



Community Development Department | Planning
616 NE Fourth Avenue | Camas, WA 98607
(360) 817-1568
Permits@CityofCamas.us

General Application Form

Case Number: PA20-45

Applicant Information

Applicant/Contact: Martin Hertrich Phone: (503) 489-1176
Address: P.O. Box 97 martin.hertrich@attglobal.net
Street Address *E-mail Address*
Boring OR 97009
City *State* *ZIP Code*

Property Information

Property Address: 4555 & 4615 NW Camas Meadows Drive 986035-733 & 172970-000
Street Address *County Assessor # / Parcel #*
Camas WA 98607
City *State* *ZIP Code*
Zoning District LI/BP Site Size 4.80 acres

Description of Project

Brief description:
Zone Change to Commercial Mixed-Use

Are you requesting a consolidated review per CMC 18.55.020(B)? YES NO
Permits Requested: Type I Type II Type III Type IV, BOA, Other

Property Owner or Contract Purchaser

Owner's Name: Vanport Manufacturing, Inc. & Hertrich Adolf Phone: (503) 489-1176
Last *First*
P.O. Box 97
Street Address *Apartment/Unit #*
E mail Address: Boring OR 97009
City *State* *Zip*

Signature

I authorize the applicant to make this application. Further, I grant permission for city staff to conduct site inspections of the property.

Signature: Martin Hertrich Date: 1/28/2021

Note: If multiple property owners are party to the application, an additional application form must be signed by each owner. If it is impractical to obtain a property owner signature, then a letter of authorization from the owner is required.

Date Submitted:	Pre-Application Date:	<input type="checkbox"/> Electronic Copy Submitted	Validation of Fees
Staff:	Related Cases #		

Application Checklist and Fees [updated on January 1, 2020]

◇ Annexation	\$849 - 10% petition; \$3,608. - 60% petition	001-00-345-890-00	\$
◇ Appeal Fee		001-00-345-810-00	\$392.00 \$
◇ Archaeological Review		001-00-345-810-00	\$135.00 \$
◇ Binding Site Plan	\$1,848. + \$24 per unit	001-00-345-810-00	\$
◇ Boundary Line Adjustment		001-00-345-810-00	\$101.00 \$
◇ Comprehensive Plan Amendment		001-00-345-810-00	\$5,729.00 \$ 5,729.00
◇ Conditional Use Permit			
Residential	\$3,360 + \$103 per unit	001-00-345-810-00	\$
Non-Residential		001-00-345-810-00	\$4,256.00 \$
◇ Continuance of Public Hearing		001-00-345-810-00	\$515.00 \$
◇ Critical or Sensitive Areas (fee per type)		001-00-345-810-00	\$762.00 \$
	(wetlands, steep slopes or potentially unstable soils, streams and watercourses, vegetation removal, wildlife habitat)		
◇ Design Review			
Minor		001-00-345-810-00	\$426.00 \$
Committee		001-00-345-810-00	\$2,335.00 \$
◇ Development Agreement	\$862 first hearing; \$530 ea. add'l hearing/continuance	001-00-345-810-00	\$
◇ Engineering Department Review - <i>Fees Collected at Time of Engineering Plan Approval</i>			
Construction Plan Review & Inspection	(3% of approved estimated construction costs)		
Modification to Approved Construction Plan Review	(Fee shown for information only)		\$415.00
Single Family Residence (SFR) - Stormwater Plan Review	(Fee shown for information only)		\$205.00
Gates/Barrier on Private Street Plan Review	(Fee shown for information only)		\$1,024.00
◇ Fire Department Review			
Short Plat or other Development Construction Plan Review & Insp.		115-09-345-830-10	\$280.00 \$
Subdivision or PRD Construction Plan Review & Inspection		115-09-345-830-10	\$348.00 \$
Commercial Construction Plan Review & Inspection		115-09-345-830-10	\$416.00 \$
◇ Home Occupation			
Minor - Notification (No fee)			\$0.00
Major		001-00-321-900-00	\$68.00 \$
◇ LI/BP Development	\$4,256+ \$40.00 per 1000 sf of GFA	001-00-345-810-00	\$
◇ Minor Modifications to approved development		001-00-345-810-00	\$340.00 \$
◇ Planned Residential Development	\$34 per unit + subdivision fees	001-00-345-810-00	\$
◇ Plat, Preliminary			
Short Plat	4 lots or less: \$1,904 per lot	001-00-345-810-00	\$
Short Plat	5 lots or more: \$7,055 + \$246 per lot	001-00-345-810-00	\$
Subdivision	\$7,055 + \$246 per lot	001-00-345-810-00	\$
◇ Plat, Final:			
Short Plat		001-00-345-810-00	\$197.00 \$
Subdivision		001-00-345-810-00	\$2,335.00 \$
◇ Plat Modification/Alteration		001-00-345-810-00	\$1,176.00 \$
◇ Pre-Application (Type III or IV Permits)			
No fee for Type I or II			
General		001-00-345-810-00	\$348.00 \$
Subdivision (Type III or IV)		001-00-345-810-00	\$896.00 \$
◇ SEPA		001-00-345-890-00	\$796.00 \$ 796.00
◇ Shoreline Permit		001-00-345-890-00	\$1,176.00 \$
◇ Sign Permit			
General Sign Permit	(Exempt if building permit is required)	001.00.322.400.00	\$40.00 \$
Master Sign Permit		001.00.322.400.00	\$124.00 \$
◇ Site Plan Review			
Residential	\$1,132 + \$33 per unit	001-00-345-810-00	\$
Non-Residential	\$2,828 + \$67 per 1000 sf of GFA	001-00-345-810-00	\$
Mixed Residential/Non Residential	(see below)	001-00-345-810-00	\$
	\$3,987 + \$33 per res unit + \$67 per 1000 sf of GFA		
◇ Temporary Use Permit		001-00-321-990-00	\$79.00 \$
◇ Variance (Minor)		001-00-345-810-00	\$683.00 \$
◇ Variance (Major)		001-00-345-810-00	\$1,273.00 \$
◇ Zone Change (single tract)		001-00-345-810-00	\$3,289.00 \$

Adopted by RES 1023 AUG 2005; Revised by RES 1113 SEPT 2007; Revised by RES 1163 OCT 2009; Revised by RES 1204 NOV 2010;
Revised by RES 15-001 JAN 2015; Revised by RES 15-007 MAY 2015; Revised by RES 15-018 DEC 2015; Revised by RES 16-019 NOV 2016;
Revised by RES 17-015 NOV 2017; Revised by RES 18-003 APRIL 2018; Revised by RES 18-013 NOV 2018; Revised by RES 19-018 DEC 2019

Fees reviewed & approved by Planner:

Initial Date

For office use only

Total Fees Due: \$

VANPORT MANUFACTURING, INC.

P.O. Box 97 ♦ 28590 SE Wally Rd. ♦ Boring, OR 97009
Phone (503)663-4447 ♦ Fax (503)663-1516

January 28, 2021

City of Camas
Community Development Department/Planning
Attn: Sarah Fox, AICP
616 NE Fourth Avenue
Camas, WA 98607

RE: Proposal Narrative for application to amend the comprehensive plan with a zone change to commercial mixed-use with response to criteria in Camas Municipal Code Section 18.51.010.

Comprehensive Plan Amendment

CMC 18.51.010 Criteria

- A. **What is proposed.** To rezone Tax Parcel Numbers 986035-733 and 172970-000 on Camas Meadows Drive having the Industrial designation with a Light Industrial/Business Park (LI/BP) zone to a Commercial designation with a Mixed-use (MX) zone.
Why? 1) To conform to the recently rezoned neighboring parcels and provide continuity in development. 2) To address the lower demand for office space caused by the recent acceleration of the trend towards “work from home”. 3) To provide a mix with nearby restaurant, retail and professional office spaces to service the residential component. 4) To allow for land use that is better suited to the sloping topography of the property as well as its location next to a golf course.
- B. **Impact.** With a total acreage of 4.8 acres, the anticipated impact will cover a relatively small area in the existing development. However, it will also be consistent with the new zoning designation on the adjacent 4 acres to the east, thus allowing for a more uniform development.
- C. **Current comprehensive plan deficiency.** The subject property is part of the Grass Valley area. The proposed change will not entirely replace the uses consistent with the Grass Valley area of the CAMAS 2035 plan. It will, however, add more versatility by addressing the projection of the previously unforeseen trend in decline in demand for business office space while also addressing housing diversity and supply. The goal and policy in the city’s comprehensive plan, Camas 2035, for Grass Valley, specifically Policy ED-3.3 for the protection of employment land from conversion to residential, is met by the limited space used for residential use under the mixed-use guidelines while at the same time serving to reduce demand on the transportation system. Relative to the service industry, fewer new jobs will be located in locations used by the industrial sector. Therefore, the proposed amendment would not affect the Grass Valley area’s ability to

meet its share of employment land demand. Likewise, Camas would still have the employment-land capacity to meet the 20-year forecast. Lastly, as stated previously, it will also be consistent with the new zone designation of the adjacent property.

