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PRE-APPLICATION CONFERENCE
La Center Elementary School Playground Structures (2024-007-PAC)
 Meeting conducted on Wednesday, March 20th, 2024

PROJECT INFORMATION

Site Address	2001 NE Lockwood Creek Road, La Center, WA
Legal Description	NE 1/4 S03, T4N, R1E, W.M., Clark County, Parcel 62674
Applicant/Property Owner	Peter Rosenkranz, Superintendent La Center School District 725 Northeast Highland Road La Center, WA 98629 Contact: 360-263-2131, peter.rosenkranz@lacenterschools.org
Applicant's Representative	Brad Kilby, AICP HHPR, Inc. 205 Southeast Spokane Street Portland, OR, 97202 Contact: 503-221-1131, bradk@hhpr.com
Proposal	Applicant is proposing to cover existing exterior play areas located directly south and west of the existing school. The covered areas would collectively cover approximately 7,965 square feet. Option 1 would consist of a structure covering 3,840 square feet of existing play area and Option 2 would consist of a structure covering 4,125 square feet of existing play area.
Date of Issue	March 20, 2024

SUMMARY The La Center School District is proposing to cover existing exterior play areas located directly south and west of the existing elementary school. The covered areas would collectively cover approximately 7,965 square feet. Option 1 would consist of a structure covering 3,840 square feet of existing play area and Option 2 would consist of a structure covering 4,125 square feet of existing play area. During the pre-application conference, the applicant indicated that they would move forward with Option 1.

Based on the review of the following applicable code sections, it is determined that the proposed development may be exempt from land use review, including site plan review, conditional use permit, and SEPA.

During the pre-application conference, the applicant provided additional details that made it appear the project does not meet definition of low potential impacts as the proposed underground supporting structures for the play structure involve ground disturbance of up to 18 inches below the ground surface. Therefore, an archaeological predetermination is required. The applicant will need to provide this documentation prior to issuance of any city permits so that the City can evaluate whether a

predetermination report is necessary. A previous archaeological predetermination prepared for the subject property can be sufficient to complete this requirement.

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.

Public Works and Engineering Analysis

Comments

Grading

The City Erosion Control Standards require that any activity disturbance over 500 SF must comply with the city standards. An erosion control plan will need to be submitted, if the project disturbs more than 500 SF.

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. LCMC 13.10.200. All costs associated with installing the side sewer shall be borne by the applicant. LCMC 13.10.110.

There is no sewer connection associated with this project, so this code does not apply.

Chapter 18.320 (Stormwater and Erosion Control)

Section 18.320.120 (1) LCMC states that ground-disturbing activities of more than 500 square feet 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 square feet of impervious surface is subject to stormwater regulation.

The applicant proposes to cover the existing plays per the applicant's plan. Option 1 is to cover a 3,840 SF structure, and option 2 would covering a 4,125 SF play area. It is our understanding that the applicant intends to construct Option 1 play structure cover. If option 2 is used, the notes below apply for this added area as well.

Since these are covered areas, they are not considered a pollution generating surface, and will not have to comply with the ordinance or Puget Sound Manual for water quality treatment. The structure will however have to comply with the stormwater quantity control aspect of the city ordinance. The applicant will need to submit a stormwater plan showing the downspouts, and how the stormwater ordinance will be followed.

The LCMC section 18.320.220 states that if surface water leaves the site, stormwater must be detained per LCMC. Runoff calculations need to consider undisturbed forest as the pre-developed

condition in determining runoff curve numbers or a downstream analysis of the existing conveyance system is required. The design must meet the LCMC 18.320 and the 1992 Puget Sound Manual for the design of the system.

The applicant's engineer discussed infiltrating stormwater runoff from the downspouts or connecting the downspouts from the play structure cover directly to existing storm piping or adding a new outlet south of the school to the existing ground that outfalls to La Center Bottoms Wetland. The applicant will need to provide a Geotechnical Report or study that supports use of infiltration. If stormwater piping will be installed or added to the existing piping that drains south of the school, a study or memorandum justifying outfall. The study/memorandum must show the impacts to the existing slope and erosion will be prevented to meet the city erosion control ordinance.

