



210 East Fourth Street
 La Center, Washington 98629
 T/360.263.7665

PRE-APPLICATION CONFERENCE NOTES
Peterson Subdivision (2023-025-PAC)

Meeting conducted on Wednesday, July 26, 2023– 2:00 P.M.

PROJECT INFORMATION

Site Address	3214 NW Pacific Highway, La Center, WA 98629 Parcel Nos.: 258766000 and 258631000
Legal Description	#8, #11, #151 & #161 SEC 33 T5N R1EWM 4.65A
Applicant	Andrew Rockwell MJS Investors 503.888.2597 andrewr@mjsinvestors.com 11201 SE 8th Street, Suite 116, Bellevue, WA 98004
Applicant’s Representative	Travis Johnson PLS Engineering 360.944.6519 pm@plsengineering.com 604 W Evergreen Boulevard, Vancouver, WA 98660
Property Owner(s)	Rodney Peterson rodman@tds.net P.O. Box 176, La Center, WA 98629
Proposal	The applicant proposes to subdivide the property into 47 lots for single-family detached (31 units) and attached (16 units) residences in the MDR-16 zone. Prior to subdivision, the applicant proposes to complete a boundary line adjustment (BLA) between Parcel Nos 258766000 and 258631000. The existing single-family home will remain in parcel 258766000 whereas the proposed subdivision will occur on reconfigured parcel 258631000 resulting from the BLA. The site would be accessed from two eastbound local streets from existing intersections at NW Larson Drive developed with Riverside Estates.
Date of Issue	August 7, 2023

SUMMARY

The applicant is proposing to subdivide the site to create 47 fee simple lots with 31 single-family detached residences and 16 single-family attached 2-plex residences. The site is designated Urban Residential (UR) on the City’s Comprehensive Plan map and is zoned Medium Density Residential (MDR-16) on the City’s adopted zoning map.

The site would be served by two public roads (NW 13th Way and NW 11th Street) extending east from the existing intersections at NW Larsen Drive. The applicant's preliminary plat plan appears to show three flag lots that do not meet the minimum lot size requirements as discussed later in this report.

The site is within a category 2 critical aquifer recharge area (CARA), as is most of the City of La Center. There are no specific requirements for residential development regarding category 2 CARAs. The site also contains mapped geologically hazardous areas, fish and wildlife habitat conservation areas (FWHCAs; mapped riparian habitat for Bolen Creek), and potential wetland buffers. All critical areas will require confirmation of their presence by a qualified professional and, if they are present, a critical areas report and critical areas permit to impact them. See Chapter 18.300 below for further discussion.

Based on a review of aerial photos, there appear to be trees along the southern and eastern boundaries of the site. If trees exceeding five inches in diameter at breast height are proposed to be removed, a type II tree cutting permit is required under LCMC 18.350 "Tree Protection." The type II tree cutting permit can be reviewed concurrently with type III preliminary plat application. A mitigation plan is required for trees 10 inches or greater in diameter that are removed.

The site has mostly high-risk and some moderate-high risk of encountering archaeological resources. An archaeological predetermination report will be required for development in these areas as per Table 18.360.020-1.

PRELIMINARY REVIEW

Development Standards

Subsequent application(s) shall address the following development standards. Failure of the City to cite specific requirements of the La Center Municipal Code (LCMC) in this report does not relieve the applicant of the responsibility to meet all applicable criteria. If the proposal changes from what was presented in the pre-application conference, it may trigger other review standards and processes than what is identified in this report.

Applicable Criteria: The application will be reviewed for compliance with the La Center Municipal Code (LCMC): 3.35 Impact Fees; Title 12, Streets, Sidewalks & Public Ways; Title 13, Public Utilities; Title 18, Development Code Chapters: 18.30 Procedures; 18.140 Medium Density Residential (MDR-16); 18.147 Parks and Open Spaces; 18.190 Urban Holding District (UH-10); 18.210 Subdivision Provisions; 18.220 Boundary Line Adjustments; 18.225 Legal Lot Determinations; 18.240 Mitigation of Adverse Impact; 18.245, Supplementary Development Standards; 18.260 Variances; 18.280 Off-Street Parking Requirements; 18.282 Outdoor Lighting; 18.300 Critical Areas; 18.310 Environmental Policy; 18.320 Stormwater and Erosion Control; 18.350 Tree Protection; and 18.360 Archaeological Resource Protection.

Public Works and Engineering Analysis

Chapter 12.10 -- Public and Private Road Standards

City of La Center Engineering Standards for Construction shall apply to all public road improvements unless modified by the director. LCMC 12.10.040.

- NW 14th Avenue (Larsen Road): Was built with half street improvement per city standard detail ST-15, with a 25-foot paved width. Full widening will be required adjacent to the Peterson Property to allow for right of way and paved roadway per the Local Access Standard.

All other interior streets: Full Street improvement per city standard detail ST-15 Local Access

The applicant shall provide full street improvements on interior streets according to the City of La Center Local Access standard ST-15. In addition to the interior street improvements, street lights, street trees, and stormwater improvements are required. LCMC 12.10.190.

The applicant proposes to use a “Knuckle turns” for the north-south interior street. The applicant will need to show that fire trucks or busses can maneuver these turns without impacting the oncoming traffic. It is likely that no parking signs will result at these turns.

Streets and Circulation

The applicant proposes to connect to Larsen Drive aligning with the existing intersections built in phase 1 of Riverside Estates. There appears to be no curb radius at the northeast intersection of W. 13th Way and Larsen Drive. A minimum radius of 25-feet is required. A temporary paved radius may be acceptable until development occurs with the property to the north.

The traffic study shall include traffic impacts, including level of service to all adjacent streets and intersections to the development; including but not limited to:

1. Larsen Drive and Pacific Highway.;
2. Pacific Highway and 10th Street;
3. Pacific Highway and 5th Street;
4. La Center Road and Timmen Road.
5. La Center Road and Paradise Park Road.

The report shall include average daily traffic and peak hour traffic for intersections and streets as noted above. LCMC 18.215.050(n).

Chapter 13.10 -- Sewer System Rules and Regulations

Connection to public sewer is required. LCMC 13.10. All work is to be performed by a duly licensed contractor in the City of La Center. LCMC 13.10.230. Work will be performed using an open trench method unless otherwise approved per LCMC 13.10.200. The Applicant’s Engineer proposes to add 47 homes to the existing 8-inch diameter sewer in in Larsen Drive at NW 11th Street. The applicant will need to verify that this stub to the east exists, and it is good condition. Per the Engineering Standards, the applicant shall provide calculations with a report that shows the future upstream influent and the capacity of the downstream facilities. The applicant shall verify that the downstream sewer has enough capacity for the proposed development and any upstream future development can be supported by the existing downstream system.