- D. How the proposal complies with and promotes the goals and specific requirements of the growth management act.** As the property is part of the Camas Meadows Development, some of the specific requirements were met during its development, such as public facilities and services, preserving historic sites, environmental protection and shoreline management. The proposal is also compatible with the goal of concentrating growth and reducing sprawl. The addition of the residential component in changing the zoning to a mixed-use should serve to reduce traffic that is typical between suburbs and commercial and retail centers. In addition, it will increase the availability of housing in answer to demand in Camas, which could affect affordability in a positive manner.
- E. What changes, if any, would be required in functional plans if the proposed amendment is adopted?** The current zoning in the development is supported by the city's water, sewer, stormwater and shoreline plans and it is unlikely that the proposed amendment would require changes to the infrastructure. This also includes the transportation system which was built to accommodate the development of office space and light industry. Certain trips may be eliminated with a community commercial development where residential is supported by commercial and retail space within walking distance.
- F. What capital improvements would be needed to support the proposed change which will affect the capital facilities plans of the city?** There should be no capital improvements necessary to support the proposed change as the existing improvements under the current zoning will also support the zoning in the proposed amendment.
- G. What other changes, if any, are required in other city or county codes, plans or regulations?** A traffic impact assessment (TIA) will determine if the existing transportation infrastructure is adequate and would be done following the submission of the application as well as determining if there will be any impact on the park and trail services under the mixed-use zone compared to the light industrial and business park.

Grass Valley Comprehensive Plan Policies

As already mentioned, the subject property is part of the Grass Valley portion of the 2035 Comprehensive Plan. The goals of the Grass Valley Comprehensive Plan include high-tech industrial development, promote a cooperative industrial business park, allow businesses and City to share resources efficiently, sustainable development, increase economic gains, and improve environmental quality. With the exception of some specific uses, such as high-tech industry development on the property, the other goals can still be met under the change to commercial mixed-use.

ED-3.1 The creation and retention of industries that provide family-wage jobs

The purpose of the change in land use will not only allow for family-wage jobs to continue to occur (with the exception of those in the manufacture of high-tech goods and devices) the addition of the residential component will potentially also allow employees to live closer to their place of employment. The impact on the employment land will be minimal as the subject property is a small portion of the Grass Valley Area and larger lots in the Camas Meadows Corporate Center are still available for development for light industrial and business park use. The deficiency in the current zoning for Grass

Valley is that there are few options for employers who have employees who wish to locate housing close to the place of employment. And, as one of the purposes of mixed land use is to encourage a more compact development, the change in zoning will promote businesses that provide jobs where the employee can live closer to work, therefore promoting the growth management goal of reducing urban sprawl. And the infrastructure for a development with businesses where employees can live in walking distance from work does not require a change to the city's functional plans nor will it require additional capital improvements. With the golf course on the back side of the property, walking trails and parks, the area is already set for businesses to attract and retain employees who are looking for nearby recreation. Whether this will increase the demand for park and trail services is yet to be determined, as well as whether there will be an impact to the transportation system by businesses that have employees who live nearby, but will use the traffic infrastructure to leave the area for goods and services not available in the vicinity.

ED-3.2 Capitalize on existing facilities and infrastructure and include a mix of uses that and are trail- and transit-oriented and designed with high-quality streetscape appeal.

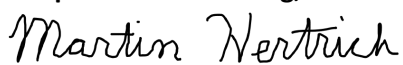
The purpose of the change to commercial mixed-use is compatible with policy ED-3.2, particularly with the addition of the residential component as this type of policy is commonly promoted in residential neighborhoods. Therefore, the impact is expected to be positive with respect to this policy because of this compatibility. And, by allowing for the development of a more walkable community and less reliance on a car, a commercial mixed-use zone meets part of this policy more effectively than the current zoning. Not only does the proposed zoning meet the mix of uses required by this policy by its very nature, the mix of uses also promotes a more compact design to aid in the goal of concentrating growth and controlling urban sprawl. The existing facilities and infrastructure, including the high-quality streetscape developed for the current zoning, will support a commercial mixed-use zone under this policy as well, eliminating the need for any changes to the functional plans of the city as well as the need to make additional capital improvements. The possibility of additional use of nearby trails by residents of dwellings in a mixed-use zone creating an impact to increase the need for more trail services is yet to be determined.

ED-3.3 Protecting employment land from conversion to residential uses.

Creation of employment land was one of the primary goals of the Camas Meadows Development. Commercial mixed-use includes uses that provide employment while providing additional housing in the same development and therefore this is not a full conversion to residential. The number of jobs reduced as a result of changing to commercial mixed-use, if any, will have minimal impact on this policy. Although the current zoning provides for employment land, it does not address one of the growth management goals of preventing urban sprawl as well as commercial mixed-use. The employment land is segregated under light industrial/business park zoning which encourages separate developments for housing and employment lands where the public commutes to work. And the current functional plans of the city for water, sewer and stormwater that support employment lands will not need to be changed with the inclusion of some residential. Likewise, the current capital improvements on Camas Meadows Drive that were installed to support the employments lands should be sufficient to support a mix of employment and residential uses. The existing transportation infrastructure that was designed to support the employment lands may also be sufficient but can be confirmed with a traffic impact assessment.

Respectfully submitted:

Vanport Manufacturing, Inc.



Martin Hertrich

Pedwar Development Group, LLC

May 26, 2021

City of Camas
Attn: Sarah Fox, Senior Planner
616 NE 4th Avenue
Camas, WA 98607

RE: Rezoning of properties on Camas Meadows Drive

Dear Ms. Fox,

I am writing to express my interest and support in the rezoning of several properties to Commercial Mixed Use along the North side of NW Camas Meadows Drive. Vanport Manufacturing, owner of two parcels along this road, has applied for a rezoning application. I, on behalf of Pedwar Development Group (owners of property 986026-906), wish to support their efforts and application to rezone insofar as the Council supports rezoning our parcel as well.

The current Light Industrial zoning combined with the location of these properties restricts potential development to unique suitors. With Light Industrial businesses across the street, and new housing construction down the road, I believe the addition of a Commercial Mixed Use zone would increase the likelihood of development and provide a positive mix of development in the area.

I am kindly asking for the Council and your support.

Thank you,



Chris Williams
Managing Member
Pedwar Development Group, LLC

cc: Vanport Manufacturing, Inc.



H. Lee & Associates, PLLC

Civil Engineering, Traffic Engineering, and Planning

MEMORANDUM

To: City of Camas Staff

From: Hann Lee, P.E.

Date: March 5, 2021

Subject: Vanport Manufacturing Rezone Trip Generation Memorandum



P.O. Box 1849
Vancouver, WA 98668
Phone: (360) 727-3119

Page 1 of 2

INTRODUCTION

The proposed Vanport Manufacturing Rezone properties are located at 4555 and 4615 NW Camas Meadows Drive and are comprised of tax lots 172970000 and 986035733 in Camas, Washington. The existing parcels total 4.8 acres (209,088 square feet) and are zoned IL/BP. The rezone proposal is to change the existing zoning from IL/BP to MX to match the abutting parcels to the east.

The build out of the existing IL/BP zoning was based on a floor area ratio (FAR) of 0.25 of the net building area (209,088 square feet). Applying this FAR yields a build out of 52,272 square feet of IL/BP space. For trip generation purposes the build out of the existing zoning was assumed to be ITE Code 130 "Industrial Park" use.

The build out of the proposed MX zoning was based on a City of Camas Municipal Code (COCMP) Table 18.09.030 and COCMP Chapter 18.24 - Mixed Use. Based on COCMP Table 18.09.030, the maximum density for the MX zoning is 24 dwelling units per net acre. Applying the maximum density for the proposed MX zoning to the size of the project site (4.8 acres) yields a build out of 115 residential units. COCMP Chapter 18.24 - Mixed Use gives guidance for the MX zoning saying the purpose for the MX zoning is to promote new construction of multi-story structures with commercial uses on the ground floor and residential uses on the upper stories. Based on the guidance given in COCMP Chapter 18.24 - Mixed Use, HLA assumed a ground floor commercial build out of 15,000 square feet. For trip generation purposes the 115 residential units were assumed to be ITE Code 231 "Mid-Rise Residential with 1st Floor Commercial" use. For trip generation purposes the 15,000 square feet of first floor commercial was assumed to be ITE Code 820 "Shopping Center" use.

TRIP GENERATION COMPARISON

Estimates of daily, A.M. peak hour, and P.M. peak hour trips generated by the build out of the existing and proposed zonings were developed from rates published in “Trip Generation, 10th Edition” (Institute of Transportation Engineers, 2017). The build out of the existing zoning is expected to generate 176 daily, 21 A.M. peak hour (2 in, 19 out), and 21 P.M. peak hour (4 in, 17 out) net new trips and is summarized in Table 1. The build out of the proposed zoning is expected to generate 943 daily, 49 A.M. peak hour (19 in, 30 out), and 79 P.M. peak hour (46 in, 33 out) net new trips and is summarized in Table 2. The proposed zoning is expected to generate 767 more daily, 28 more A.M. peak hour (17 in, 11 out), and 58 more P.M. peak hour (42 in, 16 out) net new trips. Table 3 summarizes the trip generation comparison of the existing IL/BP zoning and the proposed MX zoning.

