

STAFF REPORT

Annual Comprehensive Plan Amendments
City File Number: CPA22-01

TO:	Camas Planning Commission	DATE:	October 19 th , 2022
FROM:	Marty Snell, AICP, MacKay Sposito on behalf of planning staff		
LOCATION:	4711 NW Camas Drive (Property Tax ID# 986026906)		
APPLICABLE LAW:	Camas Municipal Code Chapters (CMC) Chapter 18.51		

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This Staff Report will:

- Analyze the City's Comprehensive Plan policies and goals; and
- Address the provisions set forth in Camas Municipal Code 18.51.

I. COMPREHENSIVE PLAN AMENDMENT PROCESS

Each year in the months leading up to January, the City announces that proposed amendments to the Comprehensive Plan will be received for 30 days. The City received one application (File: CPA22-01).

II. BACKGROUND

In 2016, the city adopted a complete update to its comprehensive plan and map, titled Camas 2035 (Ord. 16-010). The city's comprehensive plan guides land use and the city's financial plans relative to capital facilities and the provision of city services and programs, consistent with the state's Growth Management Act (GMA) and Clark County's Community Framework Plan.

The plan includes six (6) elements that work together to achieve the community's vision and long-term economic vitality. Those elements include policies and goals for the following: Land Use; Housing; Natural Environment; Transportation and Street Plans; Public Facilities, Utilities, and Services; and Economic Development.

The growth plan anticipates that the city will have a total population of 34,098 in 2035 and will add 11,182 new jobs. According to the state's Office of Financial Management, the city's population, as of April 1, 2021, is **26,870**, which is a 3.09% increase from the 2020 Census of **26,065**. This increase is 1.15% more than the Clark County increase of 1.94%, which is in keeping with a trend of more growth than the county experiences as a whole.

The City must evaluate proposed comprehensive plan changes in order to provide a balance of residential and employment lands. The City must also carefully evaluate the amount of developable land for each use, after deducting for critical areas or other practical challenges. The following report will discuss the city's compliance with the population and employment allocations to date and provide an analysis of the proposed amendments.

III LAND INVENTORY

EMPLOYMENT LANDS

The city's vision for economic development (Camas 2035, Section 6.1) in part reads, "In 2035, the economy has grown to attract a variety of businesses that offer stable employment opportunities and family wage jobs in the medical and high tech fields." This element also has a goal to 'maintain a diverse range of employment opportunities to support a setting and quality of life that attract and retain businesses.'

The City has approximately 3,398 acres designated for employment (combined commercial and industrial lands), or 33% of the overall acreage. Based on June, 2022 Clark County's Buildable Lands Report (BLR), it is estimated that there is 963 net acres of vacant and underutilized employment land in Camas. The model estimates that the city's capacity of 296 net acres of Commercial land and 667 acres of Industrial land will create 11,921 additional jobs by 2035. This estimate is based on the employment density assumptions of adding 9 jobs per acre for industrial and 20 jobs per acre for commercial, which was reaffirmed by Clark County for the June 2022 BLR.

Given the high-level nature of the buildable lands analysis, there may be additional land that cannot be developed when detailed site plans are researched, or alternatively, a new employer may exceed the estimated jobs per acre based on whether their industry can expand vertically instead of lineally.

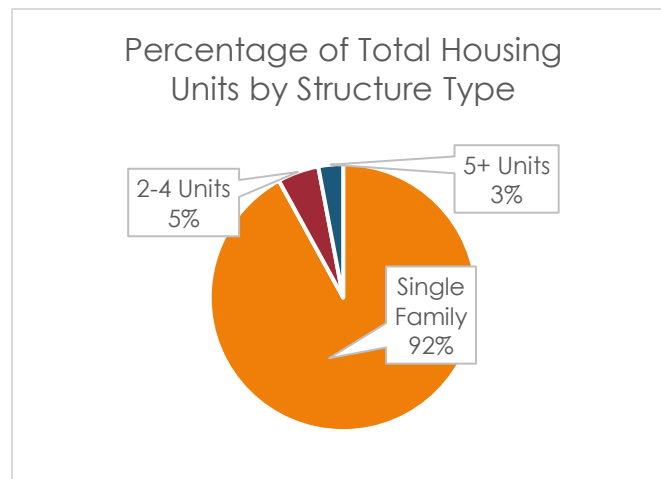
The Industrial comprehensive plan designation is comprised of the following zones: Light Industrial (LI); Light Industrial Business Park (LI/BP); Business Park (BP); and Heavy Industrial (HI). The city's industrial lands include the top employers, some school district properties, and provide family-wage jobs. Commercially designated properties include the following zones: Regional Commercial (RC); Downtown Commercial (DC); Mixed Use (MX); Neighborhood Commercial (NC); and Community Commercial (CC). The most recent commercial developments and preliminary approvals have occurred in the city's downtown and along NW 38th Avenue.

