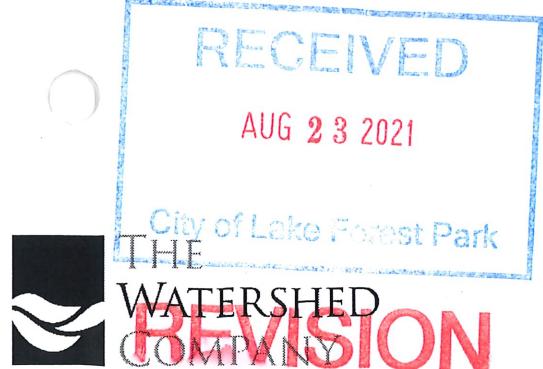


TECHNICAL MEMORANDUM

Date: August 20, 2021
To: Cameron Tuck, Assistant Planner, City of Lake Forest Park
From: Alex Capron, Environmental Planner
Project Number: 2021-RUE-0001 (TWC: 190405)



Subject: Garey RUE Narrative

The purpose of this memo is to provide a response to City correction #2, as follows:

2. Please provide a narrative with your application for reasonable use exception which explains how you comply with the specific criteria of approval for an RUE (see LFPMC 16.16.250 (C)), which explains each criteria of approval when seeking an RUE. The narrative should describe, in detail, how your project complies with the criteria of approval for reasonable use exceptions. Please use square footage calculations, specific code sections, and specific comprehensive plan goals and policies, as well as real data to describe how the project complies with the necessary criteria. It may be necessary for you to consult with a firm that has experience in processing these types of land use applications. Alternatively, you could perform a public records request to view previous narratives for reasonable use criteria.

Response: The following is an analysis of consistency with the reasonable use exception criteria in LFPMC 16.16.250. Note, this same analysis is located within the revised Critical Areas Report, Dated August 18, 2021.

C. The hearing examiner shall grant an exception only if:

1. Application of the requirements of this chapter will deny all reasonable economic use of the property; and

Response: The project is currently fully encumbered via the 115-foot standard buffer of Lyon Creek. There is not adequate area on-site for buffer averaging or a 25% buffer reduction, as allowed under LFPMC 16.16.355.B.1. The maximum reduced buffer (86.25 feet) still encumbers the entire parcel, preventing the placement of a building footprint and associated driveway for a single family residence outside the buffer.

2. There is no other reasonable economic use with less impact on the critical area; and

Response: There is no other reasonable use consistent with the residential zoning of the property and compatible with the surrounding neighborhood that would result in less impact. The 10' setback from the house footprint is necessary to provide for maintenance of both the house and the stormwater dispersion trenches, as well as safe ingress-egress in an

emergency situation. The proposed residential development footprint for the parcel is the minimum necessary size to fulfill the needs of the applicant and has been determined to be smaller than comparable adjacent lots, as outlined in the comparable structure/housing study above in Section 3.3.

3. The proposed development does not pose an unreasonable threat to the public health, safety, or welfare, on or off the proposed site, and is consistent with the general purposes of this chapter and the comprehensive plan; and

Response: There would be no detriment to the public health, safety or welfare, on or off the parcel, as a result of the proposed development. This development is supported by the following City Goals and Policies, as found within the City's 2015 Comprehensive Plan:

Housing Policy H-2.1 Continue to incorporate site standards, landscaping, and building design guidelines into land use regulations to ensure that infill development complements surrounding uses and the character of Lake Forest Park. Note, infill development is the process of developing vacant or underused parcels within a surrounding area that is already largely developed, per the City Comprehensive Plan Housing Element.

Policy Response: The proposed residence preserves the vast majority of pre-existing natural areas. Further, this site proposes to enhance at a greater than 1:1 ratio to offset project impacts. All remaining lots surrounding this residence within City limits are developed with single-family homes.

Housing Policy H-2.2 Promote site planning techniques that create quality outdoor spaces and are in harmony with neighboring properties.

Policy Response: See response to previous policy.

Parks, Trails, & Open Space Policy PT-4.5 Remove invasive species in parks, trails, and open spaces. As a pre-existing open space zoned for single-family development, invasives will be removed site-wide to preserve remaining open space.

Policy Response: All applicable front and side-yard setback standards, as well as all applicable building codes, will be met. Driveway access will be established from the existing public roadway and will provide for safe passage and emergency access. Of the one tree designated for removal, it will be replaced at a greater than 3:1 ratio.

4. Any alteration is the minimum necessary to allow for reasonable economic use of the property.

Response: The alteration is the minimum necessary for a single-family structure and appurtenances that will fulfill the needs of the applicant. As demonstrated, the size of the impact is less than the median of surrounding properties. Specifically, the nine neighboring properties (Table 1 below) indicate the proposal is below the median household size and significantly under the median impact area.