Table 1. Trip Generation Summary for Existing IL/BP Zoning

	Amount	Average Daily	A.M. Peak			P.M. Peak		
			In	Out	Total	In	Out	Total
Existing (IL/BP) Zoning – Industrial Park (ITE Code 130)								
Rate per 1,000 square feet (ksf)		3.37	0.04	0.36	0.40	0.08	0.32	0.40
Trips	52.272 ksf	176	2	19	21	4	17	21

Table 2. Trip Generation Summary for Proposed MX Zoning

	Amount	Average Daily	A.M. Peak			P.M. Peak		
			In	Out	Total	In	Out	Total
Proposed (MX) Zoning – Mid-Rise Residential with First Floor Commercial (ITE Code 231)								
Rate per Dwelling Unit (DU)		3.44	0.08	0.22	0.30	0.25	0.11	0.36
Trips	115 units	396	10	25	35	28	13	41
Proposed (MX) Zoning – Shopping Center (ITE Code 820)								
Rate per 1,000 square feet (ksf)		37.75	0.58	0.36	0.94	1.83	1.98	3.81
Trips	15.000 ksf	566	9	5	14	27	30	57
Pass-By Trips – 34% P.M. Only		(19)	-	-	-	(9)	(10)	(19)
Net Trips for Shopping Center		547	9	5	14	18	20	38
Net Trips for Proposed MX Zoning		943	19	30	49	46	33	79

Table 3. Trip Generation Comparison for Vanport Manufacturing Rezone

	Average Daily	A.M. Peak			P.M. Peak		
		In	Out	Total	In	Out	Total
Existing (IL/BP) Zoning	176	2	19	21	4	17	21
Proposed (MX) Zoning	943	19	30	49	46	33	79
Proposed Rezone Trip Increase	767	17	11	28	42	16	58



**LAND NEED ANALYSIS
FOR MIXED USE DEVELOPMENT
ON A SITE IN CAMAS, WASHINGTON**

JOHNSON ECONOMICS, LLC
621 SW Alder St, Suite 605
Portland, Oregon 97205

**PREPARED FOR:
ICAP EQUITY
APRIL 2020**



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I. INTRODUCTION

JOHNSON ECONOMICS was retained by ICAP EQUITY to evaluate the feasibility of a mixed-use residential and commercial development on a site in northwest Camas, Washington. The site in question is currently zoned Light Industrial/Business Park (LI/BP). This report assesses the appropriateness of rezoning the land from the industrial designation to a designation that would allow for the mixed-use development. This analysis compares the suitability of the site for the two alternative uses (business park vs. mixed use) based on market and planning criteria.

JOHNSON ECONOMICS aims to inform this decision by taking the following steps:

- Review the City of Camas’ current relevant planning documents and evaluate, update, and/or modify forecasts and capacity estimates based on current information;
- Discuss the relative suitability of the site for either an Industrial Business Park or Mixed Use.
- Discuss most current projections for employment land needs and land inventory based on estimates from the Camas 2035 Comp Plan and Clark County VBLM and Buildable Lands Report.
- Estimate market demand for residential and commercial uses.
- Reconcile the above to determine the “need” and suitability for additional LI/BP vs. mixed-use commercial land capacity at the subject site.

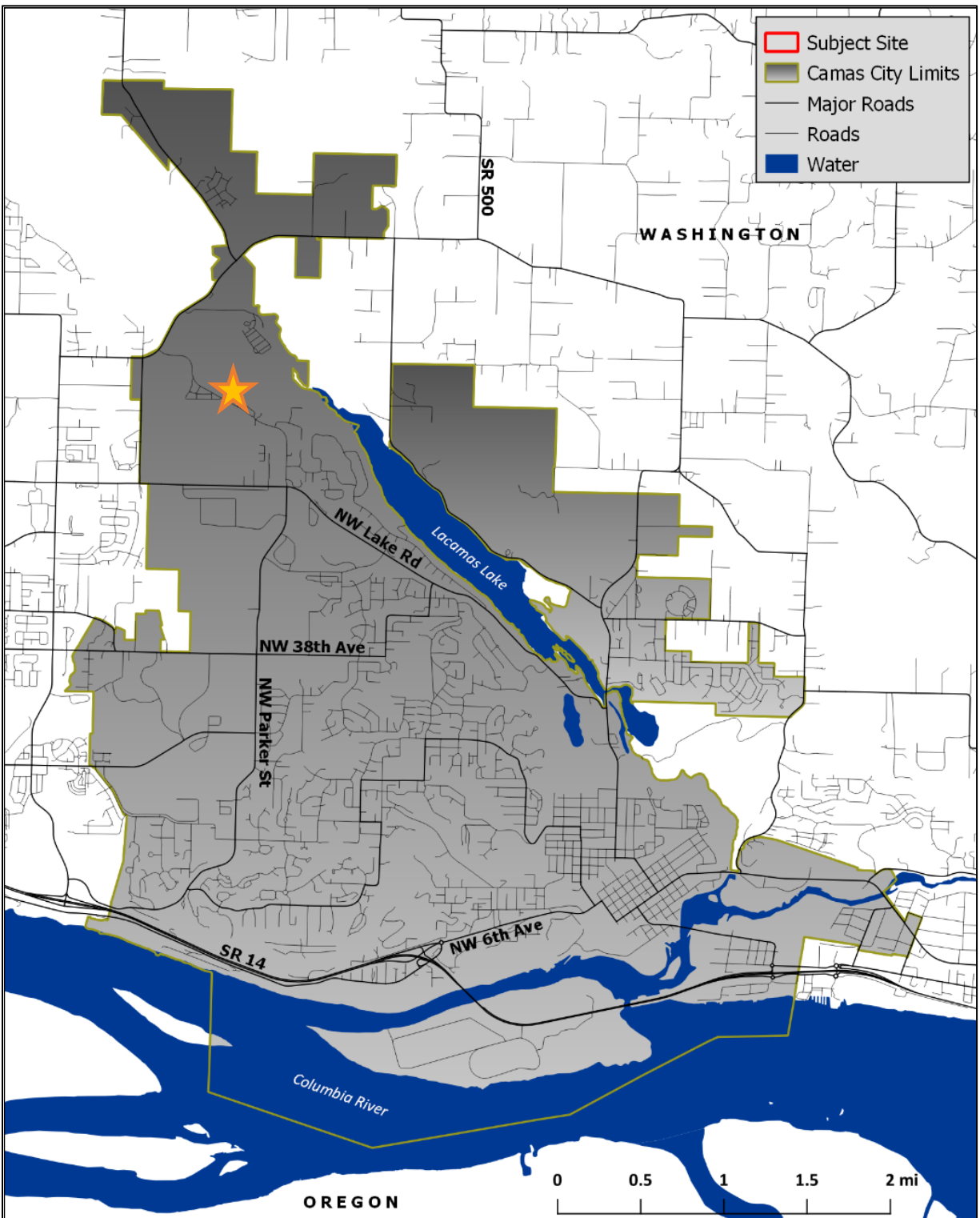
FIGURE 1.1: SITE CONTEXT



SOURCE: Bing Maps, Johnson Economics



FIGURE 1.2: SUBJECT LOCATION



Source: Johnson Economics, Clark County, US Census Bureau TIGER, Metro RLIS



II. SITE ANALYSIS

THE SUBJECT SITE

The subject site is a roughly rectangular-shaped parcel, consisting of four taxlots. In total, the parcel amounts to four acres in size. The site is currently forested and located on Camas Meadows Drive in Northwest Camas. The site features a downwards slope from the south (Camas Meadows Drive) to the north (golf course fairway). Access will be from Camas Meadows Drive, a three-lane arterial street.

Broadly speaking, the site is located near the boundary of a large area planned for light industrial or business park employment uses (to the west) and a large area planned for residential and commercial uses (to the south and east).

The site and much of the surrounding area is zoned LI/BP. However, there is multi-family zoning (MR-18) located directly to the south. There is business park zoning directly to the east, but this area is now under development as the Village at Camas Meadows, which includes multi-family and single-family residential. Therefore the site sits right at the boundary of residential and employment neighborhoods.

Surrounding Uses: The site is bordered directly to the east and north by the Camas Meadows Golf Club and to the south by the driving range. There is an existing business park development located to the south and west across Camas Meadows Drive. There are new multi-family and single-family residential subdivisions under development less than 0.25 miles southeast of the site.

There is also substantial remaining vacant land in the immediate area, mostly in the area zoned LI/BP to the west and south, but also in the MR-18 zone directly to the south.

Services: The subject site lies roughly 1.5 miles by road to the nearest concentration of shopping and commercial services on NE 192nd Avenue. Commercial tenants in the area include Costco, Walmart, JC Penny, PetSmart, Home Depot, and Lowe's, as well as a number of smaller stores, restaurants, and service providers. The site also offers good access to recreational amenities, like the Camas Meadows Golf Club, Lacamas Lake, Lacamas Heritage Trail, and Harmony Sports Complex.

There is land zoned for commercial use along Lake Road to the south, and in the Green Mountain Village area to the north, which will be somewhat closer if in eventually develops with commercial uses. The site is over 4 miles from Downtown Camas via Lake Road and Everett Street.

PROPOSED ALTERNATIVE USES

There is a proposal for change in Comp Plan designation for the subject site, from LI/BP to a commercial designation that permits mixed use. As noted, the site sits at the boundary of employment and residential neighborhoods.

The purpose of the Light Industrial/Business Park (LI/BP) zone according to the Camas Municipal Code is:

The Light Industrial/Business Park (LI/BP) district is intended to provide for employment growth in the city by protecting industrial areas for future light industrial development. Design of light industrial facilities in this district will be "campus-style," with ample landscaping, effective buffers, and architectural features compatible with, and not offensive to, surrounding uses. Commercial development in the LI/BP district is limited to those uses necessary to primarily serve the needs of the surrounding industrial area, and is restricted in size to discourage conversion of developable industrial land to commercial uses. (Chapter 18.21.010)



The mix of uses alternatively proposed at the site are likely to include multi-family residential uses and small-format commercial uses, such as convenience retail, small dining or small office uses. The commercial zones which would allow for some residential uses as part of a development are the Mixed Use Zone (MX), Community Commercial (CC), Downtown Commercial (DC) and Regional Commercial (RC). The CC, DC and RC zones placed conditions on mixed uses that are likely to make them inappropriate for the subject site. The MX zone allows mixed uses as a conditional use and provides for more flexibility in how they might be configured.