RESIDENTIAL LANDS

The majority of land in Camas is designated for single family residential uses (45%). Together with multifamily, residentially designated lands comprise approximately 53% of total acreage. Camas 2035 states that the city must add 3,868 new residential units within residentially designated areas by 2035 to meet the growth rate of 1.26 percent population growth per year. Since adoption in 2016, there has been an average of 250 residential units built per year.

In July, the city adopted the Camas Housing Action Plan (Res. 21-006), which provides detailed background information on the city's current housing stock, and strategies to further the 2035 goals of achieving a greater mix of housing types, sizes, and affordability levels. The following chart is an excerpt from the plan. The full plan is available on the city's website at:

<https://www.cityofcamas.us/com-dev/page/camas-housing-action-plan>.



Multifamily Apartment and Townhouse Developments in Camas, 2022

Development Name	Type	Year Built	NUMBER OF UNITS
Lloyd Apartments, 1022-1050 E. 1 st Avenue	Apartments	1954	8
Hill Crest Apartments, 1222 NW Couch Street	Apartments	1971	5
First Avenue Apartments, 1410 E. 1 st Avenue	Apartments	1972	11
Camas House Apartments, 1102-1138 E. 1 st Avenue	Apartments	1979	16
Crown Villa, 1529 Division Street	Apartments	1986	19
River View Apartments, 3003 NE 3 rd Avenue	Apartments	1995	60
Russell Street Townhouses, 1820 SE Seventh Ave	Townhomes	1996	9
River Place Apartments, 1718 SE 11 th Avenue	Apartments	1998	20
Third Avenue Apartments, 2615 NE 3 rd Avenue	Apartments	2000	42
Camas Ridge, 1420 NW 28 th Avenue	Apartments	2011	51
Logan Place Village, 1346 NW 25 th Avenue	Townhomes	2014	26
7 th Avenue Townhomes, 710 NW 7 th Avenue	Townhomes	2015	10
Stoneleaf Townhomes, 5843 NW 26 th Avenue	Townhomes	2015	12
Parker Village, 20 th Avenue & NW Brady Road	Townhomes	2018	60
Terrace at River Oaks, 3009 NE 3 rd Avenue	Apartments	2018	120
Clara Apartments, 608 NE Birch Street	Apartments	2020	32
Kielo at Grass Valley, 5988 NW 38 th Avenue	Apartments	2020	276
Parklands at Camas Meadows, NW Longbow Lane	Townhomes	2020	24
The Casey, 5515 NW Pacific Rim Blvd.	Apartments	2022 (u.c.)	136

IV. APPLICABLE COMPREHENSIVE PLAN GOALS & POLICIES

In order to support changes to the Camas 2035 plan, the city must review the application in light of Camas Municipal Code (CMC) 18.51 Comprehensive Plan and Zoning Amendments and, more specifically, CMC 18.51.030 Evaluation Criteria to address the following:

- A. *Impact upon the city of Camas comprehensive plan and zoning code;*
- B. *Impact upon the surrounding properties, if applicable;*
- C. *Alternatives to the proposed amendment; and*
- D. *Relevant code citations and other adopted documents that may be affected by the proposed change.*

Further, the city must agree that the proposed amendments comply with and promote the goals of the Growth Management Act.

Commercial and industrial properties are focal points as to where the city plans and anticipates job growth potential for the community. The Camas 2035 plan includes goals and policies for job growth within the Economic Development element of the plan (Ch. 6). The subject property is located within the "Grass Valley" area of the city, which is within an economic development target area located in the west side of the city.

The applicant proposes to amend the Industrial designation to Commercial, with an associated zoning district of Mixed Use (MX). Relevant goals and policies are found in the Land Use, Housing, and Economic Development chapters of the Camas 2035 plan. A few are touched on below.

