June 16, 2015

Good Evening Planning Commissioners,

<u>My name is Mark Martin</u> and as the citizen leader of the opposition to the Green Mountain PRD, I would like to request more time for my presentation. If you are unable to grant more time tonight, then I would respectfully ask that you not make a decision tonight, so that you may better listen to all the testimony offered here tonight. Let me begin by saying, based on the Camas Staff report which I will frequently quote in my comment below, the applicant's PRD documents are woefully inadequate. "A can be met" plan with a full 75 conditions of approval is not a comprehensive plan. No matter how rosy the verbiage chosen to present this plan is, the Camas Staff Report indicts the Green Mountain PRD as incomplete, without proper infrastructure proactive planning. It is seriously disturbing that such a plan would be brought before this esteemed Planning Commission to even consider recommending this plan.

By way of background: There are currently six commercial projects and 15 residential projects actively underway in Camas, according to the City of Camas in 2014. Probably more have already been approved in 2015. The cumulative effect of these projects on Camas's ability to keep up with needed infrastructure remains extremely dubious. This massive growth has received minimal proactive infrastructure improvements by the city. This includes sewer, water, and road improvements, to say nothing of the traffic implications or the impacts on our schools and recreational facilities. Indeed, in the project we are here to discuss tonight, the City of Camas has not even been able to paint an appropriate white stripe or stop bar to prevent accidents at one of the highest accident rate intersections in Clark County at Ne Goodwin Rd. and Ne Ingle Rd which is ground zero for the new Green Mountain PRD. It has been at least a year and a half since the City of Camas has known of this need to provide more sight vision for cars attempting to merge on to NE Goodwin from NE Ingles Rd, yet no action to paint a white strip has occured. While I applaud the recent modifications in the Friberg-Strunk road project, it did take more than a year to complete this update. Yet, there is still more than a 15 minute backup during peak period use, due to inadequate storage in the new left hand turn lane on to Friberg Rd. Moreover, Friberg Rd. is still not widened as needed, even according to the City's own plans for future infrastructure. Why wasn't this done when the neighborhood were already being greatly inconvenienced?

Very briefly, I'd like to discuss the sewer and water situation in the proposed Green Mountain PRD and save the bulk of my presentation for the traffic gridlock that is inevitable if this project moves forward.

#### Water Supply:

The current water supply available to even Phase 1 of the PRD is inadequate, according to the staff report. A booster pump station is needed and a final engineering plan approval has not been completed. "Neither the DA nor the application materials specify how, when or where the applicant will install the booster pump station (DE-5) or provide a future location for water storage facility (S-6). Additionally, the water system mainline improvements (T-7) and (N-1) are not discussed or identified in the application materials or the DA." This is a <u>serious condition of approval</u>. "Prior to final engineering plan approval for <u>any phase</u> the applicant shall demonstrate to the city's satisfaction that the proposed water system being installed will provide adequate fire flows for the lots proposed." Also, "as noted above, the 2010 WSP identifies Reservoir S-6 within the applicant's site...a condition is warranted requiring dedication of land suitable for construction of a 2.0 million gallon reservoir." This has not happened. The city and applicant <u>have not</u> entered into an agreement specifying the location and size of the land dedication for the reservoir. There is no location for this reservoir and as of yet, undetermined city funds available for this project. Perhaps increased taxes.

**Storm Drainage**—while "there are provisions for regional stormwater facilities in the DA, .....the facilities proposed do not appear to provide a regional function."

"Two of the (three) wet ponds do not meet the location requirements...in that they are not setback a minimum of 30 feet from the street."

The staff report goes on to say, that "Staff is not entirely opposed to the applicant's exception request" for reduced or no setback. Yet the staff report continues to note the developer's inferior design standard pertaining to Planned Residential Developments. Staff then states that they, "strongly recommend to the applicant to consider providing regional stormwater facilities...that can serve a larger area of the proposed PRD."

#### Sewer System highlights:

"Currently there is no public sanitary sewer system serving the Green Mountain Area of Camas." The nearest sewer line (6 inch diameter, no solids) is approximately ½ mile from Phase 1 of the PRD. "The Applicant and the City have been working diligently over the last year to develop a design and financing plan to construct the permanent system with a financial contribution by the applicant. However, to date, a final agreement has not been reached regarding the applicant's proportionate share or other responsibility for constructing the permanent system."