MX Mixed Use. This zone provides for a wide range of commercial and residential uses. Compact development is encouraged that is supportive of transit and pedestrian travel. (Chapter 18.21.050)

SITE SUITABILITY FOR ALTERNATIVE USES

The following is a general discussion of the suitability for the site for the alternative uses based on market considerations, physical configuration, and access. While the site may be technically suitable for an industrial or business park use, there are multiple reasons that it is likely more suitable for a mix of commercial and residential uses.

Light Industrial/Business Park

The site would generally be physically suitable for light industrial or business park development, as evidenced by the existing business park developments along Camas Meadows Drive, but due to some site limitations and location factors is not as well suited for this use as the alternative. At four acres, it is of sufficient size to hold one or more office, industrial or “flex space” type developments.

- **Compatibility:** Some industrial and flex-space users may not be compatible with the existing golf course use to the north edge of the site. These may include businesses that create negative externalities such as noise, smoke or other fumes, excessive industrial yard machinery or storage, or heavy truck traffic. All of these factors would make an industrial user an unattractive neighbor to the golf club. At the same time, employees at the site would be unlikely to take advantage of the proximity to the golf facilities during most daylight hours, as golf tends to be more of a residential lifestyle amenity than a corporate park amenity.
- **Topography:** The sloping topography of the site might present a challenge for industrial users who prefer flat land. The preparation and grading of this land must not be cost prohibitive, because typically industrial users pay the least of the major uses for buildable land (i.e. excessive land development costs can render a site infeasible for industrial use). The topography would present less of a challenge to a business park development offering more standard office space.
- **Traffic/Access:** The area is generally accessible for campus-style employment uses via Camas Meadows Drive which is a three-lane arterial. In theory if enough of the vacant LI/BP lands in the northwest Camas area were to build out, this could eventually lead to traffic congestion at high-volume times of the day.
- **Market Conditions:** The Camas and East Vancouver submarket has seen healthy growth of industrial and office park users and new jobs during the recent economic recovery. The area has attracted multiple high-paying professional firms in recent years and remains a draw for Portland-metro business owners looking to move to a more favorable tax environment. According to data from CoStar Analytics, the strength of the local office market has fluctuated over time. While rent levels have risen steadily, vacancy has at times exceeded the 10% threshold sought in a healthy market.

Currently, there are thousands of vacant square feet of space available at the Camas Meadows Corporate Center across the street from the subject site. As discussed more in Section III of this report, there is also estimated to be an oversupply of industrial and business park land to accommodate new development. For



these reasons, Johnson Economics does not estimate that there is currently a significant shortage or even tight supply of industrial, business park or office space in the Camas area for the foreseeable future.

Commercial and Residential Mixed Use

The site would be physically suitable for a mix of commercial and residential uses and is an adequate size for such a development.

- **Compatibility:** The site is compatible for a range of small commercial users including convenience retail, small dining establishments and small office users. These uses can benefit from a location between industrial parks to the west, residential neighborhoods to the east, and traffic to and from the golf course.

Residential housing is a traditional compatible use next to a golf course, and this development would benefit from being near the clubhouse and driving range. The established neighborhoods to the east around the golf course demonstrate that this is a desirable location for residents, offering excellent access to nature, views, and livability amenities. New single-family homes in the area sell in the range of \$350,000 to well over one million dollars.

The site would be suitable for a range of residential housing types from attached multi-family apartments to townhomes to condominiums. Based on currently achievable rents and construction costs, the likely development form for housing on this site would be two-to-three story wood-frame construction.

- **Topography:** Multi-family developments are typically feasible on more uneven topography due to the ability to locate multiple buildings and parking areas at different elevations. Commercial uses at the site would need more even building sites and parking lots. However, residential and/or commercial developments can also typically afford higher cost for land preparation than industrial uses.
- **Traffic/Access:** The area is accessible via Camas Meadows Drive. The site location is somewhat distant from other commercial services. This would provide an advantage for the right mix of commercial businesses at the site, who could serve the on-site tenants, local neighborhoods, and nearby employers. NW Lake Road to the south offers access to the regional network of major arterials and highways. The quiet location is likely to be a key attractor to prospective residents at the site.
- **Market Conditions:** The subject site is a good location for small businesses, providing good access and visibility, with a built-in local customer base. The greatest concentrations of commercial shopping and service are all located more than a mile from this area. Demand for these businesses will continue to grow as Camas experiences strong residential and employment growth. As Section III of this report presents, the Camas 2035 plan forecasts strong growth in commercial jobs over coming decades, and significantly outnumbering industrial jobs.

Section IV of this report discusses estimates of demand for housing types by age and income groups. Since 2000, Camas has grown by nearly 4,000 households, or 86% growth. This translates to robust annual growth of 3.2%, in comparison to 1.4% growth in Washington State, and 0.8% in the United States. The community is forecasted to continue to add an average of roughly 200 households each year over the next five years. The housing supply for both owner and rental units must continue to increase to meet the need of these new residents.

Camas is a strong residential development market, with median sale price of homes approaching \$500,000 and 30% higher than the prior peak in 2007. Annual home sales have increased from 415 to 770 between 2007 and 2019, and housing units permitted rose from 130 to 650 per year. This pace already exceeds the forecasted growth rate of the Camas 2035 plan.



III. LAND CAPACITY VS. DEMAND (CAMAS 2035)

CAMAS 2035 FINDINGS

Figure 3.1 presents the estimated buildable acres of commercial, industrial and residential land in Camas as identified in the City’s most recently adopted Camas 2035 Comp Plan. Camas 2035 was adopted in 2016 and generally reflects the land demand and capacity estimates from 2015. The original source of the buildable land inventory was the 2015 Vacant Buildable Lands Model (VBLM) of Clark County.

The adopted Comp Plan estimated 464 net acres of buildable commercial land (generally retail and office), and an estimated 660 net acres of buildable industrial land. There was an estimated supply of 876 net buildable acres of residential land.

After the projected amount of land need over 20 years was factored, the analysis adopted in the Comp Plan finds that there is a surplus of land for all three land uses. The Comp Plan finds the narrowest 20-year surplus of commercial land (127 acres), with a larger surplus of industrial lands (167 acres), and the largest surplus of residential land (231 acres).

(The most recent 2018 VBLM finds a diminished supply of net buildable lands in all of these categories due to development over the last few years. However, the 2018 VBLM does not include a forecast of job and housing growth, making the 2015 figures the best numbers for comparison in this analysis.)

**FIGURE 3.1: ESTIMATED LAND SUPPLY AND DEMAND
CITY OF CAMAS COMPREHENSIVE PLAN (2015 – 2035)**

Land Use Category	Density	Demand (2035)			Total Land Supply / Capacity		Surplus Supply / Capacity	
		Jobs	Units	Acres	Net Acres (CP) ¹	Capacity (jobs/units)	Net Acres (CP)	Capacity (jobs/units)
Commercial	20 jobs/ac	6,744		337	464	9,280	127	2,536
Industrial	9 jobs/ac	4,438		493	660	5,940	167	1,502
	Total:	11,182		830	1,124	15,220	294	4,038
Residential	6 units/ac		3,868	645	876	5,256	231	1,388

¹ Acreage based on VBLM, but further refined by City. Finding of more net acres than in VBLM.

Source: Camas 2035, Table 1-1; Clark County Vacant Buildable Lands Model (2015)

Forecasted Job Growth (Land Demand): The Comp Plan presents a forecast of land demand for 337 commercial acres and 493 industrial acres over the planning period. However, due to the higher assumed density of jobs on commercial lands (20 jobs/ac.), this amounts to many more commercial jobs than industrial jobs (6,744 vs. 4,438 respectively).

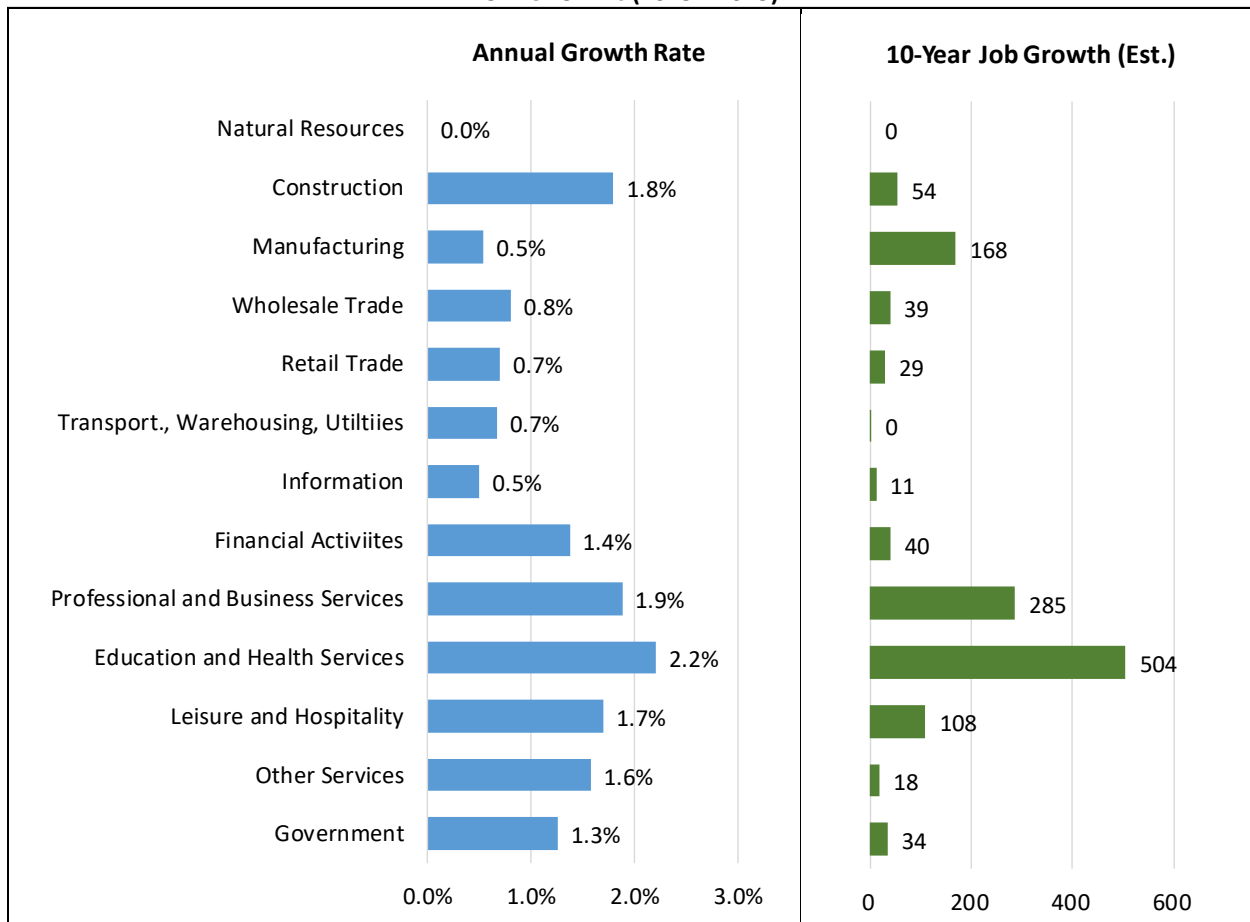
The Comprehensive Plan projects 11,182 new jobs in Camas by 2035, based on estimates from the Clark County Buildable Lands Report (2015). Given the 9,093 jobs from 2013 shown in the Comprehensive plan, this means that the city has forecasted average annual employment growth in the range of 3.7% per year.