Land Use (Camas 2035, Ch. 1): The city's overall vision is outlined in the Land Use chapter. Five (5) major land use categories are covered in this chapter with goals and policies.

Citywide Goal LU-1: Maintain a land use pattern that respects the natural environment and existing uses while accommodating a mix of housing and employment opportunities to meet the City's growth projections.

The following policies are particularly applicable to the proposed amendments:

Policy LU-1.1: Ensure the appropriate mix of commercial-, residential-, and industrial-zoned land to accommodate the City's share of the regional population and employment projections for the 20-year planning horizon.

Policy LU-1.3: Maintain compatible use and design with the surrounding built and natural environments when considering new development or redevelopment.

Policy LU-1.5: Where compatible with surrounding uses, encourage redevelopment or infill development to support the efficient use of urban land.

Goal LU-2: Create a diversified economy and serve Camas residents and tourists by providing sufficient land throughout the City to support a variety of business types and employment opportunities.

The following policies are particularly applicable to the proposed amendments:

Policy LU-2.4: Encourage mixed-use developments (residential and commercial) in order to support adjacent uses and reduce car trips, but not at the expense of job creation.

Policy LU-2.7: Protect employment land from conversion to residential uses in order to ensure an adequate supply of commercial and industrial land to meet 20-year employment projections.

Housing (Camas 2035, Ch. 2): The city's housing goals and policies focus on increasing housing diversity and affordability over the next 20 years.

Citywide Goal (H-1): Maintain the strength, vitality, and stability of all neighborhoods and promote the development of a variety of housing choices that meet the needs of all members of the community.

The following policies are particularly applicable to the proposed amendments:

Policy H-2.3: Any comprehensive plan designation change that increases residential capacity should require a quarter (25 percent) of the new units to be affordable to households earning 50 to 80 percent of Camas' MHI at the time of development.

Policy H-2.4: All affordable housing created in the City should remain affordable for the longest possible term, whether created with public funds, through development agreements, or by regulation.

Economic Development (Camas 2035, Ch. 6): The vision for the community's economy is articulated in this chapter. The city is broken out by six (6) distinct areas. The most relevant of these is the Grass Valley area.

Grass Valley Economic Development Goal, ED 3: Promote a cooperative industrial business park in which businesses and the City share resources efficiently to achieve sustainable development, with the intention of increasing economic gains and improving environmental quality.

The following policy is applicable to the proposed amendments:

Policy 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.

Impacts on Utilities and Transportation Plans

Public Works staff reviewed the proposed zone change of this five (5) acre parcel and considered the potential substantive impacts to the city's sewer, water, and transportation systems and plans. With negligible impacts to either systems or plans, Public Works concluded that the proposed change does not warrant revisions to the adopted plans. Future potential impacts will be reviewed and considered again at the time of a development application. (see *Public Works memo dated September 7, 2022*)

EVALUATION CRITERIA – CMC 18.51.030 (A-D)

The application materials must include responses to eight general questions (A-H, of CMC§18.51.010).

After considering whether or not the current plan is deficient, the Planning Commission must recommend whether to support, reject or defer the amendments to City Council. The code provides the following criteria at CMC18.51.030:

- A. *Impact upon the city of Camas comprehensive plan and zoning code;*
- B. *Impact upon surrounding properties, if applicable;*
- C. *Alternatives to the proposed amendment; and*
- D. *Relevant code citations and other adopted documents that may be affected by the proposed change.*

At the following section, staff will address the applicable criteria for each proposal. At Section IX of this report, there is a summary of the proposed changes to land use acreages.

V. PROPOSED AMENDMENT

A. PEDWAR PROPERTY (FILE #CPA22-01)

Description: Amend comprehensive plan from Industrial to Commercial with an associated rezone from Light Industrial/Business Park (LI/BP) to Mixed Use (MX) of a 5-acre site that is currently vacant.

Site Location and Description:



The vacant 5-acre (+/-) property is located along NE Camas Meadows Drive and is designated Industrial with zoning of Light Industrial/Business Park (LI/BP). The same designation lies to the north, west and south of the site. To the north is the Camas Meadows Golf Course and across the street; to the south is a corporate business park. To the east of the site, properties comprising 8.8 (+/-) acres were amended in 2020 and 2021 from Industrial to Commercial with a concurrent rezone of Mixed Use. Further to the southeast are multifamily designated properties, with one project, the Village at Camas

Meadows under construction. Another multifamily development is located north of the golf

course. To the east of the golf course, there is a Business Park zone with a mixed use development planned.

