

January 2023

# Comprehensive Plan Amendment and Rezone Request

City of Camas 2023 Annual Review Cycle

Camas, WA

**Contact/Planner:**

MacKay Sposito, Inc.  
Attn: Martin Snell  
18405 SE Mill Plain Blvd #100  
Vancouver, WA 98683  
(360) 771-8082  
[msnell@mackaysposito.com](mailto:msnell@mackaysposito.com)

**Applicant:**

MacKay Family Properties  
Attn: Dan MacKay  
4041 NW Sierra Drive  
Vancouver, WA 98607  
(360) 921-0134  
[dpm30@comcast.net](mailto:dpm30@comcast.net)

MSi Job #: 18026

MacKay  Sposito

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# Application Form, Checklist, and Authorization Letters

1

Section

**Comprehensive Plan Amendment  
and Rezone Request**



General Application Form

Case Number:

Applicant Information

Applicant/Contact: MacKay Dan Phone: 360-921-0134
Address: 4041 NW Sierra Drive Camas WA 98607
Email Address: dpm30@comcast.net

Property Information

Property Address: The two properties with street addresses are 4511 NW 18th Avenue and 4245 NW 16th Street
Zoning District Business Park (BP) and Regional Commercial (RC) Site Size 31.4 Acres

Description of Project

Brief description: Application to amend the Comprehensive Plan map from Industrial and Commercial to Multifamily High and the Zoning map from Business Park (BP) and Regional Commercial (RC) to Multifamily-18 (MF-18)

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: MacKay Dan etal Phone: 360-921-0134
Address: 4041 NW Sierra Drive Camas WA 98607
Email Address: dpm30@comcast.net

Signature

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

Signature: Date:

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: Staff: Related Cases # Electronic Copy Submitted Validation of Fees

**Application Checklist and Fees [updated on January 1, 2023]**

◇ Annexation	\$944 - 10% petition; \$4,013 - 60% petition	001-00-345-890-00	\$
◇ Appeal Fee		001-00-345-810-00	\$436.00 \$
◇ Archaeological Review		001-00-345-810-00	\$150.00 \$
◇ Binding Site Plan	\$2,055 + \$24 per unit	001-00-345-810-00	\$
◇ Boundary Line Adjustment		001-00-345-810-00	\$113.00 \$
◇ Comprehensive Plan Amendment		001-00-345-810-00	\$6,373.00 \$ X
◇ <u>Conditional Use Permit</u>			
Residential	\$3,738 + \$105 per unit	001-00-345-810-00	\$
Non-Residential		001-00-345-810-00	\$4,734.00 \$
◇ Continuance of Public Hearing		001-00-345-810-00	\$573.00 \$
◇ Critical or Sensitive Areas (fee per type)		001-00-345-810-00	\$848.00 \$
	(wetlands, steep slopes or potentially unstable soils, streams and watercourses, vegetation removal, wildlife habitat)		
◇ <u>Design Review</u>			
Minor		001-00-345-810-00	\$474.00 \$
Committee		001-00-345-810-00	\$2,598.00 \$
◇ Development Agreement	\$959 first hearing; \$590 ea. add'l hearing/continuance	001-00-345-810-00	\$
◇ Director's Interpretation			\$350.00 \$
◇ <u>Engineering Department Review - Fees Collected at Time of Engineering Plan Approval</u>			
Construction Plan Review & Inspection			<i>(3% of approved estimated construction costs)</i>
Modification to Approved Construction Plan Review			<i>(Fee shown for information only)</i> \$459.00
Single Family Residence (SFR) - Stormwater Plan Review			<i>(Fee shown for information only)</i> \$228.00
Gates/Barrier on Private Street Plan Review			<i>(Fee shown for information only)</i> \$1,139.00
◇ <u>Fire Department Review</u>			
Short Plat or other Development Construction Plan Review & Insp.		115-09-345-830-10	\$308.00 \$
Subdivision or PRD Construction Plan Review & Inspection		115-09-345-830-10	\$384.00 \$
Commercial Construction Plan Review & Inspection		115-09-345-830-10	\$460.00 \$
◇ Franchise Agreement Administrative Fee			\$5,696.00 \$
◇ <u>Home Occupation</u>			
Minor - Notification (No fee)			\$0.00
Major		001-00-321-900-00	\$75.00 \$
◇ LI/BP Development	\$4,734 + \$41.00 per 1000 sf of GFA	001-00-345-810-00	\$
◇ Minor Modifications to approved development		001-00-345-810-00	\$378.00 \$
◇ Planned Residential Development	\$38 per unit + subdivision fees	001-00-345-810-00	\$
◇ <u>Plat, Preliminary</u>			
Short Plat	4 lots or less: \$2,118 per lot	001-00-345-810-00	\$
Short Plat	5 lots or more: \$7,848 + \$250 per lot	001-00-345-810-00	\$
Subdivision	\$7,848 + \$250 per lot	001-00-345-810-00	\$
◇ <u>Plat, Final:</u>			
Short Plat		001-00-345-810-00	\$219.00 \$
Subdivision		001-00-345-810-00	\$2,598.00 \$
◇ Plat Modification/Alteration		001-00-345-810-00	\$1,308.00 \$
◇ <u>Pre-Application (Type III or IV Permits)</u>			
No fee for Type I or II			
General		001-00-345-810-00	\$387.00 \$
Subdivision (Type III or IV)		001-00-345-810-00	\$996.00 \$
◇ SEPA		001-00-345-890-00	\$886.00 \$ X
◇ Shoreline Permit		001-00-345-890-00	\$1,308.00 \$
◇ <u>Sign Permit</u>			
General Sign Permit	(Exempt if building permit is required)	001.00.322.400.00	\$45.00 \$
Master Sign Permit		001.00.322.400.00	\$138.00 \$
◇ <u>Site Plan Review</u>			
Residential	\$1,259 + \$34 per unit	001-00-345-810-00	\$
Non-Residential	\$3,146 + \$68 per 1000 sf of GFA	001-00-345-810-00	\$
Mixed Residential/Non Residential	(see below)	001-00-345-810-00	\$
	\$4,435 + \$34 per res unit + \$68 per 1000 sf of GFA		
◇ Temporary Use Permit		001-00-321-990-00	\$88.00 \$
◇ Variance (Minor)		001-00-345-810-00	\$760.00 \$
◇ Variance (Major)		001-00-345-810-00	\$1,417.00 \$
◇ Zone Change (single tract)		001-00-345-810-00	\$3,659.00 \$

*Fees reviewed & approved by Planner:*

	<u>Initial</u>	<u>Date</u>
<b>Total Fees Due:</b>		\$

Authorization to Sign Application

We, the owners of parcel number 125193000, 986055381, and 125185000, do hereby authorize Dan MacKay to sign an application to request a change to the Comprehensive Plan and Zoning District of said parcel. The application is to be submitted to the City of Camas for its consideration and we acknowledge Mr. MacKay will be the primary point of contact regarding the proceeding until a decision is made by the City of Camas.

Parcel Numbers: 125193000, 986065381, 125185000

Owner Name (print):

MACKEY FAMILY CLARK  
COUNTY PROPERTIES, LLC  
Signature

Dan MacKay-Coman

Date:

1/27/23

Owner Name (print):

Signature

Date:

Owner Name (print):

MACKEY FAMILY CLARK  
COUNTY PROPERTIES, LLC  
Signature

Dan MacKay-Coman

Date:

1/27/23

Owner Name (print):

Signature

Date:

Authorization to Sign Application

We, the owners of parcel number 127372000, do hereby authorize Dan MacKay to sign an application to request a change to the Comprehensive Plan and Zoning District of said parcel. The application is to be submitted to the City of Camas for its consideration and we acknowledge Mr. MacKay will be the primary point of contact regarding the proceeding until a decision is made by the City of Camas.

Parcel Number:

127372000

Owner Name (print):

MACKAY FAMILY PROPERTY LLC

Signature

Dan MacKay

Date:

JANUARY 27, 2023

Owner Name (print):

MACKAY FAMILY PROPERTY LLC

Signature

Dan MacKay

Date:

1/27/23

Authorization to Sign Application

We, the owners of parcel number 125193000, 986055381, and 125185000, do hereby authorize Dan MacKay to sign an application to request a change to the Comprehensive Plan and Zoning District of said parcel. The application is to be submitted to the City of Camas for its consideration and we acknowledge Mr. MacKay will be the primary point of contact regarding the proceeding until a decision is made by the City of Camas.

Parcel Numbers: 125193000, 986065381, 125185000

Owner Name (print):

DENNIS Daley Trust

Signature

[Handwritten Signature]

Date:

1/27/23

Owner Name (print):

\_\_\_\_\_

Signature

\_\_\_\_\_

Date:

\_\_\_\_\_

Owner Name (print):

\_\_\_\_\_

Signature

\_\_\_\_\_

Date:

\_\_\_\_\_

Owner Name (print):

\_\_\_\_\_

Signature

\_\_\_\_\_

Date:

\_\_\_\_\_

Authorization to Sign Application

I, the owner of parcel number 127367000, do hereby authorize Dan MacKay to sign an application to request a change to the Comprehensive Plan and Zoning District of said parcel. The application is to be submitted to the City of Camas for its consideration and I acknowledge Mr. MacKay will be the primary point of contact regarding the proceeding until a decision is made by the City of Camas.

Parcel Number:

127367000

Owner Name (print):

John G. Mackay

Signature



Date:

1/30/23

# GIS Developer's Packet

**Comprehensive Plan Amendment  
and Rezone Request**

# DEVELOPER'S PACKET

## Produced By:

Clark County Geographic Information System (GIS)



## For:

MackKay Sposito

## Subject Property Account Number(s):

125185000

PDF # 296806

Printed: January 25, 2023

Expires: January 25, 2024

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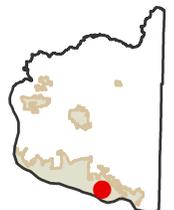


### General Location

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

 Location of Subject Property(s)

Printed on: January 25, 2023



Geographic Information System



Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.

# Property Information Fact Sheet

## Mailing Information:

Account No.: 125185000  
Owner: DALEY DENNIS W ETAL  
Address: PO BOX 757  
C/S/Z: RANCHO SANTA FE, CA 92067

**Assessed Parcel Size:** 11.15 Ac

**Property Type:** UNUSED OR VACANT LAND - NO IMPROVEMENTS

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## PARCEL LOCATION FINDINGS:

**Quarter Section(s):** SW 1/4,S04,T1N,R3E

**Municipal Jurisdiction:** Camas

**Urban Growth Area:** Camas

**Zoning:** BP

**Zoning Overlay:** No Mapping Indicators

**Comprehensive Plan Designation:** IND

**Columbia River Gorge NSA:** No Mapping Indicators

**Late-Comer Area:** No Mapping Indicators

**Trans. Impact Fee Area:** Camas

**Park Impact Fee District:** No Mapping Indicators

**Neighborhood Association:** No Mapping Indicators

**School District:** Camas

**Elementary School:** Grass Valley

**Junior High School:** Skyridge Middle

**Senior High School:** Camas

**Fire District:** City of Camas

**Sewer District:** Camas

**Water District:** Camas

**Wildfire Danger Area:** No Mapping Indicators

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## ENVIRONMENTAL CONSTRAINTS:

**Soil Type(s):** OdB, 19.4% of parcel  
PoB, 80.6%

**Hydric Soils:** Hydric, 19.4% of parcel  
Non-Hydric, 80.6%

**Flood Zone Designation:** Outside Flood Area

**CARA:** Category 2 Recharge Areas

**Forest Moratorium Area:** No Mapping Indicators

**Liquefaction Susceptibility:** Bedrock

**NEHRP:** B

**Slope:** 0 - 5 percent, 68.8% of parcel  
10 - 15 percent, 4.1%  
5 - 10 percent, 27.1%

**Landslide Hazards:** No Mapping Indicators

**Slope Stability:** No Mapping Indicators

**Cultural Resources:**

**Archeological Predictive:** Moderate, 9.3% of parcel  
Moderate-High, 90.7%

**Archeological Site Buffers:** Mapping Indicators Found

**Historic Sites:** No Mapping Indicators





## 2021 Aerial Photography

Printed on: January 25, 2023

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

23131	23132	23133	23134
13106	13105	13104	13103
13107	13108	13109	13110



Geographic Information System

0 200 400 Feet

 Subject Property(s)

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## 2021 Aerial Photography with Elevation Contours

Printed on: January 25, 2023

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

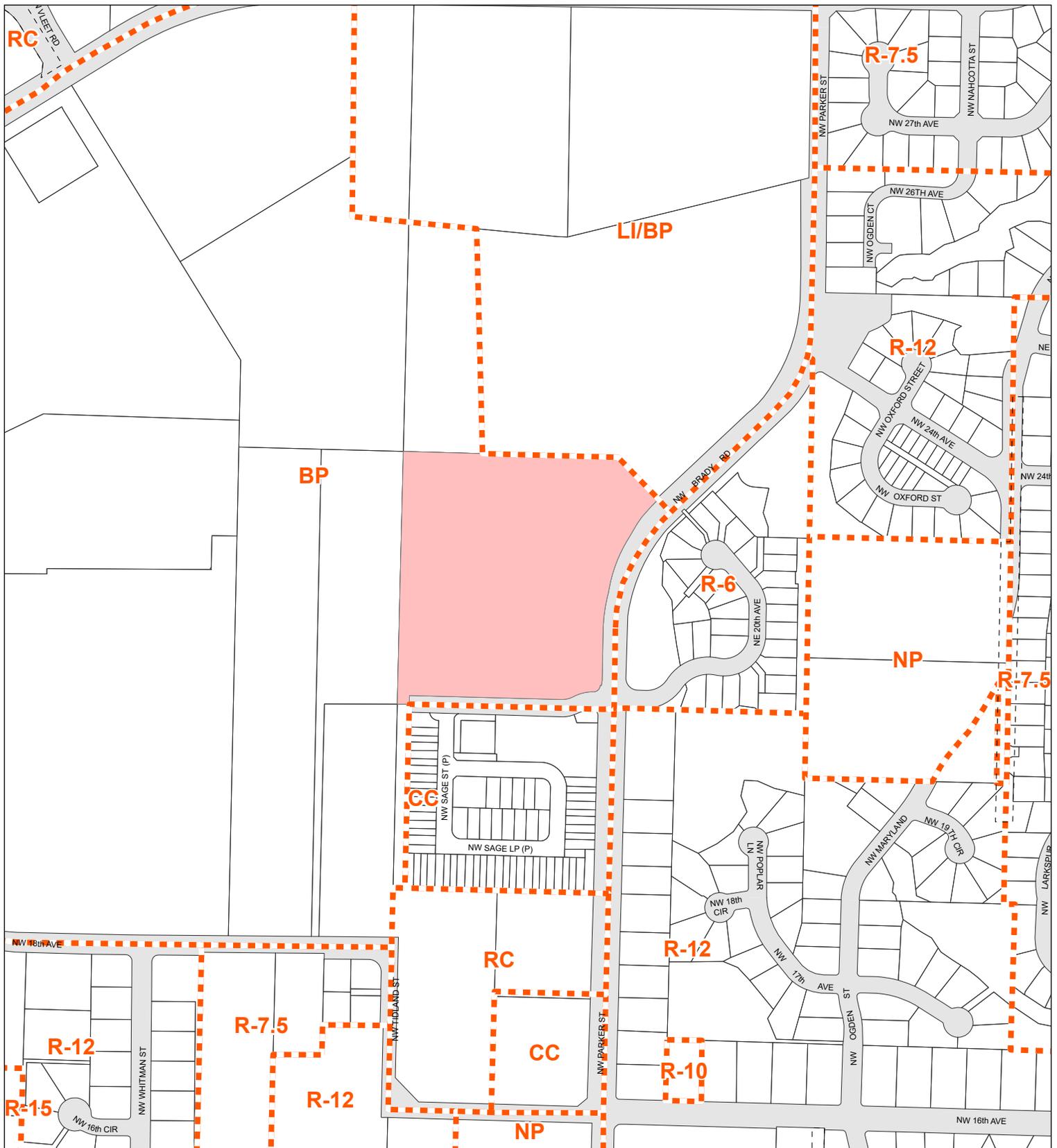
23131	23132	23133	23134
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Geographic Information System

0 100 200 Feet

- 2' Elevation Contours
- Subject Property(s)

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### Zoning Designations

Printed on: January 25, 2023

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

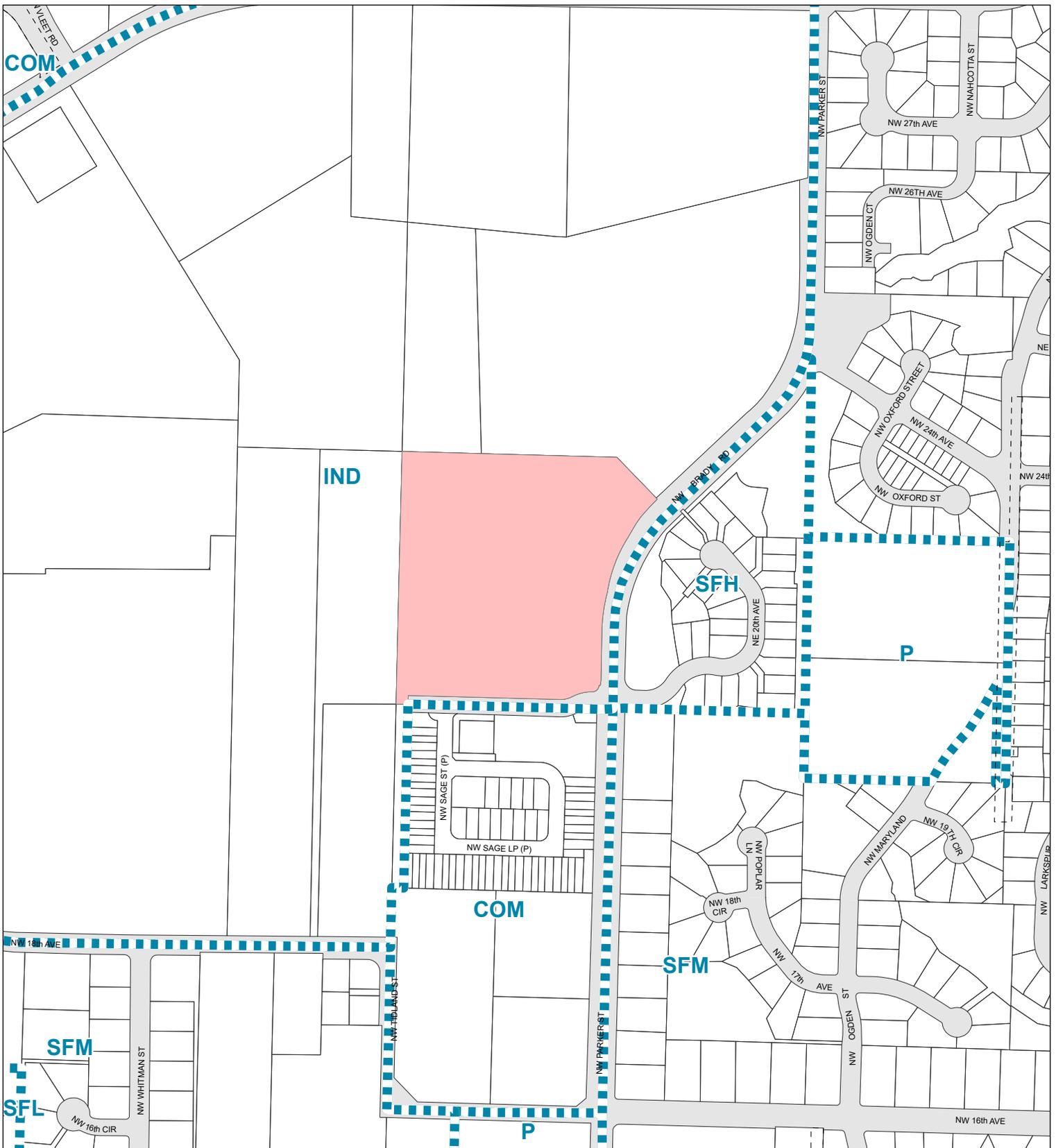
Geographic Information System

0 200 400 Feet

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Zoning Boundary
- Urban Holding - 10 (UH-10)
- Urban Holding - 20 (UH-20)
- Urban Holding - 40 (UH-40)
- Surface Mining Overlay District

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Geographic Information System

0 200 400 Feet

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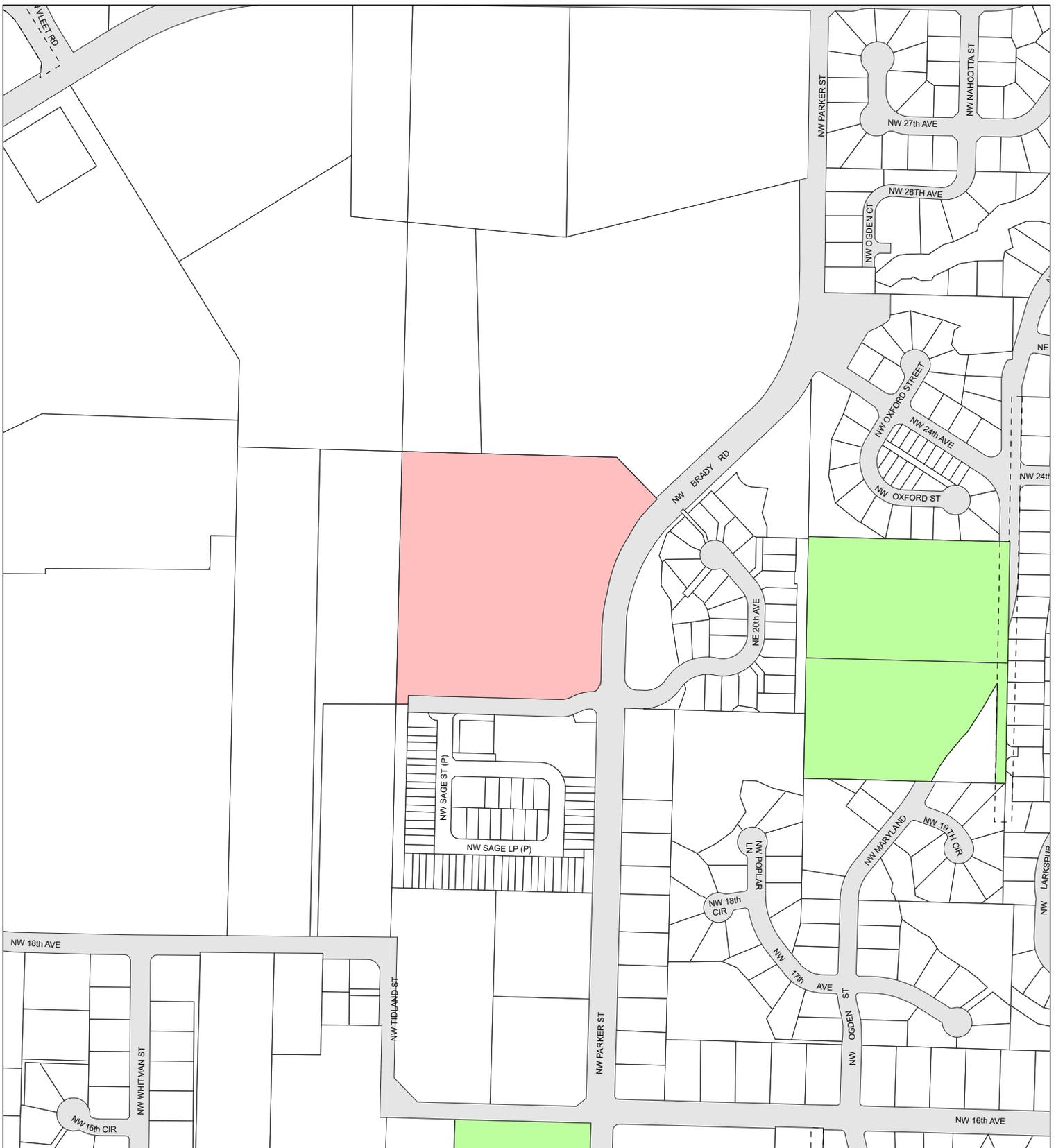
### Comprehensive Plan Designations

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Comprehensive Plan Boundary
- Industrial Reserve
- Railroad Industrial Reserve
- Mining
- Rural Center Mixed Use
- Urban Reserve
- Columbia River Gorge Scenic Area

23131	23132	23133	23134
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13107	13108	13109	13110



### Arterials, C-Tran Bus Routes, Parks & Trails

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023

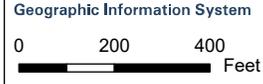
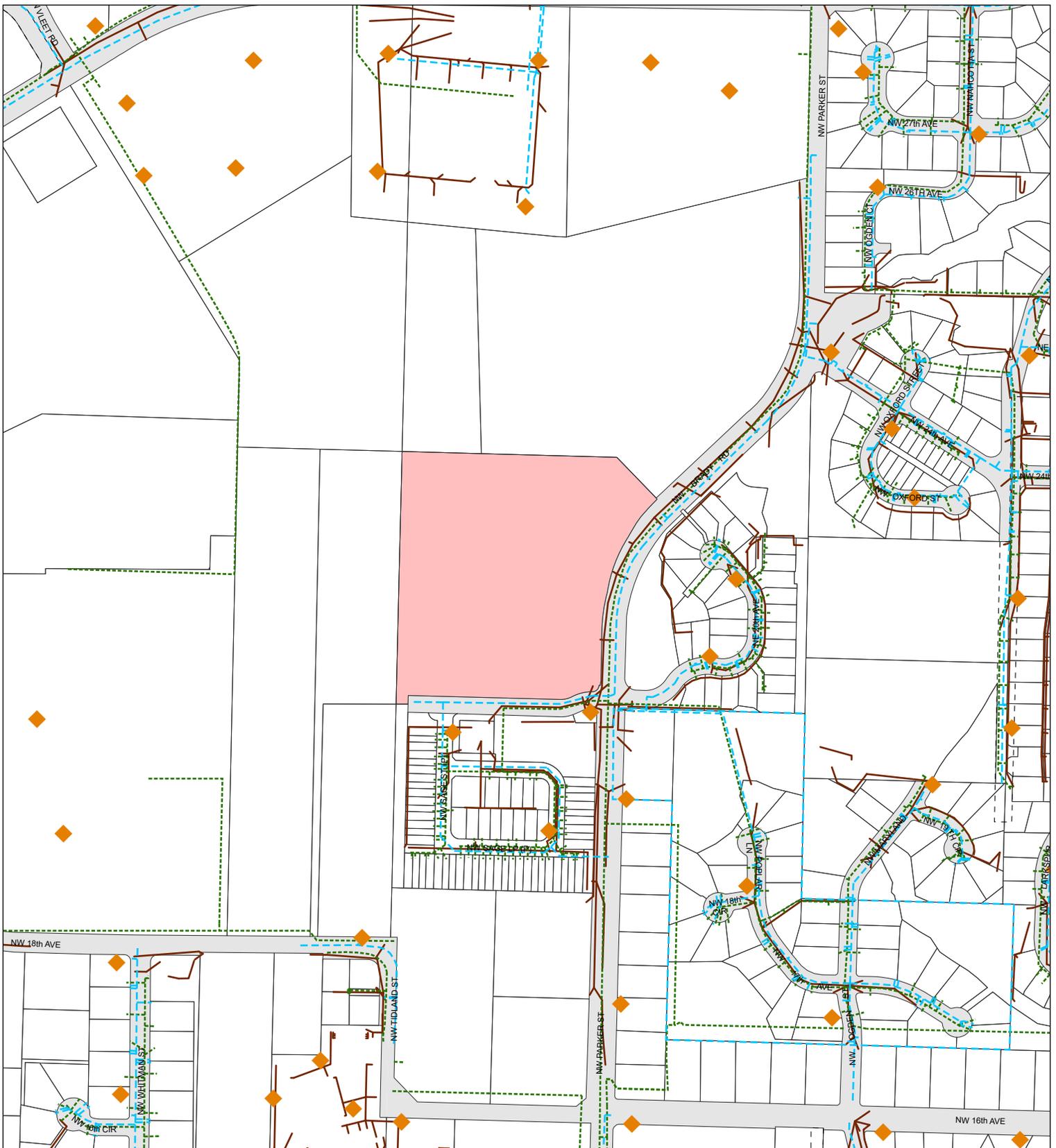
Geographic Information System

0 200 400 Feet

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Parks
- Trail
- C-Tran Route
- Principal Arterial
- Minor Arterial
- Collector
- Rural Major Collector
- Rural Minor Collector
- State Route
- Other
- Proposed Arterial
- Scenic Highway

