A. Prepared by a Qualified Professional. A critical areas report for a habitat conservation area shall be prepared by a qualified professional who is a biologist with experience preparing reports for the relevant type of habitat.
- B. Areas Addressed in Critical Area Report. The following areas shall be addressed in a critical area report for habitat conservation areas:
 1. Within a subject parcel or parcels, the project area of the proposed activity;
 2. All wetlands and recommended buffer zones within three hundred feet of the project area within the subject parcel or parcels;
 3. All shoreline areas, water features, floodplains, and other critical areas, and related buffers within three hundred feet of the project area of the subject parcel or parcels; and
 4. The project design and the applicability of the buffers based on the proposed layout and the level of land use intensity.
- C. Habitat Assessment. A habitat assessment is an investigation of the project area to evaluate the presence or absence of a potential critical fish or wildlife species or habitat. A critical area report for a habitat conservation area shall contain an assessment of habitats, including the following site- and proposal-related information at a minimum:
 1. Detailed description of vegetation on and adjacent to the project area;
 2. Identification of any species of local importance, priority species, or endangered, threatened, sensitive, or candidate species that have a primary association with habitat on or adjacent to the project area, and assessment of potential project impacts to the use of the site by the species;

3. A discussion of any federal, state, or local special management recommendations, including Department of Fish and Wildlife habitat management recommendations, that have been developed for species or habitats located on or adjacent to the project area;
 4. A discussion of measures, including avoidance, minimization, and mitigation, proposed to preserve existing habitats and restore any habitat that was degraded prior to the current proposed land use activity, and to be conducted in accordance with mitigation sequencing (Section 16.51.170); and
 5. A discussion of ongoing management practices that will protect habitat after the project site has been developed, including proposed monitoring and maintenance programs.
- D. Additional Information May be Required. When appropriate due to the type of habitat or species present or the project area conditions, the city may also require the habitat management plan to include:
1. An evaluation by the Department of Fish and Wildlife or qualified expert regarding the applicant's analysis and the effectiveness of any proposed mitigating measures or programs, to include any recommendations as appropriate;
 2. An evaluation by the local Native American Indian Tribe; and
 3. Detailed surface and subsurface hydrologic features both on and adjacent to the site.

Applicant Response: Please see Attachment 13—Critical Areas Habitat Assessment for demonstration of compliance with the above criterion.

V. REVIEW PROCEDURES

16.07 SEPA Categorical Exemption and Threshold Determination

16.07.020 – Exemption Levels.

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- C. The exemptions listed in CMC [Section 16.07.020](#) and WAC 197-11-800 shall not apply within critical areas, or within two hundred feet of a critical area boundary.

Applicant Response: As this proposed Facility is within a designated critical area, it is not exempt from SEPA. See Attachment 1b – SEPA Checklist.

18.19 Design Review

18.19.020 – Scope.

Design review is required for all new developments within commercial, mixed-use, business park, or multifamily zones, redevelopment (including change in use, e.g., residential to commercial), or major rehabilitation (exterior changes requiring a building permit or other development permit). Commercial uses in the context of design review include both traditional uses listed as commercial under the zoning code as well as recreational, religious, cultural, educational, and governmental buildings and associated properties. Additionally, design review is applicable to all new developments or redevelopments within a gateway area as defined in the design review manual.

Applicant Response: AT&T is proposing to install a stealth wireless communication facility abutting the eastern building façade of a religious facility. The WCF will require a building permit, therefore, the proposed scope of work is subject to Design Review.

18.19.040 – Design review committee.

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- B. The DRC will hold a public meeting to consider a design review application when:

1. The city planner determines that the issues related to a specific proposal are complex enough to warrant a review by the DRC;
2. The proposal varies from the guidelines of the DRM; or
3. When an administrative decision on a design review application is appealed with no prior review by the DRC.

Applicant Response: Please see Attachment 14—Pre-Application Notes stating an administrative Minor Design Review is required for the proposed application, which will not require review by the DRC.

18.19.050 – Design principles.