Discussion: The applicant requests that the comprehensive plan designation of Industrial on the subject parcels be amended to Commercial, with a concurrent rezone from LI/BP to MX.

In order to better evaluate the proposal, the city must consider the comprehensive plan goals and policies for the Grass Valley Area (Economic Development, Chapter 6) and the zoning regulations of the proposed Mixed Use Zone. The comprehensive plan specifically requires an analysis of buildable lands, for any proposed conversions within the Grass Valley area of the city, **“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.”**

Land Need Analysis for Mixed Use Development

For this request, the applicant submitted a report titled “Land Need Analysis for Mixed Use Development on a Site in Camas, Washington” (Johnson Economics, LLC, February, 2022). The stated purpose of this report is to evaluate the feasibility of multi-family residential development on the subject site. Furthermore, analysis in the report compares the suitability of the site for two alternative uses (business park v. mixed use) based on market and planning criteria.

Land Capacity vs. Demand (Camas 2035)

The report notes there are thousands of square feet of space available at the Camas Meadows Corporate Center and an estimated oversupply of industrial and business park land to accommodate new development. (pp. 4 & 5) Additionally, the report outlines the findings of Clark County's Vacant Buildable Lands Model and the city's own Comprehensive Plan relative to land capacity. Figure 3.1 of the report (p. 6) shows a net surplus across commercial, industrial, and residential land uses – 127 acres, 167 acres, and 231 acres respectively. Relying on Clark County's Buildable Lands Report for the pace of development for five years (2016-2020), the report states there is sufficient land supply for commercial (over 50 years), industrial (over 400 years), and residential (8 years) uses. While commercial and industrial development tends to be 'chunky' – meaning development does not happen on a linear 6-acre or 1.6-acre burn rate per year as noted on page 6 of the report – it stands to reason that there is more land supply for commercial and industrial development than there is for residential development. This point is underscored in the northern area of Grass Valley, where the report notes an adequate supply of space and land for commercial/industrial use and a constrained supply for residential use.

Supplemental Employment Sector Analysis

Johnson undertook some analysis of forecasted growth rates for major industry sectors, based on WA Employment Security Department data for the broader SW WA region. The analysis leads to the expectation of more growth in the Education and Health services and also in Professional and Business Services – both in terms of percentages and in absolute jobs numbers. The conclusion of this analysis is **‘the greatest number of new jobs will be found in sectors that tend to use commercial office and retail space (and land) and fewer jobs in sectors that use industrial space.’** (p. 7)

Residential Demand Analysis

The Johnson Economics report includes a somewhat in-depth analysis of the market for rental housing (apartments) in Camas for the past 20 years and for the next 5 years (2022-2027). The analysis shows a trend of households growing older and with more households with higher incomes than in the previous two decades. The report forecasts that new growth alone will

demand support for 250+ units over the next five years and will represent a wide array of household incomes and cohort groups. One interesting note in the report speaks to 'trading up' into newer units with less wear-and-tear and more amenity rich complexes. This is in response to research that many of the existing apartment projects in Camas are old and are small (averaging 35 years old and 19 units as an average size). The report concludes that more updated properties and development should offer competitive advantages to households looking to rent.

Report Conclusions

The report concludes with, "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." The conclusion is based on market forces, demand for multifamily residential units, topography of the site, and compatibility with adjacent and surrounding uses. (p. 13)

Mixed Use Zoning in Camas

Previous to 2020, the Mixed Use Zone was found at two areas of the city—adjacent to downtown and north of the intersection of Lake Road and Everett Road. Those areas were targeted for their redevelopment potential for transit-oriented developments: given the prevalence of small lots located near arterials and collectors. Those areas were also formerly designated a mix of other commercial designations that at the time prohibited new residential construction. Mixed Use and Downtown Commercial zones are the only commercial zones in the city that allow a variety of residential uses outright. Camas 2035 ("Plan") at Section 1.4.5 states, *"Future conversion of commercial or industrial areas to MX should consider the benefits to the community, such as providing a gathering place (e.g., pocket park), housing options for a variety of income levels, and job opportunities."* This section of the Plan includes three policies and the following goal for mixed use areas. **"LU-5: To foster economically and socially diverse mixed neighborhoods as the foundation for a healthy city, which includes meeting the multi-modal transportation, housing, employment, education, recreation, and health needs of the citizens."**