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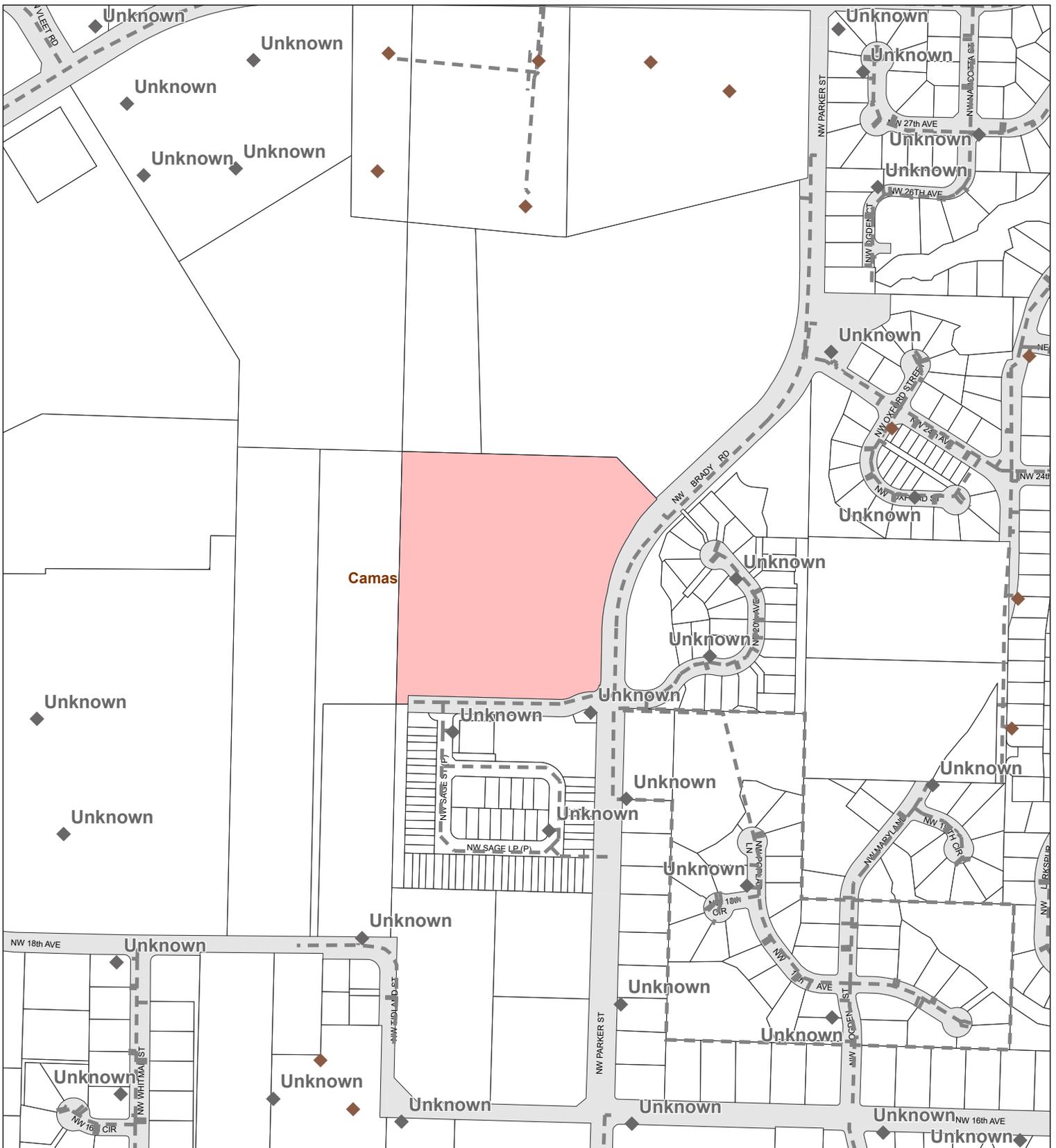
### Water, Sewer, and Storm Systems

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- 1-Year Wellhead ZOC
- 5-Year Wellhead ZOC
- 10-Year Wellhead ZOC
- Water Lines
- Sewer Lines
- Storm Water Lines
- Hydrants

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23131	23132	23133	23134
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# Hydrant Fire Flow Details

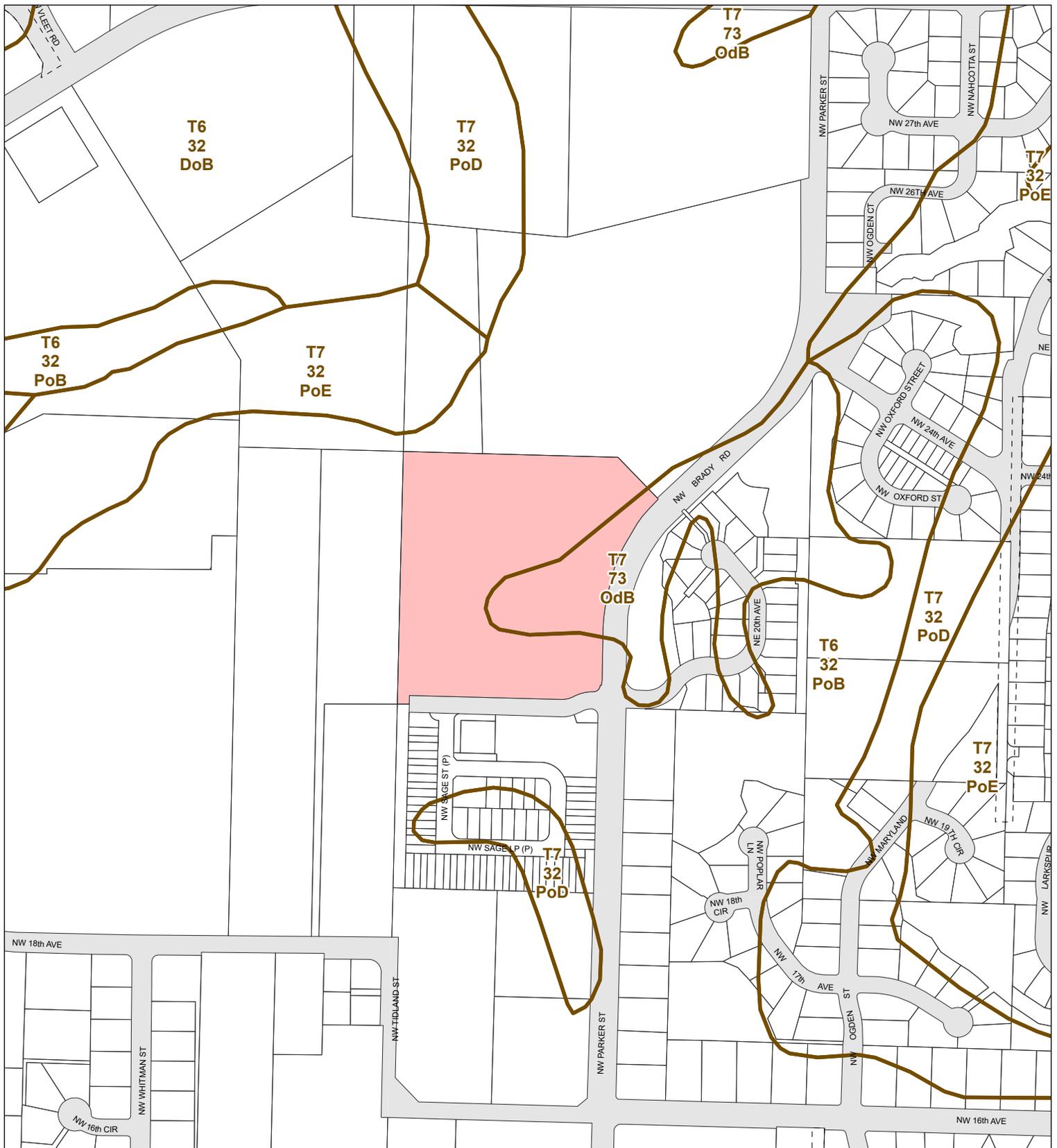
Account No.: 125185000  
Owner: DALEY DENNIS W ETAL  
Address: PO BOX 757  
C/S/Z: RANCHO SANTA FE, CA 92067

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Water District(s)	Hydrant Data Update	Project Site Provider
Camas	April 18, 2022	Service Provider

## HYDRANT INFORMATION:

Hydrant ID	Hydrant Owner	Main Diameter	Flow at 20 PSI	Test Date	Distance to site
Unknown	Camas	0.0"	No Data		62 ft
Unknown	Camas	0.0"	No Data		106 ft
Unknown	Camas	0.0"	No Data		327 ft
Unknown	Unknown	0.0"	No Data		338 ft
Unknown	Camas	0.0"	No Data		338 ft
Unknown	Camas	0.0"	No Data		397 ft



### Soil Types

Printed on: January 25, 2023

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Soil Type Boundary

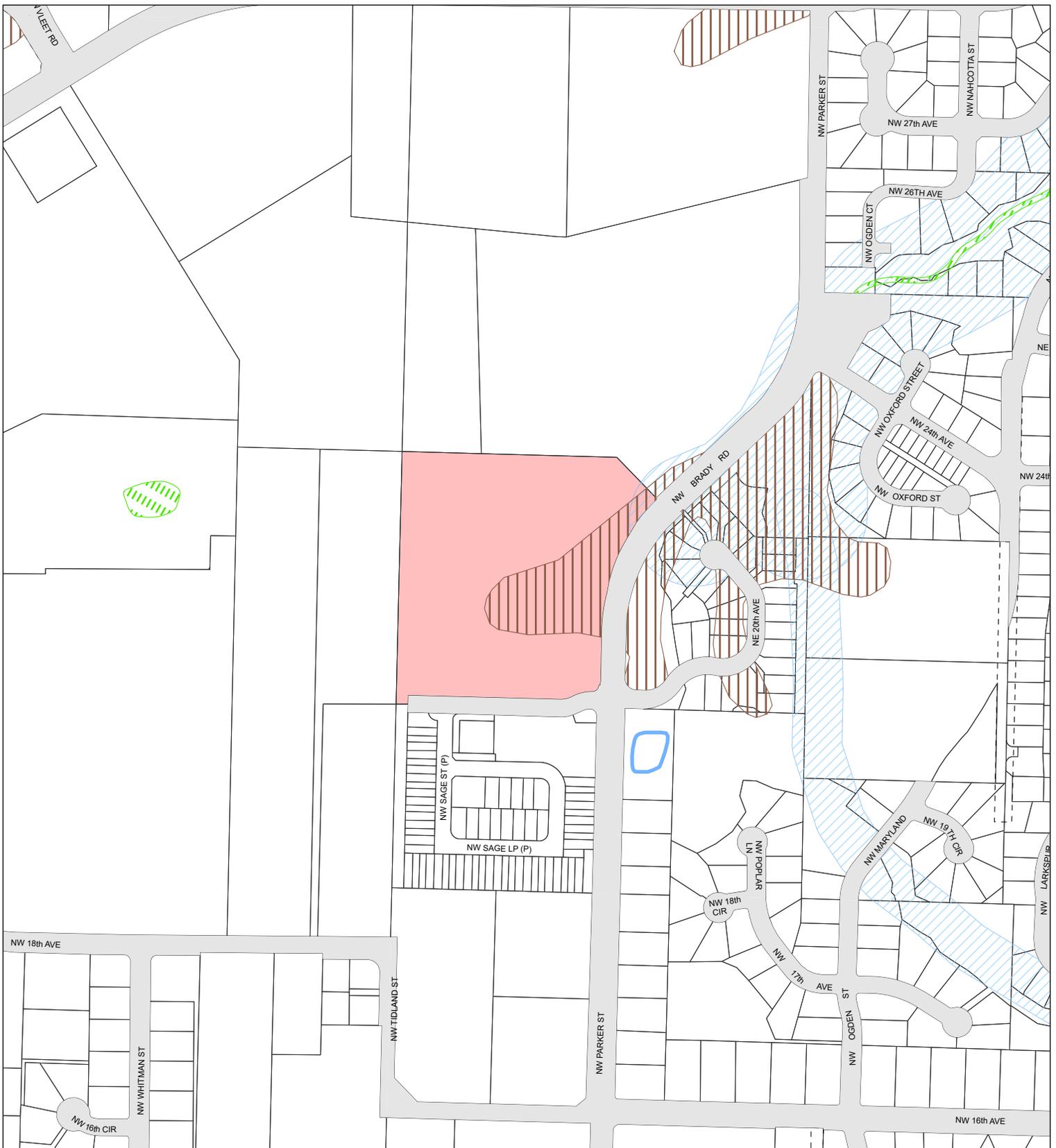
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Geographic Information System



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## Environmental Constraints I

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Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
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 C/S/Z: RANCHO SANTA FE, CA 92067



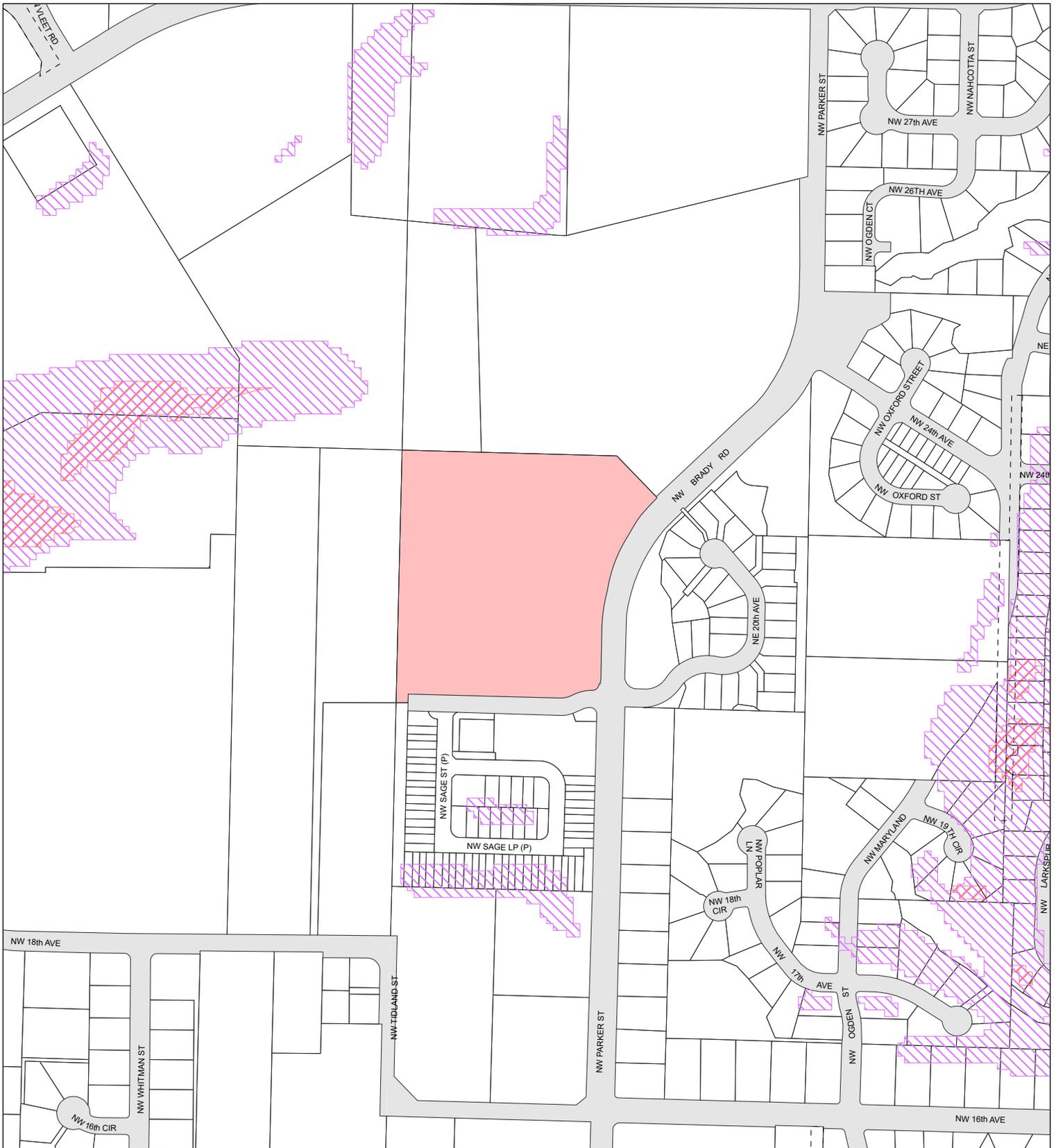
Geographic Information System



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- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Hydric Soils
- Wetland Inventory
- CARA Category 1
- Riparian Habitat or Species Area
- Non-Riparian Habitat or Species Area
- 100 year Floodplains
- Floodway
- Shorelines
- Stream

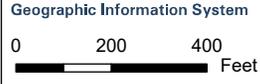
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## Environmental Constraints II

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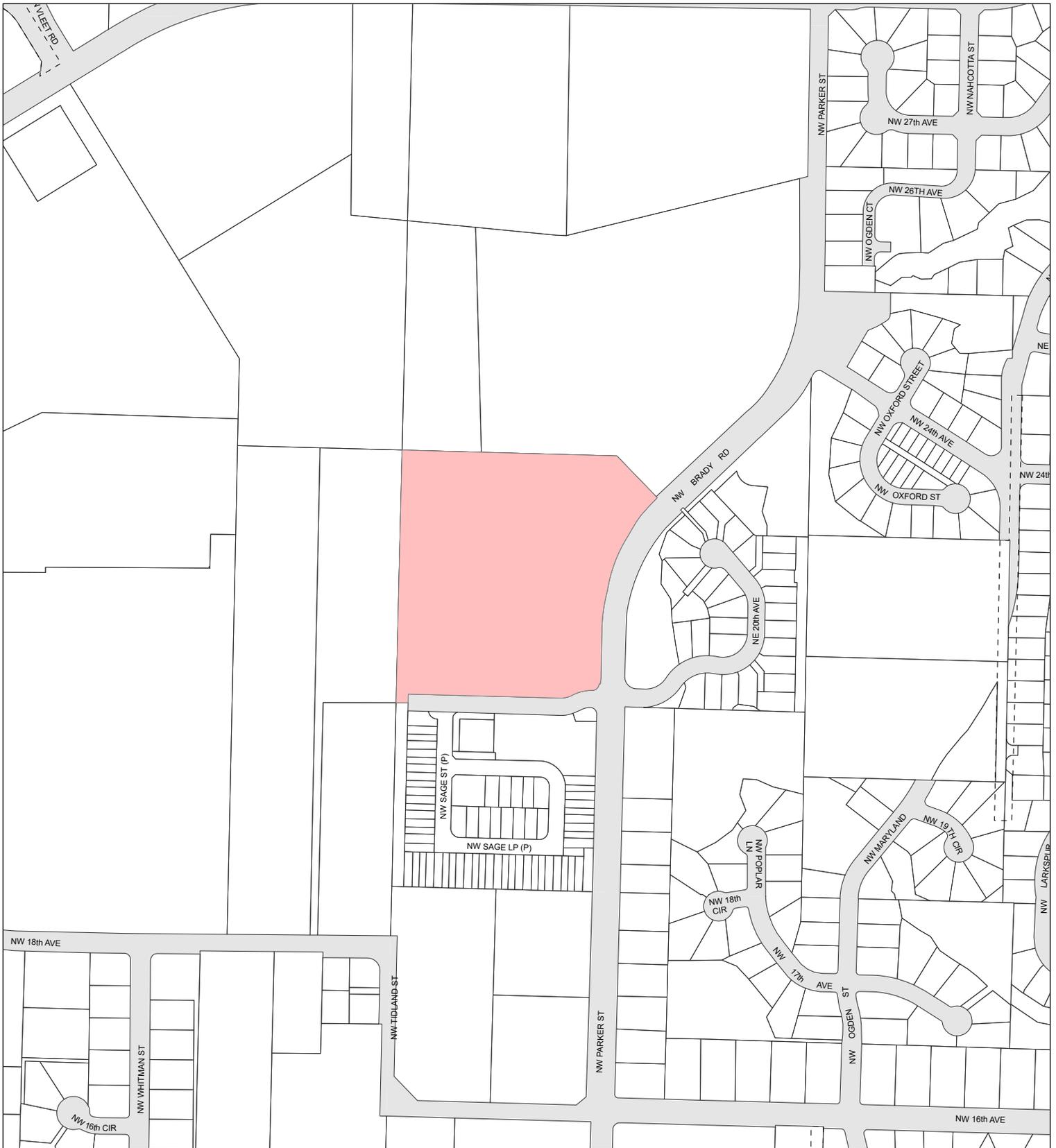
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- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Slopes > 15%
- Potentially Unstable Slope
- Historic or Active Landslide
- Severe Erosion Hazard Area
- Forest Moratorium Area
- ★ CCHR Historic Site
- NRHP Historic Site
- WSHR Historic Site
- WSHR Historic Barn
- ▲ INV Historic Site

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### Adjacent Development

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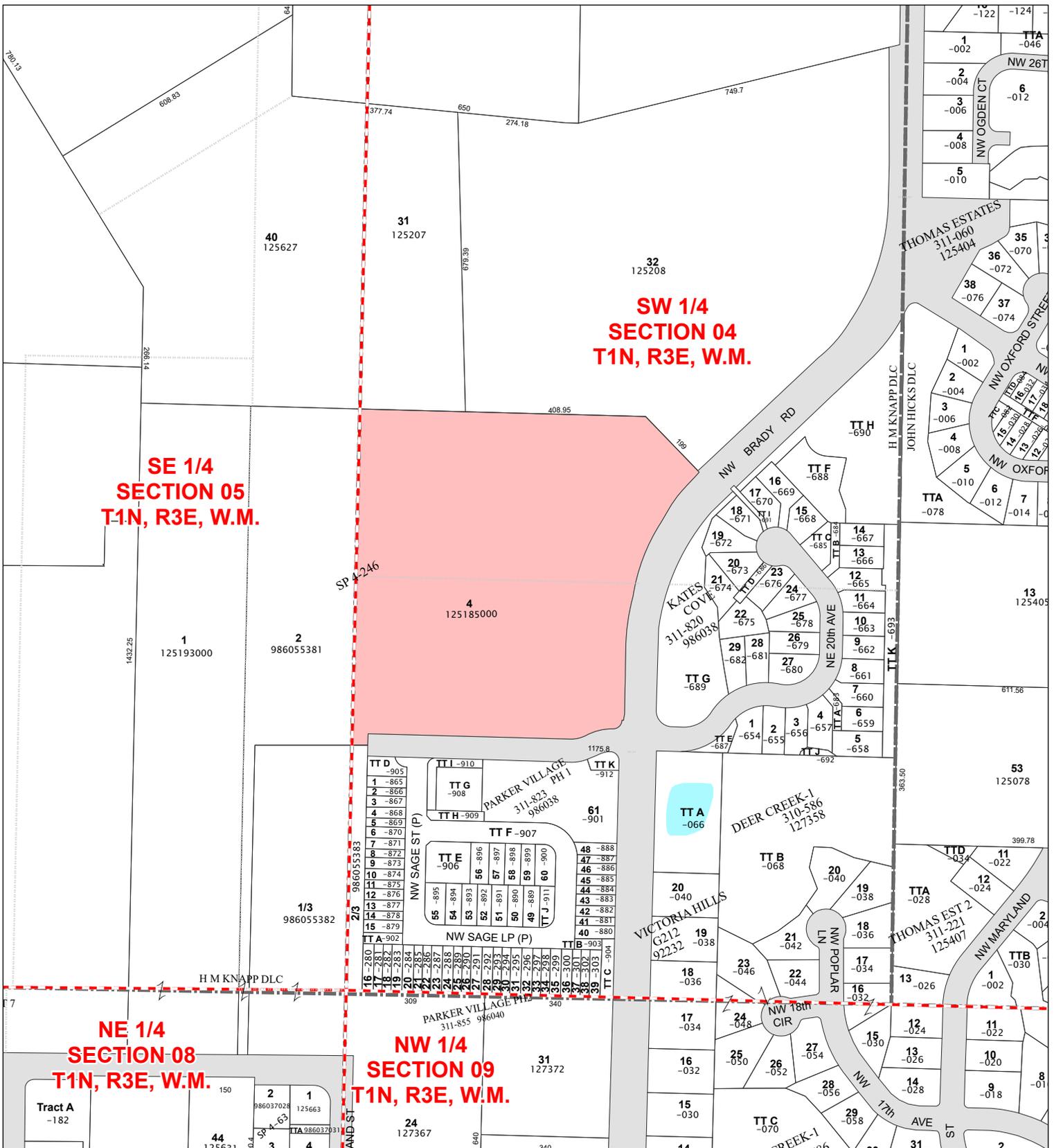
- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Adjacent Development

23131	23132	23133	23134
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Geographic Information System

0 200 400 Feet

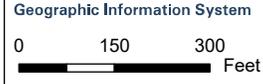
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### Quarter Section Parcels

Printed on: January 25, 2023

Account: 125185000  
 Owner: DALEY DENNIS W ETAL  
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 C/S/Z: RANCHO SANTA FE, CA 92067



- Subdivision Lines
- Donation Land Claim
- Section Quarters
- City Boundaries
- Subject Property(s)
- Road Right of Way - Actual Road May not Exist
- Transportation or Major Utility Easement

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# DEVELOPER'S PACKET

## Produced By:

Clark County Geographic Information System (GIS)



## For:

MackKay Sposito

## Subject Property Account Number(s):

986055381

125193000

127367000

127372000

PDF # 296807

Printed: January 25, 2023

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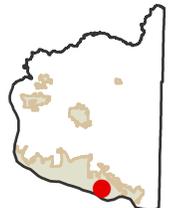


### General Location

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023

 Location of Subject Property(s)



Geographic Information System



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# Property Information Fact Sheet

## Mailing Information:

Account No.: 986055381, 125193000, 127367000, 127372000  
Owner: DALEY DENNIS W ETAL  
Address: PO BOX 757  
C/S/Z: RANCHO SANTA FE, CA 92067

**Assessed Parcel Size:** 19.84 Ac

**Property Type:** Multiple Property Types

---

## PARCEL LOCATION FINDINGS:

**Quarter Section(s):** SE 1/4,S05,T1N,R3E,  
NE 1/4,S08,T1N,R3E,  
NW 1/4,S09,T1N,R3E

**Municipal Jurisdiction:** Camas

**Urban Growth Area:** Camas

**Zoning:** BP, RC, CC

**Zoning Overlay:** No Mapping Indicators

**Comprehensive Plan Designation:** IND,  
COM

**Columbia River Gorge NSA:** No Mapping Indicators

**Late-Comer Area:** No Mapping Indicators

**Trans. Impact Fee Area:** Camas

**Park Impact Fee District:** No Mapping Indicators

**Neighborhood Association:** No Mapping Indicators

**School District:** Camas

**Elementary School:** Grass Valley

**Junior High School:** Skyridge Middle

**Senior High School:** Camas

**Fire District:** City of Camas

**Sewer District:** Camas

**Water District:** Camas

**Wildfire Danger Area:** Over 500ft need further review

---

## ENVIRONMENTAL CONSTRAINTS:

**Soil Type(s):** PoB, 95.1% of parcel  
PoD, 4.9%

**Hydric Soils:** Non-Hydric, 100.0% of parcel

**Flood Zone Designation:** Outside Flood Area

**CARA:** Category 2 Recharge Areas

**Forest Moratorium Area:** No Mapping Indicators

**Liquefaction Susceptibility:** Bedrock

**NEHRP:** B

**Slope:** 0 - 5 percent, 5.1% of parcel

10 - 15 percent, 6.3%

15 - 25 percent, 2.6%

5 - 10 percent, 86.0%

**Landslide Hazards:** Slopes > 15%

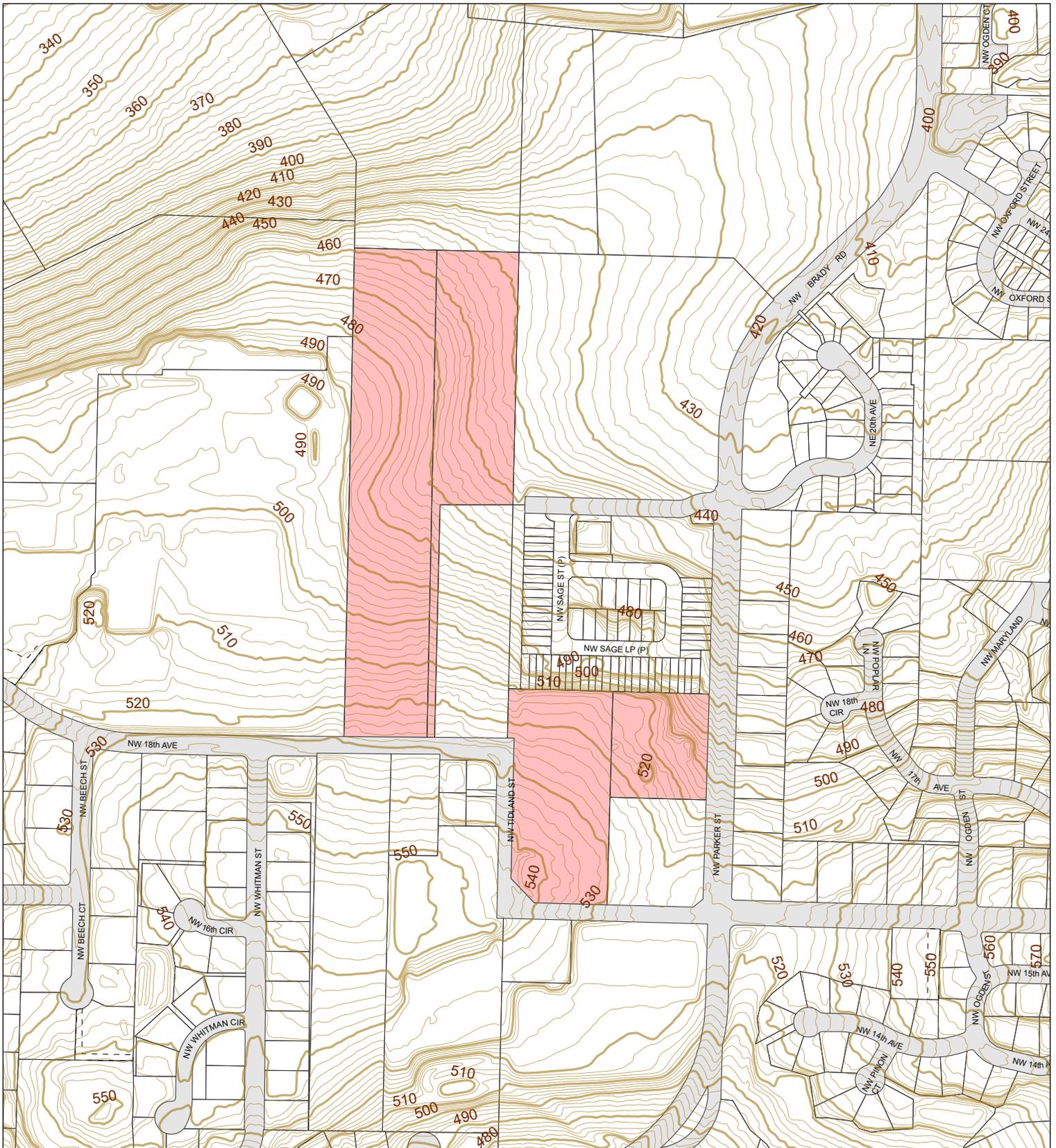
**Slope Stability:** No Mapping Indicators

**Cultural Resources:**

**Archeological Predictive:** Low-Moderate, 9.3% of parcel  
Moderate, 13.1%  
Moderate-High, 77.6%

**Archeological Site Buffers:** Mapping Indicators Found

**Historic Sites:** No Mapping Indicators



## Elevation Contours

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- 10' Elevation Contours
- 2' Elevation Contours

Printed on: January 25, 2023

23131	23132	23133	23134
13106	13105	13104	13103
13107	13108	13109	13110
	13117	13116	13115



Geographic Information System

0 200 400 Feet

Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.