The principles as provided in the DDM or DRM are mandatory and must be demonstrated to have been satisfied in overall intent in order for approval of a design review application to be granted. Standard principles shall apply to all commercial, mixed use, or multifamily uses. Specific principles are used in addition to the standard principles for gateways and corridors, commercial, mixed uses, and multifamily (e.g. apartments, townhouses, duplexes).

A. Standard Principles.

1. Landscaping shall be done with a purpose. It shall be used as a tool to integrate the proposed development into the surrounding environment.

Applicant Response: The proposed WCF will be installed in an existing parking lot abutting the eastern building façade of a religious facility. To maintain the existing parking spaces and circulation on-site to the greatest extent possible, no landscaping is proposed around the structure. Moreover, no landscaping should be needed as the proposed Facility is a faux bell tower with all equipment contained within the structure which will effectively screen the Facility from the public.

2. All attempts shall be made at minimizing the removal of significant natural features. Significant natural features shall be integrated into the overall site plan.

Applicant Response: There are no significant natural features on-site. The structure will be placed along the eastern façade of the existing building in the existing parking lot.

3. Buildings shall have a "finished" look. Any use of panelized materials shall be integrated into the development in a manner that achieves a seamless appearance.

Applicant Response: To mitigate visual impact, AT&T is proposing to install a 60ft stealth RF transparent structure in the form of a faux bell tower. A faux bell tower with a spire and cross will be installed above the RF transparent structure at the request of the property owner and complements the existing church spire on top of the building. The proposed overall height to the top of the cross is 88ft. The structure will be treated with brick veneer to match the existing building, and the faux bell tower and spire will match the existing spire on the church. The proposed WCF will be in line with the existing steeple for balance and will include arches on the eastern and northern elevations to match those on the building. Please see Attachment 7—Photo Simulations, and Attachment 19—Zoning Drawings, Sheet A3.0, for further discussion and demonstration of the proposed design and AT&T's compliance with this requirement.

4. A proposed development shall attempt to incorporate or enhance historic/heritage elements related to the specific site or surrounding area.

Applicant Response: As noted above, AT&T is proposing a faux bell tower to house its antennas and equipment. This will ensure that the structure does not appear as a wireless communications facility and blends with the existing use of the property as a church. The stealth structure will be treated with brick veneer to match the existing building's façade. Additionally, the proposed bell tower and spire above the RF transparent structure

will be designed to match the existing spire on the church. These measures will ensure the Facility is incorporated with the use of the subject parcel and will minimize the visual impact to the surrounding community.

[The remainder of Section 18.19.050 is OMITTED – Not applicable]

18.19.070 – Application requirements.

Application for design review shall be submitted on the most current forms provided by, and in a manner set forth by the community development director or designee. The application shall include such drawings, sketches, and narrative as to allow the approval authority review of the specific project on the merits of the city's design review manual and other applicable city codes. An application shall not be deemed complete unless all information requested is provided.

Applicant Response: AT&T has submitted a complete General Application form, drawings and a narrative for the proposed Design Review. See Attachment 1—General Application Form, Attachment 2—Project Narrative and this Attachment 3—Statement of Code Compliance, and Attachment 19—Zoning Drawings.

Chapter 18.43 Conditional Use Permits

18.43.030 – Application.

Application for a conditional use permit shall be filed with the community development department on forms provided by the city. The application shall be accompanied by a filing fee as may be set from time to time by resolution of the city council. The application and review process shall be subject to a Type III procedure, pursuant to CMC [Chapter 18.55](#) Administration and Procedures of this title.

Applicant Response: AT&T has submitted a complete General Application Form for the proposed WCF, which includes this Statement of Code Compliance, and all required fees. Please see Attachment 1—General Application Form.

18.43.050 – Criteria.

The hearings examiner shall be guided by all of the following criteria in granting or denying a conditional use permit:

- 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;

Applicant Response: AT&T's proposed WCF will not be materially detrimental to the public welfare or to improvements or residents in the neighborhood of the subject property. The proposed WCF is an unmanned, passive use and will not generate traffic, noise, or dust. Further, the proposed WCF is less impactful than other uses allowed in the residential zone subject to a conditional use permit, such as a community club, minor public facility, pumping station and museum. The proposed Facility will comprise only 400 sq.ft. of an approximately .42-acre parcel and has been designed as a stealth structure that compliments the existing use on the parcel.

