

**BEFORE THE HEARING EXAMINER  
FOR CITY OF VANCOUVER**

In the Matter of the Application of	)	NO. PRJ-161559/LUP-73694
	)	
	)	
<b>Four Seasons Subdivision LLC</b>	)	<b>Four Seasons North PUD</b>
	)	
	)	
	)	
for Approval of a Preliminary Plat	)	FINDINGS, CONCLUSIONS,
and Planned Development	)	AND RECOMMENDATION
_____	)	

**SUMMARY OF RECOMMENDATION**

The Vancouver Hearing Examiner recommends to the City Council that the requested preliminary plat and planned development to allow the subdivision 8.77 acres into 114 single-family residential lots be **APPROVED** subject to conditions.

**SUMMARY OF RECORD**

**Request:**

Four Seasons Subdivision LLC (Applicant) requested approval of preliminary plat and planned development to allow the subdivision of 8.77 acres into 114 single-family residential lots. The subject property is located at 11511 NE 28th Street in Vancouver, Washington.

**Hearing Date:**

The Vancouver Hearing Examiner held an open record hearing on the application on October 15, 2019.

**Testimony:**

At the open record hearing the following individuals presented testimony under oath:

Scott Taylor, SGA Engineering, representing the Applicant  
Phil Wuest, representing the Applicant  
Mark Person, Senior Planner, City of Vancouver

**Exhibits:**

At the open record hearing the following exhibits were admitted in the record:

1. Staff Report, dated October 1, 2019
2. Land Use Application, submitted April 2, 2019

3. Applicant Narrative
4. Development Plans
5. Notice of application, public hearing and optional SEPA determination of non-significance (DNS), dated July 25, 2019
6. Final determination of non-significance (DNS), dated August 28, 2019
7. Clark County Public Health Development Review evaluation, dated February 28, 2019
8. Letter from Department of Ecology, dated August 23, 2019
9. Letter from Southwest Clean Air Agency, dated August 22, 2019
10. Evergreen School District Capacity Letter, dated February 7, 2019
11. Trip Generation and Distribution Report by Kittelson, dated March 14, 2019
12. Trip and Traffic Impact Fee Worksheet, dated September 4, 2019
13. Four Seasons North Parking Assessment by Rick Williams Consulting
14. Preliminary Stormwater Report by SGA Engineering, dated March 19, 2019
15. Geotechnical Investigation by Columbia West, dated November 1, 2018
16. Applicant PowerPoint, submitted October 15, 2019
17. City of Vancouver PowerPoint, submitted October 15, 2019
18. Revision to sewer comments, submitted October 15, 2019

Upon consideration of the testimony and exhibits admitted in the record, the Hearing Examiner enters the following findings and conclusions:

### **FINDINGS**

1. The Applicant requested approval of preliminary plat and planned development to allow the subdivision of 8.77 acres into 114 single-family residential lots. The subject property is addressed as 11511 NE 28th Street in Vancouver, located between NE 28th Street and NE Angelo Drive at the southwest corner of the intersection of NE Four Seasons Lane and NE 28th Street.<sup>1</sup> *Exhibits 1, 2, 3, and 4.*
2. The application was received by the City on April 2, 2019 and determined fully complete on July 11, 2019. Submitted materials included both a concept development plan and a detailed development plan as part of their planned development application. *Exhibits 1, 2, 3, and 4.*
3. The subject property is relatively flat with approximately eight feet of elevation decline at

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<sup>1</sup> The subject property is also known as Assessor Parcels 162742-014, 162742-026, 162742-028, 162742-030, 162742-032, and 162742-034. *Exhibit 2.*

the northern end of the site and does not contain mapping indicators for any environmentally sensitive areas. The site is currently vacant. Surrounding development includes retail commercial to the west, multi-family residential to the south, senior living, a public park and public school to the east, and single-family residential development north of 28th Street. *Exhibits 1 and 16.*

4. The development would include 32 attached single-family residences organized into eight four-unit structures all fronting NE 28th Street, 12 detached single-family structures fronting NE Angelo Drive, and 70 detached single-family residences oriented towards private tracts within the central portion of the site. The residences would be two-story single-family homes, which are allowed uses within planned developments in the R-22 residential district. The project would be developed in a single phase. *Exhibits 1, 3, and 4; VMC 20.420.030; VMC 20.260.020.B(1)(a); VMC 20.260.020.B(2)(a).* All of the lots (100%) would be alley loaded, meaning the subdivision qualifies for the increased lot coverage by structure resulting from narrow lot development standards (discussed in more detail below). Additionally, the proposal would utilize zero lot line development and reduced setbacks for covered porches. *Exhibits 1, 3, and 4; VMC Chapter 20.910 Exceptions & Interpretations; VMC Chapter 20.927 Narrow Lot adjustments.*
5. The subject property is zoned Higher Density Residential (R-22). *Exhibit 1.* The purpose of the R-22 zone is “to accommodate rowhouses, garden-type apartments, and lower-density multi-dwelling structures at a minimum lot size of 1,500 square feet per unit.” *VMC 20.420.020.* Planned developments are a land use development tool intended to provide a means for creating planned environments in any base zoning district through the application of flexible standards, including zero-lot lines, narrower streets, and other innovative planning practices that result in well-designed, efficient and functional urban environments. *VMC 20.260.010.* Planned developments are allowed in R-22 zoning districts. *VMC 20.260.020.*
6. The R-22 zone requires development density ranging from 18.1 to 22 units per acre. Of the gross site area, 0.9 acres would be dedicated as public rights-of-way, 2.58 acres would be dedicated as private access easements, 0.45 acres would be stormwater management facilities, 1.15 acres would be open space, and 0.21 acres would be parking tracts. This leaves a net site area for density calculation purposes of 5.74 acres, meaning the site requires a minimum of 104 dwelling units and a maximum of 126 units. At 114 units, the proposal would provide density of 19.86 units per net acre. *Exhibits 1, 3, and 4; VMC 20.420.040.*
7. The following bulk dimensional standards apply to standard development in the R-22 zone: minimum lot area of 1,500 square feet; minimum lot width of 20 feet and lot depth of 50 feet; minimum landscaped area of 10% of the overall site; and maximum building height of 50 feet. Required setbacks from property lines are as follows: front, 10 feet; rear/through yards, zero<sup>2</sup> to five feet; side yards of zero to five feet; side yards on a street,

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<sup>2</sup> Subject to compliance with zero lot line standards.