## 2021 Aerial Photography

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023



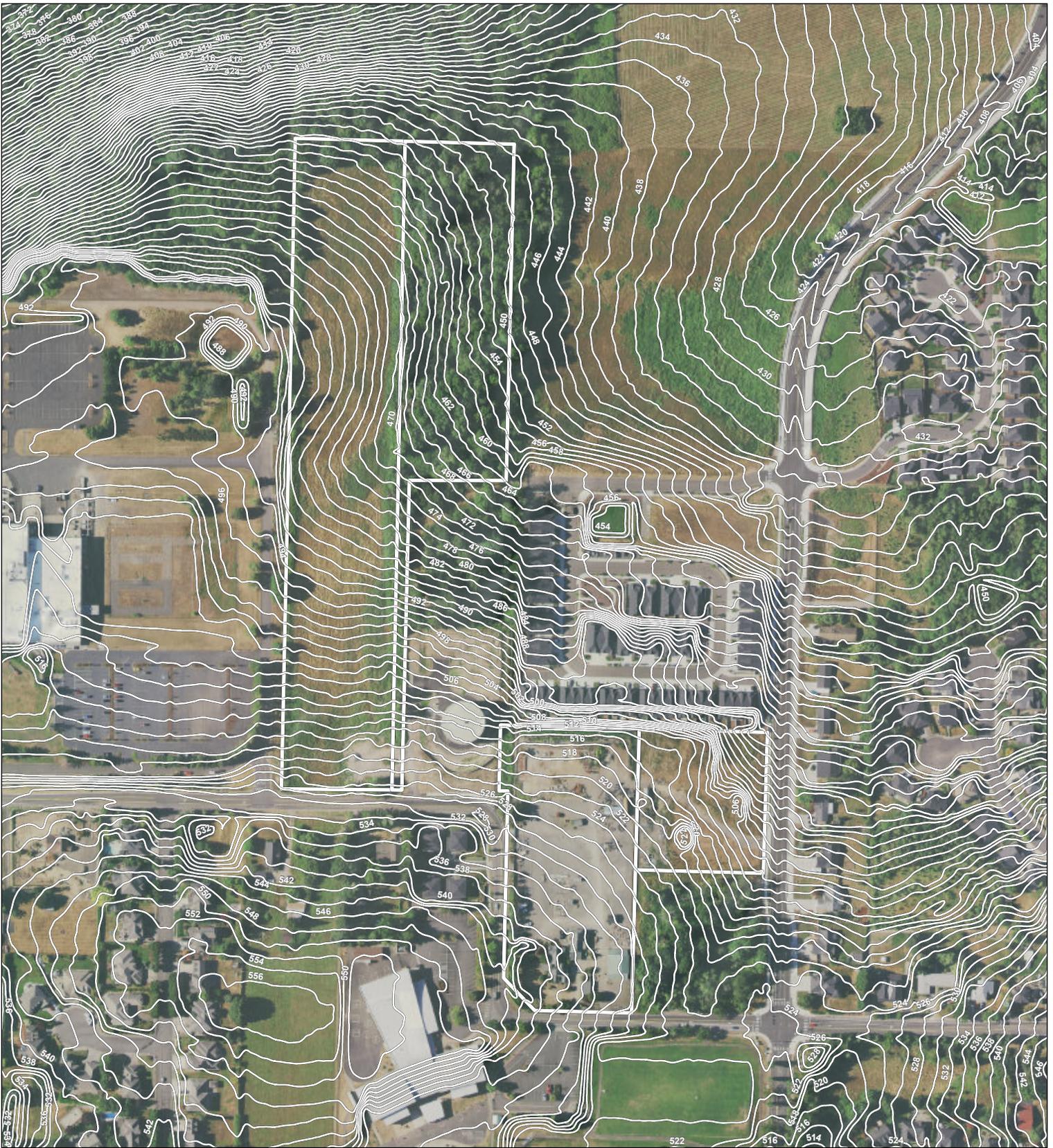
Geographic Information System

0 200 400 Feet

 Subject Property(s)

23131	23132	23133	23134
13106	13105	13104	13103
13107	13108	13109	13110
	13117	13116	13115

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## 2021 Aerial Photography with Elevation Contours

Printed on: January 25, 2023

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

23131	23132	23133	23134
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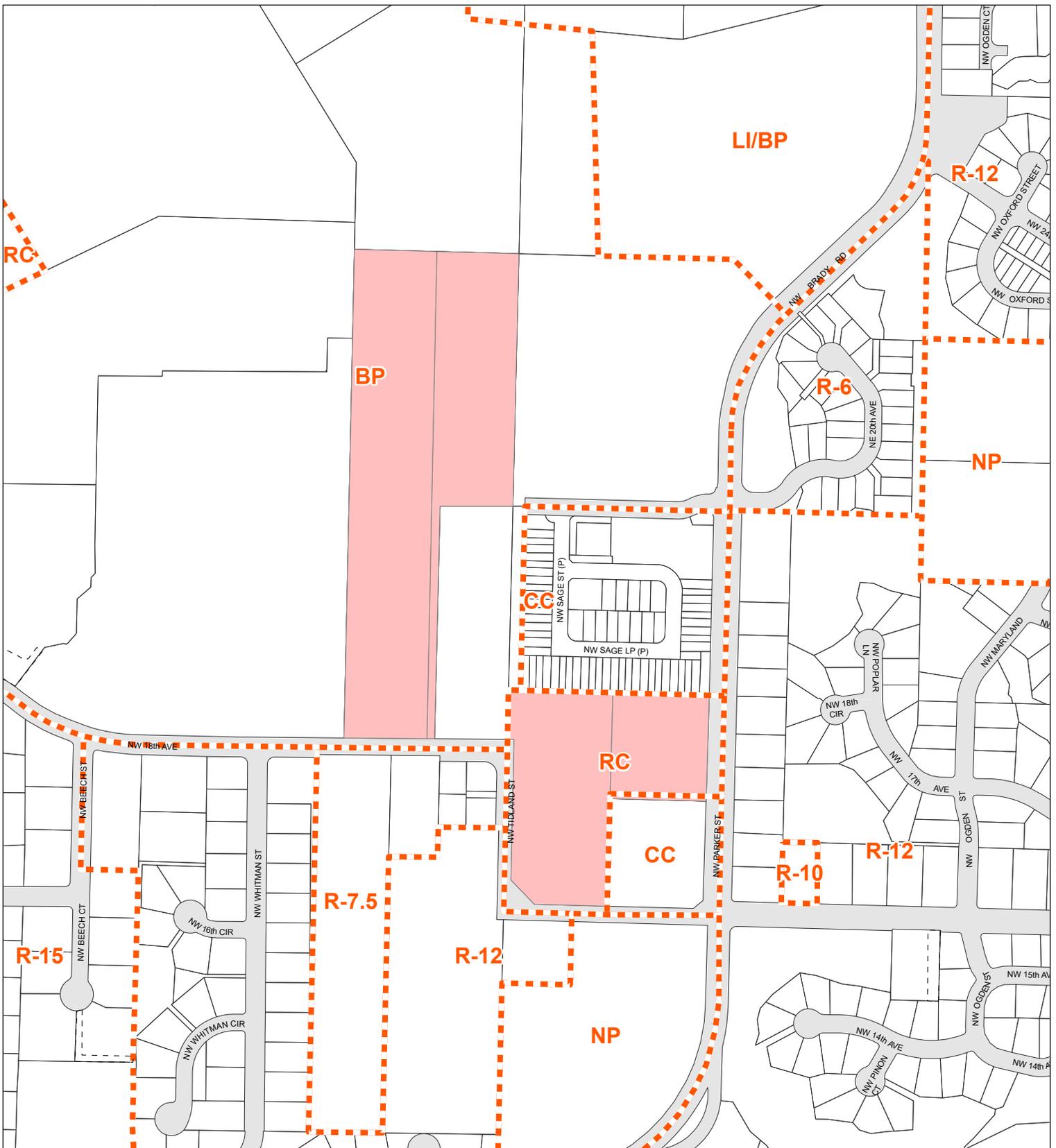


Geographic Information System



- 2' Elevation Contours
- Subject Property(s)

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### Zoning Designations

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023

CLARK COUNTY, WASHINGTON

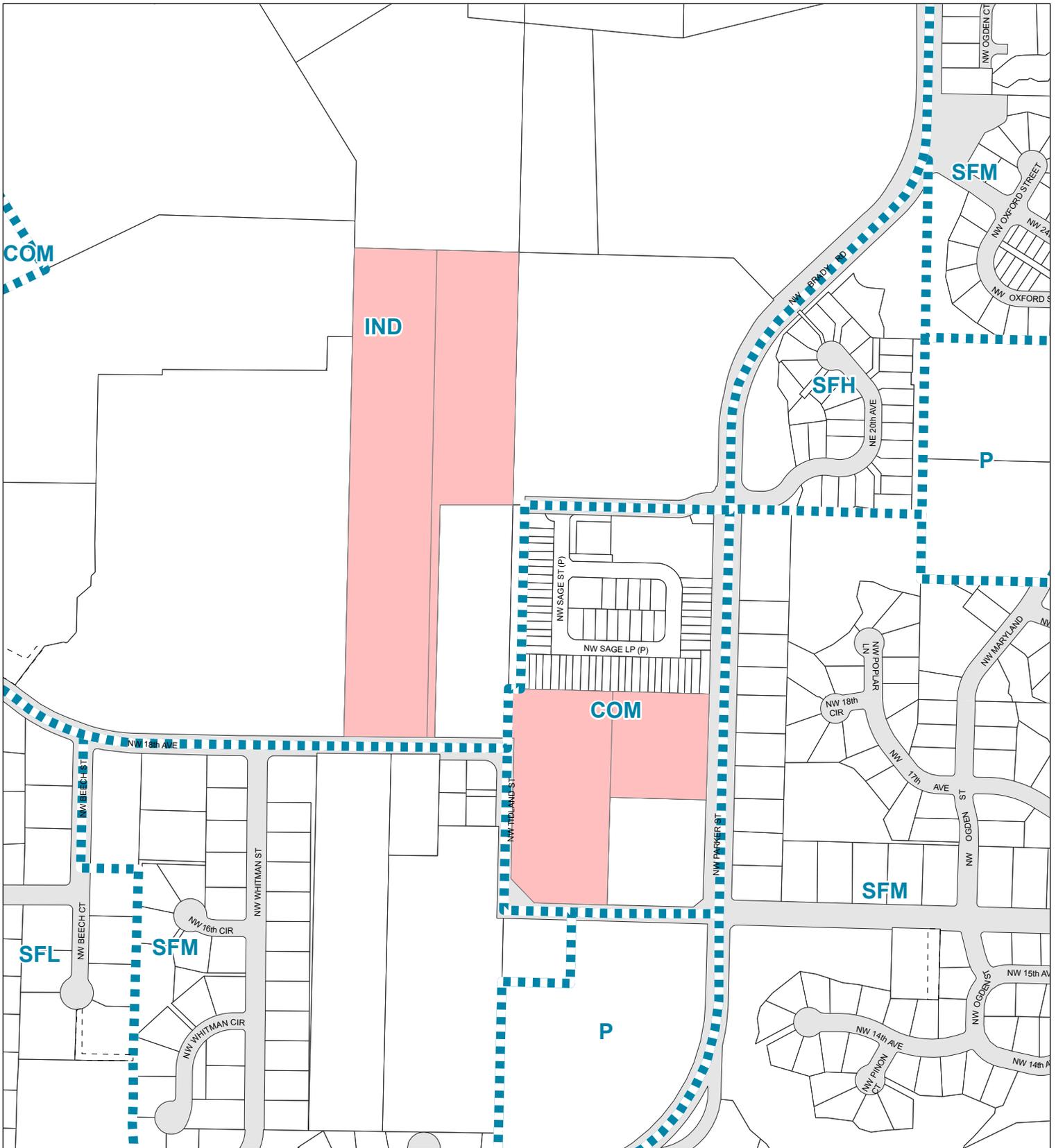
Geographic Information System

0 200 400 Feet

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Zoning Boundary
- Urban Holding - 10 (UH-10)
- Urban Holding - 20 (UH-20)
- Urban Holding - 40 (UH-40)
- Surface Mining Overlay District

23131	23132	23133	23134
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Geographic Information System

0 200 400 Feet

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### Comprehensive Plan Designations

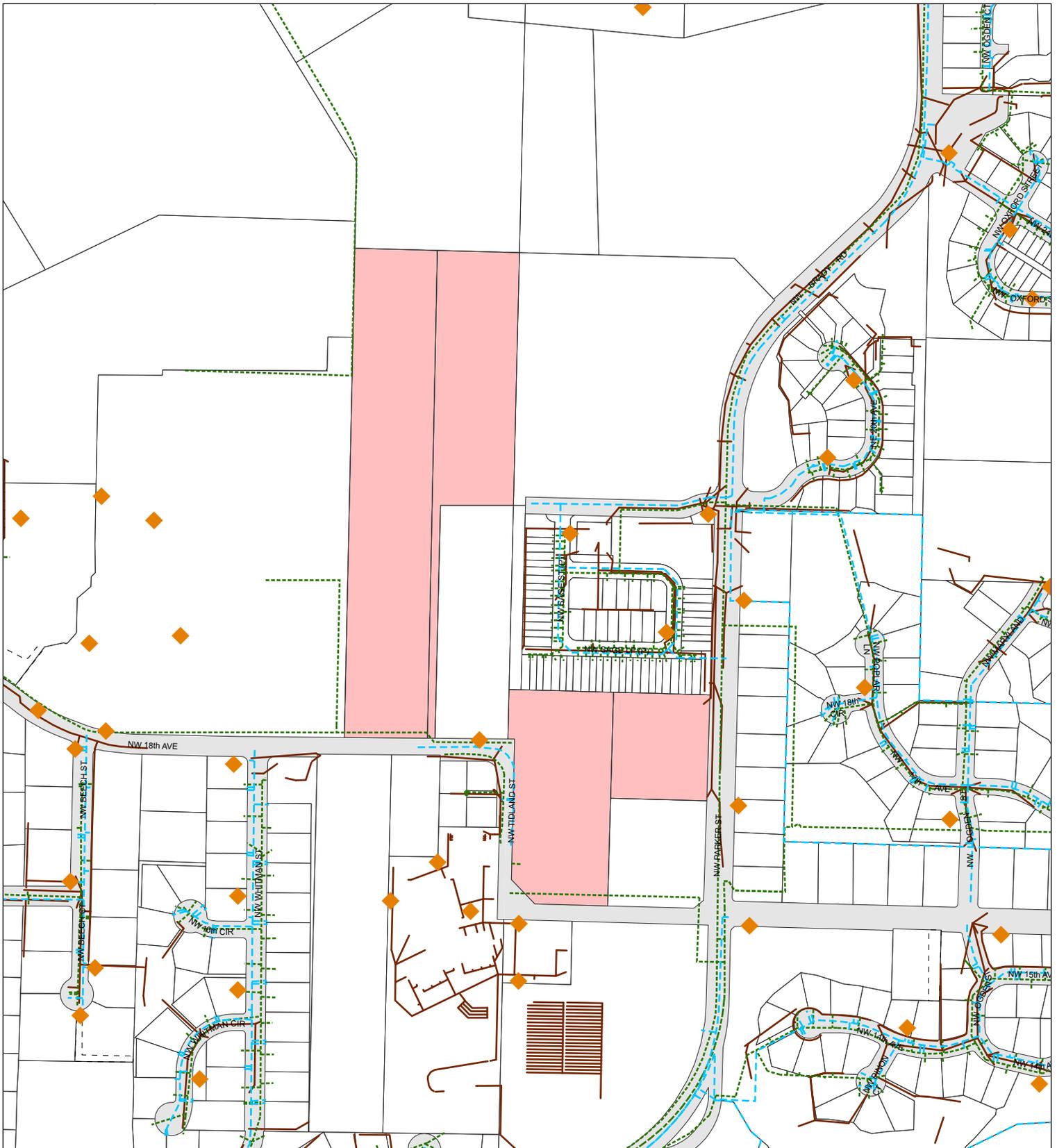
Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Comprehensive Plan Boundary
- Industrial Reserve
- Railroad Industrial Reserve
- Mining
- Rural Center Mixed Use
- Columbia River Gorge Scenic Area
- Urban Reserve

23131	23132	23133	23134
13106	13105	13104	13103
13107	13108	13109	13110
		13117	13116
			13115





**CLARK COUNTY, WASHINGTON**

Geographic Information System

0 200 400 Feet

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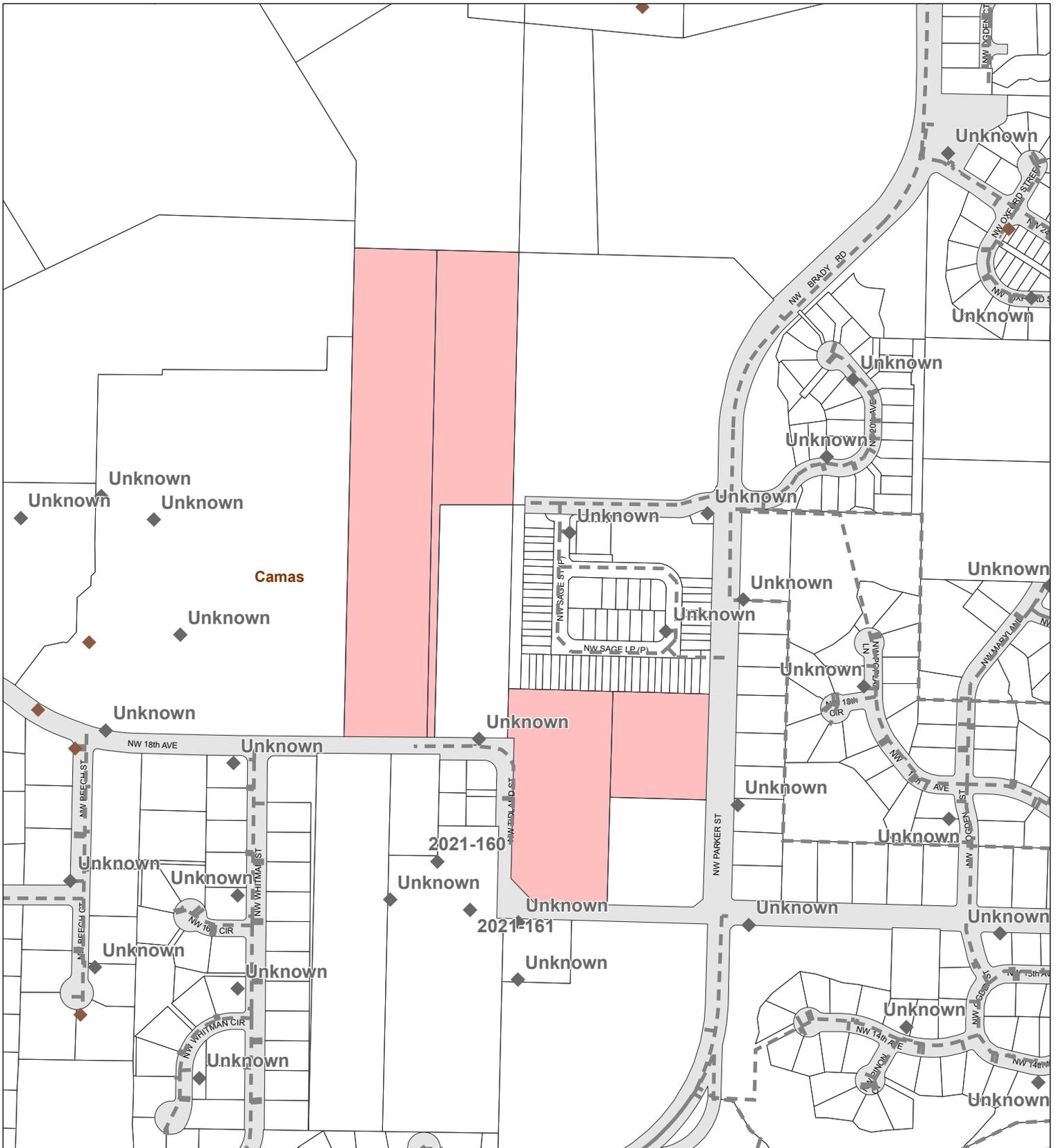
### Water, Sewer, and Storm Systems

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- 1-Year Wellhead ZOC
- 5-Year Wellhead ZOC
- 10-Year Wellhead ZOC
- Water Lines
- Sewer Lines
- Storm Water Lines
- Hydrants

Printed on: January 25, 2023

23131	23132	23133	23134
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CLARK COUNTY, WASHINGTON

Geographic Information System

0 200 400 Feet

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### Water Systems

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023

- Subject Parcel
- Public Road
- Water District Boundary
- Unknown Size Water Line
- < 10" Water Line
- 10-20" Water Line
- > 20" Water Line
- No Flow Data Hydrant
- 0 - 499 GPM at 20 PSI
- 500 - 999 GPM at 20 PSI
- > 1000 - 1749 GPM at 20 PSI
- > 1750 GPM at 20 PSI
- Hydrant > 500' from parcel(s)

23131	23132	23133	23134
13106	13105	13104	13103
13107	13108	13109	13110
		13117	
		13116	13115

# Hydrant Fire Flow Details

Account No.: 986055381, 125193000, 127367000, 127372000

Owner: DALEY DENNIS W ETAL

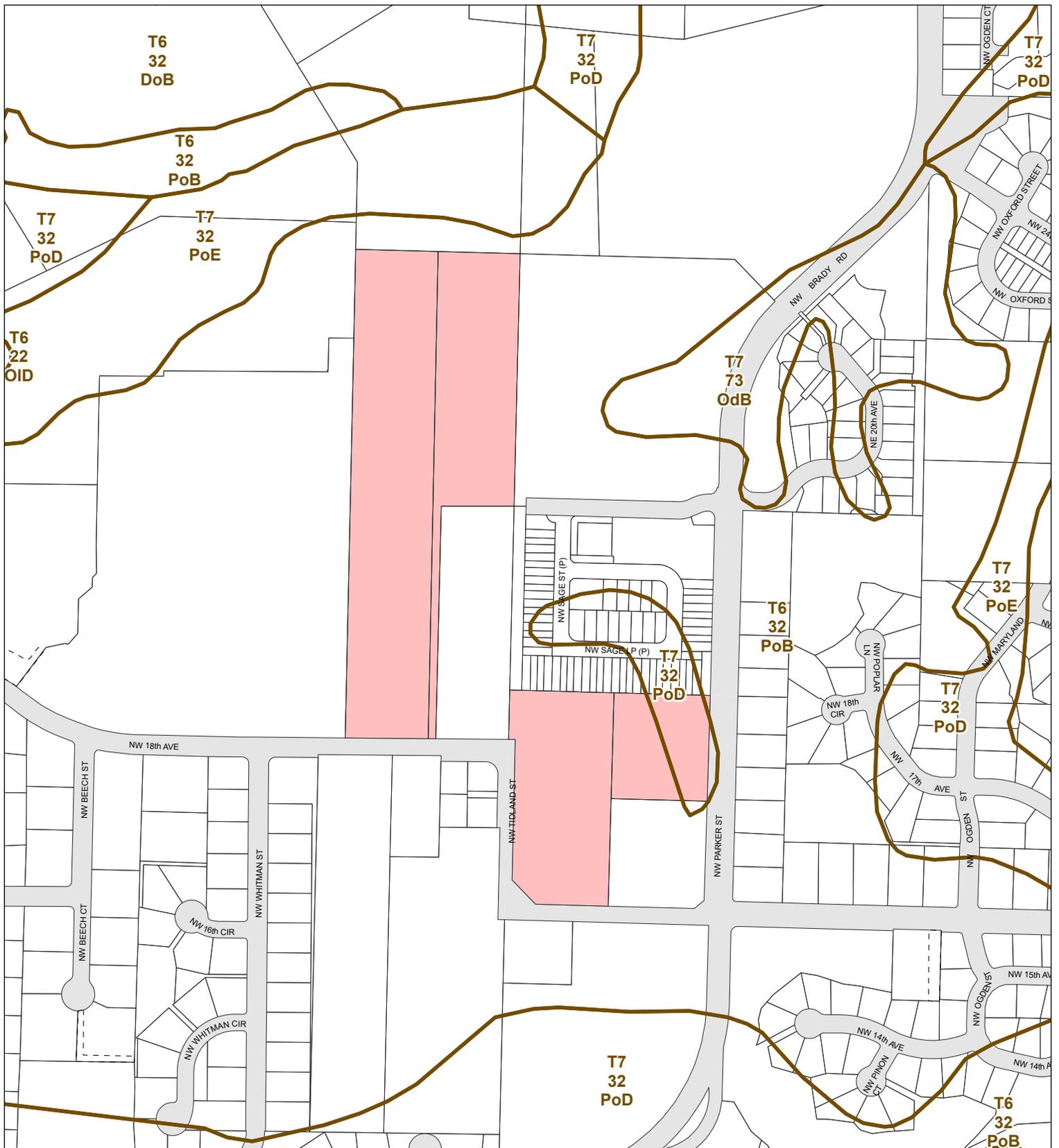
Address: PO BOX 757

C/S/Z: RANCHO SANTA FE, CA 92067

Water District(s)	Hydrant Data Update	Project Site Provider
Camas	April 18, 2022	Service Provider

## HYDRANT INFORMATION:

Hydrant ID	Hydrant Owner	Main Diameter	Flow at 20 PSI	Test Date	Distance to site
Unknown	Unknown	0.0"	No Data		76 ft
Unknown	Unknown	0.0"	No Data		85 ft
Unknown	Unknown	0.0"	No Data		97 ft
2021-161	Private	0.0"	No Data		155 ft
Unknown	Camas	0.0"	No Data		185 ft
Unknown	Camas	0.0"	No Data		191 ft
2021-160	Private	0.0"	No Data		222 ft
Unknown	Unknown	0.0"	No Data		236 ft
Unknown	Unknown	0.0"	No Data		303 ft
Unknown	Unknown	0.0"	No Data		342 ft
Unknown	Private	0.0"	No Data		369 ft
Unknown	Unknown	0.0"	No Data		399 ft
Unknown	Unknown	0.0"	No Data		467 ft
Unknown	Unknown	0.0"	No Data		499 ft



### Soil Types

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 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

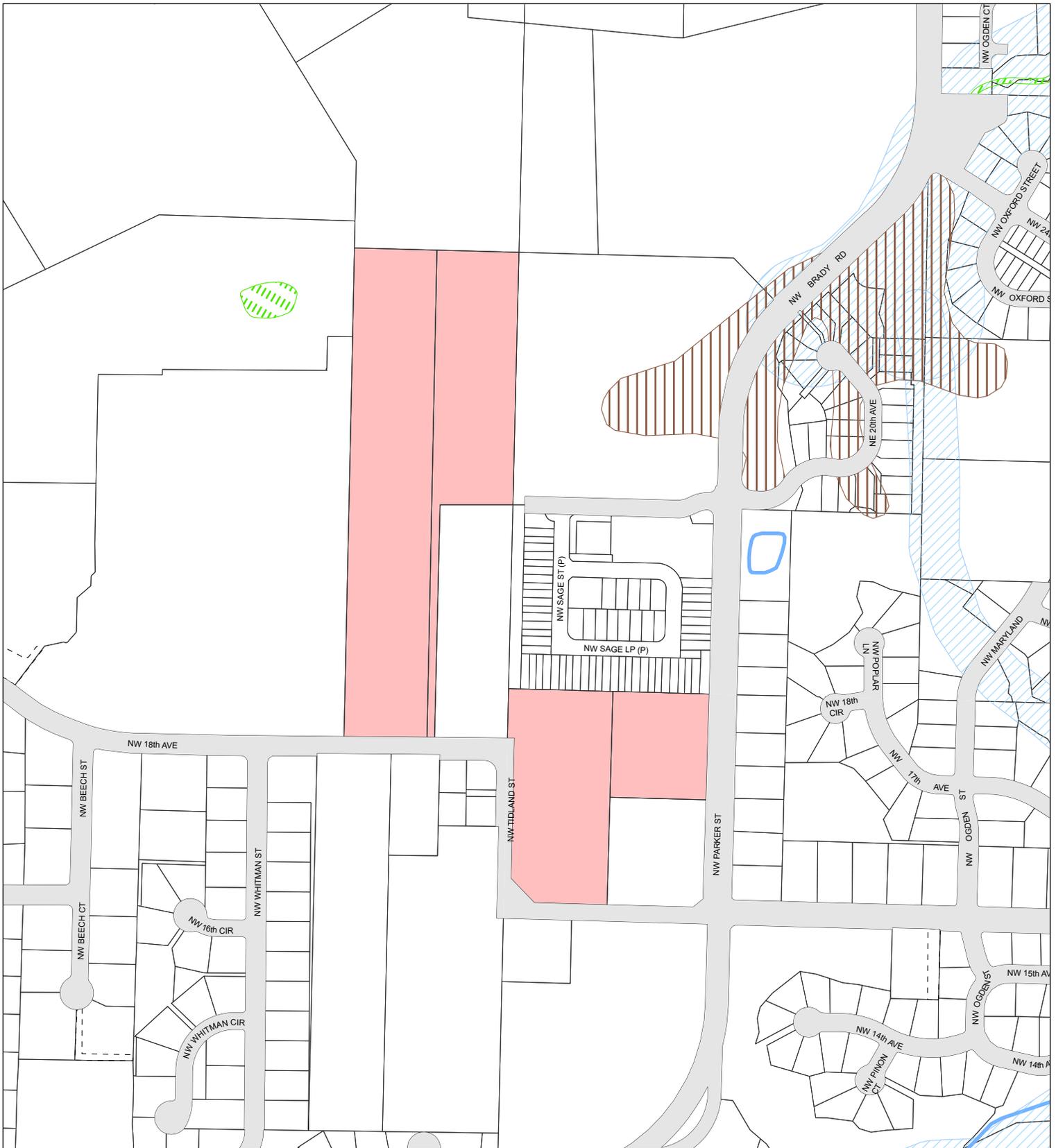
- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Soil Type Boundary

23131	23132	23133	23134
13106	13105	13104	13103
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Geographic Information System  
 0 200 400 Feet

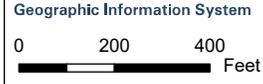
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## Environmental Constraints I