- B. The proposed use shall meet or exceed the development standards that are required in the zoning district in which the subject property is situated;

Applicant Response: As demonstrated by AT&T's responses in this Statement of Code Compliance, the proposed Facility complies with all applicable standards of the R-7.5 zoning district and wireless communication facility standards in Chapter 18.35.070.

- C. The proposed use shall be compatible with the surrounding land uses in terms of traffic and pedestrian circulation, density, building, and site design;

Applicant Response: *As noted, AT&T is proposing a stealth structure designed as a bell tower to complement the existing church spire. Further, the proposed WCF is an unmanned facility and will not generate traffic. A cellular technician will visit the site approximately one time per month for maintenance. However, it is becoming more common for facilities to be remotely monitored. Additionally, AT&T will improve a portion of the existing sidewalk and replace existing driveways to benefit traffic and pedestrian circulation.*

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;

Applicant Response: *The proposed Facility is the least intrusive means to meet AT&T's service objective within the Targeted Service Area while maintaining compatibility with surrounding structures and land uses to the greatest extent feasible. AT&T's proposed WCF is designed to complement the existing church spire and will be treated to match the building. Please see Attachment 19—Zoning Drawings. The antennas and equipment will be housed within the stealth structure so as not be visible to neighboring properties. Access to inside the structure will be locked and restricted to authorized personnel.*

E. The proposed use is consistent with the goals and policies expressed in the comprehensive plan;

Applicant Response: *The Facility is in conformance with relevant goals and policies of the City of Camas Comprehensive Plan. Please see the additional discussion in Attachment 2—Project Narrative for demonstration of AT&T's compliance with this criterion.*

F. Any special conditions and criteria established for the proposed use have been satisfied. In granting a conditional use permit the hearings examiner may stipulate additional requirements to carry out the intent of the Camas Municipal Code and comprehensive plan.

Applicant Response: *AT&T complies with all applicable criteria required for wireless communication facilities detailed in Chapter 18.35. AT&T also acknowledges, understands, and intends to comply with any reasonable conditions of approval imposed on the proposed Facility.*

Chapter 18.55 Administration and Procedures

Article I – General Procedures

18.55.020 – Determination of proper procedure type.

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B. Optional Consolidated Permit Processing. An application that involves two or more project permits may be submitted concurrently and processed with no more than one open record hearing and one closed record appeal. If an applicant elects this process upon submittal and in writing, the determination of completeness, notice of application, and notice of decision or final decision shall include all project permits reviewed through the consolidated permit process.

Applicant Response: *AT&T has submitted a General Application form requesting a Conditional Use Permit Review, a Minor Design Review, and a Critical Area Review. In addition, AT&T has submitted a Development Permit for the floodplain review. AT&T hereby requests to be consolidated under a single Type III review for the proposed Facility.*

Article II – Pre-Filing Requirements

18.55.050 – Initiation of action.

Except as otherwise provided, Type I, II, III, or BOA applications may only be initiated by written consent of the owner(s) of record or contract purchaser(s). Legislative actions may be initiated at the request of citizens, the city council, planning commission, or department director or division manager.

Applicant Response: AT&T has submitted a complete General Application Form for the proposed WCF. Please see Attachment 1—General Application Form and Attachment 15—Property Owner Letter of Authorization, which gives permission to Smartlink to submit on the property owner's behalf.

18.55.060 – Preapplication conference meeting – Type II, Type III.