Existing septic system must be abandoned or removed as necessary per Clark County Environmental Health permitting.

Chapter 18.320 (Stormwater and Erosion Control)

Section 18.320.120 (1) LCMC states that ground-disturbing activities of more than 500 S.F. are subject to the requirements of *City of La Center Erosion Control Guidelines*. Section 18.320.120 (2)(a) LCMC states that the creation of more than 2,000 S.F. of impervious surface is subject to stormwater regulation.

The applicant proposes to create new impervious interior streets in the subdivision. Per LCMC 18.320.210, treatment best management practices (BMP) shall be sized to treat the water quality design storm, defined as the six-month, 24-hour storm runoff volume.

The applicant proposes to treat stormwater from pollution generating surfaces (impervious) with a detention pond the southeast corner of the site. The applicant will need to show how water quality and detention requirements per the LCMC will be met.

The lots at the south end of the site abuts the existing maintenance road to the pump station. The applicant will need to provide stormwater design so that subsurface or surface drainage from these lots does not affect the road. A drain rock subsurface system was built along the north side of this pump station access road, south of the Peterson Property. The applicant shall not impact this subsurface drainage piping, and additional underground subsurface drainage on Larsen drive and possibly the Peterson property may need to be constructed so that it does not affect the pump station, and adjacent property.

Part of the Peterson Property, north of the site, slopes south to the proposed NW 13th Way public road.

Additional subsurface piping under the proposed roadway, may be necessary to prevent degradation of the new roads.

The applicant will demonstrate how stormwater treatment will be accomplished to meet the 1992 Puget Sound Manual and the City ordinance. In addition, water quantity will need to be managed to meet the engineering standard. The treatment will need to meet the City of La Center and 1992 Puget Sound Manual and the City of La Center standards, which requires compliance with the Water Pollution Control Act and the Water Resources Act.

Per LCMC 18.320.220, if infiltration is used for disposal of stormwater, the project must infiltrate the 100-year storm where local soil types and ground water conditions are suitable. Per the Puget Sound Manual, an emergency overflow above the 100-year storm event needs to be shown. If infiltration of stormwater is not feasible for quality treatment and quantity disposal, stormwater runoff must be detained meeting the requirements of Chapter 18.320 LCMC and then discharged into the existing low point on the site. Clark County Soil Groups or USDA may be used to determine the hydrology of the site. Isopluvials shall be used to determine the design storm frequency (attached). Per the City Ordinance, a forested condition must be used for the pre-developed surface condition. The HEC-1 flood hydrograph package or HEC HMS may be used for hydrologic computation of site quantity control.

The collection system shall be designed by the rational method using HEC-12 1984 edition standards for gutter and storm pipe capacity. As an alternate, WSDOT Hydraulics Manual can be used for inlet capacity design. The 100-year rainfall intensity must be used for pipe capacity design using the rational method. Attached is the City rainfall intensity chart.

Per LCMC 14.10.140, a preliminary stormwater plan and preliminary stormwater report shall be submitted for review as part of the land use application. The stormwater report must also address stormwater how energy dissipation will be accomplished so that the downstream property is not impacted by stormwater.

Downspouts connections from the houses must connect directly into the site stormwater system. Laterals from the storm main in the street must be shown to serve each lot. A Technical Information Report (TIR) is required along with the development plans for approval of the stormwater system.

Maintenance of Stormwater Facility

If the stormwater treatment and disposal facility is within public right-of-way, the applicant shall maintain the facility for two years after development. An operations manual must be submitted for City review approval for the maintenance of the facility in all cases. The City is disinclined to own or maintain the stormwater facility. Stormwater facilities must be located in a separate tract.

Grading

A grading and erosion control permit is required as part of the subdivision plans. As part of the grading plans, finished floor elevations need to be shown for the lots in addition to grading quantities. The plan shall show retaining walls necessary to grade the lots.

The City Erosion Control Standards require that any activity disturbance over 500 S.F. must comply with the City standards. As part of these standards a construction stormwater permit is required from the Department of Ecology and an SWPPP will be necessary as part of the plan submittal to the City. Soil disturbance is discouraged between November and May.

Geotechnical Study. A complete application will include a geotechnical study and report, prepared by a geotechnical engineer or geologist, licensed in the state of Washington. The report shall include at a minimum, testing to support the structural section of the roadway, site building construction, grading, retaining wall design, as applicable, and subsurface drainage. LCMC 18.212.050.

Chapter 15.05 Building Code and Specialty Codes

If the property contains any existing structures (residences, buildings, structures, etc.) a demolition permit is required. The following criteria is required for submittal. Demolition permits can be applied for through our permitting website and are over-the-counter permits.

Materials required for submittal:

- Residential Building Permit Application
- Site Plan
- Asbestos Survey Report (SW Clean Air)
- Septic Tank Decommission Report (Clark County Public Health), if applicable
- Well (Water) Decommission Report, if applicable
- Fuel Tank Decommission Report, if applicable

Apply online: <https://lacenterwa.portal.iworq.net/portalhome/lacenterwa>

Fee: \$100.0

Land Use Analysis

Chapter 8.60 Sign Requirements

If proposed, signs must comply with this chapter including the general requirements (8.60) and requirements for signs in residential zones (8.60.060). One illuminated freestanding sign is permitted at the project entrance provided it is no larger than 32 square feet and no taller than five feet above average grade. Free standing signs must meet the dimensional and configuration requirements of the allowed sign types (monument, single pedestal, dual pedestal, single pylon, dual pylon).