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

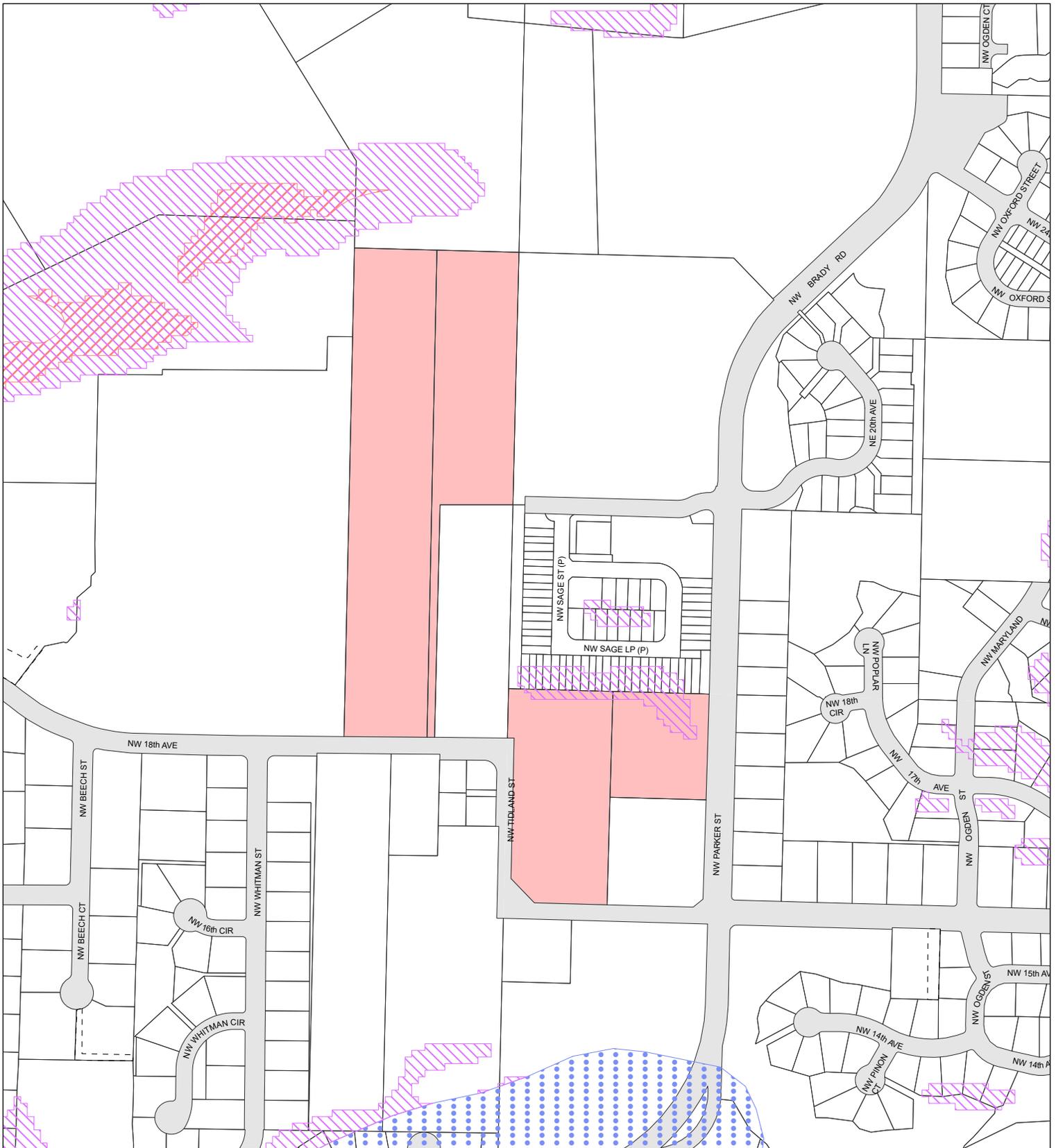
Printed on: January 25, 2023



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- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Hydric Soils
- Wetland Inventory
- CARA Category 1
- Riparian Habitat or Species Area
- Non-Riparian Habitat or Species Area
- 100 year Floodplains
- Floodway
- Shorelines
- Stream

23131	23132	23133	23134
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## Environmental Constraints II

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

- Subject Property(s)
- Public Road
- Transportation or Major Utility Easement
- Slopes > 15%
- Potentially Unstable Slope
- Historic or Active Landslide
- Severe Erosion Hazard Area
- Forest Moratorium Area
- ★ CCHR Historic Site
- NRHP Historic Site
- WSHR Historic Site
- WSHR Historic Barn
- ▲ INV Historic Site

Printed on: January 25, 2023

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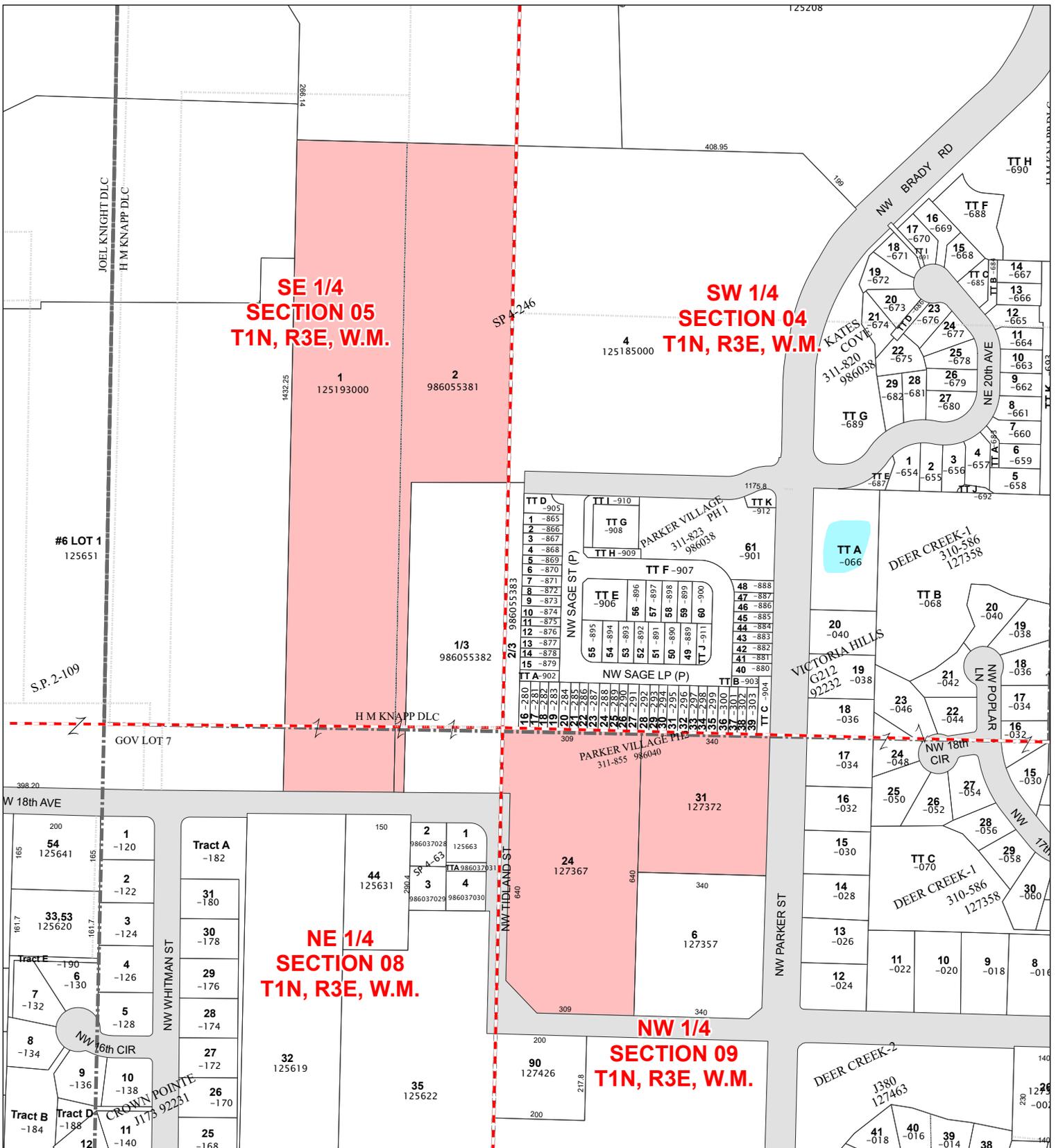


Geographic Information System



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### Quarter Section Parcels

Account: 986055381, 125193000, 127367000, 127372000  
 Owner: DALEY DENNIS W ETAL  
 Address: PO BOX 757  
 C/S/Z: RANCHO SANTA FE, CA 92067

Printed on: January 25, 2023

Geographic Information System

0 150 300 Feet

- Subdivision Lines
- Donation Land Claim
- Section Quarters
- City Boundaries
- Subject Property(s)
- Road Right of Way - Actual Road May not Exist
- Transportation or Major Utility Easement

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Application Narrative

3

Section

**Comprehensive Plan Amendment  
and Rezone Request**

**MackKay Family Properties**  
**Comprehensive Plan Amendment and Rezone Request**  
**City of Camas 2023 Annual Review Cycle**

## I. Request

The MacKay family is requesting to amend the City of Camas' Comprehensive Plan (Camas 2035 plan) land use designations for five parcels from Light Industrial and Commercial to Multifamily residential. This request also includes changes to the zoning districts from Business Park (BP) and Regional Commercial (RC) to Multifamily-18 (MF-18).

## II. Site Description

The subject properties include five (5) parcels totaling 31.4 acres. The properties are located generally at NW Tidland Street and NW 18<sup>th</sup> Avenue and NW Brady Road and NW 20<sup>th</sup> Avenue.

### Subject Properties (in blue highlight)



The subject properties are surrounded by a variety of uses. With the northern three parcels, the properties are bounded by vacant industrial land to the north (with the larger property adjacent to Analog Devices, Inc. to use for their own potential expansion), an attached housing development and city water reservoir to the south, industrial and educational uses (nLIGHT, Inc. and the Odyssey Middle School/Discovery High School campus) to the east, and NW Brady Road to the west.

The southern two properties are bounded by an attached housing development to the north (Parker Village), NW 16<sup>th</sup> Avenue and an approved commercial development (Camas Station) to the south, NW Brady Road to the east, and NW Tidland Street to the west. The southern two parcels are also across NW 16<sup>th</sup> Avenue from Prune Hill Sports Park and Prune Hill Elementary School. As you can see, the southern and northern parcels are separated by a city reservoir located on 4 acres, which property was purchased by the City of Camas from the MacKay family.

Surrounding Development (subject properties in red hatch)



A list of the properties by parcel number with acreage and planning information is as follows:

Assessor Parcel #	Acreage	Comp Plan Designation	Zoning District*
125185000	11.15	Industrial	BP
986055381	4.7	Industrial	BP

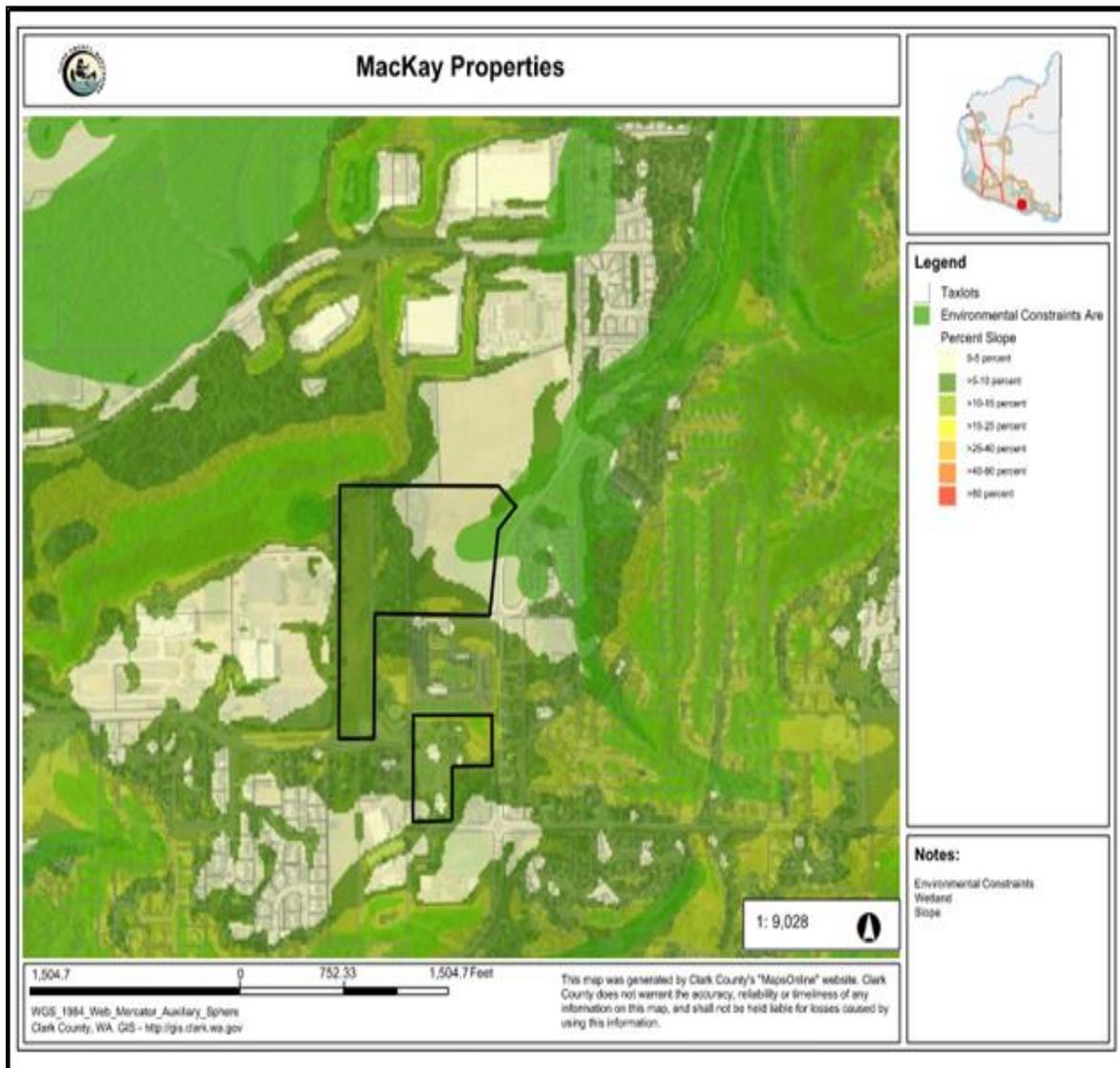
125193000	8.97	Industrial	BP
127367000	4.19	Commercial	RC
127372000	2.39	Commercial	RC

\* According to Clark County GIS Property Information Center

### Environmental Constraints

The BP zoned parcels do have notable environmental constraints, mainly in the form of slopes 10-20% and wetlands, that impact any efficient industrial or business park development of the property. The largest property contains wetland presence and the two contiguous lots west of the water reservoir have topographic challenges mentioned earlier in this narrative.

Environmental Constraints (source: Clark County GIS)



### III. Applicable Review Criteria

#### Camas Municipal Code - Title 18 Zoning

#### Chapter 18.51 - Comprehensive Plan and Zoning Amendments

##### **18.51.010 - Application for amendments to comprehensive plan.**

Any interested person, including applicants, citizens, planning commission, city council, city staff, and other agencies, may submit an application in the month of January each year for a comprehensive plan amendment. The application shall specify:

##### **A. A detailed statement of what is proposed and why;**

*Response:*

*The applicant is requesting to change the Comprehensive Plan designations of Industrial and Commercial to Multifamily High and the zoning districts from Business Park (BP) and Regional Commercial (RC) to Multifamily-18 (MF-18).*

*The reasons for the request are varied. With one exception (Sharp Electronics selling one of its old facilities to nLIGHT, Inc.), surrounding land uses have either been converted from industrial uses to something else (educational use and municipal water reservoir) or the land has been passed over for development for the past 30+ years. With burdensome slopes and odd parcel geometries for industrial or business park development, the properties are not ideally suitable for commercial and/or industrial uses as envisioned by the City's zoning districts.*

*As noted, the two westernmost parcels contain slope constraints and have odd parcel characteristics in that they are narrow and long (250' x 1450' with one parcel and 'flagstem' 250' x 750' parcel). The latter parcel is a residual parcel from the City water reservoir short plat. These two properties are surrounded by the one remaining industrial use of nLIGHT, Inc., the city water reservoir, and an abutting housing development to the east. The largest parcel of three industrial parcels contain wetland constraints and abuts a new residential development to the south and is across Brady Road from Kate's Cove subdivision.*

*The two commercial parcels are adjacent to Prune Hill Elementary School on the west, Brady Road on the east, and residential on the north. It is an 'island' of commercial that is surrounded by educational and residential uses. Until a conditional use permit (CUP) for a project known as Camas Station was recently approved, the property at the NW corner of 16th Avenue and Brady Road has been vacant and unused. It is worth noting that the proposed CUP faced significant neighborhood opposition. With the surrounding properties, the two parcels are better suited for residential development, as they would provide a 'buffer' from the recently approved Camas Station to other uses.*

**B. A statement of the anticipated impacts of the change, including the geographic area affected, and issues presented by the proposed change;**

*Response:*

*The proposed change will help solve development related issues associated with the site. As previously stated, the subject properties are surrounded by two primary uses, which are residential and educational. Due to the properties' current zoning, parcel sizes and configurations, environmental and slope constraints, challenging access, and surrounding land uses, the properties have limited development potential under current zoning. Designating and zoning the properties for multifamily residential will expand the development opportunities of the parcels, while providing the opportunity for much needed housing development in a form other than large lot single family houses. The change will ensure the properties are more in line and consistent with the surrounding area.*

*The prospect of adding more commercial development in the area, in light of the recently approved Camas Station CUP, presents significant challenges for the market and perhaps transportation infrastructure. According to the Market and Land Need Analysis report prepared by Johnson Economics, LLC in December 2022 (hereafter referred to as the JE Report), under the current zoning, suitable uses for the two southern parcels are for those uses with small footprints with a neighborhood orientation. With a recent CUP approval, development of Camas Station makes it difficult to find adequate support for similar establishments on the subject two properties. The JE report notes that the Camas Station project, comprised of a fueling station and 14,000 square feet of convenience, coffee, and additional retail and service, captures market demand. This makes the potential for additional development to be severely limited and unlikely. (p. 8 of JE report) With respect to the three northern parcels, the JE report touches on compatibility, scale and configuration, topography, traffic and access, and market conditions. The report notes that the physical and locational attributes, coupled with weak market conditions for the uses envisioned in the LI and BP zones, render many of the industrial and commercial uses infeasible. (p. 7 of the JE report)*

*With respect to potential impacts to traffic otherwise generated by development of the property under current zoning, the proposed change would have a positive impact on the transportation infrastructure. **As shown in a traffic memo prepared by Lancaster Mobley, the net change in potential trip generation is 722 less trips in the AM peak, 889 less trips in the PM peak, and 8,484 less trips for the weekday total.** (p. 4 of LM memo) It cannot be overstated enough that changing the properties to multifamily residential has the potential to impact the transportation infrastructure far less than leaving it zoned as is and seeing development consistent with commercial and industrial generated traffic.*

**C. An explanation of why the current comprehensive plan is deficient or should not continue in effect;**

*Response:*

*Light Industrial Properties*

*The current land use designations of Light Industrial and Commercial are no longer adequate for the development of the property. The westernmost properties planned for Light Industrial*

*contain slope constraints and are narrow and long, which is problematic with the setbacks imposed by the development code. The largest property planned for Light Industrial, which is 11.15 acres in size, has wetland constraints and is adjacent to a new, attached housing development built within the last 5-6 years. The Comprehensive Plan has had these designations in place for decades and the most recent development, aside from the attached housing project to the north, has been the construction of a city-owned water reservoir. Leaving the property as Light Industrial will needlessly render the property vacant and undeveloped for decades to come. It is a detriment to the City and its economic future to retain any property zoned for employment that in all likelihood does not develop. A false or shadow inventory prevents the City from growing its future employment base and creating more jobs for Camas residents. This has an adverse effect on the City's buildable lands supply for employment and on its tax base.*

### Commercial Properties

*The two commercial properties are not large enough to attract anything more than neighborhood-scaled development. Approval of the adjacent 2.16-acre property for the Camas Station development (consisting of a gas station, convenience store, coffee shop, and other retail and personal services) has the effect of absorbing the market demand for commercial development in the area. The Johnson Economic report notes that larger footprint commercial development would not be feasible for these properties for a number of reasons, least of which is related to topography, traffic impacts generated by such development, congestion at times due to school operations, and market conditions.*

### **D. A statement of how the proposed amendment complies with and promotes the goals and specific requirements of the growth management act:**

*Response:*

*The City's growth management goals and policies are reflected in the Camas 2035 Plan (adopted June, 2016). The plan contains chapters for the following elements: Land Use, Housing, Natural Environment, Transportation, Public Facilities and Services, and Economic Development.*

*The proposed amendment will provide the land supply needed to meet the citywide Land Use goal LU-1 to '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'. It also addresses the citywide land use policy LU-1.1 to '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.'*

*In terms of housing specific provisions in the Camas 2035 plan, the citywide housing goal H-1 states, '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.' Furthermore, citywide policy H1.1 states, 'Provide a range of housing options to support all ages and income levels.' The proposed amendment addresses these goals and policies.*

*The proposed amendment speaks to the documented need for housing diversity and choice. According to the recent 2021 City of Camas Housing Action Plan (HAP), 89% of the city's housing units are single-unit structures and only 5% in duplex, triplex, and quadruplex units (2014-2018 American Community Survey data). Important to note is that the Camas HAP is a policy document addressing the lack of housing supply, housing choice and diversity, and affordability. All these issues have triggered changes to the Growth Management Act to remove barriers to the production of housing of all types to a range of economic segments and to provide guidance to local governments to address housing issues. These changes to the GMA have occurred after the Camas 2015 plan, during a time when housing demand is far surpassing housing supply and when cities are encouraged to increase residential building capacity by offering more choice and variety of housing options.*

*By amending the land use designation and zoning district to multifamily residential, the gap in providing the opportunity for the availability of housing diversity and choice is improved.*

**E. A statement of what changes, if any, would be required in functional plans (i.e., the city's water, sewer, stormwater or shoreline plans) if the proposed amendment is adopted;**

*Response:*

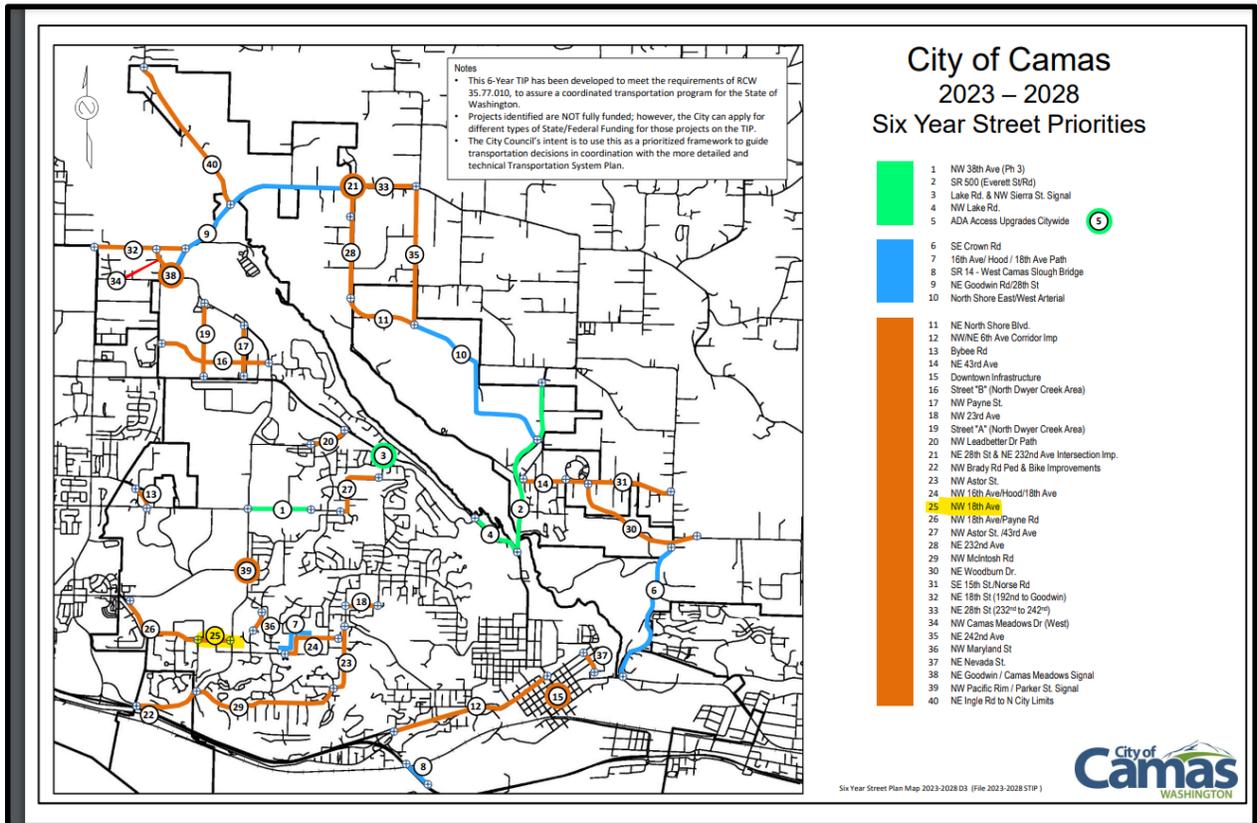
*The subject properties are served by city services and capital facilities. With recent improvements to the city's water system and NW Brady Road, the proposed change does not substantially affect the city's capital facilities plans. To highlight this point, the city's General Sewer/Wastewater Facility Plan shows the system accommodating a build-out scenario of over 18,500 dwelling units and nearly 53,000 people. In the MFR-24 land use alone the plan suggests accommodating 3,175 units and nearly 9,000 people. The properties are not within a shoreline environment and, therefore, require no changes to the Shoreline Master Program.*

**F. A statement of what capital improvements, if any, would be needed to support the proposed change which will affect the capital facilities plans of the city;**

*Response:*

*The City's Six Year Transportation Improvement Program map shows the extension of NW 18th Avenue, through the two commercial properties, from NW Tidland Road to NW Brady Road, rendering the property as an 'island' surrounded on all four sides by NW 16th Avenue, NW 18th Avenue, NW Tidland Road and NW Brady Road. (see inset map below) If the zone change is approved, the extension of NW 18<sup>th</sup> Avenue from NW Tidland Street to NW Brady Road would be required as part of a proposed development.*

## City of Camas Six Year Street Priorities



*As noted earlier, the City's overall sewer and water systems are more than adequate to support the change from commercial and industrial to residential.*

**G. A statement of what other changes, if any, are required in other city or county codes, plans, or regulations to implement the proposed change; and**

*Response:*

*No other changes to city or county codes, regulations, or plans are required to implement the proposed amendment.*

**H. The application shall include an environmental checklist in accordance with the State Environmental Policy Act (SEPA).**

*Response:*

*A SEPA checklist has been completed and submitted with the application.*

## **Camas Comprehensive Plan Goal and Policies (Camas 2035 plan)**

### **Chapter 1 - Land Use**

**Citywide Land Use 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.

*Response:*

*Changing the land use designations and zoning to multifamily residential provides a mix of land use patterns that better reflect the surrounding area and accommodates much needed housing opportunities for something other than large lot, single family residential development. As noted in the 2021 Housing Action Plan, one of the recommended strategies to obtain more housing stock and more diversity of housing is to consider targeted rezones during Comprehensive Plan updates (A-4). This strategy notes identifying strategic locations, such as urban nodes, vacant land, and industrial lands, where rezoning would be needed to achieve desired residential mix/density or to reflect a built density that is higher than the current zoning classification.*

**Citywide Land Use Policies 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.

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

*Response:*

*As noted in other sections of this narrative, the surrounding land uses are predominantly residential and educational, with a soon to be neighborhood commercial node that will absorb most of the commercial and personal services demand in the area. The southern properties that once accommodated a commercial nursery and landscape business, where 'lay down' yards were extensively used, will be redeveloped to a more efficient use of the land. By changing the zoning, allowing for residential use will encourage redevelopment and more efficient use of the land.*

*With the three northern industrial parcels, the land is adjacent to higher density residential development, a conspicuous municipal use (city water reservoir), industrial property to the east (nLIGHT, Inc.), and vacant industrial land to the north (Analog Devices, Inc.). Allowing residential development on these three properties would be compatible with the adjacent residential development and the property that houses the city's water reservoir. With respect to the westernmost property, the west property line is 425 +/- feet away from the nLIGHT, Inc. building. The closest element of the nLIGHT property is 60 +/- feet away and it is a parking lot screened by a row of large evergreen trees. (see inset map below) There is also a private road that runs the nearly length of the entire north/south property line that acts as a separator. Residential development in close proximity to employment presents opportunities for reducing commute trips and lengths. The possibility of someone living close to their employer would not occur if the current zoning is maintained.*

Surrounding Development (subject properties in red hatch)



LU-1.6: Ensure adequate public facilities (including roads, emergency services, utilities, and schools) exist to serve new development, and mitigate potential impacts to current residents.

*Response:*

*The city has adequate utilities in the area to serve new development. With installation of a new water reservoir on an adjacent site, water availability and capacity is surely adequate. Recent improvements to the NW Brady/Parker corridor has improved north/south traffic flow and the planned extension of NW 18th Avenue will improve east/west traffic flow.*

*As far as other public facilities, such as police, fire and schools, development of the property as residential will trigger payment of impact fees, which mitigates the impact of development on*

*certain systems like fire facilities and schools. Future development will add improved value to the increased land value that, in turn, increases total assessed valuation and payment of property taxes. Future property tax revenue will assist in the service provision to additional potential development and this area.*

LU-1.7: Ensure consistency with County-wide planning policies.