10 feet; and garage setback from (front) street, 18 feet, or from (rear) alley, five feet. *VMC 20.420.050*. Maximum allowed lot coverage by structure in the R-22 zone is 50%, which is increased to 65% when more than 50% of proposed units are served by alleys pursuant to the City's narrow lot development standards (addressed in more detail below). *VMC 20.927.050*. Adjustments to applicable development standards can be authorized through the planned development process pursuant to *VMC 20.260.050.B* if a project proponent can show: 1) the adjustment is warranted given site conditions and/or characteristics of the design; 2) the benefits outweigh any potential adverse impacts; and 3) any impacts are mitigated to the extent practical. *VMC 20.260.050.B*.

8. The first modification to development standards under the planned development procedures is a proposed increase in allowed lot coverage by structure from 65 to 75%. This modification would allow for approximately 2,000 square foot buildings (including garages), which the Applicant asserted is the minimum area needed to accommodate single-family homes with two-car garages and adequate living space. The Applicant asserted that typical living space for a three-bedroom home would be about 1,550 to 2,260 square feet and a typical two-car garage would be approximately 460 square feet. As conceptually proposed, approximately 1,700 square foot homes with 400 square foot garages would result in a total of 2,100 square feet of building space, one-half of which is 1,050 square feet. Adding a 250 square foot front porch results in a ground-floor footprint of 1,300 square feet, which is just under 75% of the proposed lot size of 1,750 square feet for most lots. To address the minimal private outdoor space on the resulting lots, the project is designed to provide outdoor area around front porches and an emphasis on green/open space, including a "central green" through the center of the project that would aggregate useable open space into an amenity serving the community. *Exhibits 1, 3, and 4*.
9. The second modification to development standards proposed under the planned development procedures is reduction of minimum lot size for three lots from 1,500 to 1,451 square feet for Lots 93, 96, and 97. These three lots, each proposed to be reduced 49 square feet in area below the minimum lot size standard, would be situated as interior lots on multifamily structures facing NE 28th Street. The Applicant submitted that such a small reduction in area on an interior lot would barely be visually detectable if at all and would result in no impacts. *Exhibits 1, 3, and 4*.
10. A third modification from development standards through the planned development process is a request to deviate from the 20-foot onsite maneuvering room standard for driveways established in *VMC Table 20.420.050 Note 4*, reducing onsite maneuvering room to 18 feet. The Applicant contended that because the alleys have been widened from 16 feet to 20 feet to provide adequate emergency vehicle access, two additional feet of area cannot be provided within the driveways in the lots. Of note, the standard calls for 16-foot alleys and 20-foot driveways, which would provide 36 feet of maneuvering room for vehicles in driveways. As proposed, there would be 38 feet of maneuvering room, meaning the technical deviation would not result in less practical maneuvering room. *Exhibits 1, 3, and 4*.

11. The Applicant asserted that the proposed planned development modifications satisfy the adjustment standards established in VMC 20.260.050.B and are justified in that the project satisfies the City's minimum density standard while creating a housing product and community design believed to be in demand in the current market, with features including small yards, two-story floor plans with two-car garages, and covered front porches, and community oriented open space near the Four Seasons activity center in east Vancouver. Planning Staff agreed that the criteria for granting adjustments under the planned development ordinance are satisfied. *Exhibits 1, 3, and 4; Testimony of Phil Wuest, Chris Robertson, and Mark Person.*
12. All proposed lots would be designed in accordance with narrow lot development standards. Narrow lots are defined in Code as those that are less than 40 feet wide. VMC 20.927.020. Although the minimum lot width requirements of the underlying zoning districts do not apply in planned developments, the Applicant has elected to be subject to the City's narrow lot development standards (VMC 20.927) in order to take advantage of incentives for providing alleys, including in this case zero lot lines and reduced front setbacks for proposed covered porches. In order to qualify for these incentives, the Applicant proposes alley access for 100% of the lots. All other setback requirements will adhere to the development standards of the underlying zoning and planned development standards. *Exhibits 1 and 3.*
13. The subdivision ordinance requires a minimum street frontage of 20 feet per lot. Each of the proposed lots would satisfy this requirement. No flag lots are proposed. *Exhibits 1, 3, and 4; VMC 20.927.020; VMC 20.320.040.H.*
14. To offset the proposed relaxed development standards, VMC 20.260.060.C requires developers of planned developments to provide common open space for active and passive recreational activities in an amount that is at least 10% of the gross site area. The proposed development includes common open space tracts comprising slightly more than 10% of the overall site area and including such amenities as pedestrian connections through the site to nearby retail opportunities, the elementary school, and public park. *Exhibits 1 and 4; Phil Wuest Testimony.*
15. Pursuant to VMC Chapter 20.925, a minimum of 10% of the net lot area of each lot must be landscaped. Compliance with this requirement would be determined at the time of building permit review. In addition to landscaping within lots, street trees are required at a maximum spacing of 30 feet on public and private streets. Recommended conditions of approval address landscaping and street tree requirements. *Exhibits 1 and 4.*
16. The proposal is subject to the requirements of the City's tree conservation ordinance, which requires tree preservation and planting to achieve a minimum of 30 tree units per net acre. VMC Chapter 20.770. Based on a net site area of 5.74 acres, a minimum of 172 trees units are required. The tree plan shows 192 tree units to be planted, which satisfies the minimum required. The City arborist reviewed the proposed tree plantings and recommended conditions to bring the plan into compliance with City tree standards,

which conditions were added to Planning Staff's recommended conditions of approval. This meets the minimum tree density requirement of 30 tree units per acre. *Exhibits 1 and 4.*