Though average annual growth in the city was only 1.5% from 2001 to 2015, growth has been rapid since the downturn. From 2010 to 2015, the city added jobs at an average annual rate of 5.4%, and at 5.0% after 2016. These numbers are both faster than the 3.6% and 4.3% growth seen county-wide in those time frames, respectively.



Supplemental Employment Sector Analysis: JOHNSON ECONOMICS prepared additional analysis of employment growth based on the forecasted growth rate of major industry sectors in Southwest Washington. This forecast is based on 10-year growth rates prepared by the Washington State Employment Security Department (ESD) for the broader Southwest Washington region. Because the methodologies differ, the overall job growth forecast does not match that found in the Comp Plan. However, this does provide more granularity on what employment sectors are expected to grow fastest in the region, and whether or not these tend to be industrial, office or retail jobs.

**FIGURE 3.2: ALTERNATE 10-YEAR JOB GROWTH PROJECTION
CITY OF CAMAS (2015 – 2025)**



SOURCE: Washington State Employment Security Department, Johnson Economics

This analysis utilized the estimated employment base level of 9,093 as presented in the Camas 2035 plan, distributed across sectors as reported by the US Census Longitudinal Employer-Household Dynamics program. Applying the projected growth rates from the ESD, we see that the fastest growing industries are projected to be Education and Health Services (2.2% annually), Professional and Business Services (1.9%), and Construction (1.8%).

In terms of absolute growth in number of jobs, the greatest local growth is expected in Education and Health Services, and Professional and Business Services. There next highest number of jobs are in manufacturing and tourism-related sectors. (These numbers do not match the adopted forecast in the Camas 2035 Plan, and therefore should be viewed as an indicator of projected growth relative to other sectors.)

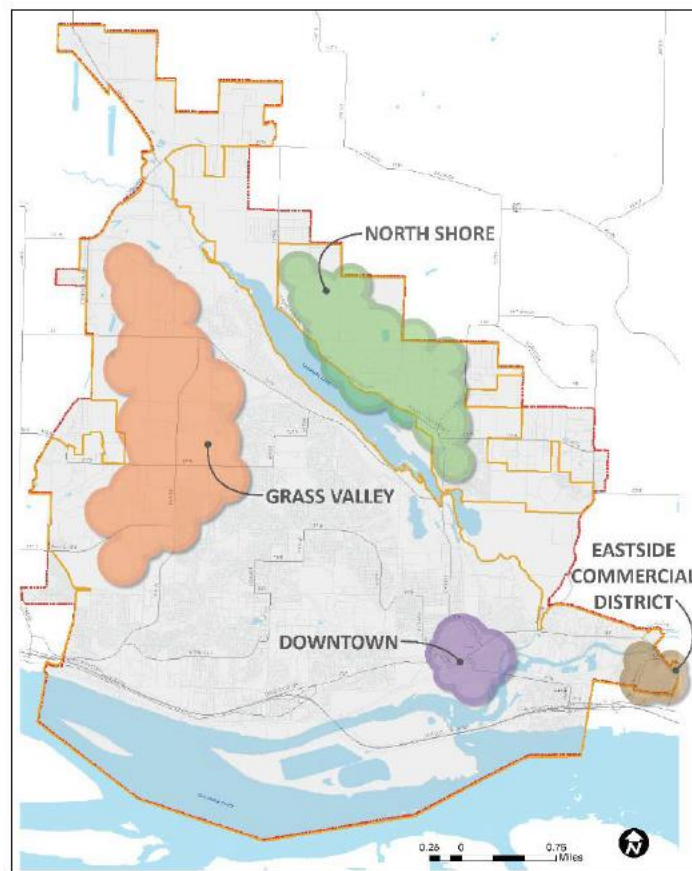


This alternate forecast suggests that the greatest number of new jobs will be found in sectors that tend to use commercial office and retail space (and land), and fewer new jobs in sectors that use industrial space. The major users of industrial space (manufacturing, transportation/warehousing, construction) are projected to make up roughly 16% of new employment under this alternative forecast. The sectors which are major users of office and retail commercial space make up an estimated 82% of new employment.

GRASS VALLEY ECONOMIC DEVELOPMENT AREA

The subject area is located in the Grass Valley Economic Development Area described in the Camas 2035 plan. The plan leaves the area vaguely defined as a large region of industrial, business park, and commercial zones on the western side of the city (Figure 3.3).

FIGURE 3.3: CAMAS ECONOMIC DEVELOPMENT AREAS



SOURCE: Camas 2035, City of Camas

The Camas 2035 Comp Plan describes the Grass Valley Economic Development Area as follows:

Grass Valley is home to several national and international technology and manufacturing firms. Land uses in Grass Valley include large technology and manufacturing campuses, surrounded by retail and commercial services and residential development. The City has invested in significant infrastructure improvements in Grass Valley in support of high-tech industrial development, which is still the focus for this area. (Camas 2035 6.4.3)



One of the underlying development policies for Grass Valley relates to maintaining adequate employment land supply to meet 20-year needs when conversion of some of the area to other uses is proposed:

ED-3.3: Protect employment land from conversion to residential uses by requiring an analysis of adequate buildable lands in Grass Valley to meet 20-year employment projections prior to land conversion approval. (Camas 2035 6.4.3)

JOHNSON ECONOMICS conducted an inventory of remaining buildable employment land in Camas as of 2019, using Clark County GIS data. We first filtered out all but commercial, industrial, and multifamily-zoned land. We then filtered out projects that are committed to being developed in the short-term. We then used the following property type descriptions to determine the amount of viable land:

- Prime Developable Ground
- Unused Land Timbered
- Unused or Vacant Land – No Improvements
- Vacant

This inventory resulted in the following estimates of buildable employment land in the Grass Valley area (supply), vs. the total demand for industrial lands forecast in the Camas 2035 Plan (demand). The estimates are presented in the following table and map (Figures 3.4 and 3.5).

**FIGURE 3.4: ESTIMATED VACANT, UNUSED AND DEVELOPABLE LANDS
GRASS VALLEY VS. CAMAS, WA (2019)**

<u>Zone</u>	<u>Parcels</u>	<u>Acreage</u>	<u>Job Capacity</u>
BP	8	94.9	854
LI	4	59.8	538
LI/BP	19	183.3	1,650
Total:	31	338.0	3,042
Indust. Demand (Camas 2035):		493.1	4,438
Grass Valley Share:		69%	69%