*Response:*

*The Clark County Comprehensive Plan contains seven (7) countywide planning policies (CPPs) relative to Housing. The most pertinent of these are:*

*2.1.4 Link housing strategies with the locations of work sites and jobs.*

*2.1.5 Link housing strategies with the availability of public facilities and public services.*

*2.1.6 Encourage infill housing within cities and towns and urban growth areas.*

*2.1.7 Encourage flexible and cost efficient land use regulations that allow for the creation of alternative housing types which will meet the needs of an economically diverse population.*

*Changing the zoning on these five properties links future housing development to employment opportunities that have emerged with development on the far western edge of Camas and along the 192nd Avenue corridor in east Vancouver. Public facilities and services are available to the properties for residential development. As vacant properties that have been passed over many times for their intended use (under current zoning), changing the zoning will unlock the potential for the property to develop as 'infill' under the terms of the CPP. With comparatively little multifamily residential zoned land, Camas lacks in alternative housing types and housing to meet the needs of economically diverse populations. Rezoning these properties open up the possibility of creating alternative housing types and for a range of household incomes.*

Employment 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.

### Employment Land Policies

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.

*Response:*

*Coupled with the recently approved Camas Station commercial development at the NW corner of NW 16th Avenue and Brady Road, changing the zoning and allowing the opportunity for residential development facilitates a mix of uses in the area. With a mix of commercial and residential in close proximity to each other, there is a real possibility that residents living in new developments will be able to walk to convenience-oriented commercial and personal services at the Camas Station development. There is also the possibility that residents can walk, bike or otherwise commute without a vehicle to nearby employers. With recent improvements to NW Brady/Parker Road and with eventual improvements required with future developments, the area will be well-served with bicycle and pedestrian access, which is critical for non-vehicular*

*mobility. Keeping the land zoned for employment when it is unlikely to develop as such erodes this goal.*

Neighborhood Goal LU-3: Create vibrant, stable, and livable neighborhoods with a variety of housing choices that meet all stages in the life cycle and the range of affordability.

*Response:*

*Redesignating and rezoning the properties to multifamily will promote the realization of a more diversified housing inventory in both density and affordability. This diversified residential inventory will also provide nearby employers more housing choices for their workers and therefore reduces traffic congestion and carbon emissions due to the proximity of work and place of residence.*

### Neighborhood Policies

LU-3.1: Encourage a variety of housing typologies to support the overall density goal of six dwelling units per acre.

*Response:*

*Until recently, Camas has historically experienced residential densities much lower than the overall density target of six (6) dwellings per acre. According to Clark County's Buildable Lands Report dated June, 2022, between 2016 and 2020, Camas saw development occur at 5.5 dwelling units per acre for single family residential and multifamily residential development at 11.4 dwelling units per acre. The aggregate density for residential development was 6.5 dwelling units per acre. These numbers reflect the availability of both single family residential and multifamily residential zoning. With the recent absorption of vacant multifamily residential properties, Camas will experience certain challenges in maintaining the overall density target of 6 dwellings per acre. Rezoning this 31.4 acres to MF-18 will add to the inventory of MF-18 zoned land in the city, much of which is already developed or is located in the North Shore subarea of the city, and will ensure the opportunity for Camas to new development achieving the density targets called out in GMA plans. Development of multifamily residential in the North Shore area would not be as immediate as it would occur on the MacKay properties, largely due to the lack of all infrastructure components and other services.*

LU-3.3: Encourage connectivity between neighborhoods (vehicular and pedestrian) to support citywide connectivity and pedestrian access.

*Response:*

*Coupled with the recently approved Camas Station commercial development at the NW corner of NW 16th Avenue and Brady Road, changing the zoning and allowing the opportunity for residential development. With a mix of commercial and residential in close proximity to each other, there is a real possibility that residents living in new developments will be able to walk to convenience-oriented commercial and personal services at the Camas Station development. There is also the possibility that residents can walk, bike or otherwise commute without a vehicle to nearby employers. With recent improvements to NW Brady/Parker Road and with eventual improvements required with future developments, the area will be well-served with bicycle and pedestrian access, which is critical for non-vehicular mobility.*

LU-3.5: Where neighborhoods adjoin natural areas or trails, ensure connections through neighborhoods to enhance access to recreation amenities.

*Response:*

*The properties are located near Prune Hill Sports Park for recreational amenities and are within a 15-minute walking distance to the Open Space network on the west side of Prune Hill.*

*Development of the property would provide bike/pedestrian access to the overall system of Bike/Ped/Trails system in west Camas. NW Brady/Parker Road includes bike lanes for bicycle movements. The inset map is a partial image of the Camas Trails map. (The subject property is shown in blue.)*

Camas Trails Map



## **Chapter 2 - Housing**

Citywide Housing 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.

### Citywide Housing Policies

H-1.1: Provide a range of housing options to support all ages and income levels.

*Response:*

*As currently zoned, the properties are not allowed to develop with multifamily residential uses. Redesignating and rezoning the properties will promote the opportunity for developing housing choices allowed in the multifamily residential zoning district. Developed as traditional multifamily residential, the properties will be better positioned to yield units that are more in line with the needs of all members of the community. This diversified residential inventory will also provide nearby employers more housing choices for their workers and therefore reduces traffic congestion and carbon emissions due to the proximity of work and place of residence.*

H-1.6: Encourage in-fill development on vacant or underutilized sites, subject to design review guidelines, that have adequate urban services, and ensure that the development is compatible with the surrounding neighborhood.

*Response:*

*Development of the property would be in keeping with the other recent developments in the area. To the extent that design review is required, future development will comply with the standards in place at the time of development application. As mentioned previously, the area is fully served by adequate public facilities and utilities.*

H-1.7: Require all new housing developments to provide a range of housing types and sizes that are evaluated through the land use approval process and stipulated on the final plat.

*Response:*

*By rezoning the properties to multifamily, the properties are much more likely to develop with a range of housing types and sizes given the surrounding developments nearby, especially with the approved Camas Station commercial development. It is possible that there could be a mix of small footprint attached housing and traditional multifamily apartments that develop on the properties. Subsequent development will follow the city's land use review process and will comply with development code requirements and standards in place at the time of development application.*

Affordable Housing Goal H-2: Create a diversified housing stock that meets the needs of all economic segments of the community through new developments, preservation, and collaborative partnerships.

### Affordable Housing Policies

H-2.1: Support and encourage a wide variety of housing types throughout the City to provide choice, diversity, and affordability and promote homeownership.

*Response:*

*Approving this plan amendment and rezone request speaks to the opportunity for the City to support and encourage a wide variety of housing types and choices for citizens of Camas. Throughout this narrative and in the 2021 Housing Action Plan, it is noted that Camas lacks an adequate supply of housing that is varied in type and tenancy. This fact has been more pronounced in recent years with the lack of all residential units coming 'on-line' that is needed for a growing population. Many factors play into the 'Housing Crisis' that we have experienced in the past few years and today, one of which is a sufficient land supply that is zoned for and has the services ready or nearly ready for development. Rezoning these properties will add much needed multifamily residential to the limited land supply in Camas.*

H-2.7: Conduct an affordable housing study in order to determine the number of existing affordable units and assess the need for additional units. Develop policies to implement recommendations of the affordable housing study.

*Response: Funded by state grant dollars, the Camas Housing Action Plan (HAP) was adopted by the City Council in July 2021. The HAP contains chapters on community input, demographic*

*trends, housing supply and housing needs, housing policy review, and housing strategies. Whereas the report does not define the total number of affordable units, Table 25 of the HAP shows the projected future housing needs for both renter and owner by five different income groups. Excluding the household group that has income greater than 100% of median family income (MFI), the total number of units needed is 1,835 of the total 4,589 units needed to meet the 20-year forecast. This means that 40% of the future housing needs must address households with incomes up to the MFI. The single largest band is the households earning 50-80% of the MFI, which shows the need for 734 units evenly split between renters and owners. Combining the low income households (50-80% of MFI) and the moderate income households (80-100% of MFI) shows the need to have nearly 1,150 units to be built to accommodate the next 20 years of housing needs. The report concludes in this section with, 'To accommodate the variety of households anticipated, as well as to better serve existing households with difficulty affording their homes, Camas will need housing options diverse in type, tenure, and cost.'*

*Approving this request will ensure the opportunity to provide the diverse housing options for type, tenure, and cost.*

## **Chapter 6 - Economic Development**

Citywide Economic Development Goal ED-1: Maintain a diverse range of employment opportunities to support all residents and provide a setting and quality of life that attract and retain businesses.

Citywide Economic Development Policies ED-1.1: Ensure that tools are in place to attract healthcare and high-tech, sustainable, and innovative industries to expand and to provide stable employment.

*Response:*

*A few tools in the toolkit to attract health care, high-tech, and innovative industries include 1) having housing options available for a wide spectrum of employees, 2) having housing near employment areas to cut down on commute trips and lengths, and 3) having housing near amenities such as parks, schools, and convenience retail. By rezoning these properties and providing an opportunity for residential development, the City would be using all three tools for attracting those desirable industries.*

# Johnson Economics Executive Summary and Key Takeaways

4

Section

**Comprehensive Plan Amendment  
and Rezone Request**

**Key Takeaways of:**

***'Market and Land Need Analysis for a Proposed Comprehensive Plan Amendment and Rezone Request in Camas, Washington'***

**Johnson Economics**

**December 2022**

**Mackay Family Properties Comprehensive Plan Amendment  
and Rezone Request**

**City of Camas 2023 Annual Review Cycle**

The MacKay's Johnson Economics, LLC of Portland, OR, to analyze market and land needs and to report on said items in support of a request to change the Comprehensive Plan land use designations and zoning districts. The analysis and report is part and parcel of what is required when requesting that land for employment uses be changed to residential uses.

The Johnson Economics (JE) report comprises five sections: introduction, site analysis, land capacity analysis, market analysis, and conclusions. With the site analysis section, it is broken out into a discussion of the subject sites, proposed alternative uses, and site suitability for alternative uses. The land capacity analysis looks at the 2015-2035 Comprehensive Plan and the 2021 Clark County Buildable Lands Report. Regarding the market analysis, the discussion is broken out into three areas: commercial, industrial, and residential. The three (3) analysis sections lead to the conclusions of the report.

## Section II Site Analysis

### Site Suitability for Alternative Analysis

The report breaks out the subject sites by the north site (BP) and south site (RC). Both sites are looked at in terms of compatibility, scale/configuration, topography, traffic/access, and market conditions.

**Key takeaways** for the north site for BP uses are:

- **Compatibility:** *"Some industrial uses dependent on frequent or heavy inbound or outbound freight may not be compatible with the surrounding residential and educational uses, due to congestion in the morning and afternoon."* (p. 7)
- **Scale/Configuration:** *"In terms of acreage, the site has adequate scale for most business park uses. However, the configuration renders the narrow south portion of the site unusable for the campus-style projects envisioned in this zone, though smaller commercial buildings could be accommodated."* (p. 7)
- **Topography:** *"The sloping topography makes industrial development of the narrow south portion of the site difficult from an economic standpoint."* (p. 7)
- **Traffic/Access:** *"Local arterial access via Payne Road/18th Avenue, 16th Avenue, and Parker Street/Brady Road is also likely adequate. However, these arterials are two-lane roads, and congestion around the schools during the beginning and end of the school day effectively reduces the access, especially from 18th Avenue."* (p. 7)
- **Market Conditions:** *"Apart from the Intel campus in Hillsboro, there has been very limited demand for flex buildings of a tech/R&D format, like the buildings from the 1990s north and west of the site. Suburban business park users with more of a professional/office format generally seek locations near commercial amenities (e.g., Columbia Tech Center)".* (p. 7)  
*"Office space absorption has averaged 15,000 square feet, or 1.4 acres annually. Given the site's lack of suitability (and entitlement) for heavy manufacturing, and its lack of proximity to commercial areas, only a small portion of the current industrial and office space demand can realistically be captured on the site, representing absorption of less than one acre annually on average."* (p. 8)

**Key takeaways** for the south site for RC uses are:

- Compatibility: “The regional establishments intended for the Regional Commercial (RC) zone include many “big-box” stores dependent on large scale in order to attract demand from a regional trade area. ***The traffic generated by such stores would not be compatible with the residential and educational uses around the site.***” (p. 8)
- Scale/Configuration: “***At 6.6 acres, the site does not have adequate scale for a regional commercial center. The flag-shaped configuration of the site makes it difficult to accommodate even a smaller grocery-anchored community center.*** The most likely commercial format is a non-grocer neighborhood center.” (p. 8)
- Topography: “***The east portion of the site has a relatively steep slope to the east (Brady Road), which requires significant, costly site work in order to be usable.***” (p. 8)  
Traffic/Access: “***From a capacity standpoint, the two-lane roads to the site are inadequate for the type of shopping traffic associated with regional commercial centers. As discussed, there is already congestion on the roads around the site at the beginning and end of the school day.***” (p. 8)
- Market Conditions: “***Some of this demand can likely be captured in neighborhood centers with a convenience format, like the proposed Camas Station project. However, with this center providing 14,000 square feet of convenience, gas, coffee, and additional retail and service, we regard the potential for additional establishments at this location to be very limited – especially taking into account the limited traffic exposure.***” (p. 8)

**Key takeaways** for both sites for MF-18 uses are:

- Compatibility: “***Multifamily and attached single-family housing on the sites are generally compatible with surrounding housing, schools, and park.***” (p. 9)  
However, the ***most likely development format on these sites in the current market are two- and three-story structures*** (four-story structures are typically only feasible closer to commercial amenities, where pricing is higher). We also regard the residential uses to be compatible with the nLight building west of the north site, as this building is set back quite far from the property line, and screened by a row of trees. ***We therefore find the proposed residential use on both sites to be fully compatible with surrounding uses.***” (p. 9)
- Topography: “***Multi-family and attached-home development is typically feasible on uneven topography due to the ability to locate buildings and parking areas at different elevations.***” (p. 9)
- Traffic/Access: “The sites ***have adequate access for the proposed residential uses, and the pedestrian access to schools, park, and commercial amenities at the proposed Camas Station enhances the residential marketability of the sites.*** Though the traffic will increase compared to the current undeveloped state, ***the uses represent lower intensity and peak-hour traffic than typical commercial and industrial uses.*** Moreover, the adjacent schools and proposed commercial center within walking distance will allow for trip reductions at these sites. Given the many Camas residents who commute to the west, the sites ***would also offer shorter commutes and reduced traffic compared to other buildable multifamily land in the city.***” (p. 9)
- Market Conditions: “***The market for affordable housing forms, including rental apartments and attached homes, is strong all across the region, and the recent increase in mortgage rates is likely to shift additional housing demand to these housing formats.***”

***“Our modeling of residential demand over the coming five years in Camas indicate a need for nearly 400 additional multifamily units and around 150 additional attached homes. We regard the subject sites to be well positioned to capture this demand, due to their views, access to schools and park, and relative proximity to employment and commercial areas to the west and in Downtown Camas.”*** (p. 9)

## **Section III Land Capacity Analysis**

### Ability to Meet Comp Plan Targets with Current Land Capacity

This section looks at the Camas 2035 Comp Plan as well as the 2021 Clark County Buildable Lands Report. The JE report notes, “After the projected 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).” It also notes the findings of the 2021 BLR. JE notes the June 2022 finalized BLR, “This updated VBLM found a diminished supply of net buildable lands in the commercial and residential categories, but a slight increase in the industrial category: **296 acres of Commercial Land (down from 464 ac. in 2015); 667 acres of Industrial Land (up from 660 ac.) and 710 acres of Residential Land (down from 876 ac.)**” (p. 10)

With a discussion of current land capacity vs. recent absorption (2016-2020), the JE report notes the land supply for commercial, industrial, and residential represents certain years of supply based on those absorption rates. Specifically, “According to the report, land absorption in Camas over the 2016-20 period represented 60 acres of residential land annually, 6 acres of commercial land annually, and 1.6 acres of industrial land annually. **At this pace, the residential category is the most likely to exhaust its supply of land by 2035. The current land supply represents: over 50 years of Commercial Land (5.8 acres/year); over 400 years of Industrial Land (1.6 acres/year); and 12 years of Residential Land (59.6 acres/year)**” (p. 10)

With respect to the ability to meet the Comp Plan targets with the current land capacity, “**The current supply of employment land (963 ac. total) has capacity for 11,923 jobs at these densities, thus exceeding the original 20-year target.**” (1<sup>st</sup> paragraph, p. 11)

It also concludes, “Still, the **current capacity for 11,923 jobs is more than adequate** to accommodate the 9,124 jobs that remain of the 2035 target, **representing a surplus of 286 acres.**” (2<sup>nd</sup> paragraph, p. 11)

For residential targets, “As of the 2021 Buildable Lands Report, the 710 acres of net buildable residential land can accommodate 4,260 units at the same density. In other words, the **current residential capacity is more than enough** to accommodate the entire 20-year growth target, and more than twice the needed amount to accommodate the 1,872 units remaining of the 2035 target. The **current residential surplus is roughly 400 acres.**” (3<sup>rd</sup> paragraph, p. 11)

### Impact of the Proposed Amendment on Land Supply

“Relative to the adopted growth targets, the proposed comp plan amendment will increase the imbalance in the surplus of residential vs. employment land. However, the actual absorption pace presented in the Buildable Lands Report indicates that the residential category will exhaust its supply of

land first. ***Thus, relative to actual development patterns and community needs, the proposed amendment will contribute to greater balance in the land supply.*** As mentioned, the adopted growth target for employment was based on modeling workers residing in, rather than working in, Camas in 2013. Instead of the intended 3.7% annual growth rate, the adopted target effectively assumes 4.2% annual growth. In comparison, employment growth over the 2015-21 period has averaged 3.0% annually. Thus, the comp plan's unrealistic employment growth assumptions result in artificially low estimates of surplus employment land currently. ***In other words, the current actual surplus of employment land is likely much greater than the indicated 286 acres.***" (p. 12)

### **Camas Housing Action Plan (2021)**

The JE report notes the Housing Action Plan (HAP) and comments on the thorough analysis. A key takeaway in the JE report states, "The plan identifies a need for additional multifamily and attached single-family housing, and recommends strategies that can encourage additional development in these categories. ***These strategies include rezoning employment land to multifamily residential land. Again, though this would increase the imbalance of surplus land relative to adopted growth targets, it would help reduce the imbalance in the actual development patterns and needs in the city.***" (1<sup>st</sup> paragraph, p. 12)

It notes the HAP reports around 70 acres of buildable multifamily zoned land in Camas and that 24 acres have been publicly acquired. It notes, "***Some of this land is located in the North Shore area, without current access to infrastructure.*** These sites are unlikely to develop over the near term, as they are dependent on other sites developing first and bringing the infrastructure closer (some of these sites also have significant topographical challenges). Thus, the near-term capacity for this type of housing is likely well below this figure. ***The proposed comp plan amendment and zone change would contribute additional multifamily land with near-term development potential.***" (2<sup>nd</sup> paragraph, p. 12)

## **Section IV Market Analysis**

This section evaluates market trends for commercial, industrial and residential uses in Camas. For commercial uses, retail and office trends are discussed along with historical retail and office space absorption rates.

### **Commercial**

"The office market in Camas has also shown a weak trend in recent years, at least if we ignore the 2020 expansion at Fisher Investments, which represented 108,000 square feet. With the latter included, the ***city has averaged 15,000 square feet of net absorption annually since 2016, representing just over one acre per year with typical FARs.***" (bottom of p. 14)

Looking at office space demand, with certain outlined assumptions, JE forecasts future office space growth "in office employment of roughly 100 workers annually over the next five years. This represents around 20,000 square feet of space, or 100,000 over a five-year period. ***With an FAR of 0.33, this translates into land demand of 6.9 acres over five years, or 1.4 acres annually. Combining this with the modeled retail demand, we arrive at an estimated need for 1.9 acres of commercial land annually. This represents 9.5 acres over five years and 38 acres over a 20-year planning period.***" (2<sup>nd</sup> paragraph, p. 16)

JE also forecasts retail office space demand, which is summarized in figure 4.7 of the report. It concludes with, “At a typical \$325 per square foot (annual average, according to CoStar) the total sales growth **represents an increase in retail space demand of 26,000 square feet, or 2.4 acres at a standard 0.25 FAR. This reflects roughly 5,000 square feet and 0.5 acres on an annual basis**, which is 40% greater than the average annual absorption since 2016 reported by CoStar.” (3<sup>rd</sup> paragraph, p. 17)

## Industrial

For industrial uses, JE reports a decline of 320,000 square feet of industrial space, including flex and specialty buildings, between the 2008-09 recession and 2015. The report notes that after re-occupied space in 2016 by WaferTech, “**Since then, the market has averaged 25,000 square feet (~1.4 ac.) of positive absorption annually**. More than half of this was CubeSmart Self Storage on 38th Avenue. The market lost industrial occupancy in 2021, when Karcher moved out of its building on Pacific Rim Boulevard, but regained most of this in 2022 as Northwest Paper Box moved in. Note that the Mill property is considered fully occupied.” (pp. 16-17)

JE uses the same approach in forecasting industrial demand as they do for office space. “With the projected growth of roughly 20 new jobs annually taking place in industrial buildings, **this results in a projected need for 93,000 square feet over five years, or nearly 20,000 square feet annually. At an FAR of 0.4, this represents 1.1 acres annually**. Note that these are expectations for annual averages. Industrial development typically takes place in few large projects rather than small annual increments. Moreover, certain storage or warehousing projects can be realized with limited associated job growth. At 1.1 acres annually, the modeled demand growth represents 5.5 acres over five years and 22 acres over 20 years.” (pp. 19-20)

## Residential

“Camas has been among the fastest growing cities in the County, tripling in size since 1990, **growing at more than twice the Clark County rate**. Between 2010 and 2022, the city grew from 19,400 to 27,300, adding 7,900 residents. This represents an increase of 41%, or **2.9% per year on average**.” Figure 4.14 is a graph representing these data. Furthermore, “The city’s growth was strongest in the late 1990s, when the annual growth rate averaged roughly 10.0% per year. **The weakest growth was after the 2008-09 recession, when the rate hovered around 2.0% per year**. This is still strong – the long-term regional growth rate is 1.2% – and indicates considerable demand pressures. The growth gained momentum over the last decade, averaging 3.8% per year over the 2017-2021 period, when the city added 4,500 residents. This increase was accommodated by increased housing supply, which totaled 1,600 units over the five years.” (pp. 20-21)

### Residential Shift

“**Regionally, there has been a shift in demand over the past two decades, from single-family ownership homes to multi-family rental units**. The shift was catalyzed by the foreclosure crisis and ensuing recession at the end of the 2000s, which led to stricter credit requirements for homebuyers. The recession also caused an increase in college enrollment, at rapidly growing tuition costs, something that in tandem with rapidly rising rent levels made it difficult to save up for down payments. Rental apartments became the only viable housing form for many young households, which in turn led to a shift in housing construction, from single- to multi-family units. **Rapid price gains in the single-family**

**market has continued to sustain demand for the more affordable multi-family homes in recent years.”**  
(p. last paragraph, 21)

The report continues, **“The same shift has taken place in Clark County, where the multi-family share of new housing production went from 15% in the early 2000s to 45% by 2021. Camas has not participated in this shift to the same degree.** If we exclude the 276-unit Kielo at Grass Valley in 2019 (and the Casey in 2022), the share of issued multifamily building permits has remained around 0% over the past 10 years.” (p. 1<sup>st</sup> paragraph, p.22)

#### *Historic Demand*

“Reflecting the very limited supply of new units, market absorption of apartments in Camas was very modest until 2018-19, when roughly 50 units were absorbed annually, and 2020-21, when the absorption averaged more than 160 units annually due to lease-up of Kielo at Grass Valley. In isolation, Kielo achieved absorption of 31 units per month on average (~20 ac./yr). **This is unusually high, indicating strong demand. Thus, Camas would likely have absorbed many more units with additional supply.**” (2<sup>nd</sup> paragraph, p. 22)

#### *Projected Housing Demand*

JE has developed a model that “allocates anticipated household growth into demand for housing of different forms.” The model takes into account household age and income levels, with the demand growth “anticipated to be concentrated among middle- and upper-income segments, with declines at the lowest income levels. This is in keeping with recent trends, reflecting the appeal of Camas to affluent households.”

Figure 4.20 of the JE Report shows a 5-year demand growth and an annual demand growth. In summary, the figure shows, “Detached single-family ownership homes dominate the projected demand, representing a net increase of roughly 700 units over five years. If we include detached rental homes, which typically come from the existing housing stock, there is an estimated net need for 760 new detached homes. Attached homes are projected to represent a total need for roughly 150 homes. **Rental apartments are projected to see the strongest demand growth in relative terms, for an estimated 365 units.** If we include condominiums, the net need for new multifamily units is estimated to 385.” (2<sup>nd</sup> paragraph, p. 24)

Again, this forecast is based on the historical job/housing relationship and existing single-/multifamily splits in the city. **It may underestimate the preference for housing among low- and middle-income households, who are currently underrepresented. Additional housing at appropriate price points would thus likely accommodate additional growth.**” (4<sup>th</sup> paragraph, p. 24)

## **Section V Conclusions**

### Land Capacity

According to the 2021 Clark County Buildable Lands Report, land absorption in Camas over the 2016-20 period represented absorption of 60 acres of residential land per year on average, 6 acres of commercial land annually, and 1.6 acres of industrial land annually. At these rates, the current land supply represents over 50 years of commercial land and over 400 years of industrial land, while the residential

land represents only 12 years of absorption. ***From a land capacity standpoint, the proposed re-allocation of commercial and industrial land to residential land would thus improve the balance in the land supply.*** (3<sup>rd</sup> paragraph, p. 25)

#### Market Trends

All across the region, there has been a shift in demand from single- to multifamily housing in recent years, as single-family homes have become financially unattainable for a growing share of the population. While the housing production in Clark County has evolved to match the new pattern, Camas has only to a limited degree shifted its housing production, and thus likely has some pent-up demand for multifamily housing. ***This is corroborated by the Camas Housing Action Plan (2021), which includes a detailed analysis of current and future housing needs in the city. The analysis finds a particular need for additional multi-family and attached single-family homes that can accommodate low- and middle-income households. Additional housing in these categories will likely help employment growth in the city by providing workforce housing that brings needed labor closer to Camas employment.*** (2<sup>nd</sup> paragraph, p. 25)

Given the limited need for employment land reflected in these market-based forecasts, ***the proposed re-allocation of industrial and commercial land to residential land is unlikely to have negative impact on employment growth, while it can alleviate pressures in the residential market.*** By accommodating needed workforce housing in the city, the re-allocation may in fact have a positive impact on employment growth. (2<sup>nd</sup> paragraph, p. 26)

#### Suitability for Development

***We regard both sites to be suitable for the proposed multifamily residential (MF-18) zoning, which is intended for multifamily and attached single-family housing. The sites are located at the transition between residential and employment land, where these housing forms are encouraged.*** Moreover, these uses are compatible with surrounding housing and schools, and do not face the issues related to scale, configuration, or topography that would complicate commercial or industrial development. On the contrary, the sloping topography represents an amenity in the form of views. Furthermore, the sites would provide housing within walking distance of schools, parks, and the proposed Camas Station commercial center, thus generating limited auto traffic. Given the many Camas residents who commute to the west, the sites would also offer shorter commutes and relatively less traffic compared to other buildable multifamily land in the city. A strong indication of the suitability for the proposed residential use is provided by Parker Village, a recent attached-home development located between the subject sites. (3<sup>rd</sup> paragraph, p. 26)

In conclusion, we regard the subject sites to represent desirable locations for housing, both from a community standpoint and from the perspective of renters, buyers, and developers. The sites are less suitable for employment uses, and less likely to be developed in light of current and anticipated market conditions. These findings are supportive of the proposed comp plan amendment and zone change. (last paragraph, p. 26)

# Full Johnson Economics Report

5

Section

**Comprehensive Plan Amendment  
and Rezone Request**



**MARKET AND LAND NEED ANALYSIS  
FOR A PROPOSED COMPREHENSIVE PLAN AMENDMENT  
AND ZONE CHANGE REQUEST  
IN CAMAS, WASHINGTON**

PREPARED FOR  
MACKAY FAMILY PROPERTIES  
DECEMBER 2022

**JOHNSON ECONOMICS, LLC**

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## I. INTRODUCTION

JOHNSON ECONOMICS was retained by MACKAY FAMILY PROPERTIES to conduct a land need analysis in support of an application for a comprehensive plan amendment and zone change for five tax parcels in northwest Camas (parcel #: 127372000, 127367000, 125185000, 125193000, 986055381). The parcels in question are currently designated for commercial and industrial uses, with Regional Commercial (RC) and Business Park (BP) zoning. This report assesses the appropriateness of redesignating and rezoning the parcels to residential land with Multi-Family High designation and Multi-Family 18 zoning (MF-18).

The analysis evaluates the impact of the proposed changes to the supply of residential, commercial, and industrial land in the Camas UGA. The analysis also surveys current trends in these respective markets, and estimates future demand in Camas based on current market trajectories. Moreover, the analysis evaluates the suitability and likelihood of development for each of these uses on the subject sites, based on market and planning criteria.

The main tasks completed as part of this analysis are the following:

- Review of the City of Camas' current relevant planning documents and evaluate, update, and/or modify forecasts and capacity estimates based on current information. These include current comprehensive plan and zoning maps, the Camas 2035 Comprehensive Plan, the 2021 Housing Action Plan, and the Clark County 2021 Buildable Lands Report (June 2022).
- Physical inspection of the subject sites and evaluation of their suitability for residential, commercial, and industrial uses.
- Land capacity analysis, reconciling the current land supply in the Camas UGA according to the Buildable Lands Report and to the land need projects adopted in the 2035 Comprehensive Plan.
- Analysis of ongoing market trends and future market demand for residential, commercial, and industrial uses in Camas.
- Reconciliation of findings from the above tasks to determine the need and suitability for additional multifamily vs. commercial and industrial land at the subject site, in light of city-wide land capacity and needs.



## II. SITE ANALYSIS

### THE SUBJECT SITES

The two subject sites are both flag-shaped, made up of two and three tax parcels, respectively. The north site is the largest, measuring 24.4 acres across three parcels – all with industrial comp plan designation and Business Park (BP) zoning. Most of the acreage is open fields, while some is forested. The site has frontage along NW 18<sup>th</sup> Avenue, 16<sup>th</sup> Avenue, and Brady Road/Parker Street. The site slopes to the north and east, with the south portion being steepest.

The south site is 6.6 acres in size, across two tax parcels, with commercial comp plan designation and Regional Commercial (RC) zoning. The site was previously used for a nursery, but most of it is currently vacant. It has frontage along NW 16<sup>th</sup> Avenue, Tidland Street, and Brady Road. The highest point is at the southwest corner, as the site slopes to the northeast. The steepest part is the east portion, sloping down to Brady Road.