17. The subject property is located within the 112th Avenue Corridor Subarea and is subject to the 112th Corridor Subarea Plan Design Guidelines. Per VMC 20.691.030.B, properties within the Plan District are required to provide connecting streets, trails, and open spaces illustrated on the 112th Avenue Corridor Conceptual Site Plan, and to accommodate demographic diversity through a mixture of housing types. The project is designed to incorporate the indicated roadway locations, open space, and connections to NE 28th Avenue and Angelo Drive through the site, as well as east/west pedestrian connections through the site. Buildings adjacent to the proposed alleys are oriented towards the street. City Planning Staff reviewed the proposal against the Design Guidelines and determined that it is consistent with the intent and express provisions of the guidelines. *Exhibits 1, 3, and 5.*
18. The proposal is not known to be a re-plat of a prior subdivision; no subdivision terms or conditions are known to be applicable to the proposal. However, the parcel is located within and subject to an approved 2018 development agreement (M-4251), comprehensive plan amendment, and zone change. Per the development agreement, development of the subject property must meet the following conditions.
  - a. A comprehensive parking study that examines public safety and mobility implications based on reasonable assumptions of residents or visitors use of garages, driveways, alleys or streets for parking. Based on the results of the parking study, the City may require the developer to provide additional parking spaces above current parking standards.
  - b. Compliance with applicable fire access requirements, including implications for any homes proposed for alley access only.
  - c. Compliance with transportation standards, including a traffic analysis demonstrating consistency with intersection performance and capacity standards, and revisions to the proposed street network if necessary to meet those standards.
  - d. Provisions to ensure home frontages are as envisioned in the applicant's concept plan and supporting materials submitted, particularly on 28th Street and the associated planter strip, plantings, and detached sidewalk.
  - e. Provisions to ensure compliance with applicable 112th Corridor Subarea Plan Design Guidelines, such as F.2 limitations on fence height to 36 inches as applied particularly to 28th Street, and internal pedestrian connections.
  - f. Options to facilitate variety and/or openings in any proposed extended and unbroken rows of housing, along 28th Street and within the development.
  - g. If multi-family densities are proposed to be achieved through single-family structures, design provisions shall be incorporated to achieve subarea plan building design guidelines overall intent of reducing scale and adding visual interest, particularly on 28th Street. Homes in the development should be comparable in terms of articulation

and design quality to Four Seasons North Illustrative Concept materials submitted July 25, 2018.

- h. Provisions to facilitate tree retention consistent with the 112th Corridor Subarea Plan.
- i. A requirement to record against the properties covenants, conditions and restrictions that will impose a design review process to ensure all landscaping and building on the proposed development complies with design restrictions and maintenance requirements set forth in the final land use decision approving development of the subject property and that will require future property owners to maintain all private common open areas through a Homeowners Association.
- j. A requirement to ensure pedestrian access is provided from NE 25th Avenue envisioned in the southeastern portion of the rezone site to the NE Angelo Drive roundabout.

*Exhibit 1.* The Applicant contended that the proposal meets the conditions of development agreement M-4251 through the following: by providing street parking and parking in several private tracts for residents or visitors; compliance with fire access requirements; compliance with intersection performance and capacity standards; compliance with applicable 112th Corridor Subarea Plan Design Guidelines; providing home elevations on the concept plan depicting homes that vary; on-site tree retention; creation of a homeowners association to maintain landscaping and buildings; and because the Applicant is providing a pedestrian access from NE 25th Street to the NE Angelo Drive roundabout with the Four Seasons Terrace Subdivision (a separate application from this, PRJ-161378/PIR-71984). Planning Staff concurred that the proposal comports with applicable requirements of the development agreement. *Exhibits 1 and 3.*

- 19. Access to the subdivision would be from two locations on NE Angelo Drive to the south and a private street to the east connecting to NE Four Seasons Lane. All proposed rights-of-way would be private and required to City standards and VMC Title 11. Access to individual lots within the subdivision would be from the internal network of private streets and alleys. No blocks over 800 feet are proposed. *Exhibits 1, 3, and 4.*
- 20. Thirty-two of the proposed lots would front NE 28th Street, which is designated a four-lane minor arterial with center left-turn and bike lanes, which requires a minimum 50 feet half-width right of way and 35 feet paved street half-width per city standard plan T10-08. Existing improvements along the subject frontage of NE 28th Street include asphalt roadway, curb, gutter, substandard attached sidewalks, ADA ramps, street lighting, and storm drainage. The Applicant would be required to upgrade the site's NE 28th Street frontage to include the following actions: dedicate additional right-of-way necessary to meet the minimum required 50-foot half-width standard; remove the existing sidewalk; abandon and remove the two existing mid-block ADA ramps and .all existing driveway accesses; install City standard detached sidewalks with minimum width of six-feet with planting strip; upgrade existing street lights to LED lenses per current City standards; and install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance. *Exhibits 1 and 4.*

21. Twelve proposed lots would front NE Angelo Drive, which is designated a neighborhood circulator requiring a minimum 27 feet half-width right of way and 18 feet paved street half-width per City standard plan T10-14. Existing improvements along the property frontage of NE Angelo Drive include asphalt roadway, curb, gutter, meandering sidewalks, and ADA ramps. There are also Type D ‘acorn-style’ lights located in the existing street median. No additional right-of-way or pavement width is required for NE Angelo Drive; however, additional street lighting will be required. The following improvements would be required including but not limited to the following actions: coordinate and install additional Type D ‘acorn-style’ lights (T21-04) along the frontage of NE Angelo Drive and show them on the civil plans as directed by Traffic; install City of Vancouver standard major commercial-style driveway to serve the proposed private street; upgrade the existing ADA ramp at the northwest corner of the existing private street intersection to meet current standards; and install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance. *Exhibits 1 and 4.*
22. East of the site, NE Four Seasons Lane is designated a three-lane collector arterial with bike lanes, requiring a minimum 35 feet half-width right-of-way and 23 feet paved street half-width per City standard plan T10-12. Existing improvements along the subject frontage of NE Four Seasons Lane includes asphalt roadway, curb, gutter, substandard attached sidewalks, ADA ramps, street lighting, and storm drainage. The Applicant requested a technical road modification request to allow the existing substandard sidewalks along NE Four Seasons Lane to remain in place. The proposed technical road modification request was reviewed and approved with conditions by the City. The following improvements would be required including but not limited to the following actions: dedicate additional right-of-way as necessary to meet the minimum required 35-foot half-width standard; upgrade the existing ADA ramp at the northwest corner of the existing private street intersection to meet current standards; and install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance. *Exhibits 1 and 4.*
23. All proposed interior roadways and alleys would be private streets/alleys. Consistent with the design flexibility conferred through the requested planned development, proposed cross sections of these private streets vary greatly. The City’s Transportation department specifically reviewed the proposed private accesses and determined the following improvements and design features would be required.