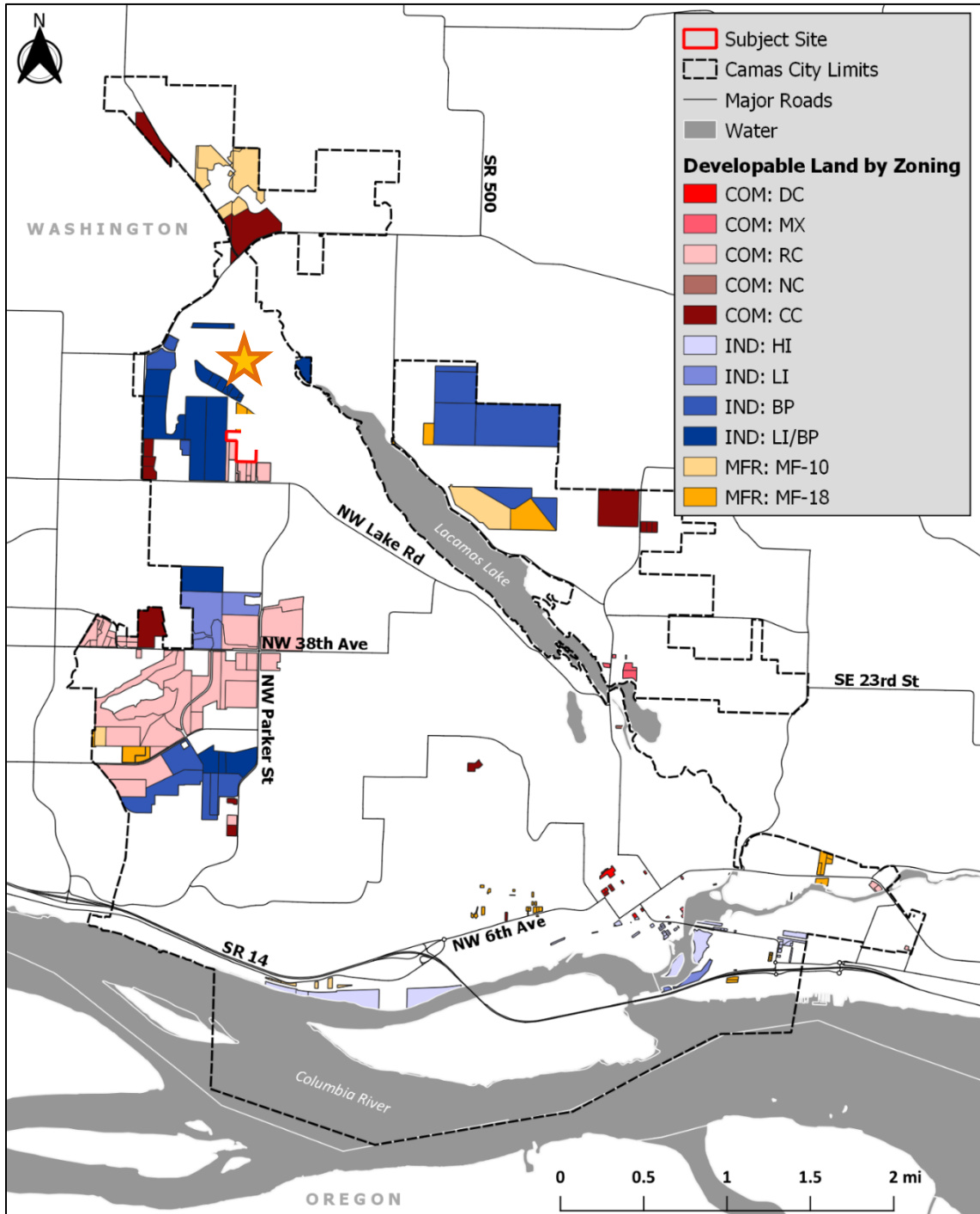
SOURCE: Clark County, Camas 2035, Johnson Economics

The inventory suggests that the Grass Valley area has sufficient available land to accommodate 69% of the total forecasted 20-year demand for industrial land in the city. A conversion of the 4-acre subject site to a different use would lower this capacity very slightly to 68% of the demand.

At the same time, the industrial areas outside of Grass Valley, most notably the Northshore area, can also accommodate a majority (63%) of the 20-year demand. These two areas alone can accommodate over 130% of forecasted need. **This indicates that if the subject site were converted to a different use, that the Grass Valley area would retain capacity to meet its share of employment land demand, while the city would maintain the capacity to meet well over 100% of the forecasted 20-year demand.**



FIGURE 3.5: VACANT, UNUSED AND DEVELOPABLE LANDS, CAMAS, WA (2019)



SOURCE: Clark County, Johnson Economics



IV. RESIDENTIAL DEMAND ANALYSIS

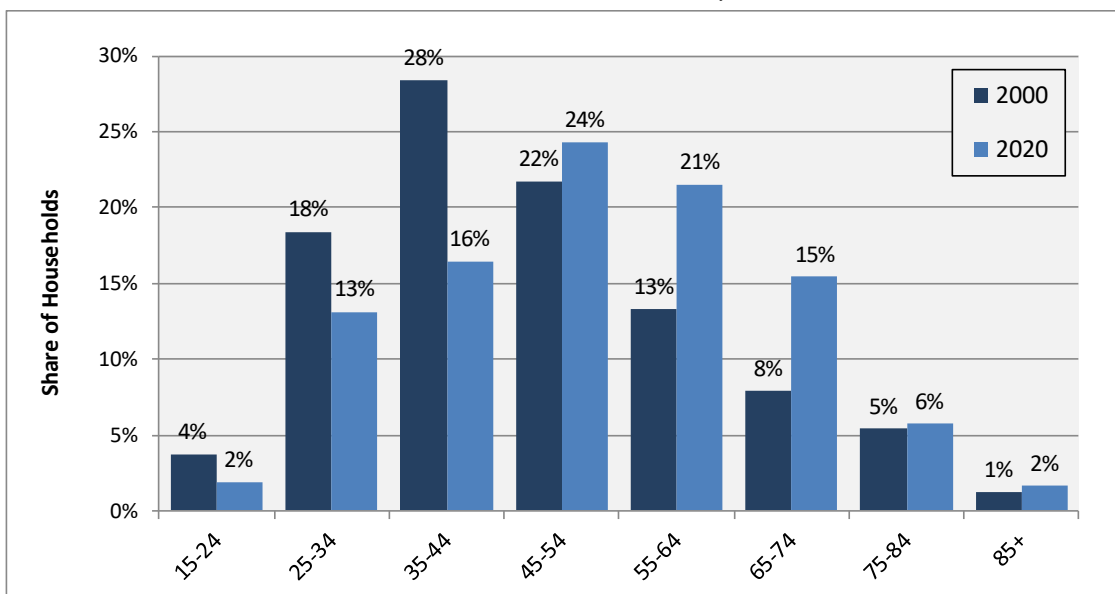
In this section, we analyze the market depth for rental apartments within the City of Camas, to determine the potential demand for housing at the subject site as part of a mixed use development. We provide estimates of turnover in the existing household base as well as estimates of current demand growth over the coming five years. The forecast supports the continued robust growth of the Camas community and need for housing.

HISTORICAL GROWTH

According to estimates from Environics and the Census, the PMA totals 8,317 households as of 2020, after adding over 3,850 households since the turn of the millennium. Over this 20-year period, this translates to an average annual growth of 3.2%, which is far above the average growth rate observed in the Portland Metro Area (1.3%). Since 2000, households in Camas have grown significantly older and wealthier on average.

Age of Householder: The following figure displays how the household growth within the market area has been distributed across age groups since 2000. The strongest growth was seen in households aged 45 to 74. All age categories except 15-24-year-olds experienced some growth in absolute terms. But in terms of share of households (%), those aged 45 to 74 grew the most.

FIGURE 4.1: AGE PROFILE OF CAMAS HOUSEHOLDS, 2000 AND 2020



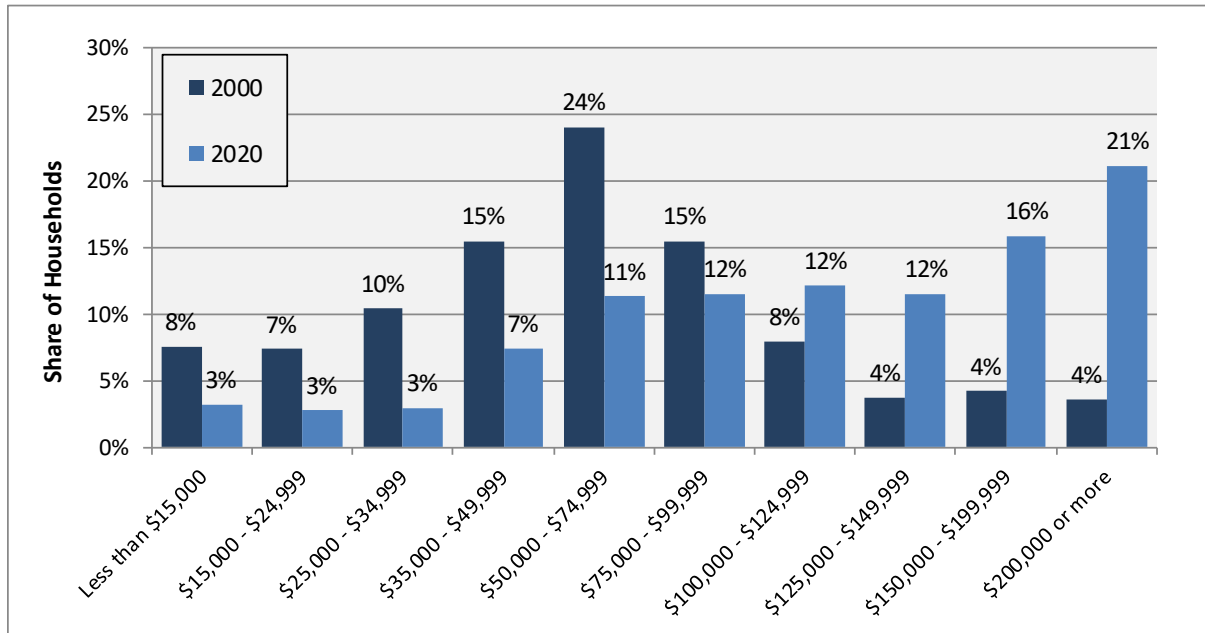
SOURCE: Environics Analytics

The largest total growth seen within an age group was in those aged 55-64. This age group increased by an estimated 1,200 households since 2000. The 45-54 age group and the 65-74-year old age group each grew by roughly 1,000 households since 2000. This group had a smaller population to begin with, however, so the increase represents a 6.8% annual growth, highest among all age groups.