Neighboring Property Analysis

The subject parcel is zoned R 9,600 with surrounding uses within the City on the east, west, and south consisting of single-family residences. For purposes of determining compatibility with authorized uses, single-family lots zoned R 9,600 located nearby were compared to the subject parcel. The surrounding lots are a mix of highly modified with many framed within existing tree canopies, though many have large driveways, parking areas, and homes. These results can be seen in Table 1 and the corresponding map in Figure 1.

A total of nine properties were analyzed within 300 feet of the subject parcel. The project proposes significantly less impact area than all but two properties and is 25% smaller than the median structure footprint within the study area.

Table 1. Neighboring Property Analysis

Address	Map Key	Parcel Number	Lot size (SF)	Impact Area* (SF)	Percent Impact Area	Approx. House Footprint (SF)
20414 37TH AVE NE	1	4022900447	13,074	3,700	28%	1,620
20420 37TH AVE NE	2	4022900448	10,570	1,900	18%	1,510
3511 NE 205TH ST	3	4022900491	11,059	5,500	50%	2,880
3607 NE 205TH ST	4	4022900496	12,449	3,300	27%	780
3611 NE 205TH ST	5	4022900499	15,982	3,000	19%	1,560
3601 NE 205TH ST	6	4022900501	9,573	4,400	46%	3,050
20405 37TH AVE NE	7	4022900510	16,135	3,600	22%	1,290
3514 NE 204TH ST	8	4022900516	13,901	5,200	37%	2,260
20406 37TH AVE NE	9	4022900446	11,961	1,430	12%	3,200
Subject Site			10,369	2,042 [^]	20%	1,180
Median			12,449	3,600	27%	1,620

*Impact area includes all structures, driveways, and other improved surfaces, measured from the 2019 aerial on King County iMap

^ Includes project proposal area, but not the existing 1,570 SF driveway easement to neighboring property to the south (3611 NE 205th St)

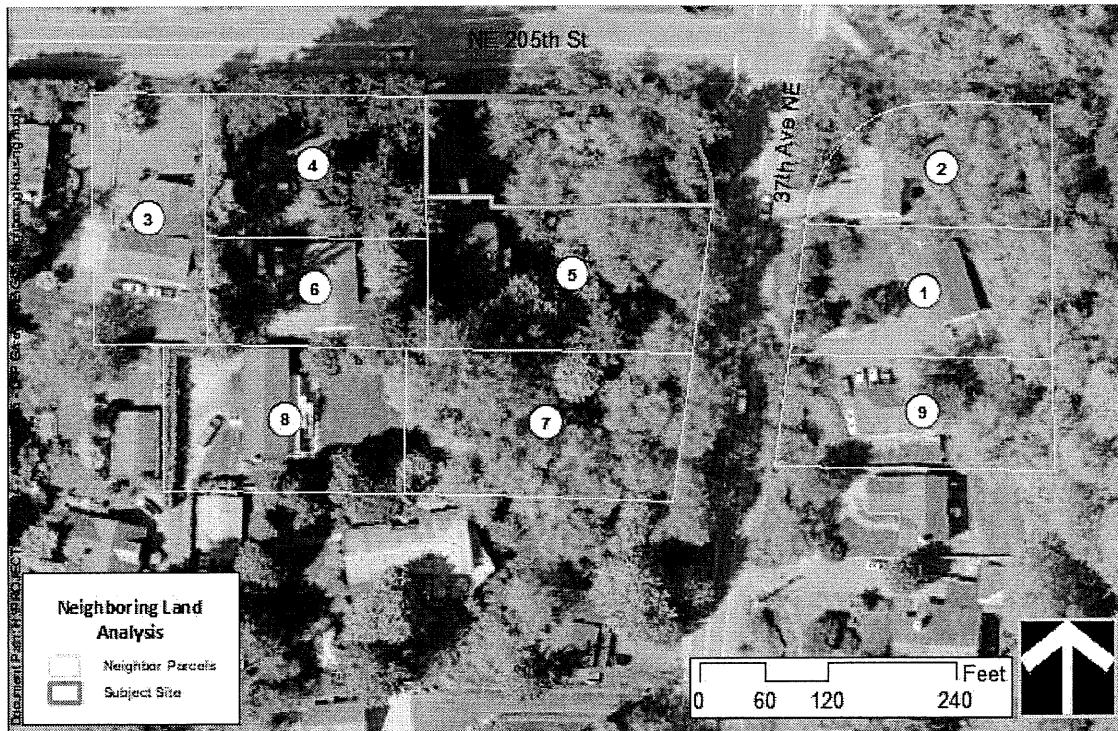


Figure 1. Housing Comparison Map