The LI/BP Zone is almost entirely found on parcels in the northwestern section of the city. Over the past few comprehensive plan amendment cycles, properties have converted from LI/BP to either BP or RC zones due to the restrictive development standards of the LI/BP zone, which include deep building setbacks from property lines (Refer to Section XI of this report). The current zoning requires a minimum front setback of 200-feet and rear setback of 100-feet. In comparison, in the MX zone there is a *maximum* front building setback of 10-feet, meaning that a building must be established at the front property line or no further back than 10-feet.

Amendment of a comprehensive plan designation not only includes a consideration of the comprehensive plan, development standards of the zoning, but also includes a comparison of the allowed land uses within the current zone and proposed zone in order to evaluate the merits of the proposal and any unintended consequences of such change. The allowed land uses for each zone are found within the Use Authorization Table at [CMC Chapter 18.07](#). There are 73 outright allowed uses within the MX zone and of those, there are 41 uses that are not allowed ("X") within the current zoning of the property (see list at Section XI of this report).

A variety of residential uses are generally allowed in the MX zone, where they are prohibited in the LI/BP zone. The city has a level of concern that development of this site and adjacent MX properties could be entirely residential in nature, given that the MX does not mandate a mix of uses. However, there is a limit to the amount of residential development that could be built, as

the MX zone includes a maximum residential density of 24 units per acre. The site would be limited to 120 units.

EVALUATION CRITERIA CMC18.51.030 (A-D) and CMC18.51.010 (C)	FINDINGS
Impact upon the city of Camas comprehensive plan and zoning code;	The amendment would decrease industrial lands by five (5) acres and increase land for residential or mixed use development.
Impact upon surrounding properties, if applicable;	The city did not identify any detrimental effects to adjacent properties if this change is approved.
Alternatives to the proposed amendment; and	The applicant submitted a Land Use Analysis for Mixed Use Development report that compared potential development under current zoning and potential development under Mixed Use zoning. (Johnson Economics, LLC, February 2022) The report finds and supports the conversion of a modest amount of industrial land to commercial land, without significantly impairing the ability to meet future industrial demand. (p. 15 of the report)
Relevant code citations and other adopted documents that may be affected by the proposed change.	Public Works staff has provided a memo stating that it has considered the zone change of this five (5) acres, in light of the water, sewer, and transportation plans and find the potential impact negligible.
<p>Why the current comprehensive plan is deficient or should not continue in effect.</p> <p>Specifically: "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." – Policy ED-3.3</p>	The Johnson Economics, LLC report relies on Clark County's Buildable Lands Report and Vacant Buildable Lands Model (VBLM) to support its findings that Camas has an adequate supply of commercial and industrial land to accommodate future growth. The report further provides reasons why Mixed Use and, specifically residential development, is more suitable for this property, which go to topography, compatibility, market conditions, and a strong demand for multifamily development.

Pursuant to CMC18.51.030 a staff report "shall contain the department's recommendation on adoption, rejection or deferral of each proposed change".

VI. PUBLIC COMMENT

None at this time.

VII. STAFF RECOMMENDATION

Department Recommendation: Staff recommends APPROVAL of the proposed Comprehensive Plan Amendment and Zone Change as requested by the applicant. The Planning Commission is to forward a recommendation to the City Council for its consideration and action.

VIII. TABLE 1 –2021 COMPREHENSIVE PLAN ACREAGE (PROPOSED)

Comprehensive Plan Designations	Current Acres	CPA22-01	Final Acres
Single Family			
· Low Density	866.86		866.86
· Medium Density	3608.65		3608.65
· High Density	437.49		437.49
Multi-Family			
· Low Density	311.01		311.01
· High Density	256.21		256.21
Commercial	979.36	5	979.36
Industrial	2397.2	-5	2292.20
Park	850.72		850.7
Open Space / Green Space	492.00		492.0
Total acreage:	10,200		10,200