Chapter 18.30.100 Type III procedure

The project would require the following applications: preliminary plat approval, legal lot determination, critical areas permit, a BLA, urban holding overlay removal, as well as potential for a variance and tree cutting permit. Preliminary plats are subject to a Type III review process. Critical areas permits, urban holding overlay removal, tree cutting permits, and the variance are subject to Type II review process. The legal lot determination and BLA is subject to a Type I review. All applications (except the BLA) would be grouped under one review process as permitted under LCMC 18.30.030 and reviewed under the highest order review process. The BLA would follow a Type I review process and must be reviewed under a separate application from the preliminary plat and occur before or be reviewed concurrently with the preliminary plat application. The Type III process would include the following timelines:

- **Completeness Review:** following submittal of the application, the City will review the application to determine if it contains all required information. Projects which undergo pre-application conference reviews are subject to a 14-day completeness review.
- **Notice period:** Once deemed complete, the City has 14 days to issue a notice of application with a combined notice of State Environmental Policy Act (SEPA) review. The notice period runs for an additional 14 days after issued.
- **Type III review period:** Once deemed complete, the City has 78 days to schedule a hearing. The hearing examiner issues a decision on subdivision applications within 14 days following the hearing.
- **Appeal:** After issuance of a decision, there is a 14-day appeal period.

Further information regarding the Type III review process is contained in LCMC 18.30.100

Chapter 18.140 Medium Density Residential

The site is zoned MDR-16, Medium Density Residential. Single-family detached and attached residential dwelling units are a permitted use within the zoning district. The development must meet a minimum density of eight units per net acre. Detached single-family has a maximum density of 12 units per net acre, whereas attached single-family has a maximum density of 14 units per net acre. Net acre is defined as gross area minus area for public rights-of-way, private streets, utility easements, public parks, and undeveloped critical areas and buffers. The gross site area is 6.41 acres. After removing 1.41 acres for right-of-way, 4.99 acres is left as net site area. The proposed density is 9.42 units/acre. At the time of formal application, the applicant should provide density calculations in conformance with the definition of "net density" in LCMC 18.40 excluding public right-of-way, private streets, and public utility easements public parks, and undeveloped critical areas and required buffers, if any. Please note that the density for the areas of the site where attached and detached single-family residences are located will have to be calculated separately to demonstrate they comply with the separate maximum density requirements of 12 and 14 units per net acre.

For single-family detached lots, the minimum lot area is 3,000 square feet and maximum lot area is 15,000 square feet. For single-family attached lots, the minimum lot area is 1,500 square feet and there is no required maximum lot area. The proposed conceptual plan shows lots ranging in size from 2,250 to 9,419 square feet. Lots 32 through 47 are proposed single-family attached, whereas the remaining lots are single-family detached. Lots 14, 21, and 24 are flag lots. The flag “pole” must be excluded from the area requirements under LCMC 18.210.040(3). If the flag pole was excluded in the area as required, lots 21 and 24 likely meet the minimum lot size requirements. The applicant shall consider redesigning these lots to minimize or eliminate flag lots and/or ensure they are compliant with the minimum lot size. Lots 10 and 14 would not meet the minimum lot size requirements due to the required lot beveling when an MDR-16 project is adjacent to LDR-7.5 land – see further discussion below. Alternatively, the applicant can apply for variance for these lots. See Chapter 18.260 below for more information. All flag pole widths meet the minimum width requirement of 20 feet.

Detached single-family lots in the MDR-16 zone are also required to be a minimum of 30 feet wide and 60 feet deep. Lot width is measured at the building setbacks and must average 60 feet at the front and building setback lines. Attached single-family lots in the MDR-16 zone are required to be a minimum of 20 feet wide and 60 feet deep. All lots appear to meet the lot depth and width requirements.

Setbacks are required as shown in Table 1, which varies with product type in the MDR-16 zone. Maximum building lot coverage shall not exceed 60 percent surface area.

See Table 1 for lot dimensional and setback standards.

Table 1. MDR-16 Dimension and Setback Requirements

Standard	Single-Family Attached	Single-Family Detached
Net Density ¹	8 -14	8 -12
Minimum Project Area	2.5 acres	2.5 acres
Minimum Lot Width	20 feet	30 feet
Minimum Lot Depth	60 feet	60 feet
Minimum Area	1,400 square feet	3,000 square feet
Maximum Area	N/A	15,000 s.f.
Maximum Lot Coverage	60%	60%
Maximum Height ⁶	35 feet	35 feet
Setbacks ²		
Minimum Front Setback	10 feet	10 feet
Minimum Garage Setback from Property Line	20 feet	20 feet
Minimum Garage Setback from Alley	3 feet	3 feet
Minimum Side Setback	0 feet attached/4 feet nonattached	4 feet
Minimum Street Side Setback	10 feet	10 feet
Minimum Rear Setback	10 feet	10 feet

¹In a phased project, each phase of the project shall meet the density requirements

²Setbacks and building envelopes shall be identified for each lot on the face of the plat or binding site plan.

⁶The maximum height of a dwelling is depicted in this table; the maximum height of a garage or accessory building is 20 feet.

LCMC 18.140.030(2) requires new lots used for medium density residential purposes to employ a “beveling” technique at the perimeter of the project. New MDR-16 lots abutting the LDR-7.5 zone shall be no less than 90 percent of the total lot area of the minimum lot size of the abutting LDR-7.5 district. Setbacks from the property lines of abutting LDR-7.5 zone shall be no less than 80% of the setback requirement of the abutting LDR-7.5 district. For this project, the proposed single-family detached lots (Lots 9 -14) directly abutting the LDR-7.5 zone to the east. Under the beveling requirement, lots 9-14 shall not have lot sizes less than 6,750 square feet, or no less than 90% of the lot area of the minimum lot size of 7,500 square feet required by the LDR-7.5 district. During the pre-application meeting, the applicant asked whether the beveling requirement applies if the lots abut a critical areas tract for the stream. Staff have determined that the lots do not need to be beveled if separated from LDR-7.5-zoned lands to the east with a critical areas tract.

LCMC 18.140.030(4) requires MDR-16 projects with five gross acres or more to not include more than 75 percent of one housing type. For example, a housing type can be multifamily, single-family attached, or single-family detached. The applicant is proposing the 47-unit project to consist of 16 single-family attached dwelling units and 31 single-family detached dwelling units, which make-up 34 percent and 66 percent of the project and is consistent with the product mixing requirement. However, the City is in the process of updating the MDR-16 code to make this requirement only applicable to MDR-16 projects that are 20 acres or more. If this code amendment is approved, this project could then have a single product type.

If the applicant wishes to have a single product type, Staff recommends that the applicant submit their subdivision application after the code update is approved by City Council. However, if the applicant submits prior to the code update being adopted, the project may be subject to the current code with the product mixing requirement dependent upon the application review timeline. The applicant would have to apply for a Development Agreement to modify the existing code requirement as vested to pursue a single product type.