- A. Prior to submitting an application for a Type II or Type III application, the applicant shall schedule and attend a preapplication conference with city staff to discuss the proposal. The preapplication conference shall follow the procedure set forth by the director.
- B. To schedule a preapplication conference the applicant shall contact the planning department. The purpose of the preapplication conference is for the applicant to provide a summary of the applicant's development proposal to staff and in return, for staff to provide feedback to an applicant on likely impacts, limitations, requirements, approval standards, fees, and other information that may affect the proposal. The director may provide the applicant with a written summary of the preapplication conference within ten days after the preapplication conference.
- C. Notwithstanding any representations by city staff at a pre-application conference, staff is not authorized to waive any requirements of the city code. Any omission or failure by staff to recite to an applicant all relevant applicable code requirements shall not constitute a waiver by the city of any standard or requirement.
- D. A preapplication conference shall be valid for a period of one hundred eighty days from the date it is held. If no application is filed within one hundred eighty days of the conference or meeting the applicant must schedule and attend another conference before the city will accept a permit application. Any changes to the code or other applicable laws which take effect between the preapplication conference and submittal of an application shall be applicable.
- E. The director may waive the preapplication requirements if, in the director's opinion, the development does not warrant these steps.

Applicant Response: A pre-application meeting was conducted on November 3, 2022, and again on May 4, 2023. Please see Attachment 14—Pre-Application Notes for a summary of the meeting.

Article III – Application Requirements

18.55.110 – Application – Required information.

Type II or Type III applications include all the materials listed in this subsection. The director may waive the submission of any of these materials if not deemed to be applicable to the specific review sought. Likewise, the director may require additional information beyond that listed in this subsection or elsewhere in the city code, such as a traffic study or other report prepared by an appropriate expert where needed to address relevant approval criteria. In any event, the applicant is responsible for the completeness and accuracy of the application and all of the supporting documentation. Unless specifically waived by the director, the following must be submitted at the time of application:

- A. A copy of a completed city application form(s) and required fee(s);

Applicant Response: AT&T has submitted a complete General Permit Application form and a Development Permit form with all noted attachments, including this Statement of Code Compliance, and all required fees. Please see Attachment 1—General Application Form and Attachment 1a—Development Permit Form.

- B. A complete list of the permit approvals sought by the applicant;

Applicant Response: AT&T is requesting a Conditional Use Permit Review, a Minor Design Review, a Critical Area Review and Floodplain Review.

ATTACHMENT 3—Statement of Code Compliance
 AT&T's WCF Application—PS25 Camas School Relo
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- C. A current (within thirty days prior to application) mailing list and mailing labels of owners of real property within three hundred feet of the subject parcel, certified as based on the records of Clark County assessor;

Applicant Response: Please see Attachment 16—Mailing List.

- D. A complete and detailed narrative description that describes the proposed development, existing site conditions, existing buildings, public facilities and services, and other natural features. The narrative shall also explain how the criteria are or can be met, and address any other information indicated by staff at the preapplication conference as being required;

Applicant Response: Please see Attachment 2—Project Narrative and this Attachment 3—Statement of Code Compliance.

- E. Necessary drawings in the quantity specified by the director;

Applicant Response: Please see Attachment 19—Zoning Drawings.

- F. Copy of the preapplication meeting notes (Type II and Type III);

Applicant Response: A pre-application meeting was conducted on November 3, 2022, and again on May 4, 2023. Please see Attachment 14—Pre-Application Notes for a summary of the meeting.

- G. SEPA checklist, if required;

Applicant Response: Please see Attachment 1b—SEPA Checklist.

- H. Signage for Type III applications and short subdivisions: Prior to an application being deemed complete and Type III applications are scheduled for public bearing, the applicant shall post one four-foot by eight-foot sign per road frontage, unless a different size (not to be less than six square feet) is approved by the director. The sign shall be attached to the ground with a minimum of two four-inch by four-inch posts or better. The development sign shall remain posted and in reasonable condition until a final decision of the city is issued, and then shall be removed by the applicant within fourteen days of the notice of decision by the city. The sign shall be clearly visible from adjoining rights-of-way and generally include the following:

1. Description of proposal,
2. Types of permit applications on file and being considered by the City of Camas,
3. Site plan,
4. Name and phone number of applicant, and City of Camas contact for additional information,
5. If a Type III application, then a statement that a public hearing is required and scheduled. Adequate space shall be provided for the date and location of the hearing to be added upon scheduling by the city.

Applicant Response: AT&T understands and intends to comply with the above provision.

- I. A copy of a full title report.

Applicant Response: Please see Attachment 17—Title Report for the subject property.