There are existing storm outfall pipes south of the school that drain to the existing slope that drains to the tributary creek flowing to the La Center Bottoms. A downstream analysis will have to be done the downspouts connect directly to this outlet. Additional erosion control measure may be necessary if this existing outfall is used.

The applicant will need to submit a stormwater plan and the stormwater memorandum or study showing compliance with the LCMC.

Land Use Analysis

The following code requirements are identified based on the City's initial review of the project against the adopted development code (*LCMC Title 18*). Formal review after application submission may reveal additional issues that require further discussion with the applicant or submittal of additional information during formal review.

Chapter 18.30 Procedures

Under LCMC 18.30.010, a land use project review and approval is required for residential developments that result in more than one dwelling unit, conditional or new uses, increase in intensity of use, or alteration to the exterior of historic properties. It is determined that the proposed shade structures are not subject to land use review as they do not meet the threshold for review under 18.30.010.

Chapter 18.215 Site Plan Review

The proposed structures are exempt from Site Plan Review under LCMC 18.215.030(5) as the proposed development would not result in an appreciate increase in land use activity from the current land use or pose an adverse impact. Therefore, Chapter 18.215 does not apply to the proposal.

Chapter 18.170 Urban Public District (UP)

The Urban Public District classifies schools as a conditional use (see Chapter 18.250 below). The applicable development requirements include setbacks and height. Based on the site plan included in the application, the setback requirements are met. The height requirement limits the maximum height to that of the base zone, however there is no other base zone that applies. Surrounding residential zones allow a maximum

height of 35 feet. Staff are proposing that the applicant limit the height of the structures to 35 feet. Setbacks and height would be reviewed at the time of building permit approval.

Chapter 18.250 Conditional Uses

There is no existing conditional use permit for the school, therefore the school is a non-conforming use in the UP District. However, the proposed development is not expanding the use as a school and will not affect the non-conformity (discussed below in Chapter 18.255) or require modification of a conditional use permit. Therefore, no conditional use permit is required for this proposal.

Chapter 18.255 Nonconforming Uses

The elementary school was established on this site in 1938¹ prior to the adoption of the La Center municipal code for Urban Public zoning district, therefore it is a nonconforming use. LCMC 18.255.010 states “a nonconforming use or development may be altered or expanded subject to the provisions of this chapter.” The proposed development will not affect the nonconforming use as a school.

Chapter 18.300 Critical Areas

The City’s critical areas maps and Clark County MapsOnline indicate the project parcel contains portions of critical areas including wetlands, frequently flooded areas, habitat areas and geohazards (erosion and seismic hazard areas). The proposed development is outside of the identified critical areas and buffers and may be considered exempt from review according to Table 18.300.040 “*Other Activities: Developments that do not impact a critical area or buffer including from runoff.*” During building plan review, a stormwater management plan will be required to show compliance with the City’s standards, therefore a critical areas review is not required.

Chapter 18.310 Environmental Policy

The proposed development would be exempt from SEPA review (18.310.090(3)) as the structures are not considered buildings and not subject to the area threshold in WAC 197-11-800(1)(b)(iii). Options 1, 2 or both as described in the site plan would not require SEPA review.

Chapter 18.360 Archaeological Resource Protection

The project site is mapped as having high risk for encountering archaeological resources on Clark County MapsOnline. Archaeological predetermination surveys are required in accordance with Table 18.360.020-1 unless there is a low risk of encountering archaeological resources. Low risk is defined as “activities involving no ground disturbance, normal maintenance and repair of existing structures and facilities, lands that have been substantially disturbed to a depth of more than eight inches, and areas that have been adequately surveyed in the past with no discovery or resources.”

During the pre-application conference, the applicant provided additional information that the supporting structures for the play structures will disturbance of up to 18 inches below the ground surface. Therefore, the proposal does not meet the definition of low potential for impacts and an archaeological predetermination report is required prior to ground disturbance pursuant LCMC 18.360.080. The applicant can provide a previous archaeological predetermination report for the subject property, if available, to meet this requirement.

¹ La Center Elementary School Annual Report 2020-2021. <https://www.lacenterschools.org/wp-content/uploads/2021/10/Elementary-Annual-Report-2020-21.pdf>

APPLICATION FEES

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

- Stormwater Review: \$150
- Critical Area Review – Exemption: \$60 + 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).

March 20, 2024 – 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
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