Prior to the issuance of final plat approval, the applicant shall construct the portion of NE 27th Way between NE 115th Place and NE 117th Place as a private street with the following City of Vancouver standard improvements:

- 28-foot paved width to allow parallel parking on one side of the street.
- Curb, gutter, 5-foot detached sidewalk, street lighting, ADA ramps, and planting strip shall be installed on the same side of the street as the parallel parking.
- Curb, gutter, and driveway approaches shall be installed on the side of the street opposite from the parallel parking.



- Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.

Prior to the issuance of final plat approval, the applicant shall construct the portion of NE 27th Way located on the east side of NE 117th Place as a private street with the following City of Vancouver standard improvements:

- 16-foot paved width (minimum).
- Flat curbs on both sides of the street per city standard plan T01-01A
- 2-foot center gutter pan
- Perpendicular parking on one side as necessary to meet minimum requirements.
- Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.

Prior to the issuance of final plat approval, the applicant shall construct NE 115th Place as a private street with the following City of Vancouver standard improvements:

- 28-foot paved width to allow parallel parking on one side of the street.
- Curb, gutter, 5-foot detached sidewalk, street lighting, ADA ramps, and planting strip shall be installed on the same side of the street as the parallel parking.
- Curb, gutter, (or gutter pan as appropriate), parallel or perpendicular parking as necessary to meet minimum requirements, 5-foot meandering sidewalk, street lighting, and ADA ramps shall be installed on the side of the street opposite from the parallel parking.
- Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.

Prior to the issuance of final plat approval, the applicant shall construct NE 117th Place as a private street with the following City of Vancouver standard improvements along the side of the street that fronts the subdivision:

- Additional paved width as necessary to provide at least 36-foot total paved width, to allow parallel parking on both sides of the street.
- Curb, gutter, 5-foot attached sidewalk, street lighting, and ADA ramps.
- Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.

The Applicant must also coordinate with the property owner on the opposite side of the street to remove all existing parking restrictions on NE 117th Place, including signage and curb paint.

*Exhibits 1 and 4.*

24. Per VMC 11.80.050.J, the City does not maintain streets, signs, streetlights, or drainage improvements associated with a private street. The proposed private internal alleys would be required to meet the general requirements of City standard plan T10-19, with the exception that the typical rolled curb may be replaced with flat curb as is allowed in narrow lot subdivisions. The following actions would be required including but not limited to the following the interior alleys must be provided with 20-foot paved width (minimum); Flat curbs on both sides of the alley per city standard plan T01-01A; and

two-foot center gutter pan; and all shared accesses must be called out on the plat. In addition, the Applicant would be required to provide a shared access and maintenance agreement for all shared driveways and private streets to cover the cost of maintaining and operating street surface, signs and markings, streetlights, and drainage system, as it applies to private streets and shared driveways. The agreement shall be recorded on all parcels that are party to the private roadway. Shared access and maintenance agreements, which may be incorporated into covenants, conditions, and restrictions (CC&Rs) must be provided prior to final plat approval and must address responsibility for liability, maintenance, maintenance methods, standards, distribution of expenses, remedies for noncompliance with the terms of the agreement, right of use easement, and any other necessary considerations. *Exhibits 1 and 4; Testimony of Phil Wuest and Mark Person.*

25. The Applicant submitted a professionally prepared transportation impact report dated March 14, 2019 and a subsequent addendum to the TIA dated March 29, 2019 (together, TIA). The TIA included trip generation, trip distribution, intersection level of service (LOS) and queuing analysis, collision analysis, and access sight distance analysis. Based on trip generation rates in the documents were based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition, utilizing Land Use Codes 210 – Single-Family Detached Housing, and 230 – Residential Condo/Townhome, the TIA concluded that the project would generate 967 new average daily trips including 76 new AM peak and 99 new PM peak hour trips. All the intersections analyzed were found to operate acceptably even with full build-out of the proposed development under existing and future traffic conditions. The TIA recommended the placement of stop signs at the proposed western private street access to NE Angelo Drive (southbound approach) and at the existing eastern private street access to NE Angelo Drive (southbound approach). These stop signs were incorporated into the City’s recommended conditions of approval. *Exhibits 1 and 11.*
26. The proposed use is located within the #288 Transportation Analysis Zone. Pursuant to VMC 11.70.090, NE 112th Avenue, NE 28th Street, and NE 18th Street are designated Category 1 Concurrency corridors, meaning that the corridors are operating at or above the City’s adopted level of service standards. Pursuant to trip generation projected by the TIA, the anticipated PM peak hour trips distributed to these corridors by the project would not cause the corridors to drop below the adopted level of service standard. *Exhibits 1 and 11.*
27. The narrow lot development standards require provision of off-street guest parking. Pursuant to VMC Chapter 20.927, at least one guest parking space is required for every three narrow lots; guest parking may be located on-street or in common parking areas. *VMC 20.927.030.B; VMC 20.927.040.A(2).* The proposed 114 narrow lots thus require a minimum of 38 guest parking spaces. As proposed, the project would provide 50 off-street and 49 on-street guest parking spaces, far exceeding the minimum requirement. The off-street guest parking is proposed in two areas in the northwest and northeast portions of the project. Conditions of approval would ensure compliance with guest parking development standards. *Exhibits 1, 3, and 4.*