The area surrounding the sites is mostly residential, though the former Sharp campus is located to the west, currently occupied in part by the headquarters of nLight, as well as Odyssey Middle School and Discovery High School. The conversion of business park space to other uses observed at the Sharp campus is part of a broader trend, also seen at the former HP campus in East Vancouver. Prune Hill Elementary and Prune Hill Sports Park are located to the south of the sites. The land between the two sites is occupied by a water tower and attached housing. The area to the north and west is zoned for business park, while the small site located at the northwest corner of NW 16<sup>th</sup> Avenue and Brady Road is zoned Community Commercial (CC).

FIGURE 2.1: MAP OF SUBJECT SITES



SOURCE: Clark County, Google, Johnson Economics





Commercial development (pink fill) has also been limited. The Fisher Investments campus, representing 375,000 square feet built out over a 10-year period, is the only large project. A 15,000-square-foot medical/personal service building (Auda Salon Studios) on NW 38<sup>th</sup> Avenue is the only other commercial project in recent years. However, two projects of smaller scale along Brady Road near the subject sites are proposed, including a daycare (Kiddie Academy, 11,000 SF) and a convenience/retail project (Camas Station, 14,000 SF). Two mid/high-density residential projects have also been built in this area: Kielo Apartments (276 units, completed 2020-21) and Parker Village (60 units, completed 2017-18). Additionally, the Casey Apartments (125 units) is currently under construction.

FIGURE 2.3: DEVELOPMENT IN THE GRASS VALLEY AREA



SOURCE: Clark County, Google, Johnson Economics



## PROPOSED ALTERNATIVE USES

The north site currently has Industrial comp plan designation and Business Park zoning, while the south site has Commercial designation and Regional Commercial zoning. The proposed comp plan amendment and zone change would give both sites a Multifamily High designation and Multifamily-18 zoning (MF-18). As noted, the sites sit at the boundary of employment and residential zones.

### **BUSINESS PARK (BP)**

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

*This zone provides for employment growth in the city by protecting industrial areas for future employment. Design of business park facilities in this district will be campus-style, with landscaped buffers, and architectural features compatible with surrounding areas. (Chapter 18.05.050)*

As discussed on the previous page, there has been no new development of this format in Business Park or other industrial zones north and west of the subject sites in recent years. The industrial land in this area that has been developed in recent years has been built out with a high school and a self storage facility, with very limited industrial employment.

### **REGIONAL COMMERCIAL (RC)**

The purpose of the Regional Commercial (RC) zone according to the Code is:

*This zone provides apparel, home furnishings, and general merchandise in depth and variety, as well as providing services for food clusters and some recreational activities. Regional commercial is the largest of the commercial zones and is designed to serve the region or a significant portion of the region's population. (Chapter 18.05.050)*

As with the Business Park zone, there has been no new development of the intended Regional Commercial format in the area north and west of the subject sites in recent years. There has, however, been a successful and important office project of a headquarter/campus format (Fisher Investments) as well as a smaller office project with a service format. Additionally, a proposed daycare (Kiddie Academy) and a retail project with a neighborhood/convenience format and a fueling station (Camas Station) have been approved adjacent to the sites, in a CC (Community Commercial) zone.

### **MULTIFAMILY-18 (MF-18)**

The purpose of the Multifamily-18 (MF-18) zone according to the Code is:

*These zones are intended to provide for dwellings such as rowhouses and apartment complexes. It is desirable for these zones to be adjacent to parks and multi-modal transportation systems. These zones also serve as a transition between commercial and residential zones. (Chapter 18.05.040)*

Three developments of this format have taken place in the Grass Valley area over the past five years, representing both rowhouses (Parker Village) and apartments, with mid-rise (the Casey) as well as a low-rise (Kielo) formats in the apartment category.



## SITE SUITABILITY FOR ALTERNATIVE USES

The following is a general discussion of the suitability of the two sites for the alternative uses based on market considerations, physical characteristics, and access.

### NORTH SITE: BUSINESS PARK (BP)

The Business Park (BP) zone allows for a wide range of commercial and industrial uses, many of which could technically be accommodated on the north site. However, the site's physical and locational attributes render many of these uses infeasible, while other uses are unrealistic due to weak market conditions.

- **Compatibility:** Some industrial uses dependent on frequent or heavy inbound or outbound freight may not be compatible with the surrounding residential and educational uses, due to congestion in the morning and afternoon. This is most problematic at the beginning and the end of the school day, when students arriving or departing by foot are crossing roads, and parents are delivering or picking up students by car. Moreover, the visual compatibility with industrial buildings, as well as large office buildings, may be an issue on the main (north) portion of the site, which is in the view of homes along NW Brady Road. Deep setbacks and landscaping might improve the visual compatibility to some extent, though this would also reduce the usable portion of the site.
- **Scale/Configuration:** In terms of acreage, the site has adequate scale for most business park uses. However, the configuration renders the narrow south portion of the site unusable for the campus-style projects envisioned in this zone, though smaller commercial buildings could be accommodated. As such, only the northern portion of the site is suitable for industrial business park use from a configuration standpoint.
- **Topography:** The sloping topography makes industrial development of the narrow south portion of the site difficult from an economic standpoint. It might also be an obstacle to large industrial users on parts of the north portion, as it makes it more costly to accommodate large buildings. As industrial users pay the least of the major uses for land and buildings, narrow buildings (higher construction costs per square foot) in a terraced development (higher development costs) are generally infeasible. Moreover, slopes are generally viewed negatively from a freight standpoint, while also being seen as unattractive for employee parking. The topography would present less of a challenge to a business park offering more standard office space, though user demand for such space is currently concentrated in areas with extensive commercial amenities (see below).
- **Traffic/Access:** The site's regional access via Highway 14, 192<sup>nd</sup> Avenue and Brady Road is likely adequate for most business park uses. Local arterial access via Payne Road/18<sup>th</sup> Avenue, 16<sup>th</sup> Avenue, and Parker Street/Brady Road is also likely adequate. However, these arterials are two-lane roads, and congestion around the schools during the beginning and end of the school day effectively reduces the access, especially from 18<sup>th</sup> Avenue. Steep elevation change further complicates the access from 18<sup>th</sup> Avenue. Brady Road is thus the best access point.
- **Market Conditions:** The industrial market is currently dominated by demand for distribution and e-commerce fulfillment space, concentrated in areas with good inter-regional freeway access. Outside these areas, much of the demand is for heavy/durable goods manufacturing spaces and construction storage. Apart from the Intel campus in Hillsboro, there has been very limited demand for flex buildings of a tech/R&D format, like the buildings from the 1990s north and west of the site. Suburban business park users with more of a professional/office format generally seek locations near commercial amenities (e.g., Columbia Tech Center).



In Camas, absorption of industrial space has averaged 25,000 square feet, or roughly 1.7 acres, annually in recent years (see Market Analysis section). Office space absorption has averaged 15,000 square feet, or 1.4 acres annually. Given the site's lack of suitability (and entitlement) for heavy manufacturing, and its lack of proximity to commercial areas, only a small portion of the current industrial and office space demand can realistically be captured on the site, representing absorption of less than one acre annually on average.

#### **SOUTH SITE: REGIONAL COMMERCIAL (RC)**

The Regional Commercial (RC) zone is intended for establishments with regional trade areas, but allows for a wide range of commercial uses. The most suitable uses at the subject site are those with small footprints and a neighborhood orientation, though the development of a convenience center for this specific segment on an adjacent site (Camas Station) will make it difficult to find adequate support for similar establishments on the subject site.

- **Compatibility:** The regional establishments intended for the Regional Commercial (RC) zone include many “big-box” stores dependent on large scale in order to attract demand from a regional trade area. The traffic generated by such stores would not be compatible with the residential and educational uses around the site. However, the RC zone also allows for many smaller business formats with a neighborhood or community orientation. These would in general be compatible with surrounding uses.
- **Scale/Configuration:** At 6.6 acres, the site does not have adequate scale for a regional commercial center. The flag-shaped configuration of the site makes it difficult to accommodate even a smaller grocery-anchored community center. The most likely commercial format is a non-grocer neighborhood center.
- **Topography:** The east portion of the site has a relatively steep slope to the east (Brady Road), which requires significant, costly site work in order to be usable. Buildings will sit well above the road, which will reduce the signage effect, making this part of the site less marketable for commercial users. Steep uphill access from Brady Road might also be a challenge. The west portion is adequately flat for commercial development.
- **Traffic/Access:** From a capacity standpoint, the two-lane roads to the site are inadequate for the type of shopping traffic associated with regional commercial centers. As discussed, there is already congestion on the roads around the site at the beginning and end of the school day. From a demand standpoint, the roads around the site do not currently have the traffic volume required to sustain most types of commercial activity. Johnson Economics has conducted extensive research on commercial development in the Portland Metro Area over the past decade, and found very few examples of suburban development along roads with a daily traffic volume below 15,000. The current volume is 7,600 on Brady Road and 2,800 at 16<sup>th</sup> Avenue/Tidland Street, according to TrafficMetrix. The adjacent site at the corner of 16<sup>th</sup> and Brady, where Camas Station has been proposed, has the additional exposure to traffic on the east leg of 16<sup>th</sup> Avenue (6,100), which puts it close to the threshold for neighborhood/convenience centers.
- **Market Conditions:** In general, the market for commercial space has been weak in recent years, due to the shift to online retail. Most new development is taking place in areas with substantial population growth. In Camas, absorption of retail space has averaged 3,600 square feet, or 0.3 acres, annually since 2016. Much of the resident demand flows out of the city to the large commercial area around the Columbia Tech Center. Some of this demand can likely be captured in neighborhood centers with a convenience format, like the proposed Camas Station project. However, with this center providing 14,000 square feet of convenience, gas, coffee, and additional retail and service, we regard the potential for additional establishments at this location to be very limited – especially taking into account the limited traffic exposure.



### **BOTH SITES: MULTIFAMILY 18 (MF-18)**

The MF-18 zone is intended for multifamily and attached single-family housing. The two sites are suitable for these housing formats, as indicated by the adjacent Parker Village. The sites are located at the transition between employment and residential areas – where this type of housing is encouraged – and possess strong residential qualities, including good views and pedestrian access to schools and parks.

- **Compatibility:** Multifamily and attached single-family housing on the sites are generally compatible with surrounding housing, schools, and park. The only possible exception is tall mid-rise buildings located across from detached single-family homes along 18<sup>th</sup> Avenue and Brady Road. Without adequate setbacks, such buildings might feel too massive near detached homes. However, the most likely development format on these sites in the current market are two- and three-story structures (four-story structures are typically only feasible closer to commercial amenities, where pricing is higher). We also regard the residential uses to be compatible with the nLight building west of the north site, as this building is set back quite far from the property line, and screened by a row of trees. We therefore find the proposed residential use on both sites to be fully compatible with surrounding uses.
- **Topography:** Multi-family and attached-home development is typically feasible on uneven topography due to the ability to locate buildings and parking areas at different elevations. The relatively small footprints of the buildings also allow for terraced development, which is an advantage in terms of capturing pricing premiums for views. No portion of the sites appears to steep for this type of development.
- **Traffic/Access:** The sites have adequate access for the proposed residential uses, and the pedestrian access to schools, park, and commercial amenities at the proposed Camas Station enhances the residential marketability of the sites. Though the traffic will increase compared to the current undeveloped state, the uses represent lower intensity and peak-hour traffic than typical commercial and industrial uses. Moreover, the adjacent schools and proposed commercial center within walking distance will allow for trip reductions at these sites. Given the many Camas residents who commute to the west, the sites would also offer shorter commutes and reduced traffic compared to other buildable multifamily land in the city.
- **Market Conditions:** The market for affordable housing forms, including rental apartments and attached homes, is strong all across the region, and the recent increase in mortgage rates is likely to shift additional housing demand to these housing formats. Though Camas has traditionally been a low-density housing market, its residential appeal – created by good schools, safe neighborhoods, outdoor recreation opportunities, and a quaint, vibrant downtown – extends into attached-home and multifamily markets as well. This was recently demonstrated by the rapid absorption of the 276-unit Kielo at Grass Valley apartment project, which leased up at a rate of 31 units per month, representing roughly 20 acres annually.

Our modeling of residential demand over the coming five years in Camas indicate a need for nearly 400 additional multifamily units and around 150 additional attached homes. We regard the subject sites to be well positioned to capture this demand, due to their views, access to schools and park, and relative proximity to employment and commercial areas to the west and in Downtown Camas.



### III. LAND CAPACITY ANALYSIS

#### 2015-35 COMPREHENSIVE PLAN

The following figure presents the estimated buildable acres of commercial, industrial and residential land in Camas as identified in the City’s most recently adopted Camas 2035 Comprehensive 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, 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 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).

**FIGURE 3.1: ESTIMATED LAND NEED AND CAPACITY, CITY OF CAMAS COMPREHENSIVE PLAN (2015-35)**

Land Use Category	Density	Land Need (2015-35)			Land Supply / Capacity		Surplus Supply / Capacity	
		Jobs	Units	Acres	Net Acres (CP) <sup>1</sup>	Capacity (jobs/units)	Net Acres (CP)	Capacity (jobs/units)
Commercial	20.0 jobs/ac	6,744		337	464	9,280	127	2,536
Industrial	9.0 jobs/ac	4,438		493	660	5,940	167	1,502
<i>Employment</i>	<i>13.5 jobs/ac</i>	<i>11,182</i>		<i>830</i>	<i>1,124</i>	<i>15,220</i>	<i>294</i>	<i>4,038</i>
Residential	6.0 units/ac		3,868	645	876	5,256	231	1,388

<sup>1</sup> 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)

#### 2021 CLARK COUNTY BUILDABLE LANDS REPORT

##### CURRENT LAND SUPPLY

The most up-to-date land capacity estimates for Camas are found in the 2021 Clark County Buildable Lands Report, which was finalized in June 2022. This updated VBLM found a diminished supply of net buildable lands in the commercial and residential categories, but a slight increase in the industrial category:

- 296 acres of Commercial Land (down from 464 ac. in 2015)
- 667 acres of Industrial Land (up from 660 ac.)
- 710 acres of Residential Land (down from 876 ac.)

##### CURRENT LAND CAPACITY VS. RECENT ABSORPTION

The Buildable Lands Report provides estimates of development pace from the 2016-2020 period. According to the report, land absorption in Camas over the 2016-20 period represented 60 acres of residential land annually, 6 acres of commercial land annually, and 1.6 acres of industrial land annually. At this pace, the residential category is the most likely to exhaust its supply of land by 2035. The current land supply represents:

- Over 50 years of Commercial Land (5.8 acres/year)
- Over 400 years of Industrial Land (1.6 acres/year)
- 12 years of Residential Land (59.6 acres/year)



**ABILITY TO MEET COMP PLAN TARGETS WITH CURRENT LAND CAPACITY**

The Camas 2035 Comp Plan adopted an employment growth target of 11,182 jobs over the 20-year period. In 2015, the total employment land (commercial and industrial) had capacity for 15,220 jobs, at the assumed employment densities of 20 jobs per commercial acre and 9 jobs per industrial acre (13 jobs/ac. weighted average). The current supply of employment land (963 ac. total) has capacity for 11,923 jobs at these densities, thus exceeding the original 20-year target.

The growth target of 11,182 jobs adopted in 2015 was very high compared to actual employment at the time (7,469 in 2015). This was likely because it was erroneously based on the number of employed workers residing in the city (9,093 in 2013) rather than the number of jobs in the city. Between 2015 and mid-2022, 2,058 jobs were created in Camas, according to the Washington Employment Security Department (June 2022 estimates used for 2022). This represents only 18% of the target, requiring the current buildable land to accommodate the remaining 82%. Still, the current capacity for 11,923 jobs is more than adequate to accommodate the 9,124 jobs that remain of the 2035 target, representing a surplus of 286 acres.

For residential use, the Comp Plan has a target population growth of 11,255, or 3,868 new households. Over the 2015-22 period, 1,996 new housing units were completed in Camas, according to the Washington Office of Financial Management, representing 52% of the growth target, while 1,872 units remain to reach the 2035 target. In 2015, the residential land capacity in Camas could accommodate 5,256 units at the assumed six units per acre. As of the 2021 Buildable Lands Report, the 710 acres of net buildable residential land can accommodate 4,260 units at the same density. In other words, the current residential capacity is more than enough to accommodate the entire 20-year growth target, and more than twice the needed amount to accommodate the 1,872 units remaining of the 2035 target. The current residential surplus is roughly 400 acres.

**FIGURE 3.2: CURRENT LAND CAPACITY VS. REMAINING GROWTH TARGETS**

	<b>Target Growth</b> 2015-35	<b>Actual Growth</b> 2015-22 <sup>1</sup>	<b>Remaining Growth</b>			<b>Current Capacity</b> 2022-35	<b>Surplus Capacity</b> 2022-35
			Target 2022-35	Density 2022-35	Land Need 2022-35		
Employment	11,182 jobs	2,058 jobs	9,124 jobs	13.5 jobs/ac. <sup>2</sup>	677 ac.	963 ac.	286 ac.
Population/Housing <sup>3</sup>	3,868 units	1,996 units	1,872 units	6.0 units/ac.	312 ac.	710 ac.	398 ac.

<sup>1</sup> Using June 2022 employment data; <sup>2</sup> Weighted average density (20.0 jobs/ac for commercial and 9.0 for industrial); <sup>3</sup> 11,255 population target.

SOURCE: Camas 2035; 2021 Clark County Buildable Lands Report, WA ESD, WA OFM, Johnson Economics

**ABILITY TO MEET COMP PLAN TARGETS WITH PROPOSED AMENDMENT**

The proposed comp plan amendment will reduce the amount of employment land by 31 acres (24 ac. industrial and 7 ac. commercial). This will only have a minor impact on the surplus capacity of employment land, which will be reduced from 286 to 255 acres. Conversely, the residential capacity will increase by 31 acres, to 429 acres.

**FIGURE 3.3: PROPOSED LAND CAPACITY VS. REMAINING GROWTH TARGETS**

	<b>Remaining Growth</b>	<b>Current Capacity</b>	<b>Proposed Capacity</b>		<b>Surplus Capacity</b> Net of Change
	Land Need		Change	New Capacity	
Employment	677 ac.	963 ac.	-31 ac.	932 ac.	255 ac.
Population/Housing	312 ac.	710 ac.	31 ac.	741 ac.	429 ac.

SOURCE: Camas 2035; 2021 Clark County Buildable Lands Report, WA ESD, WA OFM, Johnson Economics



### **IMPACT OF THE PROPOSED AMENDMENT ON LAND SUPPLY**

Relative to the adopted growth targets, the proposed comp plan amendment will increase the imbalance in the surplus of residential vs. employment land. However, the actual absorption pace presented in the Buildable Lands Report indicates that the residential category will exhaust its supply of land first. Thus, relative to actual development patterns and community needs, the proposed amendment will contribute to greater balance in the land supply. As mentioned, the adopted growth target for employment was based on modeling workers residing in, rather than working in, Camas in 2013. Instead of the intended 3.7% annual growth rate, the adopted target effectively assumes 4.2% annual growth. In comparison, employment growth over the 2015-21 period has averaged 3.0% annually. Thus, the comp plan's unrealistic employment growth assumptions result in artificially low estimates of surplus employment land currently. In other words, the current actual surplus of employment land is likely much greater than the indicated 286 acres.

### **CAMAS HOUSING ACTION PLAN (2021)**

The Housing Action Plan (HAP) completed for the City of Camas in 2021 includes a thorough analysis of housing availability and needs in the city. The plan identifies a need for additional multifamily and attached single-family housing, and recommends strategies that can encourage additional development in these categories. These strategies include rezoning employment land to multifamily residential land. Again, though this would increase the imbalance of surplus land relative to adopted growth targets, it would help reduce the imbalance in the actual development patterns and needs in the city.

According to the HAP report, there is only around 70 acres of developable multifamily-zoned land within the Camas UGA after the City recently acquired 24 buildable acres for a park. At the achieved densities assumed for future buildout of high-density residential land in Camas in the Buildable Lands Report, this represents 600 housing units. Some of this land is located in the North Shore area, without current access to infrastructure. These sites are unlikely to develop over the near term, as they are dependent on other sites developing first and bringing the infrastructure closer (some of these sites also have significant topographical challenges). Thus, the near-term capacity for this type of housing is likely well below this figure. The proposed comp plan amendment and zone change would contribute additional multifamily land with near-term development potential.

The HAP report also includes an analysis of commute times for residents in the city. Camas has a large share of commuters, most of whom commute to the west via Highway 14. The location of the subject sites means that they would provide housing closer to this employment than the other major tracts of buildable multifamily land in the city. Moreover, the sites would also provide housing close to new employment in the Grass Valley area. Thus, with residential use, the sites would contribute less new traffic and shorter commutes than the other buildable multifamily sites in the city.



## IV. MARKET ANALYSIS

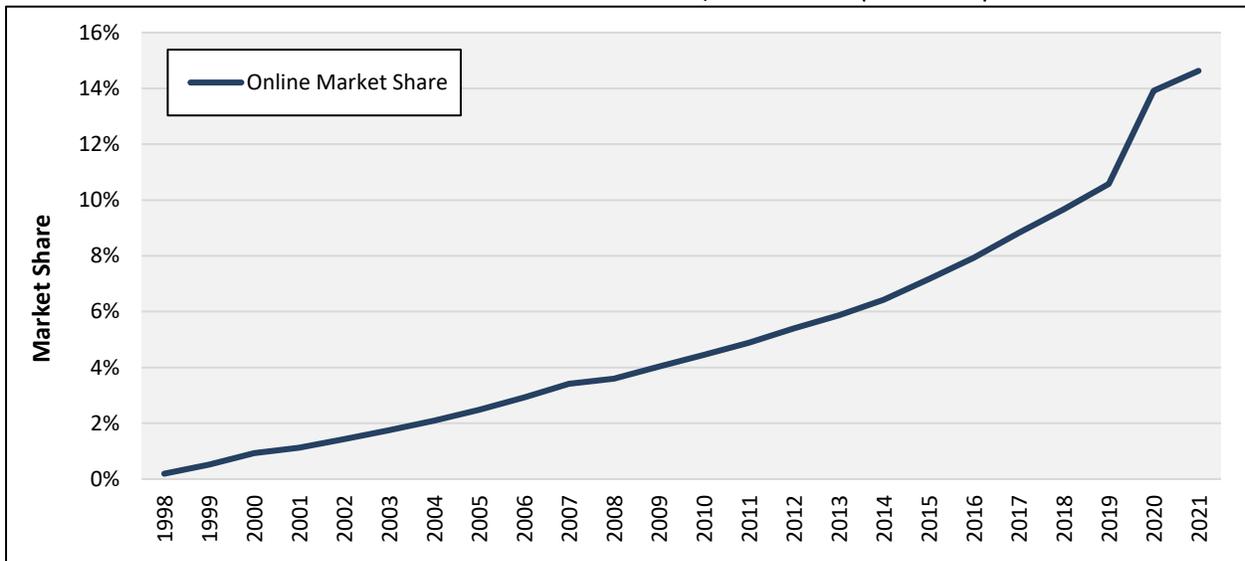
In this section, we evaluate market trends and future demand prospects for commercial, industrial, and residential uses in Camas. For context, we include broader trends of importance observed on the national or regional level.

### COMMERCIAL

#### RETAIL TRENDS

The commercial real estate market has undergone dramatic changes over the past decade. Within the retail segment, the shift to online shopping has reduced the need for brick-and-mortar space, especially from retailers selling physical goods. Pre-COVID, online retailing accounted for around 10% of all retail spending – after gaining roughly one percentage point per year over the last few years. During COVID, the online market share jumped to 15%.

FIGURE 4.1: E-COMMERCE SHARE OF ALL RETAIL, UNITED STATES (1998-2021)



SOURCE: U.S. Dept. of Commerce, JOHNSON ECONOMICS

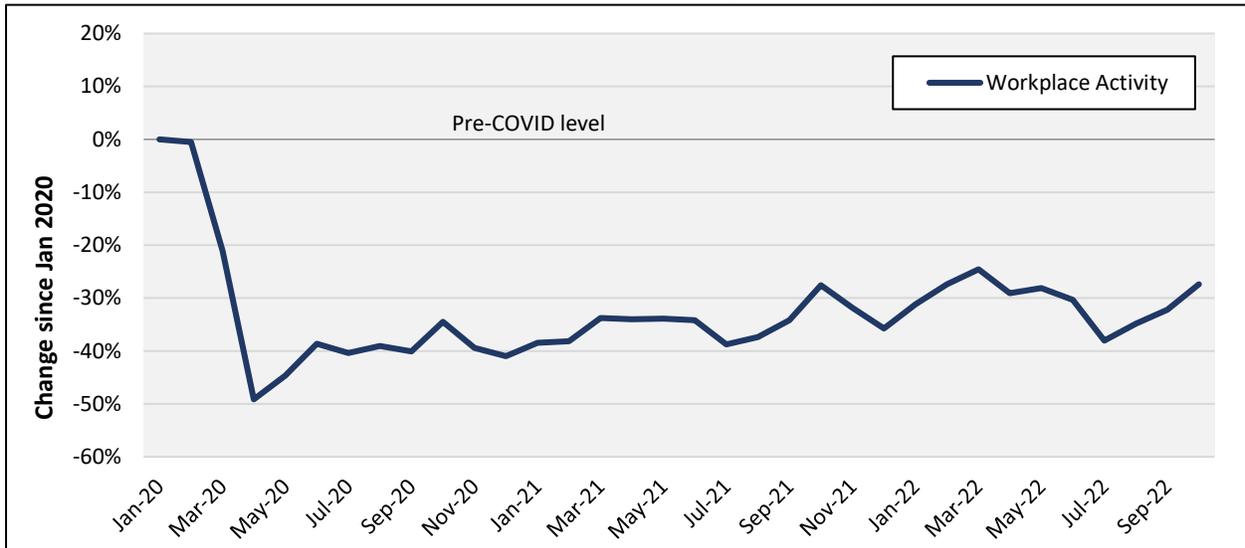
An older trend, which continues to change the retail market, is the shift from goods to services. Since the middle of the last century, the share of personal spending on physical goods has declined from over 60% to around 30%. Commercial tenants that benefit from this shift include restaurants, coffee shops, healthcare providers, beauty salons, and financial advisors. This has led to increased demand for smaller spaces while demand for large spaces has declined due to online competition. Over the past decade, only one-fifth of the net absorption of retail space has been driven by physical goods retailers, as service providers and eating/drinking places have dominated.

#### OFFICE TRENDS

Within the office segment, there already was a declining trend in the use of space per worker during the past decade, reflecting the increasing use of open floor plans without individual offices. COVID-19 led to further reductions as many workers began working from home. Though many have returned to the office as the pandemic has subsided, high rates of remote work are expected to continue going forward, as the systems are now in place and many workers show a preference for this arrangement. In Clark County, the number of workers at workplaces (mon-fri) remains 27% below the pre-COVID level as of October 2022 (see next page, workplaces are places of employment identified by Google, not including residences). The activity level has hovered around the current level over the past year, and thus does not indicate a return to pre-COVID levels any time soon.



FIGURE 4.2: WORKPLACE ACTIVITY COMPARED TO PRE-COVID (JANUARY 2020) LEVELS, CLARK COUNTY

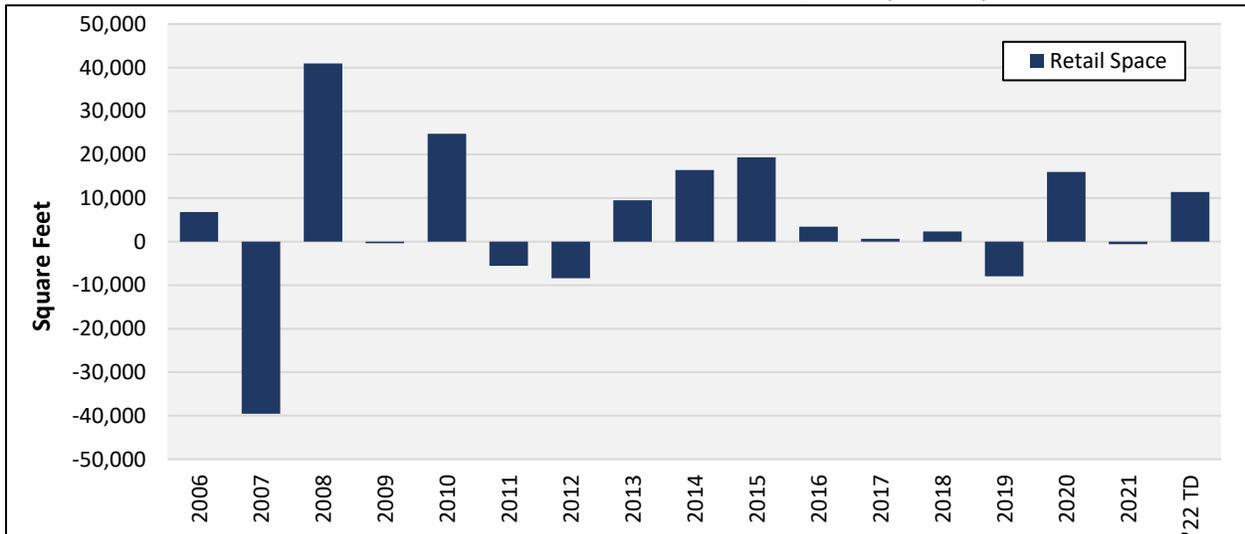


SOURCE: Google, JOHNSON ECONOMICS

**HISTORICAL RETAIL SPACE ABSORPTION**

The recent weakness in the retail market has been evident in Camas as well. Since 2016, only 22,000 square feet of retail space has been absorbed in the city on a net basis, including food/beverage space. This represents 3,600 square feet annually, or 0.3 acres assuming a typical suburban floor area ratio (FAR). In Clark County, retail space absorption has averaged 127,000 square feet annually over the same period, down from 285,000 per year over the prior 10 years.

