

June 16, 2023

Robert Maul  
City of Camas Community Development  
616 NE 4<sup>th</sup> Avenue  
Camas, WA 98607

**RE: North Shore Subarea Design Manual Comments**

Dear Robert:

Below is a list of comments for the draft Design Manual for the North Shore Subarea.

**Section 1**

**1.1 Purpose**

**Comments:**

- The purpose statement states design manual provides clear and objective standards; however, this is not the case. Many of the guidelines and principles are ambiguous or use undefined terms and the use of terms such as ‘should’ and ‘encourage’ make it unclear if a standard is required or optional. This needs to be cleaned up to avoid confusion as projects are being developed.

**1.2 The Design Approval Process**

**Comments:**

- Since the document is a supplement to the development standards in the CMC Code, it could be difficult to enforce a more stringent standard within the design manual. It may be better to simply say the CMC controls in the case of a conflict.

**Section 2.1**

**Intent and Character**

**Comments:**

- Cottage cluster lots may not be feasible to construct in the LD-NS zone due to density and lot dimensional requirements of the zone.
- Please confirm that ADU’s proposed with new development will not count against the density of the development. How will ADU’s be handled for traffic concurrency and TIF fees?
- Is the term ‘should’ used as a suggestion or mandatory requirement?

**Dimensional Standards**

**Comments:**

- Table 1 does not list a street side setback for standard lots. The setbacks also do not match what is in the proposed code language.
- The minimum lot size for cottage lots should be increased to 2,400 square feet. Rowhomes should be at 1,800 square feet. This also needs to be updated in footnote seven of 18.09.040 Table 1.
- Table 2 limits cottages to 18 feet in height. Other jurisdictions use 25 feet. Eighteen feet limits the product options to one story and does not provide much flexibility.

## Site Development Guidelines

### Comments:

- Lot size variation will be challenging when there is an average lot area that must be met.
- Guidelines are not clear and objective when mixing terms like ‘encourage’ and ‘should’. These are subjective guidelines and provide no certainty for anyone. It is unclear which guidelines, if any, are mandatory.

## Site Development Principals

### Comments:

- The first principle states “One or more dormer windows must be incorporated with residential development to provide roof variation.” Is this intended to state that each house in a development must have a dormer or that at least one house in a development must have a dormer? If all houses are required to have a dormer, you could end up with cookie cutter houses because of a forced detail. In addition, the example photos do not show dormers on all houses. Ultimately, the standard needs to be clearer.
- Are the terms ‘must’ and ‘shall’ used to make the principle mandatory? Are the terms intended to be the same?

## Section 2.2

### Intent and Character

#### Comments:

- Single-family detached housing is allowed in the HD-NS zone per the updated code, however the intent statement in this manual makes this unclear by not including it in the list of housing types or by saying a complete list of allowed uses can be found in the code as section 2.1 did.

### Dimensional Standards

#### Comments:

- Table 3: Street flanking side yard should be clarified as code allows 10 feet for cottages and rowhomes. Additionally, table note 7 for 18.08.050 Table 1 should be updated to include single-family detached homes as they are allowed in the HD-NS zone and should only have a 10-foot street side.
- Alley setbacks should be added similar to the LD-NS zone.
- Table 4: Was it intentional to provide a density range for cottages that is lower than base zone? If anything, cottage density should be allowed at a higher rate.
- The side yard flanking street is shown as 15 feet but should be 10 feet per the proposed code.

## Site Development Guidelines

### Comments:

- The design guidelines seem to only target apartment style developments. Is it intended that fee simple attached and detach family homes should also organize around a green space. This could make providing those products in the HD-NS zone infeasible.

### **Site Development Principals**

#### **Comments:**

- How will permeable surfaces be used when there is generally no infiltration within the North Shore Subarea. Requirements like this may not be feasible depending on site specifics and the stormwater manual. What is the intent of this requirement?

### **Section 2.4 (C-NS)**

#### **Comments:**

- This section is labeled as 2.4 but should be 2.3.

### **Dimensional Standards**

#### **Comments:**

- The pictured example shows the commercial building at the back of sidewalk. This will not be possible with a front building setback of 15 feet. Perhaps the option of a zero-foot setback or a 10- or 15-foot setback.

### **Site Development Guidelines**

#### **Comments:**

- The first guideline states “Encourage small, local businesses such as restaurants, cafes and grocers that serve North Shore residents and businesses, while complementing downtown Camas.” This should not be a guideline in a design manual. This is not a clear standard that can be met through design.

### **Site Development Principals**

#### **Comments:**

- Many of the principals and examples point to buildings that abut the public sidewalk, which would not be allowed with a 15-foot front setback.

### **Section 2.4**

### **Dimensional Standards**

#### **Comments:**

- Table 6 has a maximum front setback of 10 feet. Does this mean that a building may utilize a zero-foot setback?
- Setbacks for attached and detached single-family residential should be included as they are allowed uses. The current proposed standards do not provide for fee simple residential lots.
- The minimum side yard setback in the proposed code is 10 feet, but Table 6 shows 3 feet.

## Site Development Guidelines

### Comments:

- The third guideline states mixed use developments that front the central plaza shall include ground floor retail/commercial. Is this intended to mean all development fronting the central plaza or can there be a mix of residential and retail/commercial fronting the plaza? Is there a percentage of the ground floor that must be commercial?