Please see sections 18.140.040, 18.140.050, and 18.140.070 which contains design standards and requirements for single-family detached and single-family attached housing. Notable requirements include:

- Must be a unifying design theme across units
- Avoid repetitive building massing and facades
- Avoid monotonous rooflines
- Landscaping:
 - A minimum of 15 percent of the site area must be landscaped with permanent underground irrigation. Setbacks must also be landscaped and maintained.
 - If required by the director of Public Works, street trees are required on all street frontages at a minimum of two feet from the curb and at no greater than 30 feet spacing.
 - Outdoor trash and recycling containers must be screened by a six-foot solid fence, if proposed.
 - Landscaping must also meet the requirements of 18.245.060 (see below).
- Required parking shall be provided on the same lot as the building or in shared parking areas located primarily to the rear of or beneath the units. LCMC 18.280 (Off-Street Parking) says that 2 off-street parking spaces are required per unit for *single-family detached* dwellings. 31 single-

family detached dwellings are proposed; therefore 62 off-street parking spaces are required. LCMC 18.280 requires 2 off-street parking spaces plus 1 space for guests for every five units for *single-family attached* development. The applicant is proposing 16 single-family attached units, which requires 32 off-street parking spaces and 3 guest parking spaces. Off-street guest parking shall be provided on plans for the preliminary subdivision application.

- Garages must be setback a minimum of 20 feet. No more than 40 percent of the wall facing a public right-of-way may be a garage door and 25 percent of the garage wall must be windows or doors.
 - For *single-family detached* housing, the garage door cannot extend beyond the front plane of the primary façade. Garages facing an alley shall be set back a minimum of three feet from the rear property line. Garage doors shall have a minimum 50 percent of their area be decorated with glazing, relief panels, or similar ornamentation.
- Parking lots or driveways to individual dwelling units shall connect directly to a local access street that has direct access to an arterial or collector street. This requirement is met as each unit has a garage and driveway connecting to a local access street which provides access to the local roadway network and directly accessing an arterial street, Northwest Pacific Highway.
- *Single-family attached* housing shall not be permitted in clusters greater than six units.
- *Single-family attached* housing may satisfy the minimum landscaping requirement by:
 - Providing 200 square feet of enclosed private outdoor living space per bedroom for each individual dwelling unit and to be located in the rear or side yard of each individual lot; or
 - Providing 200 square feet of common indoor or outdoor recreation area per bedroom for each dwelling unit.
- *Single-family detached* housing must comply with roofline, rain protection, finish surfaces on facades, and color requirements listed in LCMC 18.140.070(2).
- Pedestrian access must be provided from the front door of the units to the public sidewalk. Public sidewalks are required and must be constructed according to the City's road standards.

Chapter 18.147 Parks and Open Spaces

LCMC 18.147 requires any residential development in the MDR-16 zone of 35 units or more to provide publicly accessible park space at a ratio of 0.25 acres per 35 dwelling units. Based on the 47 lots proposed, the applicant is required to provide 0.09 acres of park space. The applicant is proposing a 0.35-acre park, which exceeds this requirement. The required minimum contiguous parks size is 0.25 acres as listed in LCMC 18.147.030(1)(b)(iv).

The required park shall comply with the park design requirements of LCMC 18.147.030(1)(b). The most notable includes:

- The park shall meet Americans with Disability Act (ADA) regulations;
- Parks shall be designed by a licensed landscape architect;
- One contiguous park is desired; however, noncontiguous parks are allowed when the applicant complies with requirements.
- Parks shall be fronted by a public road for at least 40 percent of their perimeter. If not feasible or practicable, a pedestrian pathway or other design element approved by the City to assure free and open public accessibility shall be established through a dedication or a perpetual easement with a minimum width of 20 feet. The pathway connection shall be made from the public street to the park.

- All parks shall have at least 65% of the area improved with usable active play areas and open space.
- A park shall contain the following amenities at a minimum:
 - A paved pedestrian circulation path or sidewalk
 - Two sitting benches, a minimum of four feet long each, for each 0.25 acre of park or part thereof;
 - One trash receptacle for each 0.25 acre of park or part thereof;
 - Bike rack(s) to accommodate a minimum of six bicycles for each 0.25 acre of park or part thereof;
 - One play structure; and
 - One picnic table for each 0.25 acre of park area or part thereof.
- A low fence or impassible vegetative buffer shall be used for the screening of park borders where they abut a residential area. Screening should be a minimum of three and one-half feet in eight and shall not exceed six feet in height. The fence or hedge shall not be sight obscuring.
- Developers are encouraged to incorporate into open spaces other required facilities such as stormwater treatment and detention ponds to provide more open space, however, such areas shall not be used to meet the park area requirements.
- All park improvements required shall be either dedicated to the city or have public access easements established prior to or concurrent with final development approval.

The City is currently updating its Parks, Recreation, and Open Space (PROS) plan. This plan indicates a trail to be placed along the western bank of the off-site creek adjacent to the site. The City recognizes that there is a nearby City park, Riverside Park, to the proposed development to adequately service the site and that the project is an opportunity to develop a segment of this planned trail. Therefore, the applicant can provide a trail within the riparian buffer as allowed per 18.300.060(4)(a) along the eastern project boundary instead of providing the elements of 18.147.030 for a park. LCMC 18.147.030(1)(b)(xv) allows the Director to accept alternative park improvements that meet the intent of the parks and open spaces code. The trail would need to provide park benches, trash cans, and picnic tables.

Chapter 18.190 Urban Holding District (UH-10)

In conjunction with the subdivision application, the applicant shall request to remove the Urban Holding District (UH-10) overlay in accordance with LCMC 18.190.060. Removal of the UH-10 overlay is subject to a Type II review process in accordance with LCMC 18.30.090. The public works director is to review and certify that previously identified capital facilities deficiencies for the land in this overlay have been satisfactorily resolved for development.

Chapter 18.210 Subdivision Provisions

Submittal Requirements (LCMC 18.210.030)

A completed application form and the following materials will be required, prior to a determination of technical completeness:

1. The information listed in LCMC 18.210.010(2), provided an environmental checklist is required for a technically complete application unless categorically exempt.