28. In addition to narrow lot development guest parking, VMC Chapter 20.945 requires at least one off-street parking stall to serve residents of each lot, meeting certain dimensional and locational standards. As proposed, each lot would be developed with a two car garage and a two car driveway, exceeding the minimum off-street parking requirement. *Exhibits 1 and 4; Phil Wuest Testimony.*
29. Public water and sewer utility connections are available to the subject property. The Applicant would be required to extended both utilities through the development to serve the proposed lots. Sewer mains and separate service laterals for each building would be required. Any existing septic systems and/or wells discovered onsite would be required to be decommissioned/abandoned in accordance with Clark County requirements. *Exhibits 1, 3, 4, and 11.*
30. The Applicant submitted that the project would be compatible with neighboring uses. The proposed concept plan includes design, landscaping, parking, traffic management, and multi-modal transportation elements that would limit conflicts with adjacent uses. The proposed higher-density single family use is consistent with surrounding development patterns. Planning Staff agreed and submitted that the proposed development is compatible with the adjacent uses. *Exhibits 1 and 3.*
31. The Fire Department reviewed the proposal and determined that it is capable of compliance with the requirements of VMC Title 16 and the International Fire Code. The Fire Department's recommended conditions of approval, which address emergency vehicle access, fire hydrants, and signage among other items, were incorporated into the recommended conditions of approval. *Exhibit 1.*
32. The subject property is located in the service area of the Evergreen School District. Students residing within the subdivision would attend Endeavor Elementary School, Cascade Middle School, and Evergreen High School. The District was provided notice of the proposed development and submitted a letter regarding capacity impacts from the proposal. Planning Staff noted that school impacts would be mitigated through payment of impact fees as required by VMC 20.915, which are currently is \$6,100 per single-family dwelling unit. Any new bus stop locations to serve the project would be determined by the District. *Exhibits 1, 3, and 10; Mark Person Testimony.*
33. The subject property is located within Park District C. No park land dedication is required. The Applicant would be required to pay park impact fees pursuant to VMC Chapter 20.915. The current fee amount is \$2,142 per single-family dwelling unit. Traffic impact fees are \$2,550 per single-family detached unit and \$1,483.10 per single-family attached unit. *Exhibit 1.*
34. An archaeological predetermination was conducted on site; no evidence of archaeological materials was found. Planning Staff recommended a condition of approval requiring work to stop if archaeological deposits are found during construction. *Exhibit 1.*

35. There are no steep slopes or identified geologically hazardous areas onsite. The Applicant submitted a geotechnical study of the subject property to support appropriate design of residences and drainage facilities. The study concluded that the proposed design is compatible with the underlying soils, provided the construction recommendations contained in the report are followed. *Exhibits 1 and 15.*
36. The proposed project would generate more than 5,000 square feet of new impervious surface area and would require an erosion control plan and a stormwater pollution prevention plan (SWPPP). The existing storm system in NE 28th Street, which drains to Burnt Bridge Creek, must be protected from sediment laden runoff during construction. The submitted preliminary erosion control plan was reviewed and determined to be adequate to show that the proposal can meet the requirements of the City's erosion control ordinance (VMC Chapter 14.24). A final erosion/sedimentation control plan and a SWPPP would be required during civil review prior to building permit issuance. *Exhibit 1.*
37. Due to the proposed impervious surface areas, development of the project would also be required to comply with Minimum Requirements #1 through 9 of the City's Western Washington Phase II stormwater permit. An access and inspection easement in favor of the City for all on-site private storm facilities would be required. The application materials included a preliminary stormwater plan and report, which documents demonstrate that the project is capable of meeting the requirements of the City's stormwater ordinance (VMC Chapter 14.25). Proposed improvements include an infiltration system on-site to handle all runoff generated on-site. City Staff noted that connection to the public storm system would only be allowed if infiltration was not possible onsite and would require a flow control BMPs on-site. There are three existing storm treatment facilities on-site that must be maintained. The proposed plans appear to show that one of the facilities would be impacted by the project; if the facility is eliminated, it must be replaced with a comparable runoff treatment facility or runoff to this facility could be redirected to a new facility with enough capacity to handle the existing flow. A final stormwater plan and stormwater report would be required during civil review prior to building permit issuance. *Exhibits 1 and 14.*
38. Pursuant to the State Environmental Policy Act (SEPA), the City of Vancouver assumed the role of lead agency for review of environmental impacts caused by the proposal. After review of the Applicant's environmental checklist and application materials, the SEPA Responsible Official issued a notice of application, public hearing, and optional determination of non-significance (DNS) on July 25, 2019. The City issued a final DNS on August 28, 2019, with an appeal period ending September 11, 2019; no appeals were filed. *Exhibits 1, 5, and 6.* During the 30-day comment period, Clark County Public Health submitted comments indicating that the proposal would be required to be served by public water and sewer and that any on-site sewage components discovered during construction would have to be properly decommissioned. The Department of Ecology submitted comments relating to the standards for solid waste management and water quality. The Southwest Clean Air Agency submitted comments addressing standards for

construction dust management. *Exhibits 1, 7, 8, and 9.*

39. Notice of the application and the public hearing was issued on July 25, 2019. There was no public comment on the application. *Exhibits 1 and 5; Mark Person Testimony.*
40. Planning Staff submitted that, as conditioned, the proposal would satisfy applicable goals and policies in the Vancouver Comprehensive Plan 2011-2030 and the 112th Corridor Subarea Plan by providing new housing, flexibility, and efficiency in creating infill development. Planning Staff recommended approval with the conditions in the Staff Report. The Applicants requested minor modifications to some of the recommended conditions of approval, specifically conditions 31 and 45. Planning Staff agreed to the requested minor language revisions for both conditions. *Exhibit 1; Testimony of Phil Wuest, Chris Robertson, and Mark Person.*

## **CONCLUSIONS**

### **Jurisdiction:**

Per Vancouver Municipal Code 20.210.020 Table 20.210-1, boundary line adjustments are Type I development applications, which are decided by the Planning Official, and preliminary subdivisions are Type III development applications, which are decided by the Hearing Examiner. Per Vancouver Municipal Code 20.260.030, the Hearing Examiner is authorized to hear and issue findings, conclusions, and recommendations on planned developments pursuant to the Type IV review process. Pursuant to VMC 20.210.020.D, when more than one permit is required for a given proposal, all applications are consolidated into a single review subject to the highest type of procedure that applies to any of the applications. For the subject application, this would be a Type IV review process with a recommendation by the Hearing Examiner to City Council.

### **Planned Development Criteria for Review:**

Pursuant to VMC 20.260.050.A, to receive approval for a planned development, the Applicant must demonstrate compliance with all of the following criteria:

1. Content. The concept plan contains all of the components required in Section 20.260.070. Compliance with all applicable standards. The proposed development and uses comply with all applicable standards of the Title, except where adjustments are being approved as part of the concept plan application, pursuant to Section 20.260.030(D)(2).
2. Architectural and site design. The proposed development demonstrates the use of innovative, aesthetic, energy-efficient and environmentally-friendly architectural and site design.
3. Transportation system capacity. There is either sufficient capacity in the transportation system to safely support the development proposed in all future phases or there will be adequate capacity by the time each phase of development is completed.