## Central Plaza

### Comments:

- This section references standards and guidelines. The guidelines should be separate from the standards, as guidelines are typically general and allow for some flexibility to meet an intent, whereas standards should be very specific.
- The first standard requires a minimum of a 1-acre central plaza. This is an unreasonable requirement for a majority of the lots zoned mixed use. Specifically, a majority of the lots along Everett Street are less than one acre in size. There is potential for multiple lots to be purchased for redevelopment and only have one acre of land, making it impossible to develop that one acre. Additionally, with the cost of land and development, to provide one acre of open space would require a minimum of 3-5 additional acres of land, potentially more to make development feasible. If the intent of the standard is to apply to an entire area of mixed use, how does that work for the areas that have many property owners, when one or a few want to develop?

## Section 2.5

### Dimensional Standards

#### Comments:

- Table 6 has a maximum front setback of 10 feet. Does this mean that a building may utilize a zero-foot setback?
- Minimum setbacks in the proposed code are none for front, side, and rear, but Table 7 shows setback requirements.
- Table 7 also calls out alley loaded, which is not typical for an employment zone.

## Section 2.6

### Intent and Character

#### Comments:

- The description of the intent of the parks and open space section is somewhat confusing. Could be modified to provide more clarity on what the areas are and what the edge is. Does area refer to open spaces or the entire subarea? Is edge referencing to the edge or open spaces or the boundary of the entire subarea?

## Design Guidelines

### Comments:

- Is this section implying that entering into a development agreement with the City in the North Shore will require the dedication of land for parks?

## **Design Principles**

### **Comments:**

- Who determines what the greatest extent possible is? If a signing engineer or arborist determines something needs to be removed or graded and the City requires a change the signing engineer or arborist does not agree with, will the City take liability for their requirement?

## **Section 3.1**

### **Street Lighting**

#### **Comments:**

- The third guideline states streetlights should be traditional. What is a traditional streetlight and who will determine this?

### **Signage**

#### **Comments:**

- The first guideline states to use consistent signage. Will the signage type be set by the first development in the North Shore? There should be standards set for developers to meet if consistent signage across development is preferred.
- The second guideline states to promote a traditional “main street” composition. What is traditional? If traditional is building fronts abutting sidewalks, then some of the proposed design standards in the previous sections may make the traditional composition difficult.

### **Tree Grate**

#### **Comments:**

- Custom tree and storm grates can become extremely expensive very quickly and requiring them could come at the cost of other features that might provide more benefit. Additionally, if the grates are intended to establish a place identity, is it anticipated that all developments should use the same grates?

## **Section 3.2**

### **Rights-of-Way**

#### **Comments:**

The opening paragraph describes the right-of-way standards as a minimum with creativity and expansion beyond the standard encouraged. In addition, it states that bulb-outs and mid-block crossings should be incorporated. This is not clear and objective and leaves too much gray area for an applicant to meet a standard.

### **Local Streets**

#### **Comments:**

- Parking should be added to the local streets. These streets serve residential areas, and in higher density development, street parking is needed in residential areas.

## **Collector Streets**

### **Comments:**

- The collector street description states that the section is a minimum requirement and is subject to review by the engineer. It also states the section details are subject to change. The sections should be the standard to be met. Allowing for review after a standard is set does not provide clear and objective standards. Zones needing on-street parking should be identified so that an applicant has a clear standard to meet at the beginning of the design process.
- Should on-street parking be provided for this level of street if it will be serving mixed-use, commercial, and high density residential?

## **Ridgeline Road**

### **Comments:**

- The ridgeline road description states that the section is a minimum requirement and is subject to review by the engineer. It also states the section details are subject to change. The sections should be the standard to be met. Allowing for review after a standard is set does not provide clear and objective standards.

## **North Shore Boulevard**

### **Comments:**

- The North Shore boulevard description states that the section is a minimum requirement and is subject to review by the engineer. It also states the section details are subject to change. The sections should be the standard to be met. Allowing for review after a standard is set does not provide clear and objective standards.

## **Section 4**

### **Comments:**

- The opening paragraph states sustainability elements are encouraged, but then uses 'should' throughout the elements. If only encourage, 'should' needs to be removed as it is not clear if these are just guidelines or required standards.

## **Section 4.1**

### **Sustainable Site**

#### **Comments:**

- Element two states to limit the amount of impervious surface with the use of pervious pavement design. The majority, if not all, of the North Shore Subarea does not have permeable soil, making the use of permeable pavements infeasible.

## **Section 4.3**

### **Sustainable Streets**

#### **Comments:**

- Element two states pollinator habitat should be provided in sidewalk strips. This does not seem well suited to areas that would have heavy pedestrian and vehicular traffic. This element would be better suited to the open spaces and not the streetscapes.
- Element four encourages wildlife corridors across rights-of-way. These would be very expensive and not likely feasible for any developer to construct.

### **General Comments:**

- As noted through the comments, the design manual is not clear and objective. It is not clear what is a required standard and what is a request or suggestion. It is unclear through the context of the document the difference between a guideline and a principle. Is one required and the other a suggestion? This should be clarified. Make sure 'shall', 'must', 'should', 'encourage', etc. are used accurately based on if the element is required or simply a suggestion or request.
- Some of the guidelines and principles don't seem to take into account the reality of the existing conditions in the North Shore Subarea. For example, integrating permeable surfaces in an area with soils that generally don't infiltrate or requiring a one-acre central plaza for mixed use development, where a majority of the mixed-use parcels are not even one acre in size.
- Many of the design standards tables do not match up with what is required in code. It may be easier to simply reference the code, then there is less chance for confusion and if design standard code changes in the future, the design manual will not need to be updated as well.
- Page 6 is missing the page number.

Sincerely,

**AKS ENGINEERING & FORESTRY, LLC**

Michael Andreotti