FIGURE 4.3: HISTORICAL NET ABSORPTION OF RETAIL SPACE, CAMAS (2006-22)



SOURCE: CoStar

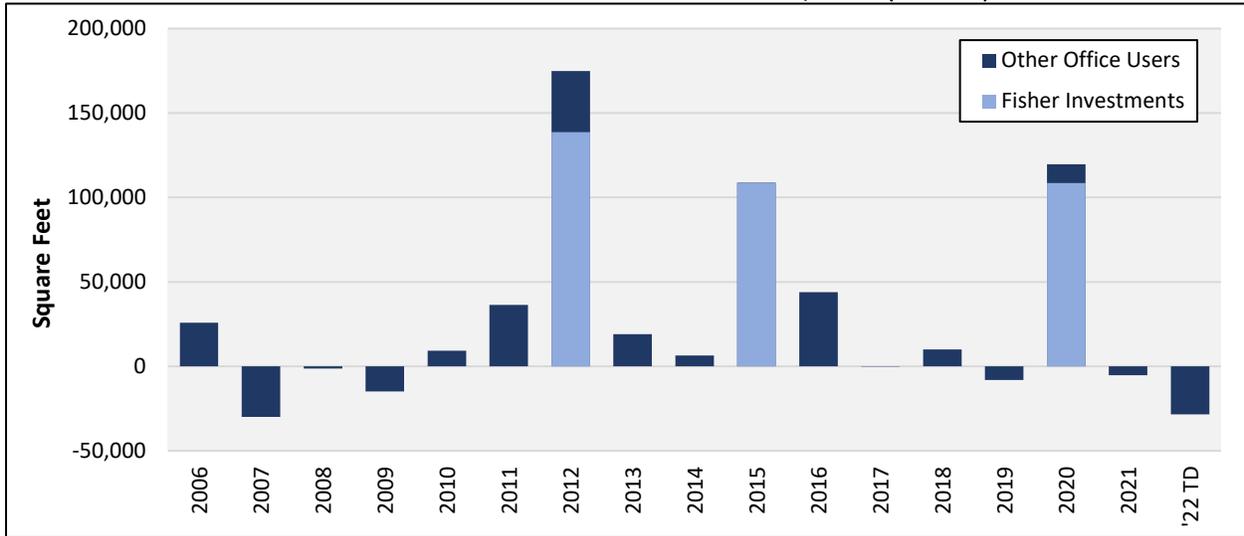
**HISTORICAL OFFICE SPACE ABSORPTION**

The office market in Camas has also shown a weak trend in recent years, at least if we ignore the 2020 expansion at Fisher Investments, which represented 108,000 square feet. With the latter included, the city has averaged 15,000 square feet of net absorption annually since 2016, representing just over one acre per year with typical FARs.



Combined with the retail absorption, this indicates 1.3 acres of annual absorption. With the Fisher expansion excluded, the office market has seen negative absorption (loss of occupied space), representing -3,400 square feet (-0.2 ac) annually. Note that the CoStar data does not capture all owner-user activity. The following chart includes manual adjustments to correct the absorption years for Fisher Investments in 2012, 2015, and 2020.

FIGURE 4.4: HISTORICAL NET ABSORPTION OF OFFICE SPACE, CAMAS (2006-22)



SOURCE: CoStar

**FUTURE RETAIL SPACE DEMAND**

Due to the large retail concentrations west of Camas, much of the retail demand from Camas residents is met by establishments outside the city. According to Environics, retail sales (including food/beverage) in Camas is only 48% of resident demand in 2022. The sales leakage is greatest for big-ticket items. The following table compares estimates of sales inside the city to demand from households residing within the city. The demand estimates are based on local demographics and the Census Bureau’s Consumer Expenditures Survey. Sales estimates are derived from the Census Bureau’s Retail Sales Survey.

FIGURE 4.5: RETAIL SUPPLY AND DEMAND, CAMAS (2022)

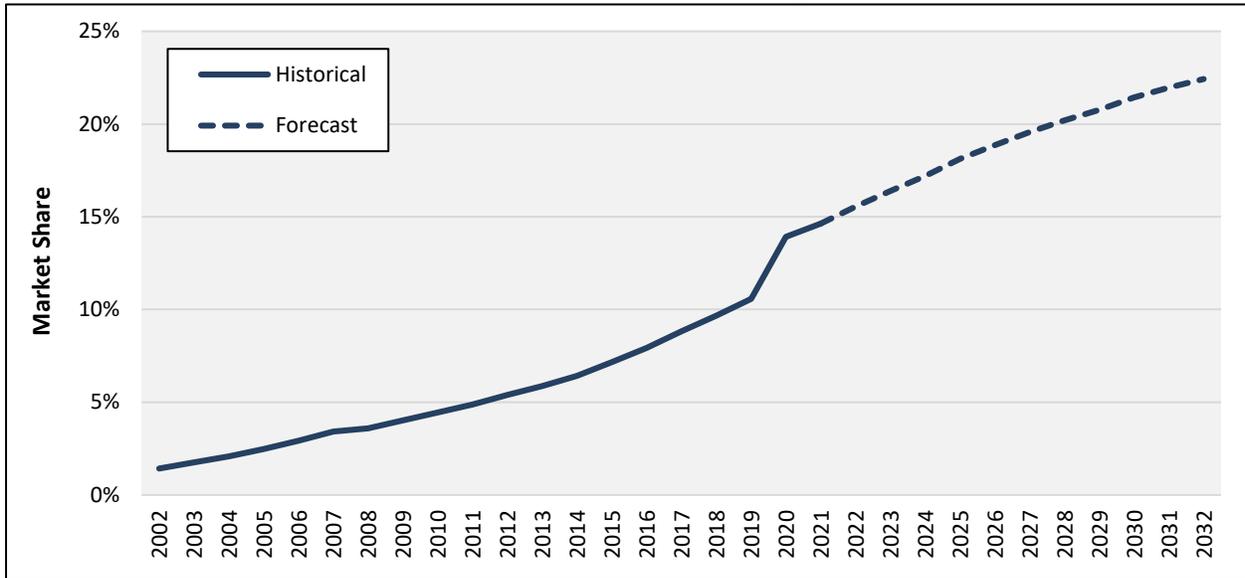
RETAIL SUPPLY-DEMAND, CAMAS 2022		2022 Demand	2022 Supply	Demand Gain/Leakage	
Retail Category (NAICS)	(Consumer Spending)	(Retail Sales)	(Total \$)	(%)	
Motor Vehicle and Parts Dealers-441	\$133,212,543	\$33,842,041	(\$99,370,502)	-75%	
Furniture and Home Furnishings Stores-442	\$13,585,021	\$3,370,938	(\$10,214,083)	-75%	
Electronics and Appliance Stores-443	\$7,937,200	\$1,821,572	(\$6,115,628)	-77%	
Building Material, Garden Equip Stores -444	\$45,983,770	\$17,248,741	(\$28,735,029)	-62%	
Food and Beverage Stores-445	\$85,886,445	\$49,136,544	(\$36,749,901)	-43%	
Health and Personal Care Stores-446	\$33,224,227	\$12,125,205	(\$21,099,022)	-64%	
Gasoline Stations-447	\$42,803,167	\$19,146,114	(\$23,657,053)	-55%	
Clothing and Clothing Accessories Stores-448	\$24,739,059	\$7,644,275	(\$17,094,784)	-69%	
Sporting Goods, Hobby, Book, Music Stores-451	\$9,731,411	\$5,055,633	(\$4,675,778)	-48%	
General Merchandise Stores-452	\$75,026,228	\$63,287,650	(\$11,738,578)	-16%	
Miscellaneous Store Retailers-453	\$13,180,762	\$10,366,955	(\$2,813,807)	-21%	
Foodservice and Drinking Places-722	\$72,981,794	\$43,197,835	(\$29,783,959)	-41%	
<b>Total Including Food/Drinking Places</b>	<b>\$558,291,627</b>	<b>\$266,243,503</b>	<b>(\$292,048,124)</b>	<b>-52%</b>	

SOURCE: Environics/Claritas, JOHNSON ECONOMICS



JOHNSON ECONOMICS models future retail sales via population forecasts, net of the anticipated continued shift to online shopping. Current demand from Camas residents is escalated assuming the residential forecast presented later in this section, which estimates 2.5% annual growth over the next years. Loss in demand to online retail is estimated using a nationwide forecast of market share by FTI Consulting. The forecast for all retail, including vehicles and gasoline, but excluding food and drinking places, is displayed below. The forecast indicates an online market share of 22% by 2032.

**FIGURE 4.6: ONLINE RETAIL MARKET SHARE FORECAST, UNITED STATES**



SOURCE: FTI Consulting, JOHNSON ECONOMICS

When modeling future retail space demand, we combine sales estimates for food/drinking places and true retailers, with online retail subtracted from the latter. Given the assumed shift to online retail, the modeled household growth is only expected to generate an increase of \$2.6 million in physical retail sales in Camas over the 2022-27 period. However, the food/drinking places are projected to see a sales increase of \$5.6 million. At a typical \$325 per square foot (annual average, according to CoStar) the total sales growth represents an increase in retail space demand of 26,000 square feet, or 2.4 acres at a standard 0.25 FAR. This reflects roughly 5,000 square feet and 0.5 acres on an annual basis, which is 40% greater than the average annual absorption since 2016 reported by CoStar.

**FIGURE 4.7: FORECAST OF RETAIL SPACE DEMAND, CAMAS (2022-27, 2022 DOLLARS)**

CHANGE IN RETAIL LAND NEED, 2022-27		CAMAS SALES				
		2022 Sales		2027 Sales		2022-27 Change
at 2.5% annual household growth			Share		Share	
<b>2022</b>	Retail, Physical Stores	\$223,045,668	84.4%	\$225,728,024	75.6%	\$2,682,356
	Retail, Online Stores	\$41,070,160	15.6%	\$72,893,795	24.4%	\$31,823,636
	Food/Drinking Places	\$43,197,835	100.0%	\$48,841,511	100.0%	\$5,643,676
<b>2022-27</b>	Physical Retail + Food/Drinking Places	\$266,243,503		\$274,569,534		\$8,326,031
	Change in Occupied Space (at \$325/SF)					25,619 sqft.
	<b>Change in Land Need (at 0.25 FAR)</b>					<b>2.4 Ac.</b>

SOURCE: JOHNSON ECONOMICS



### FUTURE OFFICE SPACE DEMAND

We model demand for office space in Camas via employment projections in the typical office industries. We then apply industry-specific rates of office utilization to this job growth. Our job growth assumptions are in part based on pre-COVID growth in Camas (2015-19) and projections from the Washington Employment Security Department (ESD) for Southwest Washington. The ESD forecasts are conservative in nature and underestimated the growth pre-COVID. On the other hand, the historical growth rates from the 2015-19 period likely overestimate the long-term future growth potential, as this was a period of strong suburban expansion after weakness following the 2008-09 recession. When establishing future assumptions for Camas, we therefore reconcile these data sources and also consider our regional industry expectations. We also consider specifics in the Camas market, for instance the impact of Fisher Investments in the financial sector. The annual growth rates assumed in our forecast are displayed in column C below.

**FIGURE 4.8: ASSUMED ANNUAL EMPLOYMENT GROWTH RATES, CAMAS (2022-27)**

<b>Growth Assumptions</b>		<b>Annual Growth Rates</b>		
<b>NAICS</b>	<b>Industry</b>	A) Historical AAGR, 2015-19	B) Projected AAGR (ESD), Long-Term	C) Assumed AAGR (JE), 2022-27
51	Information	13.0%	3.2%	4.1%
52-53	Financial Activities	12.1%	1.4%	3.4%
54-56	Prof./Biz Services	2.6%	2.3%	2.5%
61-62	Education & Health	4.4%	2.3%	3.3%
81	Other Services	4.7%	2.3%	3.2%
92	Public Administration	0.3%	1.2%	0.7%

*SOURCE: WA ESD, U.S. Census Bureau, JOHNSON ECONOMICS (JE)*

After projecting employment in 2022 and 2027, we apply typical rates of office utilization within each industry. For this, we rely on figures from E. D. Hovee & Co., used in the 2014 Urban Growth Report for the Portland Metro region. However, we apply an upward adjustment to the financial sector due to Fisher Investments' large share of this sector. Finally, we apply square footage factors per employee to the projected office employment, generally assuming averages of 200-300 square feet, depending on industry. For this determination, we rely on several employment density analyses conducted by JOHNSON ECONOMICS over the past decade. However, we make a downward adjustment to the financial sector reflecting the higher density of Fisher Investments.

With the outlined assumptions, the model indicates growth in office employment of roughly 100 workers annually over the next five years. This represents around 20,000 square feet of space, or 100,000 over a five-year period. With an FAR or 0.33, this translates into land demand of 6.9 acres over five years, or 1.4 acres annually. Combining this with the modeled retail demand, we arrive at an estimated need for 1.9 acres of commercial land annually. This represents 9.5 acres over five years and 38 acres over a 20-year planning period.

**FIGURE 4.9: FORECAST OF OFFICE SPACE DEMAND, CAMAS (2022-27)**

<b>Office Space Demand</b>	<b>Total Jobs</b>		<b>Office Share</b>	<b>Office Jobs</b>			<b>Avg. SqFt. Per Job</b>	<b>Office Space Demand</b>		
	<b>2022</b>	<b>2027</b>		<b>2022</b>	<b>2027</b>	<b>2022-27</b>		<b>2022</b>	<b>2027</b>	<b>2022-27</b>
Information	128	156	25%	32	39	7	200	6,400	7,824	1,424
Financial Activities	2,234	2,640	87%	1,944	2,297	354	175	340,127	402,016	61,889
Prof./Biz Services	1,186	1,342	76%	895	1,013	118	225	201,472	227,947	26,475
Education & Health	569	669	30%	171	201	30	275	46,943	55,216	8,274
Other Services	89	104	32%	28	33	5	300	8,544	10,001	1,457
Government	208	215	43%	89	93	3	250	22,360	23,154	794
<b>Total, Office Sectors</b>	<b>4,414</b>	<b>5,128</b>		<b>3,160</b>	<b>3,676</b>	<b>517</b>		<b>625,845</b>	<b>726,158</b>	<b>100,313</b>

*SOURCE: WA Employment Security Department, U.S. Census Bureau, Hovee & Co., JOHNSON ECONOMICS*



## INDUSTRIAL

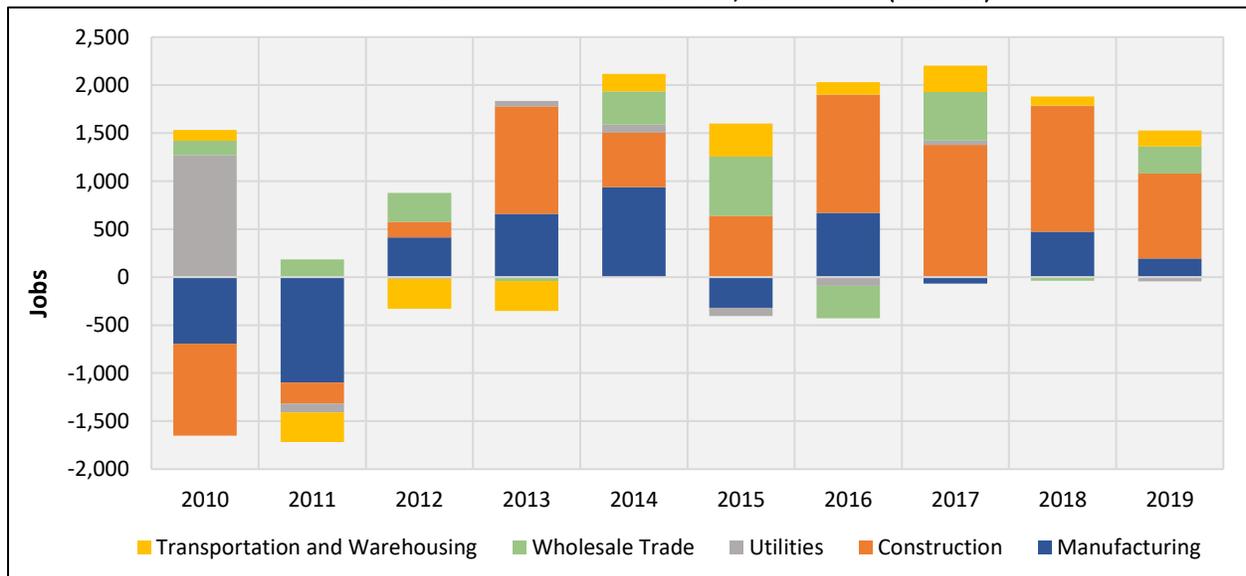
### BROAD INDUSTRIAL TRENDS

The market for industrial space has also undergone major changes in recent years, reflecting technological advances and shifts in the economy. Demand for warehouse and distribution space has been boosted by e-commerce, which has moved storage needs from retail stores to warehouses. At the same time, the growth of high-tech supply chain management systems that require investments and expertise have caused a consolidation within the warehousing and distribution industry, with increasing reliance on larger third-party operators. New and large buildings that can more efficiently accommodate modern logistics operations have therefore been in high demand. With distribution driving much of the demand, there has been a particular need for sites with good freeway access.

Manufacturing has seen some improvement over the past decade, after a long period of declines. High-tech manufacturing was a major driver of growth in the Portland Metro Area in the 1990s, led by Intel, but experienced stagnation and declines over the next decades due to competition from locations in the southern states and Asia. The industry has seen modest growth in Clark County over the past decade. Stronger gains have been seen in other durable goods categories.

In Clark County, these shifts have led to development of large distribution centers at the Port of Vancouver and in Ridgefield. New manufacturing buildings have also been built, but in smaller numbers and sizes, mostly on port properties. Clark County has also seen an increase in the demand for smaller warehouses due to rapid growth in the construction industry. The following chart shows Clark County job growth in the sectors that dominate the industrial market. In the last five year before COVID, construction accounted for two-thirds of the job growth, while manufacturing represented 12%.

FIGURE 4.10: JOB GROWTH IN INDUSTRIAL SECTORS, CLARK COUNTY (2010-19)



SOURCE: U.S. Dept. of Commerce, JOHNSON ECONOMICS

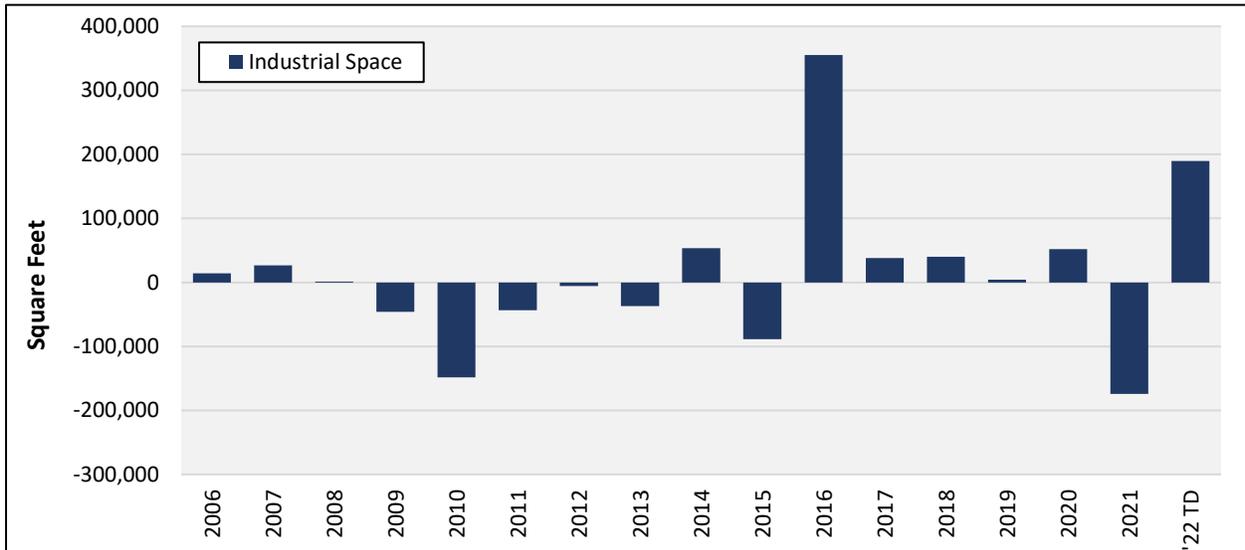
### HISTORICAL INDUSTRIAL SPACE DEMAND

In Camas, occupancy of industrial space, including flex and specialty buildings, declined by 320,000 square feet between the 2008-09 recession and 2015. According to CoStar, much of the space was re-occupied in 2016, when the net absorption was 350,000 square feet, with WaferTech being the main contributor. Since then, the market has



averaged 25,000 square feet (~1.4 ac.) of positive absorption annually. More than half of this was CubeSmart Self Storage on 38<sup>th</sup> Avenue. The market lost industrial occupancy in 2021, when Karcher moved out of its building on Pacific Rim Boulevard, but regained most of this in 2022 as Northwest Paper Box moved in. Note that the Mill property is considered fully occupied.

**FIGURE 4.11: HISTORICAL NET ABSORPTION OF INDUSTRIAL SPACE, CAMAS (2006-22)**



SOURCE: CoStar

**FUTURE INDUSTRIAL DEMAND**

For estimating future industrial demand, we use the same approach as for office space, by modeling employment growth. However, we use the growth rates achieved over the 2017-22 period for historical reference points, rather than the pre-COVID 2015-19 period, as the industrial sectors have been less impacted by remote work than the office sectors in the wake of COVID. As with the office industries, our assumptions for future growth are generally between the conservative ESD regional forecasts and the recent averages from Camas. In the manufacturing industry, we assume moderate growth in coming years, after winddown of Mill operations caused declines in recent years (preliminary 2022 data indicates positive growth). The strongest growth is anticipated in the transportation and warehousing industry, which is benefitting from e-commerce growth.

**FIGURE 4.12: ASSUMED ANNUAL EMPLOYMENT GROWTH RATES, CAMAS (2022-27)**

Growth Assumptions		Annual Growth Rates		
NAICS	Industry	A) Historical AAGR, 2017-22	B) Projected AAGR (ESD), Long-Term	C) Assumed AAGR (JE), 2022-27
23	Construction	9.4%	2.0%	3.6%
31-33	Manufacturing	-1.0%	0.8%	0.2%
42	Wholesale Trade	3.3%	0.7%	2.2%
22,48-49	Transp., Wareh., Utilities	24.8%	0.1%	11.0%

SOURCE: WA ESD, U.S. Census Bureau, JOHNSON ECONOMICS

Assumptions for space utilization are again largely derived the Portland Metro 2014 Urban Growth Report, with per-employee floor areas of 600-1,850 square feet. With the projected growth of roughly 20 new jobs annually taking



place in industrial buildings, this results in a projected need for 93,000 square feet over five years, or nearly 20,000 square feet annually. At an FAR of 0.4, this represents 1.1 acres annually. Note that these are expectations for annual averages. Industrial development typically takes place in few large projects rather than small annual increments. Moreover, certain storage or warehousing projects can be realized with limited associated job growth. At 1.1 acres annually, the modeled demand growth represents 5.5 acres over five years and 22 acres over 20 years.

**FIGURE 4.13: FORECAST OF INDUSTRIAL SPACE DEMAND, CAMAS (2022-27)**

Industrial Space Demand Employment Sector	Total Jobs		Industrial Share	Industrial Jobs			Avg. SqFt. Per Job	Industrial Space Demand		
	2022	2027		2022	2027	2022-27		2022	2027	2022-27
Construction	369	440	58%	214	255	41	600	128,412	153,251	24,839
Manufacturing	2,074	2,095	68%	1,410	1,424	14	600	846,192	854,688	8,496
Wholesale Trade	457	510	64%	292	326	34	800	233,984	260,880	26,896
Transport., Wareh., Util.	34	57	78%	27	45	18	1,850	49,062	82,672	33,610
<b>Total, Ind. Sectors</b>	<b>7,749</b>	<b>8,605</b>		<b>1,943</b>	<b>2,051</b>	<b>107</b>		<b>1,257,650</b>	<b>1,351,491</b>	<b>93,841</b>

SOURCE: WA Employment Security Department, U.S. Census Bureau, Hovee & Co., JOHNSON ECONOMICS

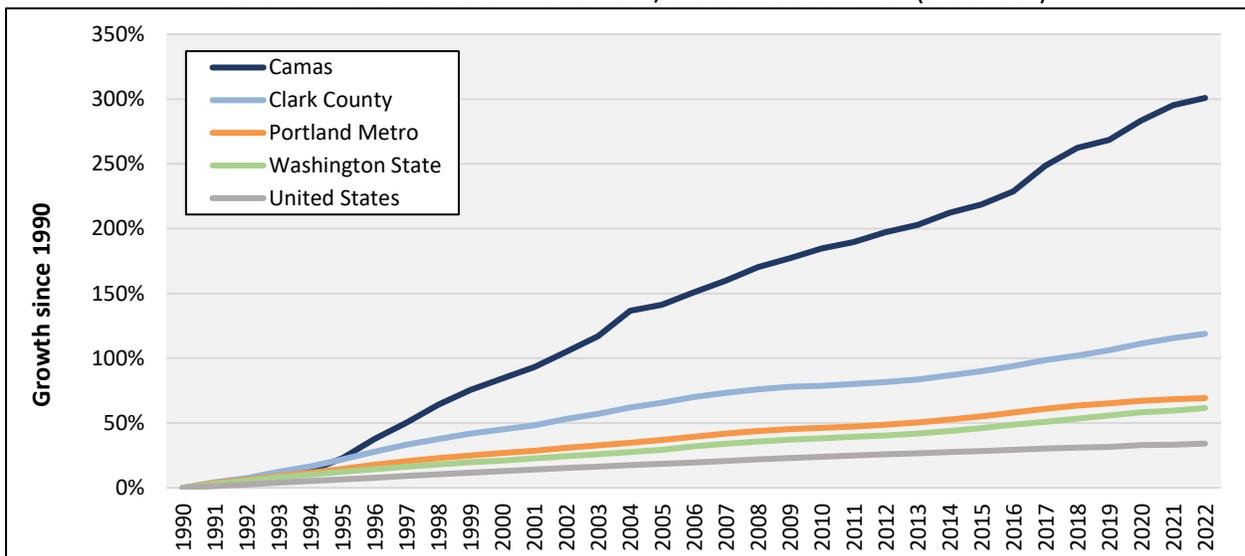
## RESIDENTIAL

### BROAD RESIDENTIAL TRENDS

Clark County has experienced strong population growth in recent decades, outpacing the other counties in the region. Since 1990, the population has grown by 119%, which is nearly twice as fast as the Portland Metro Area (+69%) and 3.5 times as fast as the nation as a whole. Financial and quality of life considerations have been among the factors often cited by new residents, including housing affordability, the lack of a state income tax, good schools, and outdoor recreation opportunities. The in-migration accelerated during COVID, as people moved out of Portland and other large cities.

Camas has been among the fastest growing cities in the County, tripling in size since 1990, growing at more than twice the Clark County rate. Between 2010 and 2022, the city grew from 19,400 to 27,300, adding 7,900 residents. This represents an increase of 41%, or 2.9% per year on average.

**FIGURE 4.14: POPULATION GROWTH SINCE 1990, GEOGRAPHIC COMPARISON (1990-2022)**

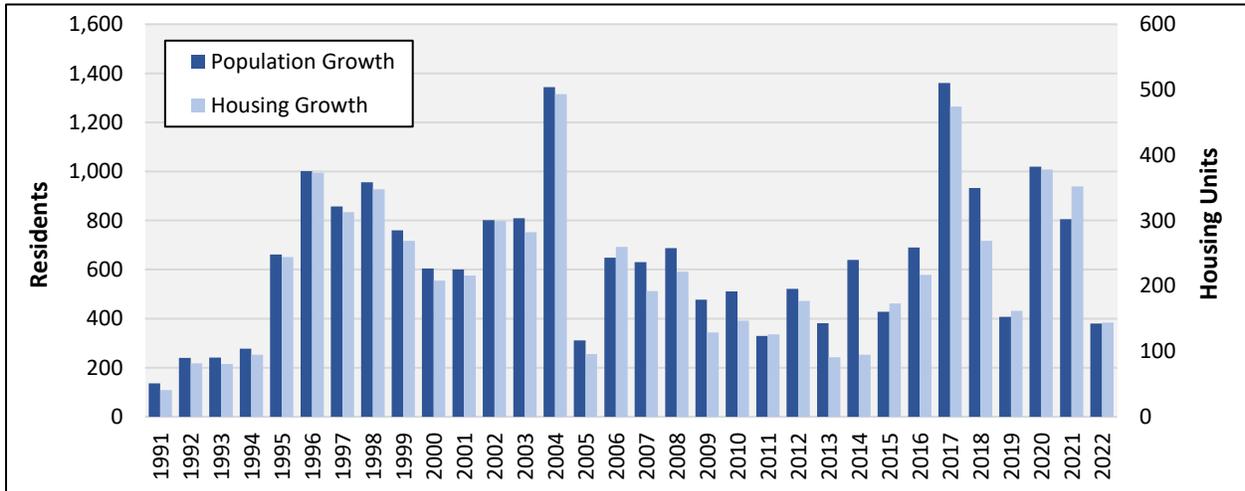


SOURCE: WA OFM, PSU PRC, JOHNSON ECONOMICS



The city's growth was strongest in the late 1990s, when the annual growth rate averaged roughly 10.0% per year. The weakest growth was after the 2008-09 recession, when the rate hovered around 2.0% per year. This is still strong – the long-term regional growth rate is 1.2% – and indicates considerable demand pressures. The growth gained momentum over the last decade, averaging 3.8% per year over the 2017-2021 period, when the city added 4,500 residents. This increase was accommodated by increased housing supply, which totaled 1,600 units over the five years.