4. Availability of public services. There is either sufficient capacity within public services such as water supply, police and fire services, and sanitary waste and storm water disposal, to adequately serve the development proposed in all future phases, or there will be adequate capacity available by the time each phase is completed.
5. Protection of designated resources. City-designated resources such as historic landmarks, significant trees and sensitive natural resources are protected in compliance with the standards in this and other Titles of the VMC.
6. Compatibility with adjacent uses. The concept plan contains design, landscaping, parking/traffic management and multi-modal transportation elements that limit conflicts between the planned development and adjacent uses. If zoning districts are shifted per section 20.260.020(C) VMC, there shall be a demonstration that the reconfiguration of uses is compatible with surrounding uses by means of appropriate setbacks, design features or other techniques.
7. Mitigation of off-site impacts. All potential off-site impacts including litter, noise, shading, glare and traffic, will be identified and mitigated to the extent practicable.

Pursuant to VMC 20.260.050.B, adjustments to numerical development standards may be processed as part of the [planned development] request for concept if the applicant can demonstrate compliance with all of the following approval criteria:

1. The adjustment(s) is warranted given site conditions and/or characteristics of the design.
2. The benefits accruing from the implementation of the adjustment outweigh any potential adverse impacts.
3. Any impacts resulting from the adjustment are mitigated to the extent practical.

**Subdivision Criteria for Review:**

Pursuant to VMC 20.320.040, to obtain approval of a preliminary subdivision, the Applicant must demonstrate compliance with all of the following criteria:

- A. Public facilities provision. Appropriate provisions to the extent necessary to mitigate an impact of the development have been made for transportation, water, storm drainage, erosion control and sanitary sewage disposal methods that are consistent with the City's current ordinances, standards and plans;
- B. Proposed improvements. Appropriate provisions have been made for proposed streets, alleys and public ways, utilities and other improvements that are consistent with the City's current ordinances, standards and plans, and Department of Health and/or Washington State Department of Transportation standards and plans, where applicable;

- C. Open space and dedications. Appropriate provisions to the extent necessary to mitigate an impact of the development have been made for open space, parks, schools, dedications, easements and reservations;
- D. Physical characteristics. The design of the proposed short subdivision or subdivision site has taken into consideration the physical features of the site, including but not limited, to: topography, soil conditions, susceptibility to flooding, inundation or swamp conditions, steep slopes or unique natural features such as wildlife habitat or wetlands;
- E. Re-platting of existing subdivisions. When re-platting an existing subdivision, the short subdivision or subdivision shall comply with all of the terms and conditions of the existing subdivision's conditions of approval;
- F. Compliance with all requirements of this title. The proposed short subdivision or subdivision complies with all applicable requirements of this title unless modified through the approval; and
- G. Compliance with State requirements. That the proposed short subdivision or subdivision complies with the requirements of RCW 58.17.110.
- H. Narrow Lot Additional Criteria. Land divisions which contain one or more residential lots having a width of less than 40 feet shall meet additional criteria of VMC 20.927.030 A, B and C.

**Conclusions Based on Findings:**

1. As conditioned, the proposal demonstrates compliance with the criteria for a planned development.
  - a. The Applicant submitted a concept development plan as required by the planned development ordinances. The proposed residential uses are allowed within planned developments and within the underlying R-22 zoning designation. The proposed development would be consistent with the standards of Title 20, with the exception of authorized adjustments and incentives. The requested adjustments to the minimum lot area for three of the 114 lots, maximum lot coverage standards for the detached single-family structures in the interior of the project, and reduced maneuvering room between garages and the 20-foot wide private alley access are consistent with the approval criteria in that they are needed for the two-story/front porch design concept, would contribute to the communal open space resulting in a cohesive neighborhood, and would not result in unmitigated impacts. The conditions recommended by Planning Staff, slightly modified by discussion at hearing, have been incorporated into this recommendation. *Findings 2, 7, 8, 9, 10, 11, 12, 14, 19, 20, 21, 22, 23, 24, 25, and 26.*

- b. The proposal provides for an architectural and site design that is consistent with the 112th Avenue Corridor Plan District. With the proposed alley-loaded lots, central green, and front porches, the residences would have a strong street orientation. The proposed pedestrian connections would promote walking and pedestrian access to nearby jobs and commerce. Trees would be planted in a quantity exceeding minimum ordinance requirements. *Findings 4, 7, 11, 12, 16, 17, and 18.*
  - c. With the recommended street and alley improvements, frontage dedication and improvement, and the stop signs recommend by the Applicant's traffic impact analysis, adequate provisions would be made for transportation system capacity to serve the development. *Findings 7, 10, 12, 17, 19, 20, 21, 22, 23, 24, 25, and 26.*
  - d. Municipal sewer and water are available to serve the development, and stormwater would be infiltrated on-site. No phasing is proposed. The recommended conditions of approval address Fire Department requirements. *Findings 29, 31, 35, 36, and 37.*
  - e. There are no sensitive natural resources on site that would require protection under the critical areas ordinance. Trees would be planted through the site according to approved landscape plans. No archaeological resources were identified on-site; however, a recommended condition of approval includes stop work and notification requirements if archaeological resources are discovered during construction. *Findings 3, 16, and 34.*
  - f. The proposed development would be compatible with adjacent uses. Adjacent lands are developed with higher density residential development, a retirement community, and commerce. Interior guest parking would be provided, and on-street parking would continue to be available to serve adjacent uses. Landscaping and street trees would be provided. *Findings 3, 4, 27, 28, and 30.*
  - g. With payment of mitigation fees and construction of street improvements, off-site impacts would be adequately mitigated. *Findings 19, 20, 21, 22, 23, 24, 25, 26, 32, and 33.*
2. With conditions, the proposal satisfies the criteria for a preliminary subdivision.
- a. Appropriate provision would be made for public facilities, including water, sewer, stormwater control, and transportation. *Findings 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 35, 36, 37, and 38.*
  - b. Appropriate provision would be made for streets, alleys, and utilities. The street improvements would be designed consistent with City standards. Water and sewer would be extended to each lot and through the project. *Findings 10, 12, 17, 19, 20, 21, 22, 23, 24, 25, 26, 29, and 38.*
  - c. Appropriate provision would be made for parks and open spaces. *Findings 8, 14, and 33.*