Zoning**	2020	CPA22-01	Final 2021 Acreage
Parks/Open Space			
Neighborhood Park (NP)	145.14		145.14
Special Use (SU)	164.09		164.09
Open Space (OS)	421.55		421.55
Industrial			
Heavy Industrial (HI)	858.58		858.58
Light Industrial (LI)	91.83		91.83
Business Park (BP)	542.63		542.63
Light Industrial/Business Park (LI/BP)	790.75	-5	785.75
Residential			
Residential-15,000 (R-15)	716.30		716.30
Residential-12 (R-12)	925.43		925.43
Residential-10,000 (R-10)	989.29		989.29
Residential-7,500 (R-7.5)	1534.34		1534.34
Residential-6,000 (R-6)	191.11		191.11
Multifamily Residential-10 (MF-10)	224.39		224.39
Multifamily Residential-18 (MF-18)	312.70		312.70
Commercial			
Downtown Commercial (DC)	72.22		72.22
Mixed Use (MX)	46.56	5	51.56
Regional Commercial (RC)	597.93		597.93
Neighborhood Commercial (NC)	10.57		10.57
Community Commercial (CC)	237.44		237.44
Total Acres	8872.95		8872.95

**Does not include UGB areas

IX ZONING REGULATIONS

USE AUTHORIZATION TABLE – CMC CHAPTER 18.07

Comparison of land uses that are allowed ("P") in the MX Zone and uses that are prohibited ("X") in the LI/BP Zone. Residential-type uses are highlighted.

Zoning Districts	MX	LI/BP
Antique shop ⁶	P	X
Appliance sales and service ⁶	P	X
Bowling alley/billiards ⁶	P	X
Building, hardware and garden supply store ⁶	P	X
Clothing store ⁶	P	X
Department store ⁶	P	X
Furniture repair; upholstery ⁶	P	X
Furniture store ⁶	P	X
Funeral home ⁶	P	X
Grocery, large scale ⁶	P	X
Grocery, small scale ⁶	P	X
Hospital, emergency care ⁶	P	X
Hotel, motel ⁶	P	X
Household appliance repair ⁶	P	X
Laundry (self-serve)	P	X
Nursing, rest, convalescent, retirement home ⁶	P	X
Pet shops ⁶	P	X
Second-hand/consignment store ⁶	P	X
Shoe repair and sales ⁶	P	X
Theater, except drive-in ⁶	P	X
Veterinary clinic ⁶	P	X
Auditorium ⁶	P	X

Zoning Districts	MX	LI/BP
Community club ⁶	P	X
Church ⁶	P	X
Library ⁶	P	X
Museum ⁶	P	X
Sports fields ⁶	P	X
College/university ⁶	P	X
Elementary school ⁶	P	X
Junior or senior high school ⁶	P	X
Private, public or parochial school ⁶	P	X
Adult family home	P	X
Apartment, multifamily development, row houses	C	X
Assisted living	P	X
Bed and breakfast	P	X
Designated manufactured home	P	X
Duplex or two-family dwelling	P	X
Group home	P	X
Home occupation	P	X
Housing for the disabled	P	X
Residence accessory to and connected with a business	P	X
Single-family dwelling	P	X

X DEVELOPMENT STANDARDS – CMC CHAPTER 18.09

Comparison of development dimension standards that apply to the MX Zone and the LI/BP Zone.

	MX	LI/BP ^{Note 2}
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Maximum Density (dwelling units/net acre)	24	n/a
Minimum lot area (square feet)	1,800	10 acres
Minimum lot width (feet)	None	Not specified
Minimum lot depth (feet)	None	Not specified

Setbacks: Commercial and industrial development setbacks shall be as follows, unless along a flanking street of a corner lot. If along flanking street, then the setback must be treated like a front, and provide safe sight distance.

Minimum front yard (feet)	Note 3	5' per 1 foot of building height (200' minimum)
Minimum side yard (feet)	10'	100' for building; 25' for parking
Minimum rear yard (feet)	25'	100' for building; 25' for parking area
Lot Coverage: Lot coverage (percentage)	1 story (60%) 2 stories or more (50%)	1 story (30%) 2 stories (40%) 3 stories (45%)
Building Height Maximum building height (feet)	None	60

Notes:

1. If along a flanking street of corner lot.
2. The densities and dimensions in the LI/BP zone may be reduced under a planned industrial development. See Chapter 18.21 Light Industrial/Business Park.
3. Maximum setback at front building line is ten feet.
4. Residential dwelling units shall satisfy the front setbacks of CMC Section 18.09.040 Table 2, based on comparable lot size.