2. Written authorization to file the application signed by the owner of the property that is the subject of the application, if the applicant is not the same as the owner as listed by the Clark County assessor.
3. Proof of ownership document, such as copies of deeds and/or a policy or satisfactory commitment for title insurance.
4. A legal description of the property proposed to be divided.
5. If a subdivision contains large lots or tracts which at some future time are likely to be re-subdivided, the application shall include a master plan of all land under common ownership in order to provide for extension and opening of streets at intervals which will permit a subsequent division of each divisible parcel into lots of smaller size.
6. A copy of the pre-application conference summary and all information required to address issues, comments, and concerns in the summary.
7. A written description of how the proposed preliminary plat does or can comply with each applicable approval criterion for the preliminary plat, and basic facts and other substantial evidence that support the description. See applicable subdivision review criteria below.
8. The names and addresses of owners of land within a radius of 300 feet of the site. Owner names and addresses shall be printed on mailing labels.
 - a. The applicant shall submit a statement by the assessor's office or a title company certifying that the list is complete and accurate, based on the records of the Clark County assessor within 30 days of when the list is submitted.
 - b. If the applicant owns property adjoining or across a right-of-way or easement from the property that is the subject of the application, then notice shall be mailed to owners of property within a 300-foot radius, as provided above, of the edge of the property owned by the applicant adjoining or across a right-of-way or easement from the property that is the subject of the application.
9. Applications associated with the preliminary plat, such as exceptions, adjustments or variances to dimensional requirements of the base or overlay zones or for modifications to the road standards in Chapter 12.10 LCMC that are required to approve the preliminary plat application as proposed.
10. A boundary line adjustment application is required The BLA shall be completed prior to issuance of a decision on the preliminary subdivision application.
11. A geotechnical study is required, since the site slopes are as steep as 25 percent and may meet the definition of a "landslide hazard areas" in LCMC 18.300.030 and will contain substantial fill.
12. A critical areas report is required since there is an off-site Type F stream (Bolen Creek) with a riparian buffer that includes eastern portions of the project site and with a potential occurrence of a wetland buffer.
13. A tree protection plan is required and to be prepared by a certified arborist or landscape architect in accordance with LCMC 18.350.060(2). The plan shall include an inventory of all trees on-site, their health or hazard condition, and recommendations for treatment of each tree. The plan shall be drawn to scale and include the requirements as listed in LCMC 18.350.060(2)(a through j). A mitigation plan shall be required for trees that are 10-inches in diameter or greater in accordance with LCMC 18.350.050.
14. Preliminary grading, erosion control and drainage plans, which may be a single plan, consistent with applicable provisions of Chapter 18.320 LCMC.
15. Evidence that potable water will be provided to each lot from a public water system, and that each lot will be connected to public sewer.
16. A phasing plan, if proposed.

17. Conceptual elevation plans to indicate compliance with the MDR-16 design requirements (LCMC 18.140.040), specific requirements for single-family attached (LCMC 18.140.050) and single-family detached (LCMC 18.140.070).
18. An archaeological predetermination report in accordance with LCMC 18.360.
19. Additional information:
 - a. A traffic study (please consult with the City Engineer regarding intersections to be studied.)
 - b. A completed SEPA environmental review checklist.
 - c. A signed *Agreement to Pay Outside Professional Review Expenses Related to Land Use Application*. (Provided during the meeting.)
20. A preliminary stormwater report in conformance with LCMC 18.320.

Vesting: Applications are vested in the current version of the code on the date the City deems the application to be technically complete.

Subdivision Approval criteria (LCMC 18.210.040[1]): The applicant carries the burden of proof to demonstrate that the proposal complies with the following City regulations and standards:

- Chapter 12.05 LCMC, Sidewalks;
- Chapter 12.10 LCMC, Public and Private Road Standards;
- Chapter 15.05 LCMC, Building Code and Specialty Codes;
- Chapter 15.35 LCMC, Impact Fees;
- Chapter 18.245 LCMC, Supplemental Development Standards;
- Chapter 18.300 LCMC, Critical Areas;
- Chapter 18.310 LCMC, Environmental Policy;
- Chapter 18.320 LCMC, Stormwater and Erosion Control;
- The subdivision must make appropriate provision for parks, trails, potable water supplies and disposal of sanitary wastes; and
- The subdivision complies with Chapter 58.17 RCW.

Flag Lots (LCMC 18.210.040[3]):

Lots 14, 21, and 24 are flag lots and flag lots are discouraged (although not prohibited) under LCMC 18.210.040. The applicant should explore other lot arrangements and demonstrate why flag lots are necessary and why a different lotting pattern is not possible. If the City allows the flag lots, the flag “pole” must meet the following requirements:

- Shall be 20 feet wide;
- Must be improved with an all-weather surface and have an unobstructed vertical clearance of 13.5 feet and an improved width of 20 feet;
- The pole portion cannot count toward the total lot size;
- If more than 150 feet long, an International Fire Code-approved turn-around is required;
- Where flag lots are not provided but access easements across abutting properties to public or private rights-of-way are provided, the standards of LCMC 12.10.220 shall apply.

Please note that the definition of a flag lot per LCMC 18.40 means a lot the developable portion of which is separated from the public right-of-way to which the lot has direct access by a narrow strip of land often used as a driveway. Creation of a flag lot is subject to additional standards in LCMC Chapter 18.210.

Subdivision General Issues:

1. To approve the preliminary plat, the Hearing Examiner must make an affirmative finding that “appropriate provision for potable water supplies and for the disposal of sanitary wastes, sidewalks and pathways provide safe routes for pedestrians and to schools, adequate protections and mitigations for critical areas, roadways are design for safe and efficient vehicle access, stormwater and erosion control is adequately addressed, and building and development codes are being met”.
2. All existing wells and septic systems must be properly decommissioned prior to final plat.
3. The City may refuse bonds in lieu of improvements at the time of final platting if such bonding has not been previously discussed and documented.
4. The preliminary plat shall expire five years from the date of the Final Order. RCW 17.58.140(3)(a).
5. Phasing is permitted. All phases must be identified on the preliminary plat and be consistent with the lot number sequencing.

18.210 Boundary Line Adjustment

The applicant has indicated in the provided narrative that a BLA is to be completed to leave approximately 2.2 acres with the existing home on parcel 25876600, which is directly north of the proposed subdivision. The remaining 6.41 acres resulting from the BLA on parcel 258631000 will be developed into the proposed subdivision. The BLA must can be completed prior to issuance of a decision on the subdivision application. LCMC 18.220.010(3) includes the following submittal requirements:

1. A completed application form
2. Appropriate Fee
3. Sales history since 1969 for each parcel to include required copies of additional information as listed in LCMC 18.220.010(3)(c).
4. A site plan showing current conditions, including items as listed in LCMC 18.220.010(3)(d).
5. A site plan showing proposed conditions, including items as listed in LCMC 18.220.010(3)(e).