Moreover, in the report, the city provides "guidance with respect to a temporary connection: "Discharge to the STEP system should be temporary because flows from NUGA were not included in the original design of STEP conveyance, and high operation and maintenance costs and unfavorable downstream impacts to conveyance ... have led the City to conclude that further expansion of the STEP service is undesirable."

Translation: this will cost the City of Camas a lot of money to operate and maintain and cause potential pollution impacts downstream even including the Columbia River basin.

"Should the permanent sewer system.... not be constructed prior to engineering approval of subsequent phases, the City may accept additional sewer flows into the existing system.....provided that the applicant and the City confirms that there is adequate capacity in the STEP system." Here again, we see a lack of infrastructure improvement that is the hallmark of everything in this report—a build now, worry about infrastructure later attitude. "As part of the temporary connection to the STEP system, the applicant will also be required to provide a solids retention system acceptable to the city as the existing STEP system is only suited to handle effluent flows" of human wastewater. The applicant has only proposed three large community septic tanks; two are located on the sides of the entry road not far from Lacamas Creek. There is no final engineering plan in place or approved plan at this point in time. In all of these future infrastructure developments, we see the lack of a proactive approach to building needed improvement before the construction of the Green Mountain PRD.

#### Finally, the Road situation:

NE Goodwin Road/NE 28<sup>th</sup> and NE Ingle Road are rural in nature and do not include bike lanes, sidewalks, street lighting, turn lanes or other improvements.

There is, to date, no "agreement in place with the city specifying the improvements to be installed, the cost of those improvements and what part of the improvements are creditable or reimbursable." The Traffic Impact Fee (TIF) update in 2012 designates NE Goodwin Road, west of Ingle Road as a 5 land arterial and as a 3 land arterial east of NE Ingle Rd, but the Traffic Impact Analysis (TIA) conducted by Kittelson & Associates makes clear that three jurisdictions will be affected; namely the City of Camas, City of Vancouver and WSDOT. It is estimated that Phase 1 will increase daily trips by 2050 cars/trucks. At full buildout, with 1300 units and a shopping center, daily trips increase to 17,180 trips a day. Add in the proposed (adjacent) Green Mountain Estates and you now have nearly 21,000 new car/truck trips per day. Yet in spite of the (TIA), (from pg. 7 of staff report) "the applicant has not identified traffic calming features other than the narrowed entry street and the majority of internal streets at 28 feet wide. There is no discussion of traffic calming elements for the remainder of Planning Pod 1 or the other six Planning Pods with the development."

There is ostensibly a right of way dedication along NE Goodwin and NE Ingle Road at least to the west of Ingle Rd for a 5 lane road including bike lanes , but drainage ditches, utility poles, and a bridge across the Lacamas Creek make these improvements prohibitively expensive, problematic, and very disruptive of even current traffic patterns.

**Intersection of NE 199<sup>th</sup> Ave & NE 58<sup>th</sup> St. (SR-500)**—no improvements were recommended for phase 1 in spite of the fact that the crash rate is very high at this intersection. WSDOT designates this part of SR-500 as a highway of non-significance. Therefore, the state has no plans currently for mitigation. For full build out of the PRD, the traffic will increase 73% at peak hours. Staff recommends a potential right turn lane on NE 58<sup>th</sup> street to mitigate this increase. This is farcical, given the normal level of service expected and the inevitable delays at this intersection.

**Intersection of NE Goodwin Rd/NE Ingle Rd**-has one of the highest crash rates in Clark County per the TIA, yet relocating the stop bar on NE Ingle Road 20-25 further south has yet to happen. In addition, the TIA recommends the following:

- An eastbound left turn lane on NE Goodwin Rd at NE Ingle with 100' of storage prior to occupancy of 203<sup>rd</sup> home in phase 1.
- A westbound right turn land on NE Goodwin Rd at NE Ingle Rd with a minimum 100<sup>#</sup> storage prior to occupancy of the 203<sup>rd</sup> home in phase 1.
- More analysis of the implications of 21,000 car/truck trips a day and when warranted it might require the developer to install a traffic signal.

All of this is absurdly inadequate. Any lay fool could understand that the above mitigations are a recipe for traffic nightmares in East County and Camas.

