

**From:** [Eric Golemo](#)  
**To:** ["Elizabeth Decker"](#)  
**Cc:** ["Seth Halling"](#); [Karen Bowerman](#); [Gary Medvig](#); [glen.yung@clark.wa.us](mailto:glen.yung@clark.wa.us); [Michelle Belkot](#); [Sue Marshall](#); [Glen Yung](#); [Shannon Nashif](#); [steve.faust@3j-consulting.com](mailto:steve.faust@3j-consulting.com); [Susan Ellinger](#); [Jose Alvarez](#); [Bryan Mattson](#); ["Natalie Knowles"](#); [Oliver Orjiako](#); [Kathleen Otto](#); [Megan Fletcher](#); [Sonja Wisner](#); ["Mike Odren"](#); ["James D. Howsley"](#); ["Sherrie Jones"](#); ["Andrew Gunther"](#); ["Dan Wisner"](#); ["Jeff Wriston"](#); ["Ryan Wilson"](#); ["Terry Wollam"](#); ["Noelle Lovern"](#); ["Justin Wood CCAR"](#)  
**Subject:** RE: DEAB Comments on Housing Action Plan (Work Session Follow Up)  
**Date:** Friday, July 21, 2023 2:56:50 PM  
**Attachments:** [image003.png](#)

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Elizabeth,

Thank you for the clarification. This is a good example of why it is important for us to get together and review our concerns together. The way the 'narrow driveway' standards are written in Section 40.260.155(C)(8), is very unclear. It never specifically says that, there is no requirement for narrow lots to use narrow driveways, in fact the nomenclature implies that narrow lots would use narrow driveways and says it supplements shared and ally options. I suspect this could be easily misconstrued. It may need to be clarified to specifically state that it is just an option and that larger standard driveways can still be utilized.

Anyway, while not be specifically called "Design Standards", this language in yellow below has a similar effect. Why is this language really needed. Couldn't we simply say that driveways in narrow lot development can be reduced to 10'. This language appears to be overcomplicated and "d" is an unnecessary design standard that takes away any potential benefit from narrowing a driveway. Having a garage setback 5' from the front door significantly impacts the structural complexity of construction, adds unnecessary cost, and is personal preference. There are way more cost effective solutions to create architectural interest.

- 6 b. Shared driveway approaches for two (2) abutting lots sharing one (1) curb cut shall meet  
7 the specifications in Figure 40.260.155-4 or 40.260.155-5.
- 8 c. Shared driveways which provide access to more than two (2) lots shall be at least twelve  
9 (12) feet wide, and shall be within an easement at least twenty (20) feet wide.
- 10 **8. Narrow Driveways. Where provided for a narrow lot, narrow driveways shall meet the**  
11 **following requirements:**
- 12 a. Narrow driveways shall be no wider than ten (10) feet measured at the driveway throat,  
13 unless the applicant demonstrates on the development plan that a wider driveway will not result  
14 in conflicts.
- 15 b. Where possible, narrow driveways on adjoining lots shall be grouped in close proximity to  
16 create space along the frontage for parking, trees, utilities, etc.
- 17 c. Narrow driveways shall be constructed in accordance with adopted narrow driveway  
18 standards.
- 19 d. Garages accessed from narrow driveways shall be either single car-width and located no  
20 closer to the street than the front wall (not porch) of the residence or, if wider than a single car  
21 garage, set back at least five (5) feet from the front wall (not porch) of the residence.
- 22 **§ 9. Driveway Requirements in Single-Family Detached Developments. In order to provide**  
23 flexibility in site design, driveway locations for non-corner lots in single-family detached  
24 developments are not required on the site plan, provided:
- 25 a. Detached sidewalks that meet ADA requirements are provided; and
- 26 b. Guest parking requirements for the development are shown to be met, by one (1) or more  
27 of the following methods:
- 28 (1) Designated on-street parking areas that will not be subject to future driveway  
29 placement.

Also, the proposed narrow lot parking standards are now more restrictive and push towards reducing driveway widths. They do not give as much credit toward providing additional parking onsite with wider driveways and will make these developments more expensive to construct and less affordable. DEAB also commented on this and recommended going back to the previous parking standards.

Also, it appears the Compact Lot standards are not the only place in the proposed code containing the problematic design standards. In addition to the Narrow Driveway section, they also show up in the proposed Triplex and Quadplex code.