The applicant shall demonstrate compliance with the following approval criteria pursuant LCMC 18.220.010(4):

1. No additional lots are crated that do not meet current zoning of the property.
2. Lots must meet current size requirements including minimum width and depth requirements.
3. Lots must be buildable.

An alternative option to the BLA application is to include the existing home and its accessory structures within the proposed subdivision on its own lot. This may help simplify the review process for City staff, the applicant, and the homeowner.

18.225 Legal Lot Determinations

Staff will complete a legal lot determination concurrent with the review of the consolidated land use application. Please provide information required by this Chapter (see LCMC 18.225.010[4]) including any prior city/county short plat, subdivision, or legal lot determinations; a sales or transfer deed history dating back to 1969; prior segregation request, if any; prior recorded survey, if any; and any other information regarding the legality of the lot. The lots must be legal to develop on them as opposed to just being tax parcels. Please note that staff did not locate any subdivisions or surveys in a preliminary review of Clark County information.

18.240 Mitigation of Adverse Impacts

The applicant will need to respond to this code section in their narrative as part of the type III preliminary plat application, type II critical areas, urban holding overlay removal, tree permit, and variance applications, and type I legal lot determination.

18.245 Supplementary Development Standards

18.245.020 Height of fences and hedges

If fences are proposed, they must meet the requirements of this section including that:

- They are not more than 6 feet in height in the side yard, street side yard, or rear lot lines and cannot extend into the front yard. Site distance requirements must be met.
- Prohibited materials include fiberglass or plastic sheeting, barbed wire, razor ribbon or other similar temporary material.

18.245.040 Lighting

Lighting must meet the requirements of 18.282 Outdoor Lighting (i.e., be dark sky compliant) and must not cause more than one foot-candle measured at any property line.

18.245.060 Landscaping

Landscape screening is required around the entire proposed development. Landscaping requirements are as follows:

- An L1, 5-foot-wide screen is required on an MDR-16 zoned site when abutting LDR-7.5 zoning or other MDR-16 zoned properties either separated by a street or not. The L1 standard, when less than 10 feet deep, must provide one tree per 30 linear feet of landscaped area. Groundcover plants or shrubs must fully cover the remainder of the landscape area. The L1 buffer can be contained within the private properties behind fence lines.
- The City has the ability to approve the use of existing vegetation on-site to satisfy landscaping requirements. The existing trees and other vegetation along the southern boundary of the site might be able to substitute for the L1 screening requirements in conjunction with meeting the City's tree preservation requirements in LCMC 18.350.
- All landscaped areas must meet the landscape standards of 18.245 including:
 - Landscaped stormwater areas may satisfy landscaping area requirements.
 - Rooftop and ground-level exterior equipment shall be screened to an F2 or L3 standard.
 - Landscaping must meet size requirements in 18.245.060(11-14).
 - Permanent built-in irrigation is required or a statement from a landscape architect is required to have a temporary irrigation system during establishment. Alternatively, no irrigation system is required if plantings will survive by rainwater as certified by a landscape architect and plants must be monitored for replacement of plants that don't survive.

Chapter 18.260 Variances

Minimum lot sizes for Lots 10 and 14 do not meet the City's requirements. The "pole" portion of flag lots, cannot be counted toward the total lot area and Lot 14 appears to be less than the minimum lot size area standard. Lot 14 does not meet the beveled minimum lot size requirement for lots directly adjacent to the LDR-7.5 zone as further discussed in Chapter 18.140. The same applies for Lot 10, however, it is not a flag lot. Therefore, these lot designs need to be redesigned prior to formal subdivision application or the applicant needs to apply for and receive approval of a Type I application if the varied standards are less than 10% or Type II application if the standards vary 10 to 20 percent.

If applying for a variance, the applicant must respond to the variance criteria in LCMC 18.260.040. The variance criteria require that there be an unusual circumstance such as site size or shape and that the circumstance is not a result of actions taken by the applicant. Minor site redesign should be explored prior to applying for a variance. The variance application should address why it is not possible to comply with the MDR-16 lot dimensional standards.

LCMC 18.270.040 Temporary sales offices/model homes

Sales offices are subject to type I review. The temporary use shall be within the boundaries of an approved subdivision. It shall not be permanently approved for temporary use and will not be materially detrimental to public health, safety, or welfare, nor injurious to property or improvements in the immediate vicinity. It should meet the setbacks and vision clearance required of Chapter 18 and building and fire codes. The hours of operations should be specified. The use shall cease and convert to a permitted use with a year of approval. The applicant can reapply for the permit if an additional year of the use is necessary. Adequate utilities and parking should be available to serve the temporary use, and the use should not use required off-street parking areas for adjacent or nearby uses. This application is typically completed after final plat approval and recordation and at the time of building permit for the temporary sales office.

The required materials for submittal are:

- Land Use Application
- Authorization from property owner.
- A legal description of the site
- Preliminary plan/site plan
- Written description (narrative) of how the application complies with code

LCMC 18.280 Off-Street Parking and Loading

18.280.010 Off-Street Parking Requirements

Off-street parking requirements apply. Two spaces per dwelling unit for single-family detached are required which can be either in garages or in driveways or a combination. Two spaces per dwelling unit plus one guest space for every five units is required for single-family attached. The non-guest spaces can be either in garages or in driveways or a combination or the guest spaces must be its own off-street parking area.

LCMC 18.282 Outdoor Lighting

The City adopted new outdoor lighting requirements in 2019 to reduce light pollution and in compliance with dark sky guidelines. The code contains specifications for lighting spectrum and luminance limits. These standards apply to exterior residential lights such as front and rear porch lighting. Please review these requirements before selecting lighting fixtures.

18.300 Critical Areas

There are several critical areas mapped for the project on the project site by various data sources. These include a Type II Critical Aquifer Recharge Area (CARA), a riparian buffer (FHWCA) from an off-site Type F stream (Bolen Creek), geologically hazardous areas (slopes greater than 15%, severe erosion hazard areas, and areas of potential instability), and off-site riverine wetlands associated with the off-site stream.

