

LEWIS COUNTY PLANNING COMMISSION

Frank Corbin, Chair

LETTER OF TRANSMITTAL

To: Lewis County Board of County Commissioners

From: Lewis County Planning Commission

Date: May 24, 2024

Subject: **Transmittal to the BOCC – Amendment to Lewis County Code, Title 12 and Title 16, regarding Private Road Naming**

Dear Commissioners:

The purpose of this report is to transmit to the Board of County Commissioners (BOCC) draft amendments to the Lewis County Code. The draft amendments are found in the March 29, 2024 Planning Commission Staff Report, Attachment A, available online at <https://lewiscountywa.gov/departments/community-development/events/planning-commission-04-09-2024/>.

In addition to the amendments described below, the Planning Commission would like the BOCC to consider the following points that were discussed during the May 14, 2024 deliberation:

- Dashed addresses, with no private road name, have been applied since the 1990s. Dashed addressing creates considerable confusion, particularly for emergency responders and is therefore a public safety issue. This proposal does not propose to rename all existing unnamed private roads (aka dashed roads) because that requires all of the property owners to update official information regarding their street address. However, the Planning Commission would like the County to consider waiving the private road naming fees, and perhaps paying for replacement of street signs, for a period of time to incentivize voluntary naming of private roads associated with dashed addresses.
- It is important that when an existing unnamed road is required to have a legal name applied and there is no agreement between the property owners on the name, that that disagreement does not hold up approval of the land division. Failure to design policies and procedures that enable Community Development to rename and address the road in a timely manner will potentially create costly roadblocks for the applicant and create ill will between neighbors. The Planning Commission requests that Community Development develop an implementation procedure that describes when staff will step in to assign a road name when an unnamed private road is extended. This policy should be in place before implementation of the amendments.

Recommended Amendments

1. Update 12.60.280 LCC: Driveways and private road standards to clarify that any land division that creates three or more lots must be accessed by a private road. If one lot is being divided into three, then it must be accessed by a private road. This is already the practice, but the code was not sufficiently clear.
2. Update 16.12 LCC: Require that during a simple segregation, the created lots be addressed and the private road named. This is already required during short and long plat subdivisions and would now be required for simple segregations. However, the private road serving the simple segregation would not need to be built during a simple segregation.
3. Update 16.02 LCC: Prohibit extension of unnamed roads with dashed addressing. If any new land division is proposed that requires extension of a private road, and that private road is not named, then the entire private road shall be named. This will require agreement from 50% of the property owners on that private road.
4. Revise Private Road Naming Program and Addressee's Acknowledgement Form: Clarify the applicability and process, as described in Attachment D – Policy. In addition, the program approval criteria will require a new spur off an existing private road to receive a new private road name. If the private road is an extension of an existing private road then it will need to have the same name, unless it's a dashed road name then a new name must be chosen.

Findings of Fact

1. Lewis County is required by RCW 36.70A.130 to periodically review and evaluate its comprehensive land use plan and development regulations to ensure the plan and regulations comply with the Washington State Growth Management Act; and
2. RCW 36.170A.130(2)(a) requires that amendments to comprehensive land use plans not be made more than once per year except adoption of comprehensive plan amendments necessary to enact a planned action under RCW 43.21C.440, including amendments to development regulations that are consistent with a comprehensive plan adopted under RCW 36.70A; and
3. The proliferation of unnamed roads and the "dashed address" system has resulted in an unworkable naming process with as many as five dashes, along with letter suffixes, that poses a risk to public safety because the lack of private road names directly affects fire prevention, ambulance, law enforcement and other emergency services ability to locate and assist citizen in need at those addresses; and
4. The proposed amendments are not intended to fix the history of dashed addressing, but are intended to prevent future dashed addressing and to systematically apply private road names when an extension of an unnamed road is proposed; and

5. Staff provided notice for a public hearing on the proposed code amendments in the manner prescribed in Chapter 17.12 LCC on April 30, 2024; and
6. On May 14, 2024, the Lewis County Planning Commission held a public hearing on the proposed code amendments to Title 12 and Title 16 LCC; and
7. Following the public hearing, the Planning Commission deliberated and determined that the proposed amendments met the intent and requirements of the Growth Management Act and were in accordance with the public interest.

Recommendation

Based on the above findings, the Lewis County Planning Commission recommends that the Board of County Commissioners pass an ordinance that adopts the proposed changes to Title 12 and Title 16 LCC, as shown in the March 29, 2024 Planning Commission Staff Report and associated attachments.

Being duly authorized to transmit the recommendations on behalf of the Lewis County Planning Commission, I hereby respectfully submit the documents to the Lewis County Board of County Commissioners.

Submitted by  Date 5-23-24
Frank Corbin, Chair
Lewis County Planning Commission