**Intersection of NE 192<sup>nd</sup> Ave/NE 13<sup>th</sup> Street**—The TIA projects that this intersection will not meet the City of Vancouver/s LOS requirements even with the completion of Planning Pod 1. Since NE 192<sup>nd</sup> Ave is a 5 lane arterial TIF eligible, the City of Vancouver may build the upgrade and it is recommended that the developer be required to provide a proportion of the upgrade. Do we all feel better? Sounds like a

lot of ifs, maybes, and buts. There is no discussion that I've seen of widening the road on NE 13<sup>th</sup> from Friberg to 192<sup>nd</sup> Ave.

Intersection of NE 242<sup>nd</sup> Ave/NE 28<sup>th</sup>-after a lot of bureaucracticbabble speak contained in the staff report, there is no proposed mitigation for this intersection at all, even with the full build out of the Green Mountain PRD and the 400 additional homes at Green Mountain Estates that may also be approved.

None of these traffic projections take into account the 21 current new developments in Camas, nor the yet to be proposed developments other than the Green Mountain PRD. Then, there is the 1% traffic growth rate that is figured into it for Camas or the 2% growth rate figured into it for the Vancouver traffic growth rate.

If the Green Mountain PRD passes, our Camas leaders will have guaranteed higher taxes, a diminished quality of life and Traffic Armageddon for at least 15, maybe 20 years for this part of Camas and East County. If you insist on changing our lives forever, at least begin to fund pro-active infrastructure improvements now, consider scaling back massive projects like Green Mountain PRD, and definitely delay implementation of this incompletely planned project until the public supports such a monumental decision. Please do the right thing. Thank you.

Phh H h.X. 6/16/15

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#### Questions for Staff and the Developer from Mark Martin

- 1. Has a detailed planting, mitigation and monitoring plan been provided to the city by the developer? (This is a required condition)
- 2. Has the WDFW supported ELS's contention that phase 1 does not qualify as a biodiversity area?
- 3. Comment (Other phases of PRD are definitely distinctively biodiverse—we would expect further review and respect for these areas)
- 4. Has the WDFW and EIS biologists conducted their survey for Townsend Big-eared Bats? They must do this prior to any development outside of phase 1.
- 5. Will the proposed trails T27, T29 and T30 be open to the general public?
- 6. 14 acres in the center of development is proposed as a central park, but only 5 acres for recreational areas. What is the other 65% of the 14 acres used for?
- 7. Please elaborate on the public viewing area atop Green Mountain. Staff notes, there "only appears" to be such a plan.
- 8. One place in the staff report notes that there will be an 8.8 acre commercial/retail/office area. Yet the traffic study refers to a 90,000 sf. shopping center. Which is it?
- 9. Who will oversee the process of determining if ground dredging digs up Native American artifacts? How will a bulldozer even know if this happens?
- 10. What is the nature of the existing structure found by an archaeologist? Will it be retained in place?
- 11. Why is Exhibit 52, per CMC 16.31 dated 12/19/2015?
- 12. The Staff summary states that 85 acres of open space shall be provided, yet in another part of the Staff report it states that a total of 103 acres is open space. What is the discrepancy?
- 13. Under CMC 16.51.240 preseved wetland areas and their associated buffers are required to be placed in tracts, however, according to staff, it is "unclear if they will be." Why is this?
- 14. Prior to final plat approval, private covenants will need to be submitted to the City. Has this been done yet?
- 15. Has the staff committee as of today walked the site with the developer? We would suggest that actions speaker louder than words or thoughts.
- 16. Would the developer like to comment on traffic calming features, since "there is no discussion of traffic calming element for the remainder of the so-called pods?

# Active developments in Camas, 2014



### COMMERCIAL PROJECTS

- 1. Fisher Creek Campus
- 2. Evergreen Tennis Facility
- 3. County Properties East
- Pedwar Medical Instruments.
- 5. Camas Lakeland
- 6. One Stop Mini Storage

## **RESIDENTIAL PROJECTS**

7. Stoneleaf: 54 lots 8. Breckenridge: 32 lots 9. Parker Village: 76 lots 10. Brady Road.: 29 lots 11. Summit at Columbia Vista (Phase III & IV): 38 lots 12. Cooper's Glen: 10 lots 13. Bishop: 26 lots 14. Lake Hills: About 50 lots 15. Hidden Meadows: 60 lots 16. Belz Place: 107 lots 17. 7th Ave. Townhomes: 12 lots 18. CJ Dens: 297 lots 19. Hills at Round Lake (Phases 4-13): 277 lots 20. North Hills: 44 lots 21. Province Estates: 40 lots