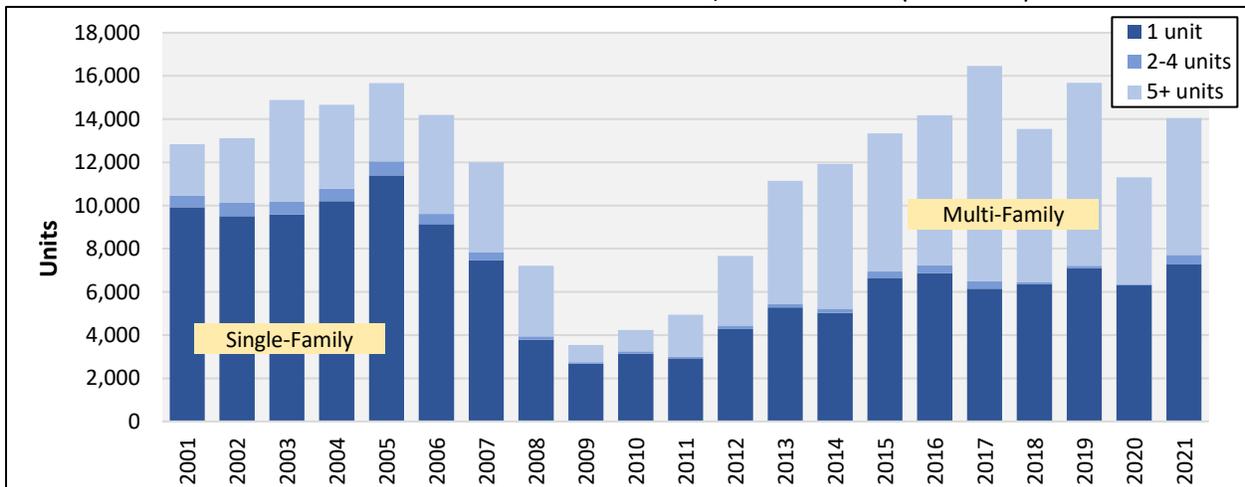
**FIGURE 4.15: POPULATION GROWTH AND HOUSING INVENTORY GROWTH, CAMAS (1991-2022)**



SOURCE: WA OFM, JOHNSON ECONOMICS

Regionally, there has been a shift in demand over the past two decades, from single-family ownership homes to multi-family rental units. The shift was catalyzed by the foreclosure crisis and ensuing recession at the end of the 2000s, which led to stricter credit requirements for homebuyers. The recession also caused an increase in college enrollment, at rapidly growing tuition costs, something that in tandem with rapidly rising rent levels made it difficult to save up for downpayments. Rental apartments became the only viable housing form for many young households, which in turn led to a shift in housing construction, from single- to multi-family units. Rapid price gains in the single-family market has continued to sustain demand for the more affordable multi-family homes in recent years.

**FIGURE 4.15: RESIDENTIAL BUILDING PERMITS BY TYPE, PORTLAND METRO (2001-2022)**

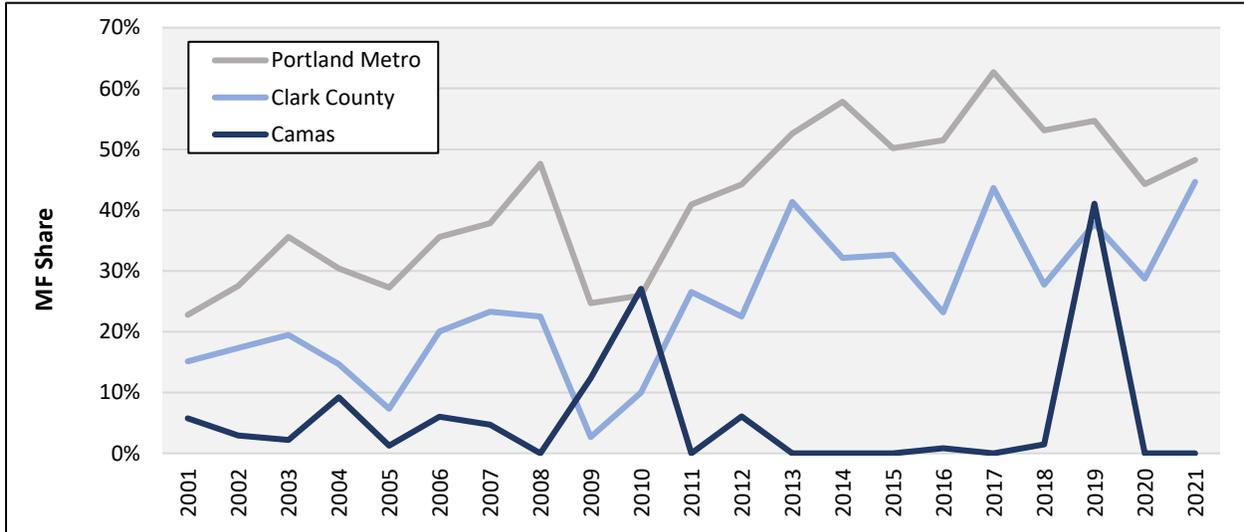


SOURCE: U.S. Census Bureau, Johnson Economics



The same shift has taken place in Clark County, where the multi-family share of new housing production went from 15% in the early 2000s to 45% by 2021. Camas has not participated in this shift to the same degree. If we exclude the 276-unit Kielo at Grass Valley in 2019 (and the Casey in 2022), the share of issued multifamily building permits has remained around 0% over the past 10 years.

**FIGURE 4.16: MULTI-FAMILY SHARE OF ISSUED RESIDENTIAL BUILDING PERMITS, GEOGRAPHIC COMPARISON (2001-21)**

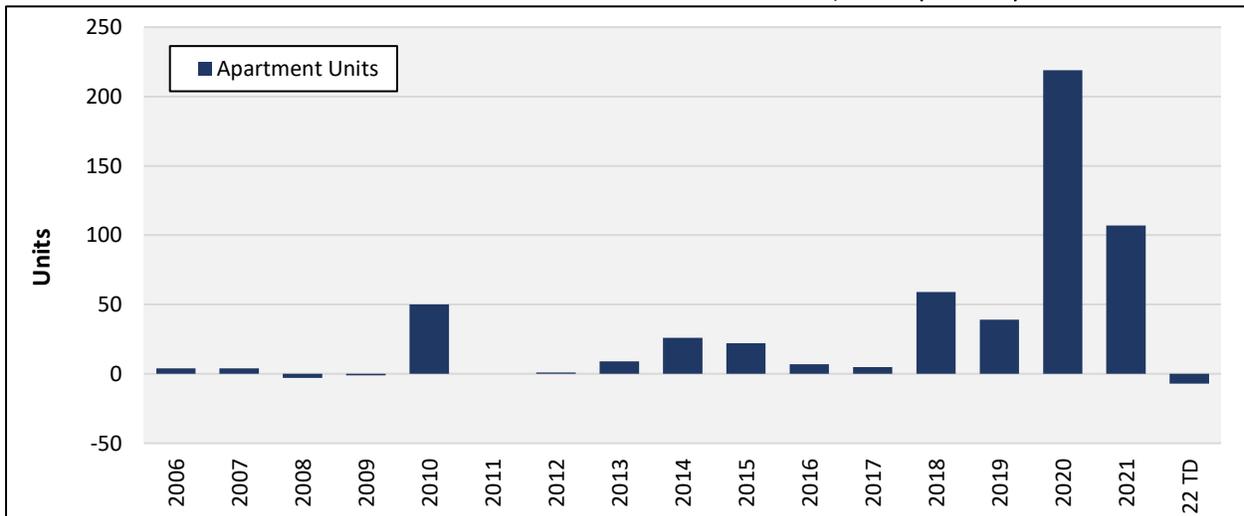


SOURCE: HUD, JOHNSON ECONOMICS

**HISTORICAL MULTI-FAMILY DEMAND**

Reflecting the very limited supply of new units, market absorption of apartments in Camas was very modest until 2018-19, when roughly 50 units were absorbed annually, and 2020-21, when the absorption averaged more than 160 units annually due to lease-up of Kielo at Grass Valley. In isolation, Kielo achieved absorption of 31 units per month on average (~20 ac./yr). This is unusually high, indicating strong demand. Thus, Camas would likely have absorbed many more units with additional supply.

**FIGURE 4.17: HISTORICAL NET ABSORPTION OF APARTMENT UNITS, CAMAS (2006-22)**



SOURCE: CoStar



### RESIDENTIAL DEMAND FORECAST – HOUSEHOLD GROWTH

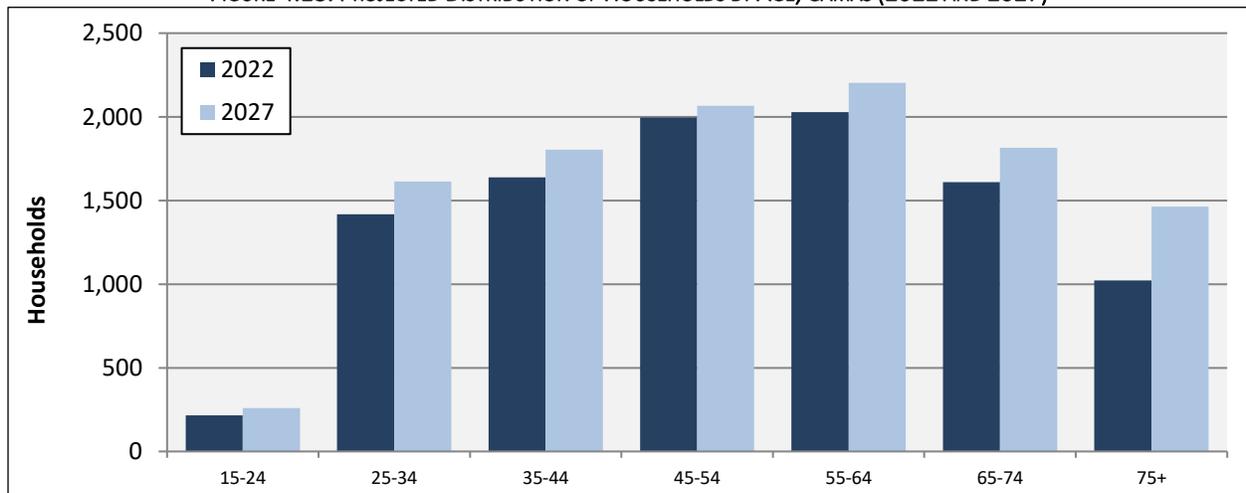
Since 2010, the population growth in Camas has averaged 2.9% per year. Over the same period, the housing inventory has increased 2.7% per year on average. The latter serves as a proxy for household growth, and is in line with extrapolated household estimates from the Census Bureau. These growth rates correlate well with the pre-COVID job growth in the areas where Camas residents work.<sup>1</sup> The weighted average job growth for these areas (weighted by number of Camas residents working in each area) over the last decade was 2.9% – identical to the population growth in Camas. Applying Johnson Economics’ expectations for annual job growth in the same areas over the next five years (3.1% weighted average) indicates growth in housing demand of 2.9% per year in Camas, or 1,500 new households over five years. Taking into account the impact of the current slowdown in the housing market due to high interest rates, we would assume 1,300 new households over the five-year period, for an annual growth rate of 2.5%. Note that this projection is based on the historical relationship between housing absorption and surrounding job growth. The underlying demand (preference) for housing in Camas regardless of financial ability is likely much higher.

### PROJECTED HOUSING DEMAND

Johnson Economics has developed a housing demand model that allocates anticipated household growth into demand for housing of different forms. Our model begins with a segmentation of the existing household base by age and income, as these are the variables that best predict housing preferences. The model accounts for aging and mortality, as well as migration patterns related to surrounding job growth (by age and wage) and retiree migration. For this segmentation, we rely in part on trended census estimates provided by Neustar. Local, segment-specific propensity rates calculated from census microdata are used to allocate the new growth to different types of housing. Some adjustments are made to account for financing hurdles in the ownership market (e.g., the high mortgage rates anticipated over the near term are modeled to result in a 17% shift from ownership to rental demand).

The following chart displays the anticipated distribution of housing demand across age segments over the forecast period. The projections indicate growth across many age groups, including at the early family stage (millennials, age 25-44), among empty nesters (age 55-64) and among seniors (baby boomers, 65+). The growth among seniors is primarily due to aging-in-place, while the growth among millennials is more reflective of in-migration.

**FIGURE 4.18: PROJECTED DISTRIBUTION OF HOUSEHOLDS BY AGE, CAMAS (2022 AND 2027)**



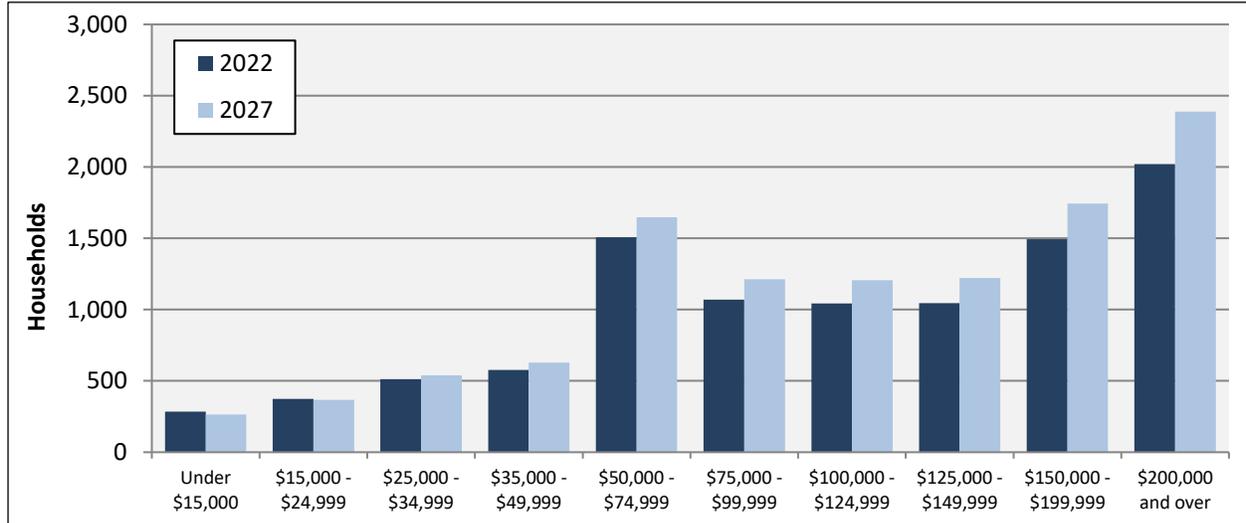
SOURCE: Neustar, Johnson Economics

<sup>1</sup> In 2019: 16.9% in Camas; 45.2% in other parts of Clark County; 36% in other parts of Portland Metro. Excludes tele-commuters. Data from U.S. Census Bureau.



With respect to income, the demand growth is anticipated to be concentrated among middle- and upper-income segments, with declines at the lowest income levels. This is in keeping with recent trends, reflecting the appeal of Camas to affluent households.

**FIGURE 4.9: PROJECTED DISTRIBUTION OF HOUSEHOLDS BY INCOME, CAMAS (2022 AND 2027)**



SOURCE: Neustar, Johnson Economics

The following table summarizes our estimates of demand growth by housing type, both for the five years and annually. Detached single-family ownership homes dominate the projected demand, representing a net increase of roughly 700 units over five years. If we include detached rental homes, which typically come from the existing housing stock, there is an estimated net need for 760 new detached homes. Attached homes are projected to represent a total need for roughly 150 homes. Rental apartments are projected to see the strongest demand growth in relative terms, for an estimated 365 units. If we include condominiums, the net need for new multifamily units is estimated to 385.

At an assumed density of 18 units per acre, the multifamily demand represents land absorption of 4.3 acres annually. Assuming 10 units per acre for the attached single-family homes, these represent 3.1 acres of annual absorption. Together the multifamily and attached homes represent 7.4 acres of projected annual absorption, or 37 acres over five years and 148 acres over a 20-year planning period.

Again, this forecast is based on the historical job/housing relationship and existing single-/multifamily splits in the city. It may underestimate the preference for housing among low- and middle-income households, who are currently underrepresented. Additional housing at appropriate price points would thus likely accommodate additional growth.

**FIGURE 4.20: RESIDENTIAL DEMAND FORECAST, CAMAS (2022-27)**

RES. DEMAND 2022-27	5-YEAR DEMAND GROWTH			ANNUAL DEMAND GROWTH		
	Owners	Renters	Total	Owners	Renters	Total
Single-family detached	688	70	758	138	14	152
Single-family attached	129	25	154	26	5	31
Multi-family	20	365	385	4	73	77
<b>Total</b>	<b>836</b>	<b>461</b>	<b>1,297</b>	<b>167</b>	<b>92</b>	<b>259</b>

SOURCE: JOHNSON ECONOMICS



## V. CONCLUSIONS

### LAND CAPACITY

The City of Camas currently has adequate land capacity to accommodate the population and employment growth assumed in the 2015-2035 Comprehensive Plan. There is a surplus of 398 acres of residential land and 286 acres of employment land. The proposed comprehensive plan amendment will only have minor impact on the land capacity, increasing the residential surplus to 429 acres and reducing the employment surplus to 255 acres.

The actual growth that has taken place in the city since the comp plan was adopted has been stronger than assumed for residential growth, but weaker than assumed for employment growth. The residential growth over the 2015-22 period represents 52% of the adopted 20-year growth target, while the employment growth represents 18%.

According to the 2021 Clark County Buildable Lands Report, land absorption in Camas over the 2016-20 period represented absorption of 60 acres of residential land per year on average, 6 acres of commercial land annually, and 1.6 acres of industrial land annually. At these rates, the current land supply represents over 50 years of commercial land and over 400 years of industrial land, while the residential land represents only 12 years of absorption. From a land capacity standpoint, the proposed re-allocation of commercial and industrial land to residential land would thus improve the balance in the land supply.

### MARKET TRENDS

Part of the reason for the weaker than expected employment growth in Camas in recent years is the relative weakness of the high-tech manufacturing sector, which expanded rapidly in Camas in the 1990s. The winddown of operations at the Mill has also played a part. Recent industrial development in Clark County has been concentrated at the ports (especially heavy industries) and along interstate freeways (distribution). Development of new office space has been concentrated in locations with extensive commercial amenities (e.g., Columbia Tech Ctr.), though with recent headwinds from increased at-home work in the wake of COVID. Commercial development continues to be slowed by the ongoing shift to online retail.

Residential growth has been stronger than expected in Camas, reflecting strong county-wide in-migration. Much of the growth in Camas can be attributed to job growth in Camas and East Vancouver. The increased demand for safe and attractive suburban housing during COVID has also played a role.

All across the region, there has been a shift in demand from single- to multifamily housing in recent years, as single-family homes have become financially unattainable for a growing share of the population. While the housing production in Clark County has evolved to match the new pattern, Camas has only to a limited degree shifted its housing production, and thus likely has some pent-up demand for multifamily housing. This is corroborated by the Camas Housing Action Plan (2021), which includes a detailed analysis of current and future housing needs in the city. The analysis finds a particular need for additional multi-family and attached single-family homes that can accommodate low- and middle-income households. Additional housing in these categories will likely help employment growth in the city by providing workforce housing that brings needed labor closer to Camas employment.

The most recent large-scale apartment project in Camas (Kielo, 2020-21) also appears to confirm the strong demand for multifamily housing. It leased up at an average rate of 31 units per month, which represents land absorption of roughly 20 acres per year. Our demand forecast for the next five years indicates absorption of 7.4 acres annually, including attached homes. This represents 37 acres over five years and 148 acres over 20 years. However, the forecast is partly based on existing single-/multi-family splits in the city, and may thus underestimate multifamily demand.



The markets for commercial and industrial space have seen moderate demand in recent years, averaging floor area absorption typically equivalent to 1.3 acres annually in the commercial segment and 1.4 acres annually in the industrial segment. Our forecasts for the next five years, based on anticipated employment and population growth, indicate absorption of 1.9 acres of commercial land annually and 1.1 acres of industrial land annually.

Given the limited need for employment land reflected in these market-based forecasts, the proposed re-allocation of industrial and commercial land to residential land is unlikely to have negative impact on employment growth, while it can alleviate pressures in the residential market. By accommodating needed workforce housing in the city, the re-allocation may in fact have a positive impact on employment growth.

### **SUITABILITY FOR DEVELOPMENT**

The north site, which is currently zoned for business park use (BP), faces several obstacles to business park development, and we regard only the north portion of the site to be suitable for the campus-style format this zone is intended for. However, there is limited demand for buildings of this format in locations without extensive commercial amenities, as indicated by the lack of campus development around the site since the 1990s. There are also issues related to compatibility and congestion, especially around the beginning and end of the school day. The south portion of the site is both too narrow and has too much slope to be feasible for campus projects or other industrial developments of some scale.

The south site is zoned for regional commercial use (RC), intended for larger commercial establishments with regional trade areas. This is a segment of the retail market with excess capacity currently, and very little new development due to the rise of e-commerce. The site does not have the scale, configuration, or access needed to accommodate a retail center of this format. The most suitable commercial format on the site is a neighborhood/ convenience center with smaller buildings. However, the site does not have the traffic exposure typically needed to make this type of development feasible. Moreover, we expect demand for this type of space to be met by the retail center proposed on the adjacent site (Camas Station), which enjoys stronger traffic exposure. Additionally, the topography makes the eastern (Brady Rd) portion of the site difficult/costly to utilize, while access from the south or west raises questions of safety, congestion, and compatibility with the adjacent elementary school.

We regard both sites to be suitable for the proposed multifamily residential (MF-18) zoning, which is intended for multifamily and attached single-family housing. The sites are located at the transition between residential and employment land, where these housing forms are encouraged. Moreover, these uses are compatible with surrounding housing and schools, and do not face the issues related to scale, configuration, or topography that would complicate commercial or industrial development. On the contrary, the sloping topography represents an amenity in the form of views. Furthermore, the sites would provide housing within walking distance of schools, parks, and the proposed Camas Station commercial center, thus generating limited auto traffic. Given the many Camas residents who commute to the west, the sites would also offer shorter commutes and relatively less traffic compared to other buildable multifamily land in the city. A strong indication of the suitability for the proposed residential use is provided by Parker Village, a recent attached-home development located between the subject sites.

In conclusion, we regard the subject sites to represent desirable locations for housing, both from a community standpoint and from the perspective of renters, buyers, and developers. The sites are less suitable for employment uses, and less likely to be developed in light of current and anticipated market conditions. These findings are supportive of the proposed comp plan amendment and zone change.

SEPA Checklist with Lancaster  
Mobley Traffic Memo

6

Section

**Comprehensive Plan Amendment  
and Rezone Request**

# SEPA ENVIRONMENTAL CHECKLIST

## **Purpose of checklist**

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

## **Instructions for applicants**

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

## **Instructions for lead agencies**

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

## **Use of checklist for nonproject proposals**

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the [Supplemental Sheet for Nonproject Actions \(Part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in “Part B: Environmental Elements” that do not contribute meaningfully to the analysis of the proposal.

**A. Background** [Find help answering background questions](#)

1.

2. **Name of proposed project, if applicable:**

Mackay Family Properties Comprehensive Plan Amendment and Rezone

3. **Name of applicant:**

Dan MacKay

4. **Address and phone number of applicant and contact person:**

Applicant: Dan MacKay, 4041 NW Sierra Drive, Camas WA, phone: (360) 921-0134

Contact Person: Marty Snell, MacKay Sposito, 18405 SE Mill Plain Blvd. Suite 100  
Vancouver, WA 98683, phone: (360) 823-1358

5. **Date checklist prepared:**

January 30, 2023

6. **Agency requesting checklist:**

City of Camas

7. **Proposed timing or schedule (including phasing, if applicable):**

City staff review by June, 2023; Planning Commission review summer/fall 2023; City Council review fall 2023. Decision made by December 31, 2023.

8. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

No.

9. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

Ecological Land Services (ELS) has conducted wetland delineations on some of the subject parcels, however it has been more than five (5) years since the work has been done.

10. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

No other applications or approvals are required for this particular proposal.

**11. List any government approvals or permits that will be needed for your proposal, if known.**

The applicant needs Camas City Council approval of the request to amend the Comprehensive Plan and zoning map.

**12. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

The applicant is requesting to change the Comprehensive Plan designations of Industrial and Commercial to Multifamily High and the zoning districts from Business Park (BP) and Regional Commercial (RC) to Multifamily-18 (MF-18).

**13. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The subject properties are located at 4511 NW 18<sup>th</sup> Avenue and 4245 NW 16<sup>th</sup> Avenue. Two properties, adjacent to each other, sit between NW Tidland Street and NW Brady Road while three other properties are located north of NW 18<sup>th</sup> Street and NW Tidland and extend to NW Brady Road. The tax lots for this application are: 125185000, 986055381, 125193000, 127367000, and 127372000. (See map below.)

Subject Parcels



## B. Environmental Elements

### 1. Earth [Find help answering earth questions](#)

#### a. General description of the site:

One of the subject properties, a former commercial nursery and landscape business, is a home site, which is relatively flat with some sloping topography (5-10%). The other properties are vacant, undeveloped lands. One property along NW Brady Road has varying slopes breaking both west to east and north to south (5-10% and 15-25%). Two adjacent properties along NW 18<sup>th</sup> Street have slopes breaking generally south to north. The largest lot has some slope (5-15%) with some relatively flat area on the north end.

Circle or highlight one: **Flat**, **rolling**, **hilly**, **steep slopes**, mountainous, other:

#### b. What is the steepest slope on the site (approximate percent slope)?

Per Clark County GIS, the steepest slope on one the properties is in the 15-25% range.

#### c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Per Clark County GIS, the dominant soil type of the properties is Powell silt loam, 0 to 8 percent slopes (PoB).

#### d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

There are no surface indications or history of unstable soils in the immediate vicinity.

#### e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

The request would not trigger any fill, excavation, or grading of the site.

#### f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Yes, erosion could occur due to clearing and grading of the properties during future site construction.

#### g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Not applicable to this application.

#### h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

Not applicable to this application.

## 2. Air [Find help answering air questions](#)

**a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

Not applicable to this application.

**b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

None known.

**c. Proposed measures to reduce or control emissions or other impacts to air, if any.**

Not applicable to this application.

## 3. Water [Find help answering water questions](#)

**a. Surface Water: [Find help answering surface water questions](#)**

**1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

There are no surface water or surface water bodies on the site or in the vicinity.

**2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

Not applicable.

**3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

Not applicable.

**4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

Not applicable.

**5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

No.

**6.**

7. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

**b. Ground Water:** [Find help answering ground water questions](#)

1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.

No.

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Not applicable.

**c. Water Runoff (including stormwater):**

1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Not applicable.

2. Could waste materials enter ground or surface waters? If so, generally describe.

No.

3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No.

4. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.

Not applicable to this application.

**4. Plants** [Find help answering plants questions](#)

a. Check the types of vegetation found on the site:

deciduous tree: alder, maple, aspen, other

evergreen tree: fir, cedar, pine, other

- shrubs
- grass
- pasture
- crop or grain
- orchards, vineyards, or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

**b. What kind and amount of vegetation will be removed or altered?**

No vegetation will be removed or altered with this application.

**c. List threatened and endangered species known to be on or near the site.**

None known.

**d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

None proposed at this time.

**e. List all noxious weeds and invasive species known to be on or near the site.**

None known.

**5. Animals** [Find help answering animal questions](#)

**a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

Examples include:

- Birds: hawk, heron, eagle, songbirds, other:
- Mammals: deer, bear, elk, beaver, other:
- Fish: bass, salmon, trout, herring, shellfish, other:

**b. List any threatened and endangered species known to be on or near the site.**

None known.

**c. Is the site part of a migration route? If so, explain.**

The area is within the Pacific Flyway for migratory waterfowl.

**d. Proposed measures to preserve or enhance wildlife, if any.**

Not applicable with this application.

- e. List any invasive animal species known to be on or near the site.

None known.

## 6. Energy and Natural Resources [Find help answering energy and natural resource questions](#)

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Not applicable with this application. This is a Comprehensive Plan Amendment and Rezone request.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

Not applicable with this application. This is a Comprehensive Plan Amendment and Rezone request.

## 7. Environmental Health [Find help with answering environmental health questions](#)

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.

No.

- 1. Describe any known or possible contamination at the site from present or past uses.

- a. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None known.

- b. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Not applicable.

- c. Describe special emergency services that might be required.

Not applicable with this application. This is a Comprehensive Plan Amendment and Rezone request.

**d. Proposed measures to reduce or control environmental health hazards, if any.**

None needed.

**b. Noise**

**1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

There are no known noise generating impacts emanating from other land uses in the area that affect this project.

**2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

Not applicable with this application. This is a Comprehensive Plan Amendment and Rezone request.

**3. Proposed measures to reduce or control noise impacts, if any.**

Not applicable with this application.

**8. Land and Shoreline Use** [Find help answering land and shoreline use questions](#)

**a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

The subject properties are surrounded by a variety of uses. The northern three parcels are bounded by vacant industrial land to the north (with the larger property adjacent to Analog Devices, Inc. to use for its own potential expansion), an attached housing development and a city water reservoir to the south, industrial and educational uses (nLIGHT, Inc. and the Odyssey Middle School/Discovery High School campus) to the east, and NW Brady Road to the west.

The southern two properties are bounded by an attached housing development to the north, NW 16<sup>th</sup> Avenue and an approved commercial development (Camas Station) to the south, NW Brady Road to the east, and NW Tidland Street to the west. The southern two parcels are also across NW 16<sup>th</sup> Avenue from Prune Hill Sports Park and Prune Hill Elementary School. The southern and northern parcels are separated by a city reservoir located on 4 acres, on property purchased by the City of Camas from the MacKay family.

The proposal will not affect land uses nearby as the request for this Comprehensive Plan Amendment and Rezone is in keeping with residential use rather than commercial or industrial uses.

**b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

No.

- 1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversized equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

No.

- c. Describe any structures on the site.**

One parcel contains a residential structure, accessory structures to residential use, and accessory structures from the historic commercial nursery and landscape business.

- d. Will any structures be demolished? If so, what?**

Not with this proposal. However, all structures would be demolished at a later date.

- e. What is the current zoning classification of the site?**

Two parcels are zoned Regional Commercial (RC) and three parcels are zoned Business Park (BP).

- f. What is the current comprehensive plan designation of the site?**

Two parcels are planned Commercial and three parcels are planned Industrial.

- g. If applicable, what is the current shoreline master program designation of the site?**

Not applicable.

- h. Has any part of the site been classified as a critical area by the city or county? If so, specify.**

Per Clark County GIS, one parcel presents indicators of wetlands and the other four parcels present indicators of slope greater than 5%.

- i. Approximately how many people would reside or work in the completed project?**

Not applicable at this time.

- j. Approximately how many people would the completed project displace?**

None with this proposal.

- k. Proposed measures to avoid or reduce displacement impacts, if any.**

None.

**l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.**

Approving the request would provide the opportunity for the property to develop as residential uses, rather than commercial or industrial. With most of the properties surrounded by residential development and educational facilities, changing the zoning to residential would advance compatibility of future land uses with the surrounding area. