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February 5, 2015

Robert Maul
Sarah Fox
City of Camas
616 NE 4th Avenue
Camas WA 98607
Re: Zone Code Text Change
Our File No. 51893-71648

Dear Rob:

We represent Pahlisch Homes, which is looking forward to building out the Lake Hills single family subdivision, which is zoned R-10. As described in Table 2 of CMC Section 18.09.040 of the municipal code, the maximum lot coverage in that zone is only 35%, whereas the other single family zones range from 30% up to 45%. Thus we propose a change to the zoning code text to allow increased lot coverage in the R-10 zone up to 45% for houses with footprints that are less than two full stories; that is, for one story houses and for houses on sloped lots that feature a main level with a partial daylight basement.

We also propose a clarification for the definition of lot coverage, with regard to transitional spaces such as front porches, outdoor rooms, covered terraces, and similar spaces that are under roof cover but not enclosed. Currently, lot coverage "means the portion of a lot that is occupied by the principal and accessory buildings, including all projections except eaves, expressed as a percentage of the total lot area." CMC 18.03.040. Because unenclosed spaces are not counted as building square footage generally, they also should not be included in the square footage of a building when calculating lot coverage. The new definition should be: "means the portion of a lot that is occupied by the enclosed areas of principal and accessory buildings, expressed as a percentage of the total lot area."

The Lake Hills subdivision is in a prime location for seasoned homeowners seeking the advantages of single story living. Many of the lots in this subdivision, and in other R-10 zones in Camas generally, are topographically challenged, which often precludes construction of conventional two story houses. Houses which accommodate all the necessary features on one story can serve the entire age range of the population, and are especially valued by today's multigenerational households.

The code does not include criteria for a zone code text change, but the criteria for a comprehensive plan change in CMC 18.51.010 provide a useful metric.

A. A detailed statement of what is proposed and why;

The vast majority of new houses built in Camas in recent decades are two stories, and this will likely continue indefinitely. Naturally the lot coverage standards reflect that reality, and are calibrated to ensure that in the lower density zones, the height of the two story houses does not cast broad shadows over the landscape.

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Of course the footprint of single story houses is larger than two story houses, which increases their lot coverage substantially. Yet being just one story, the resulting shadows and visual impacts are correspondingly smaller. A single story house preserves views that would be obstructed by a two story alternative.

In sum, the proportional relationship of a two story house to its lot and surrounding neighbors is fundamentally different than a one story house, or a one story house with a partial daylight basement. But the lot coverage standard does not account for this difference, and being designed for standard two story houses on level ground, the standard does not fit the unique characteristics of one story houses.

For the definitional change of lot coverage, there is a qualitative difference between the unenclosed spaces which are commonly not counted as building square footage generally, and fully enclosed spaces, and we believe they should not be treated the same when calculating lot coverage.

B. A statement of the anticipated impacts of the change, including the geographic area affected, and issues presented by the proposed change;

The change will impact the R-10 zone by encouraging development of large one story houses than are allowed currently. Currently, on a 10,000 sf lot, presuming 800 square feet for a 3 car garage, a one story house can have a maximum living area of only 2700 square feet; whereas a two story house could have 5400 square feet. The proposed change would allow a one story house up to 3700 square feet, or more if there is a partial daylight basement, which will have less visual impact to neighbors than the two story, 5400 square foot option.

Changing the definition of lot coverage would allow porches, outdoor rooms and related transitional spaces to be added onto houses which already are at the maximum lot coverage. This will encourage more outdoor activity during inclement weather, and encourage house designers to include these unique spaces in their plans.

C. An explanation of why the current comprehensive plan [code] is deficient or should not continue in effect;

Because the code is drafted to regulate the impacts of two story houses, it does not effectively address the different proportions and impacts of one story houses, or a one story house on slopes with partial daylight basement. The code should reflect the different shadow and view effects of the different housing types and allow families who enjoy one story living to have the right to a square footage that is closer to the amount allowed for two story houses which have greater view and shadow impacts.

The code currently discourages covered outdoor spaces, because it reduces the area available for enclosed living area. These transitional spaces benefit houses and the families that occupy them, and the city should encourage the outdoor activity they promote.

D. A statement of how the proposed amendment complies with and promotes the goals and specific requirements of the growth management act;

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The key GMA goal is number (4) Housing: "Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock." This zone code text change benefits the one story housing type enjoyed by boomers and others, which simply is not accounted for in the codes of most jurisdictions which are written with the typical two story house in mind.

Most houses have fairly abrupt transitions from inside to outdoors: either you are inside or not. To promote a variety of housing types, the city should adopt this change to encourage the use of covered porches and similar covered but not enclosed areas that are so beneficial in this climate.

E. A statement of what changes, if any, would be required in functional plans (i.e., the city's water, sewer, stormwater or shoreline plans) if the proposed amendment is adopted;

These changes would not affect density or infrastructure, and changes to the functional plans would not be required.

F. A statement of what capital improvements, if any, would be needed to support the proposed change which will affect the capital facilities plans of the city;

These changes would not affect density or infrastructure, and changes to the capital facilities plans would not be required.

G. A statement of what other changes, if any, are required in other city or county codes, plans, or regulations to implement the proposed change; and


No additional changes would be required.

Because the shape of a two story house and it's proportional relationship to the lot and surrounding neighbors are fundamentally different than a one story house, or a one story house with a partial daylight basement, we believe the lot coverage standard ought to accommodate both housing types. The code ought to recognize that houses that are shorter in height with a larger footprint have different impacts and should be subject to a different standard.

Thanks for your consideration.

Best regards,

JORDAN RAMIS PC



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