LCMC 18.300.090(1) Critical Aquifer Recharge Areas

The site and all of La Center is mapped as a Category II (CARA). However, La Center’s code does not contain any requirements for Category II CARAs. A critical areas permit is not required for development within a Category II CARA.

LCMC 18.300.090(2) Fish and Wildlife Habitat Conservation Areas

According to Clark County MapsOnline, the eastern edge of the site is within a riparian habitat buffer from, Bolen Creek. According to Washington Department of Natural Resources (DNR) GIS resources, this is a fish-bearing (Type F) stream. A Type F stream requires a 200-foot riparian buffer in accordance with Table 18.300.090(2)(f). A critical areas report will be required to assess the extent of the riparian buffer, impacts from the proposed development, and resulting mitigation required. The report shall be completed and consistent with the requirements of LCMC 18.300.090(2)(d). If mitigation is required, a mitigation plan must be provided in consistence with LCMC 18.300.090(2)(i, j, and k). This critical areas report shall be provided at the time of preliminary subdivision application to determine if a critical areas permit is necessary. If necessary, the critical areas permit will be reviewed in conjunction with the preliminary plat. LCMC 18.300.090(2)(h) prohibits platting of urban residential lots within riparian buffers. Therefore, lots 9-13 will have to be redesigned to exclude the full riparian buffer width of 200 feet in this location.

Please note that the City is updating its fish and wildlife habitat conservation regulations. Buffer widths may change and could increase. Anticipated adoption is fall or winter of 2023.

Figure 1. Riparian Habitat (in striped green)



LCMC 18.400.090(4) Geologically Hazardous Areas

Because onsite slopes are steep with areas of severe erosion hazards and potential instability as shown in Figures 2 and 3, the applicant is required to provide a geotechnical report assessing the potential for landslide hazards. If a landslide hazard exists, the applicant's report should address LCMC 18.300.090(4) including alterations to geologically hazardous areas (b) general design standards for landslide and erosion hazard areas (c) and design standards for landslide hazards (d).

Figure 2: Severe Erosion Hazard Areas (in brown)



Figure 3: Areas of Potential Instability



LCMC 18.300.090(5) Wetlands

As shown in Figure 4, the National Wetlands Inventory (NWI) maps an off-site riverine wetland along Bolen Creek. Wetland regulations are located in LCMC 18.300.090(5). A critical areas report is required to assess the extent of the wetland buffer, impacts from the proposed development, and resulting mitigation required, if applicable. The critical areas report shall provide wetland delineation, ratings, and buffering in accordance with LCMC 18.300.090(5)(g, h, and i); impacts and mitigation in accordance with LCMC 18.300.090(5)(k through p); and wetland buffer reductions, if any, in accordance with LCMC 18.300.090(5)(j). This critical areas report shall be provided at the time of preliminary subdivision application to determine if a critical areas permit is necessary. If necessary, the critical areas permit will be reviewed in conjunction with the preliminary plat.

Please note that the City is updating its wetland regulations. Buffer widths may change and could increase. Anticipated adoption is fall or winter of 2023.

Figure 4: Riverine Wetland



Chapter 18.310 Environmental Policy

The proposed development which includes provision of more than four residential dwelling unit exceeds the City’s SEPA exemptions. The applicant must provide an environmental checklist along with the subdivision application. The City will issue a SEPA determination during the application review period and at least 15 days prior to the public hearing. The City will run the SEPA comment and land use comment period concurrently and will not make a decision on the land use application until after the close of the SEPA comment period.

Chapter 18.350 Tree Protection

If any tree greater than 5” diameter at breast height (DBH) is proposed to be removed, a tree cutting permit and mitigation plan will be required. A tree protection plan will also be required in accordance with LCMC 18.350.060. The tree protection plan must depict all trees on the site, their health or hazard condition, and recommendations for the treatment of each tree. The tree protection plan must be prepared by an arborist or a landscape architect. The tree protection plan must show planting of new trees to replace the trees to be removed.

Mitigation may consist of replanting on or off-site or payment in lieu of planting. LCMC 18.350.050. For each tree that is greater than 10 inches in diameter, one, two-inch deciduous tree or a six to eight-foot

evergreen tree is required to be planted. The City can require that the development design be revised to preserve existing trees.

Chapter 18.360 Archaeological Resource Protection

The site is identified as having a moderate to moderate-high risk of containing archaeological resources and must file an archaeological predetermination report as per Table 18.360.020-1. Predetermination reports must contain the information in 18.360.080(4). Based on the findings of the predetermination report, further archaeological work or a full archaeological survey may be required.

Questions:

Staff are providing the following answers to questions asked by the applicant in their pre-application submittal.

1. Are walls allowed in stormwater ponds?

Response: Walls are allowed in the stormwater pond, as long as the water quality and quantity treatment of the pond or bioswales are not affected. Walls that are over 4 feet high from the top of the wall to the bottom of the footing, except for surcharged walls, require a building permit.

2. What is the process and timeline for a BLA?

Response: A BLA is a Type I process, which according to LCMC 18.30.050 and 18.30.080, completeness shall be issued within 14 days of a complete application with a decision made within 21 calendar days of technical completeness.

3. What are your current permit timelines for preliminary plats?

Response: Please see Chapter 18.210 of these pre-app notes for approximate timelines for preliminary plats.

4. What are your current permit timelines for engineering/construction plans? Can they be submitted while the preliminary plat is being reviewed?

Response: Generally, the review time for Engineering/Construction plans can vary based on the city's work load. Generally, the first review for Engineering plans is at least 3 weeks, and subsequent review timelines can be shorter, depending on the revised plan response from the applicant. Once the public hearing has been completed, and conditions are established, the applicant can submit Engineering Plans for review, with an agreement between the applicant and city that comments to the site plan can affect potential changes to the Engineering Plans.

5. Please provide all current impact fees. Can you provide a sample building permit showing the calculation of single-family building permit fees? DR Horton permit?