- d. There are no slopes or other critical areas on-site. Design of the subdivision would take into account the presence of the existing stormwater facilities which must be retained or replaced. *Findings 3, 35, 36, and 37.*
- e. The proposal is not a re-plat of a prior subdivision. *Finding 18.*
- f. The proposal would comply with all applicable requirements of Title 20, except as modified through the planned development process and through use of narrow lot incentives. *Findings 4, 5, 6, 7, 13, 15, 16, 18, 32, 34, and 35.*
- g. Compliance with the above criteria demonstrates compliance with most of the criteria contained in RCW 58.17. In addition to what has already been stated, the proposal makes appropriate provision for schools and students would be bussed. Also relevant is that the City reviewed the proposal under the State Environmental Policy Act and issued a determination of non-significance. *Findings 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, and 40.*
- h. As conditioned, the project would comply with the additional narrow lot criteria. *Findings 4, 12, 13, 27, and 28.*

### **RECOMMENDATION**

Based on the foregoing findings and conclusions, the requested preliminary plat and planned development to allow the subdivision 8.77 acres into 114 single-family residential lots **SHOULD BE APPROVED** subject to the following conditions to be satisfied by the Applicant or successors in interest:

#### *Prior to Civil Plan Approval*

1. The Applicant shall upload the civil plan review set showing all the revisions requested as well as all necessary reports (geotechnical, hydrology, traffic analysis, road modification, etc.). Include a detailed site plan in the civil plan review set. For questions on these requirements please contact 360-487-7804.
2. Grading plan review fees will be due upon submittal of civil plans for review. Contact Permit Center staff at 360-487-7802 to obtain a fee quote.
3. Mains and fire hydrants shall be shown with minimum fire flow provided as required by 2015 International Fire Code Appendix B, B105.2 and Table B105.1.
4. The Applicant shall add a note to the grading plan stating: "In the event that archaeological deposits are encountered during construction, work shall be halted immediately and the City of Vancouver's Community and Economic Development Department and the Washington State Department of Archaeology and Historic

Preservation shall be notified in order for the findings to be investigated and assessed by a professional archaeologist.”

5. The Applicant shall pay concurrency monitoring fees totaling \$1,500.00.
6. An erosion control plan shall be submitted and approved prior to clearing, grading or construction. The plan shall be designed according to the City of Vancouver’s General Requirements and Details.
7. The Applicant shall submit a separate fire response plan.
8. Street trees along NE 28th Street shall be planted a minimum of three feet behind the curb and plant street trees along existing private roads.
9. The Applicant shall increase diversity by reducing the number of dogwoods and planting other flowering trees such as 40 Galaxy magnolias and by reducing number of Green Arrow Cedars and plant 30 Incense Cedars. Per VMC: Replacement trees shall optimize tree diversity; include native species and at least 60 percent conifers; utilize insect and disease resistant trees.
10. The Applicant shall increase diversity by reducing maple numbers, increase Green Vase Zelkovas, incorporate European Hornbeams, and incorporate other species such as Sterling Lindens. Per VMC: Replacement trees shall optimize tree diversity; include native species and at least 60 percent conifers; utilize insect and disease resistant trees. Increase conifers such as Incense cedars along property lines.
11. Spacing of trees to be planted shall be such that it provides for the eventual mature size of the trees. Keep trees ten feet from buildings so that they have room to mature and no closer than 20 feet on center.
12. The Applicant shall coordinate with the Traffic Operations Division to establish placement locations for additional Type D ‘acorn-style’ lights (T21-04) along the frontage of NE Angelo Drive and show them on the civil plans. Prior to the issuance of final subdivision approval, the Applicant shall provide the following for NE Angelo Drive:
  - Install City of Vancouver standard major commercial-style driveway to serve the proposed private street.
  - Install Type D ‘acorn-style’ street lighting as directed by Traffic.
  - Upgrade the existing ADA ramp at the northwest corner of the existing private street intersection to meet current standards.
  - Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.

*Prior to combustible construction*

13. Fire hydrants for emergency use shall be installed, approved and maintained.

14. Fire apparatus access shall be provided and maintained.

*Prior to or during construction*

15. Temporary address signage shall be visible and legible from the street fronting the property for emergency response during construction.
16. The Applicant shall obtain all required permits to complete the sewer service lateral construction.
17. If an on-site sewage system is found during development, it must be properly abandoned. The proposed development must connect to an approved public sewer system.
18. If a well is found during development, it shall be properly decommissioned by a licensed well driller. The proposed development must connect to an approved public water system.
19. The Applicant shall comply with the requirements of the Clark County Public Health Development Review letter dated February 28, 2019.
20. The Applicant shall comply with the requirements in Southwest Clean Air Agency's letter dated August 22, 2019.
21. The Applicant shall comply with the requirements in the Department of Ecology's letter dated August 23, 2019.

*Prior to Final Plat Approval*

22. The Applicant shall submit a final plat application along with two (2) full size copies and 1 reduced 8 ½ x 11 copy of the proposed plat and tree/landscape plan. Applications can be found under Building, Planning and Environment on the City of Vancouver website, [www.cityofvancouver.us](http://www.cityofvancouver.us).
23. A note shall be added to the plat stating that all lots conform to the City of Vancouver driveway spacing standards, per VMC 11.80.110.
24. The following note shall be placed on the final plat: "Homeowners Association is responsible for maintenance of all open space tracts listed on this plat."
25. The Applicant shall satisfy all of the submittal and other related requirements itemized in the projects upcoming Notification of Civil Plan Approval (plan approval letter).
26. The following note shall be added to the final plat: "Development within this subdivision is subject to an approved tree plan. Tree removal is subject to approval by the City of Vancouver. All trees must be planted prior to occupancy per the approved tree plan."