Household Income: The area has become quite affluent over the last two decades, though part of the increase can be attributed to inflation. The realized growth on a net basis has been among households making at least \$75,000 per year. Growth is particularly strong among households making more than \$100,000 per year. Nearly all the positive growth came from households with incomes above this threshold. The highest-income households, making at least \$200,000 per year, increased over ten-fold over the period, faster than any other income group.



FIGURE 4.2: INCOME PROFILE OF CAMAS HOUSEHOLDS, 2000 AND 2020



SOURCE: Envirionics Analytics

DEMAND GROWTH (2020 - 2025)

JOHNSON ECONOMICS has developed a housing demand model that translates estimates of job growth and household growth into demand for housing of different forms. Our model begins with household growth estimates stratified by age and income, as these are the variables that best predict housing preferences. Our household growth estimates are based on projections by Envirionics, a third-party data provider that draws on various data sources to identify trends that impact the household base within specific geographies down to a census block group level. We adjust these estimates based on employment growth projections (by age) and migration trends. The goal is for the projections to reflect underlying demand rather than expected realized household growth, which is constrained by supply.

After developing a segmented projection of overall housing demand for the market area, we use local microdata from the U.S. Census Bureau to establish segment-specific rates of housing tenure (owners/renters) and housing type (SF detached/SF attached/multi-family), to derive assumptions of future housing propensity within the segments.

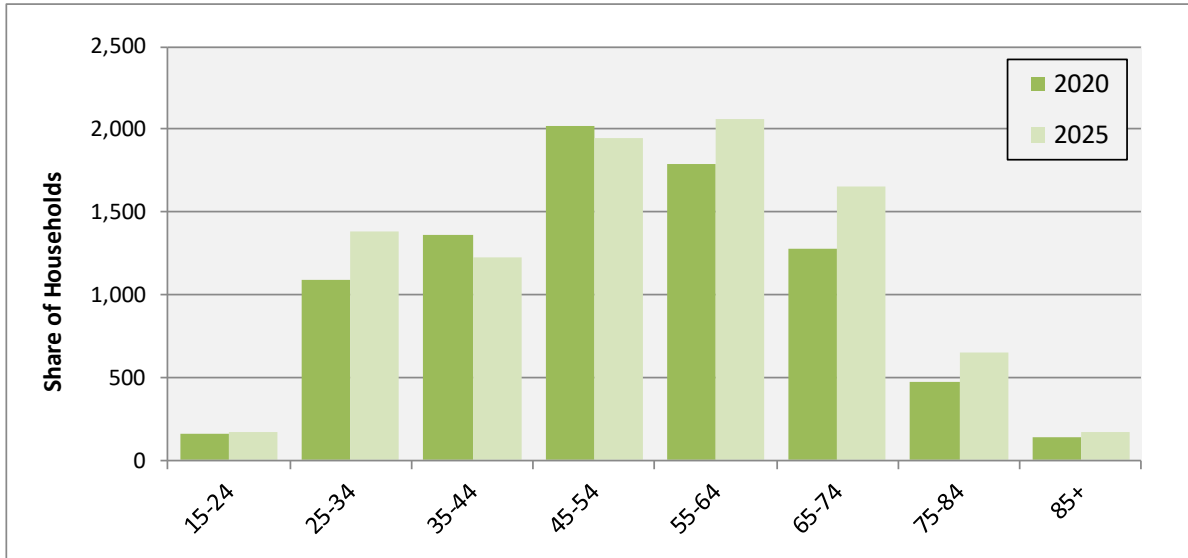
NEW HOUSEHOLD DEMAND, CAMAS

Over the coming five years, Johnson Economics projects an increase of roughly 960 households within Camas, or 190 per year. This represents annual growth of 2.2%. Note that this is based on an extrapolation of historical trends, which in turn is based on realized growth rather than underlying demand not limited by supply constraints. Taking into account job growth and migration, we believe that the household growth is likely to exceed this rate, therefore we believe this is a conservative estimate.

The following chart displays the anticipated change in the number of households by the age of the householder. The projections indicate particular demand growth among young households in the early family-stage, as well as considerable growth in empty-nester and senior segments, reflecting the aging of the baby boomers. The greatest growth is anticipated in those between 55 and 74 years of age.



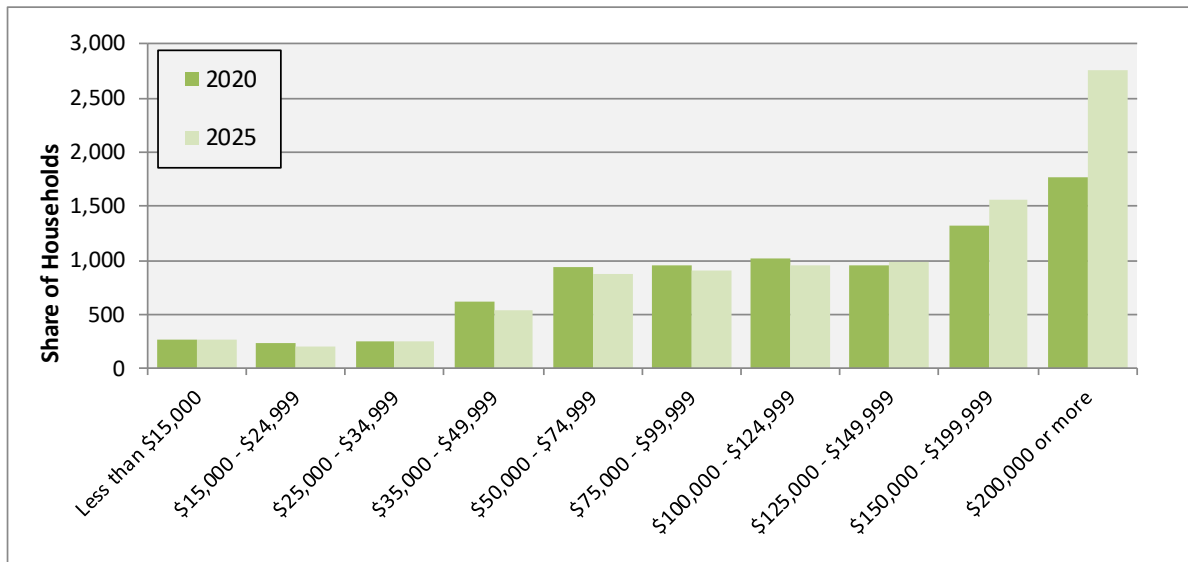
FIGURE 4.3: PROJECTED DISTRIBUTION OF HOUSEHOLDS BY AGE, CAMAS (2020-2025)



SOURCE: Envirionics, JOHNSON ECONOMICS

With respect to income, the growth is anticipated to be distributed broadly across mid- and upper-income segments, but with the greatest growth continuing to be seen in the highest income categories. The city is expected to continue to develop as an attractive middle- and upscale community for Clark County and Portland-metro workers. The affluent suburban nature of the community will enhance its attractiveness to prospective new residents.

FIGURE 4.4: PROJECTED DISTRIBUTION OF HOUSEHOLDS BY INCOME, CAMAS (2020-2025)

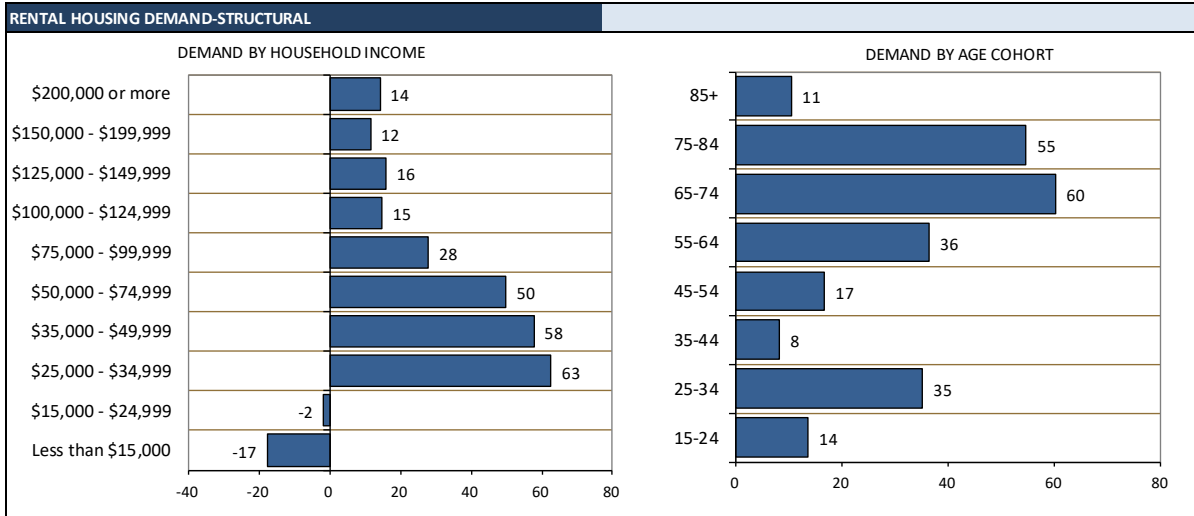


SOURCE: Envirionics, JOHNSON ECONOMICS

When we apply estimates of future tenure (rent vs. own) and housing type propensity rates to the projected demand, our model indicates that new growth alone will support roughly 240 apartment units over the coming five years, or an average of nearly 50 per year. The net new demand is projected to be concentrated among the lower- to middle-income households who are more likely to rent than own. This trend supports the need for the continued development of new housing options in coming years.