Response:

Building Fee schedule

- <https://www.codepublishing.com/WA/LaCenter/#!/LaCenter15/LaCenter1505.html#15.05.050>

Impact Fees (per ERU)

- Park Impact Fee
 - \$2,842.00
 - Single Family Residence
- Traffic Impact Fee
 - \$7,561.00
 - Single & Multi-Family Residence
- Sewer Development Charge (North of Bridge)
 - \$7,800.00
 - Single-Family Residence
- School Impact Fee
 - \$3,501.00
 - Single-Family *as set by the La Center School District

Example Fee Breakdown:

- Single-family detached
- MDR-16 zoning
- 1717 Sf livable space
- 436 Sf utility/unfinished space

Fee	Description	Amount
Building Permit	Building Permits	\$2,092.72
Building Plan Review	Plan Check Fees	\$1,360.27
Residential Code Council - First Living Unit	Building Code Council - SFR or First Unit	\$6.50
Permit Issuance	Mechanical Permits	\$65.00
Permit Issuance	Plumbing Permits	\$65.00
Right-of-Way	Right-of-Way Permit	\$80.00
Erosion Control Fee	Erosion Control Permit	\$25.00
Park Impact Fee (PIF) General SFR & MFR	Impact Fees - Park	\$2,842.00
School Impact Fee (SIF) General SFR & MFR	Impact Fees - School	\$3,501.00
Traffic Impact Fee (TIF) General SFR & MFR	Impact Fee - Traffic	\$7,561.00
Sewer Development Charge (SDC) General SFR	Impact Fees - Sewer	\$7,800.00
Sewer Residential Connection	Sewer Connection Residential	\$95.00
Fixtures and Vents on One Trap	Plumbing Fixtures	\$190.00
Air Handlers <10,000 CFM	Mechanical Permits	\$15.00
Appliance Vents	Mechanical Permits	\$24.00
Appliances	Mechanical Permits	\$90.00
Furnaces-over 100,000 Btu/h (29.3 kW)	Mechanical Permits	\$20.00
Heat Pumps/AC 0-3	Mechanical Permits	\$12.00
Ventilation and Exhaust-Hood	Mechanical Permits	\$15.00
Water Heaters	Plumbing Permits	\$15.00
	Total	\$25,874.49

6. Are there any late-comer fees attached to these parcels? If so, please provide.

Response: No, there are currently no latecomer fees attached to these parcels.

7. Are there any pending traffic mitigation requirements, other than impact fees?

Response: No. There is no pending traffic mitigation, other than recommendations by the consultant's traffic report.

8. Will fire sprinklers be required in these single-family homes?

Response: See Clark Cowlitz Fire and Rescue pre-application conference notes.

9. Will there be a Design Review required of the single-family homes?

Response: No. La Center does not have a design review process.

10. Will an arborist report be required with the Preliminary Plat application?

Response: It appears that there may be a few trees along the southern and eastern boundary of the project. An arborist report, tree protection plan, and tree mitigation plan will be required in accordance with LCMC 18.350.050, 18.350.060, and 18.350.080.

11. If the Geotech supports a reduced setback off of the steep slope, would staff also support it?

Response: There are mapped landslide hazards along the eastern project boundary and are subject to the buffer design standards of LCMC 18.300.090(4)(d). The minimum buffer size shall be 50 feet from the edge of the landslide hazard area. This buffer can be reduced to a minimum of 25 feet when a qualified professional demonstrates the reduction will provide adequate protection for the proposed development, adjacent development and uses, and the subject critical area. Where reduction of the buffer is not recommended by a qualified professional, development encroachment within the buffer may be allowed provided the qualified professional demonstrates that the site alteration will not impact a landslide area and/or the adjacent properties. This buffer may be increased where the review authority or qualified professional deems necessary to prevent risk of damage to proposed and existing development. This buffer is to be clearly staked before and during any construction or clearing. All portions of landslide hazard areas and buffers shall be designated as a landslide protection area and recorded as such on the approved site plan or plat. Staff also want to inform that this landslide hazard area is within the stream/wetland buffer, so the requirements of these buffers would likely be more restrictive.

12. Do the beveling standards in section 18.140.030(2) apply on the east end of the site given that immediately adjacent LDR land is undevelopable due to critical areas?

Response: The beveling standards is triggered by zoning and not by adjacent land use, therefore, the beveling requirement applies.

13. The applicant does not desire to include multifamily or attached housing in the development. Is there any flexibility in regard to section 18.140.030(4) "Product Types"? could the applicant provide zero lot line detached homes that would be functionally very similar to the size, density, and style of attached homes?

Response: The current code provision per LCMC 18.140.030(4) requires the mixing of product types, with no single product type exceed 75 percent of the entire project. If duplexes are proposed, they are considered attached single-family homes and would meet the requirement not to provide more than 75 percent of one product type in combination with the remaining lots being for detached single-family residences. The City’s code does not allow for zero-lot line detached single-family residences, so these cannot be used to meet the product mixing requirement.

It is important to note that the City is updating its MDR-16 code and includes amending the minimum project size threshold for the product mixing requirement from 5 gross acres to 20 gross acres. Anticipated adoption is early fall.

Application Fees

Based upon the information provided to date, we estimate that the land use application fees will include:

- Preliminary long plat: \$3,000 + \$125 per lot + cost recovery*
- Variances: Type I & II \$180 + cost recovery, Type III \$240 + cost recovery*
- Boundary Line Adjustment: \$425 + \$75 per lot + cost recovery*
- SEPA: \$510 + cost recovery*
- Legal lot determination: \$425 + \$75/lot (> or = to 2 lots) + cost recovery*
- Tree cutting permit: \$60 + cost recovery*
- Final long plat: \$920 + \$60 per lot + cost recovery*

*Cost recovery (requires a reimbursement agreement); actual cost of staff, consultants, and/or hearing examiner plus 10 percent. This fee is applicable as part of a land use action or development review (i.e., traffic study, preliminary/final plat review).

Attachments

July 26, 2023 – Attendees

Name	Organization Name	Email Address	Phone Number
Bryan Kast	City of La Center	bkast@ci.lacenter.wa.us	360-263-5189
Tony Cooper	City of La Center	acooper@ci.lacenter.wa.us	360-263-7665
Jessica Nash	City of La Center	jnash@ci.lacenter.wa.us	360-263-7664
Ethan Spoo	WSP	ethan.spoo@wsp.com	360-823-6138
Alec Egurrola	WSP	alec.egurrola@wsp.com	360-823-6133
Josh Taylor	Clark Cowlitz Fire & Rescue	josh.taylor@clarkfr.org	360-887-6227
Andrew Rockwell	MJS Investors	andrewr@mjsinvestors.com	503-888-2597
Travis Johnson	PLS Engineering	pm@plsengineering.com	360-944-6519
Jayson Taylor	PLS Engineering	jayson@plsengineering.com	360-944-6519
Rob Risinger	MJS Investors	robr@mjsinvestors.com	503-888-2597