27. The Applicant shall show all easements on the final plat.
28. The Applicant shall add a note to the plat that states: In the event that archaeological deposits are encountered during construction, work shall be halted immediately and the City of Vancouver's Community and Economic Development Department and the Washington State Department of Archaeology and Historic Preservation shall be notified in order for the findings to be investigated and assessed by a professional archaeologist.
29. The Applicant shall submit a copy of the final acceptance letter from the purveyor to the Public Health along with the final plat for signature.
30. Where private streets are included in plats/subdivisions that include conditions, covenants and restrictions (CCRs), the CCRs must include the following statement:  
*WARNING: The City of Vancouver has no responsibility to improve or maintain the private streets contained within, or private streets providing access to, the property described in this plat, nor does the City of Vancouver have responsibility for any of the infrastructure associated with the roadway such as sidewalks, drainage facilities, street lights, curbs, or landscaping.*
31. The Applicant shall provide a shared access and maintenance agreement for all shared driveways and private streets to cover the cost of maintaining and operating street surface, signs and markings, streetlights, and drainage system, as it applies to private streets and shared driveways. Any shared accesses shall be called out on the plat. Shared access and maintenance agreements shall be provided prior to final plat approval and shall either be recorded on all parcels that are benefited by the private improvements or shall be addressed in a legally binding manner through covenants, conditions, and restrictions, as approved by the City.
32. The CCRs must include terms and condition of responsibility for liability, maintenance, maintenance methods, standards, distribution of expenses, remedies for noncompliance with the terms of the agreement, right of use easement, and other considerations.
33. The Applicant shall provide the following for NE 28th Street:
  - Dedicate additional right of way as necessary to meet the minimum required 50-foot half-width standard.
  - Remove the existing sidewalk.
  - Abandon and remove the two existing mid-block ADA ramps.
  - Abandon and remove all existing driveway accesses.
  - Install City of Vancouver standard detached sidewalks with minimum width of six feet and install a planting strip. If the detached sidewalk does not fit within the standard right of way width an appropriate pedestrian easement will be required.
  - Upgrade the existing streetlights to LED lenses per current city standards.
  - Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.

34. The Applicant shall provide the following for NE Four Seasons Lane:
  - Dedicate additional right-of-way as necessary to meet the minimum required 35-foot half-width standard.
  - Upgrade the existing ADA ramp at the northwest corner of the existing private street intersection to meet current standards.
  - Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.
35. The Applicant shall comply with all conditions and requirements set forth in the road modification decision dated August 28, 2019.
36. The Applicant shall construct the portion of NE 27th Way between NE 115th Place and NE 117th Place as a private street with the following City of Vancouver standard improvements:
  - 28-foot paved width to allow parallel parking on one side of the street.
  - Curb, gutter, five-foot detached sidewalk, street lighting, ADA ramps, and planting strip shall be installed on the same side of the street as the parallel parking.
  - Curb, gutter, and driveway approaches shall be installed on the side of the street opposite from the parallel parking.
  - Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.
37. The Applicant shall construct the portion of NE 27th Way located on the east side of NE 117th Place as a private street with the following City of Vancouver standard improvements:
  - 16-foot paved width (minimum).
  - Flat curbs on both sides of the street per city standard plan T01-01A.
  - Two-foot center gutter pan.
  - Perpendicular parking on one side as necessary to meet minimum requirements.
  - Install traffic control devices as warranted, and storm drainage as required by the city stormwater ordinance.
38. The Applicant shall construct NE 115th Place as a private street with the following City of Vancouver standard improvements:
  - 28-foot paved width to allow parallel parking on one side of the street.
  - Curb, gutter, five-foot detached sidewalk, street lighting, ADA ramps, and planting strip shall be installed on the same side of the street as the parallel parking.
  - Curb, gutter, (or gutter pan as appropriate), parallel or perpendicular parking as necessary to meet minimum requirements, five-foot meandering sidewalk, street lighting, and ADA ramps shall be installed on the side of the street opposite from the parallel parking.
  - Install traffic control devices as warranted, and storm drainage as required by the City stormwater ordinance.

39. The Applicant shall construct NE 117th Place as a private street with the following City of Vancouver standard improvements along the side of the street that fronts the subdivision:
- Additional paved width as necessary to provide at least 36-foot total paved width, to allow parallel parking on both sides of the street.
  - Curb, gutter, five-foot attached sidewalk, street lighting, and ADA ramps.
  - Install traffic control devices as warranted, and storm drainage as required by the City stormwater ordinance.
40. The Applicant shall coordinate with the property owner on the opposite side of the street to remove all existing parking restrictions on NE 117th Place, including signage and curb paint.
41. The Applicant shall construct the interior alleys with the following City of Vancouver standard improvements:
- 20-foot paved width (minimum).
  - Flat curbs on both sides of the alley per city standard plan T01-01A.
  - Two-foot center gutter pan.
42. The Applicant shall coordinate with the City's Traffic Engineer to provide stop signs at the locations specified in the Applicant's traffic impact analysis. Information pertaining to the placement of the new stop signs shall be included in the signing and striping plan section of the approved civil plans. Signing and striping plans are required even if not proposing any new striping in the public right-of-way. If no new striping is proposed, then the plan should indicate what exists.

*Prior to Issuance of Building Permits*

43. The Applicant shall pay all applicable fees, including impact fees. Pursuant to Chapter 20.915 of the VMC, the Park, Traffic and School Impact Fees for a single-family residence in this plat are \$1,565.00 (Park District C), \$2,550.00 for single-family detached lots and \$1,483.13 for single-family attached lots (Pacific TIF District), and \$6,100.00 (Evergreen School District). Said fees will be recalculated for building permit application filed more than three years after preliminary plat approval. These fees do not constitute liens against the lots in this subdivision but are collected as a condition of initial building permit issuance.
44. A final summary report by the geotechnical engineer of record shall be prepared and submitted to the City of Vancouver that states the project soils were prepared in accordance with the governing geotechnical report and construction documents. Applicant shall provide a current report with lot specific conditions and compaction test results by final grading. Please send to [inspectionreports@cityofvancouver.us](mailto:inspectionreports@cityofvancouver.us).
45. Future buildings shall look substantially similar to the 28th Street renderings submitted June 20, 2019, or shall otherwise be accepted by the City.

46. Fence heights shall be limited to 36 inches along 28th Street frontage and internal pedestrian connections.

*Prior to Issuance of Certificate of Occupancy*

47. All trees shall be planted in accordance with VMC 20.925.060.
48. This project has been reviewed in accordance with the 2015 International Fire Code as adopted and amended by the Vancouver Municipal Code, Section 16.04. The Applicant will be required to comply with all applicable codes and ordinances even in the absence of plan review comments.

**Issued** November 6, 2019.

By:



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Sharon A. Rice  
City of Vancouver Hearing Examiner