Thanks,  
Eric

Eric E. Golemo, PE  
Owner / Director of Engineering and Planning  
**SGA Engineering, PLLC**  
Civil Engineering / Land Use Planning  
Development Services / Landscape Architecture  
2005 Broadway, Vancouver WA 98663  
Phone: (360)993-0911  
Fax: (360)993-0912  
Mbl: (360)903-1056  
Email: [EGolemo@sgaengineering.com](mailto:EGolemo@sgaengineering.com)

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**From:** Elizabeth Decker <edecker@jetplanning.net>

**Sent:** Friday, July 21, 2023 11:50 AM

**To:** Eric Golemo <egolemo@sgaengineering.com>

**Cc:** Seth Halling <SethH@aks-eng.com>; Karen Bowerman <karen.bowerman@clark.wa.gov>; gary.medvigy@clark.wa.gov; glen.yung@clark.wa.us; michelle.belkot@clark.wa.gov; Sue Marshall <sue.marshall@clark.wa.gov>; Glen Yung <glen.yung@clark.wa.gov>; Shannon Nashif <Shannon.Nashif@clark.wa.gov>; steve.faust@3j-consulting.com; Susan Ellinger <Susan.Ellinger@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Bryan Mattson <Bryan.Mattson@clark.wa.gov>; Natalie Knowles <natalie.knowles@3j-consulting.com>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Kathleen.Otto@clark.wa.gov; Megan Fletcher <megan.fletcher@clark.wa.gov>; Sonja Wiser <Sonja.Wiser@clark.wa.gov>; Mike Odren <modren@mackaysposito.com>; James D. Howsley <jamie.howsley@jordanramis.com>; Sherrie Jones <sherrie@swca.org>; Andrew Gunther <andrew@plsengineering.com>; Dan Wisner <wisnerdan@gmail.com>; Jeff Wriston <jeffwriston@gmail.com>; Ryan Wilson <ryan@wilsonarchitects.us>; Terry Wollam <terry@wollamassociates.com>; Noelle Lovern <Noelle@biaofclarkcounty.org>; Justin Wood CCAR <ga@ccrealtors.com>

**Subject:** Re: DEAB Comments on Housing Action Plan (Work Session Follow Up)

Hello Eric and others,

I appreciate the efforts to think through specific project examples and consider how the code will apply to ensure that a broad range of housing--in fact, an even broader range than currently exists--can be built. With regards to Item #2, however, I would like to clarify on behalf of the consultant team that **there are no design standards proposed in the Narrow Lot standards.** The Narrow Lot standards, in CCC 40.260.155, apply to all developments with lots less than 40 feet wide for both single-family detached homes and attached homes (townhouses) in all the R1 and R zones. The Narrow Lot standards would apply to all Compact Lot Developments with lots less than 40 feet wide, but Compact Lots Developments are only a portion of projects that would be subject to the Narrow Lot standards.

Only the Compact Lot standards in CCC 40.260.072 include the requirements for a main entrance, limitation on the width of street-facing garages, and required driveway configuration options. For all other Narrow Lot Developments, there are no existing or proposed standards to limit garage or driveway widths. There is a new 'narrow driveway' standard proposed in Section 40.260.155(C)(8), however, there is no requirement for narrow lots to use narrow driveways, rather, it is an additional option akin to the shared driveways in Section 40.260.155(C)(7) that developers may elect if it suits the needs of the project. The narrow driveways are proposed as an additional option because the current driveways standards in Section 40.350.030(B)(4)(b)(2) require a minimum width of 12 feet, and the option for a narrower 10-ft driveway was identified as one way to save costs and minimize impervious surfaces.

Thank you,  
Elizabeth

On Thu, Jul 20, 2023 at 1:27 PM Eric Golemo <[egolemo@sgaengineering.com](mailto:egolemo@sgaengineering.com)> wrote:

All,

I am writing as a follow up to the work session yesterday July 19th regarding the Housing Action Plan. I attended the meeting representing DEAB and discussed our Memo. I am copying Council, county staff, the consultant team, and DEAB Board members on this response for transparency.

A few questions were brought up at the meeting that we did not have the opportunity to address. I am addressing them here.

1. Staff noted that our Memo was based on the Draft Code dated March 9th but there is a new version dated June 30th. I reviewed the new draft against our comments, and it doesn't appear any of the DEAB comments were addressed in the latest version. So this doesn't affect our comments. But, we can update that line in our memo if it helps.
2. A representative from the consultant team mentioned that the example in our memo of the house with the 2-car garage would still be able to be built under the proposed code because the proposed code just gives additional options and doesn't take away existing flexibility. In particular, they mentioned that the new compact lot development standards has the design standards that limit garage sizes and driveway widths but the base zone code is not being restricted. But, upon further review the situation is different than they thought and that is incorrect. In all fairness, the consultant did not have all the project specific information. But, the example given was constructed in the R-18 zone and would fall under the Narrow Lot Standards. The new proposed Narrow Lot Standards contain some of the same design standards and limitations. So, these homes would not be allowed under the proposed code.
3. Staff noted that the most of the comments in the DEAB Memo were brought up in the HOSAP meetings. I reviewed the notes and agree that most of the items in the DEAB memo were brought up. It also appeared that there was consensus by the committee members in favor of most of the recommendations. But, they were not incorporated into the final recommendation. I am not sure why this was the case. But, these are critical issues that still need to be addressed. I also believe Planning