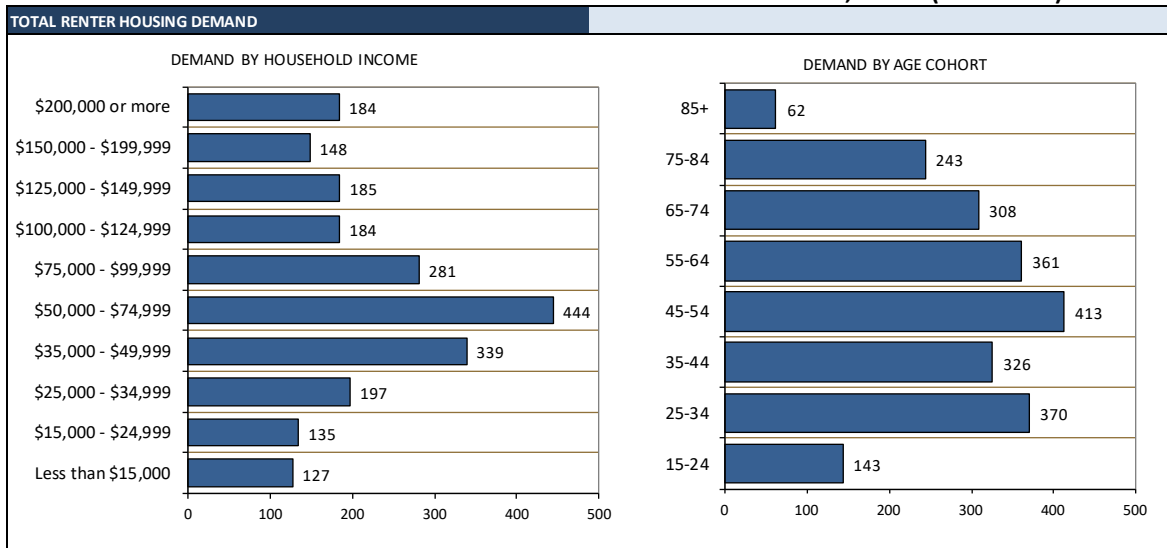
FIGURE 4.5: PROJECTED GROWTH IN DEMAND FOR RENTAL APARTMENTS, CAMAS (2020-2025)



SOURCE: *EnviroNics, JOHNSON ECONOMICS*

A secondary source of demand is turnover in the existing base of apartment households in the city. When currently renting households move out of their units, newer rental properties have the ability to compete for these renters with newer facilities and up-to-date amenities. We project around 445 rental transactions (new and turnover) per year in the Camas apartment market. These transactions are expected to represent a wider distribution across age and income categories than the net new demand.

FIGURE 4.6: PROJECTED TOTAL ANNUAL DEMAND FOR RENTAL APARTMENTS, CAMAS (2020-2025)



SOURCE: *EnviroNics, U.S. Census Bureau, JOHNSON ECONOMICS*

Though turnover represents demand for which there already is matching supply, these transactions tend to benefit the absorption of new units in the market, as existing renters “trade up” into newer units with less wear and more up-to-date features. Based on Clark County taxlot data, analyzed in GIS, the average age of existing apartment projects with at least five units in Camas is 35 years, suggesting more up-to-date properties should be able to offer a large competitive contrast. Moreover, the data indicates that the average size of these projects is 19 units. Projects of this scale rarely offer any community amenities to speak of.



V. CONCLUSIONS

ALTERNATE USES

While the subject site is generally suitable for either of the proposed uses, the prospective industrial business park development faces some disadvantages while a mixed-use development generally enjoys advantages for feasibility. These are mainly related to market forces, demand, and the topography of the site, and compatibility with surrounding uses:

- Topography:** The sloping topography of the site might present a challenge for industrial users who prefer flat land. The preparation and grading of this land must not be cost prohibitive, because typically industrial users pay the least of the major uses for buildable land (i.e. excessive land development costs can render a site infeasible for industrial use). Multi-family developments are typically feasible on more uneven topography due to the ability to locate multiple smaller buildings and parking areas at different elevations. **Higher-value residential and/or commercial developments can also typically support higher cost for land preparation than industrial uses.**
- Compatibility:** Housing is a classic compatible use next to a golf course, and this development would benefit from being near the clubhouse and driving range. The established neighborhoods to the east around the golf course demonstrate that this is a desirable location for residents, offering excellent access to nature, views, and livability amenities. The site is compatible for a range of small commercial users including convenience retail, small dining establishments and small office users. These uses can benefit from a location between industrial parks to the west, residential neighborhoods to the east, and traffic to and from the golf course.

Some industrial and flex-space users are likely to be incompatible with the existing golf course use to the north edge of the site. These include businesses that create negative externalities such as noise, smoke or other fumes, excessive industrial yard machinery or storage, or heavy truck traffic. Business Park office development may be less likely to face these issues.
- Market Conditions:** The Camas and East Vancouver submarket has seen healthy growth of industrial and office park users and new jobs during the recent economic recovery. But according to data from CoStar Analytics, the strength of the local office market has fluctuated over time. While rent levels have risen steadily, vacancy has at times exceeded the 10% threshold sought in a healthy market.

Currently, there are thousands of vacant square feet of space available at the Camas Meadows Corporate Center across the street from the subject site. As discussed more below, there is also estimated to be an oversupply of industrial and business park land to accommodate new development. For these reasons, **Johnson Economics does not estimate that there is currently a shortage or even tight supply of industrial, business park or office space in the Camas area** for the foreseeable future.

The subject site is a **good location for small commercial businesses**, providing good access and visibility, with a built-in local customer base. The greatest concentrations of commercial shopping and service are all located more than a mile from this area. Demand for these businesses will continue to grow as Camas experiences strong residential and employment growth. The Camas 2035 plan forecasts strong growth in commercial jobs over coming decades, and significantly outnumbering industrial jobs.

Since 2000, Camas has grown by nearly 4,000 households, or 86% growth. This translates to robust annual growth of 3.2%, in comparison to 1.4% growth in Washington State, and 0.8% in the United States. The community is forecasted to continue to add an average of roughly 200 households each year over the next



five years. The housing supply for both owner and rental units must continue to increase to meet the need of these new residents.

Camas is a strong residential development market, with median sale price of homes approaching \$500,000 and 30% higher than the prior peak in 2007. Annual home sales have increased from 415 to 770 between 2007 and 2019, and housing units permitted rose from 130 to 650 per year. This pace already exceeds the forecasted growth rate of the Camas 2035 plan.

- **Job Capacity:** The Camas 2035, using Clark County assumptions assumes that industrial land will develop at an average of 9 jobs per acre. The amount of employment at any one LI/BP development will vary. Office space in a business park is likely to supply jobs at a higher density than a warehouse. However, it should be noted that if a greater job density is assumed, then the forecast of total needed industrial acres over 20 years should also be lower (i.e. more jobs would be accommodated on less land.) If that is the case, then this would result in an even higher surplus of industrial land in the inventory. The impact of converting a small amount of it to a different use would be even less.

Under the alternative mixed-use scenario for the site, the commercial portion is assumed to accommodate an average of 20 jobs per acre, indicating that **the transition from industrial to commercial zoning will still allow for employment growth at the subject site.**

INDUSTRIAL AND COMMERCIAL LAND SUPPLY

The Camas 2035 comparison of 20-year land need from job and household growth, with the current buildable lands, found a surplus of all the major categories of land in Camas (Figure 3.1, reproduced below). If the lands build out as projected, there will remain a surplus of 127 commercial acres, and 167 industrial acres. **These adopted figures do not present a compelling reason to protect a small amount of either of these categories of land from conversion,** all else being equal.

**FIGURE 3.1: ESTIMATED LAND SUPPLY AND DEMAND
CITY OF CAMAS COMPREHENSIVE PLAN (2015 – 2035)**

Land Use Category	Density	Demand (2035)			Total Land Supply / Capacity		Surplus Supply / Capacity	
		Jobs	Units	Acres	Net Acres (CP) ¹	Capacity (jobs/units)	Net Acres (CP)	Capacity (jobs/units)
Commercial	20 jobs/ac	6,744		337	464	9,280	127	2,536
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Residential	6 units/ac		3,868	645	876	5,256	231	1,388

¹ Acreage based on VBLM, but further refined by City. Finding of more net acres than in VBLM.

Source: Camas 2035, Table 1-1; Clark County Vacant Buildable Lands Model (2015)

An inventory of Grass Valley industrial lands find that remaining parcels are sufficient to accommodate 69% of forecasted 20-year industrial employment (Figure 3.4), while the rest of the city could also accommodate *an additional* 63% of the forecast. This supports the Camas 2035 finding that there is significant overcapacity of industrial lands (132% of demand), **and conversion of the subject site to a different use would not violate the policy of maintaining a 20-year supply in Grass Valley.**



INDUSTRIAL VS. COMMERCIAL LAND DEMAND

The Camas 2035 projects a 20-year growth of 11,182 jobs. A majority of these (60%) are forecasted to be jobs that take place in a commercial environment, and 40% in an industrial environment (Figure 3.1). Additional analysis by employment sector using state ESD forecasts supports the conclusion that, despite robust industrial job growth, a majority of new employment will be commercial jobs. **This finding is supportive of conversion of a modest amount of industrial land to commercial land on the border of the Grass Valley LI/BP area, without significantly impairing the ability to meet future industrial demand.**

RESIDENTIAL LAND DEMAND

The Camas 2035 plan likewise finds a surplus of residential lands over the planning period. Over the coming five years, Johnson Economics projects an increase of roughly 960 households within Camas, or 190 per year. This represents annual growth of 2.2%, which we consider a conservative estimate. **The demand analysis prepared by strongly supports the need for additional housing options of all types over the coming decades.**

The subject site is an appropriate location for housing as part of a mixed-use development based on physical, location and market factors.