commission approved it under this pretense. Planning commission may have also thought that their options were limited to recommending approval or denying the proposed code before them. They attempted to recommend to approve with the problematic design standards removed but were specifically told that, "this is not an opportunity to send it back for different work." So, they could not make any recommended changes to the proposed code.

4. We agree with the comments from staff and council that we are 95% there. But, the last 5% is critical and we should try to get it right so we do the best we can make quality housing as affordable as we can.

As you are aware DEAB is the Council's advisory board for these types of issues. We take that responsibility very serious. DEAB members have put a lot of effort into the process and these comments. We are very passionate about affordable housing. We are in the trenches and deeply understand the issues.

We have, and continue to extend an invitation to connect with Staff and the Consultant team to work through some of these items so we can get it right. We can even offer up specific edits based on the recommendations if it would be helpful.

Thanks again for your consideration and opportunity to participate in the process.

Sincerely,

Eric Golemo

DEAB Representative on HOSAP

From: Seth Halling <[SethH@aks-eng.com](mailto:SethH@aks-eng.com)>  
Sent: Tuesday, July 18, 2023 7:58 AM  
To: Karen Bowerman <[karen.bowerman@clark.wa.gov](mailto:karen.bowerman@clark.wa.gov)>; [sue.marshall@clark.wa.us](mailto:sue.marshall@clark.wa.us);  
[gary.medvigy@clark.wa.gov](mailto:gary.medvigy@clark.wa.gov); [glen.yung@clark.wa.us](mailto:glen.yung@clark.wa.us);  
[michelle.belkot@clark.wa.gov](mailto:michelle.belkot@clark.wa.gov)  
Cc: [Kathleen.Otto@clark.wa.gov](mailto:Kathleen.Otto@clark.wa.gov); Megan Fletcher  
<[megan.fletcher@clark.wa.gov](mailto:megan.fletcher@clark.wa.gov)>; Sonja Wisner ([Sonja.Wisner@clark.wa.gov](mailto:Sonja.Wisner@clark.wa.gov))  
<[Sonja.Wisner@clark.wa.gov](mailto:Sonja.Wisner@clark.wa.gov)>; Eric Golemo <[egolemo@sgaengineering.com](mailto:egolemo@sgaengineering.com)>; 'Mike  
Odren' <[modren@mackaysposito.com](mailto:modren@mackaysposito.com)>; 'James D. Howsley'  
<[jamie.howsley@jordanramis.com](mailto:jamie.howsley@jordanramis.com)>; 'Sherrie Jones' <[sherrie@swca.org](mailto:sherrie@swca.org)>; 'Andrew  
Gunther' <[andrew@plsengineering.com](mailto:andrew@plsengineering.com)>; 'Dan Wisner' <[wisnerdan@gmail.com](mailto:wisnerdan@gmail.com)>;  
'Jeff Wriston' <[jeffwriston@gmail.com](mailto:jeffwriston@gmail.com)>; 'Ryan Wilson'  
<[ryan@wilsonarchitects.us](mailto:ryan@wilsonarchitects.us)>; 'Terry Wollam' <[terry@wollamassociates.com](mailto:terry@wollamassociates.com)>  
Subject: DEAB Comments on Housing Action Plan

Good morning, Councilors -

Please find the comments from the Development and Engineering Advisory Board on the proposed Draft Housing Options Code attached for your consideration. As an advisory board to County Council, we wanted to provide DEAB's written recommendation and offer to be available to provide verbal testimony and answer any questions that may arise during the upcoming Council work session and public hearing. DEAB has participated as a presenter at these Council meetings in the past and is willing to again if Council requests.

Sincerely,

Seth

DEAB Chair

Seth Halling PE, LSIT - Principal

AKS ENGINEERING & FORESTRY, LLC

9600 NE 126th Avenue, Suite 2520 | Vancouver, WA 98682

P: 360.882.0419 | <<http://www.aks-eng.com/>> [www.aks-eng.com](http://www.aks-eng.com/) |  
<mailto:[sethh@aks-eng.com](mailto:sethh@aks-eng.com)> [sethh@aks-eng.com](mailto:sethh@aks-eng.com)

Offices in: Bend, OR | Keizer, OR | Tualatin, OR | Vancouver, WA

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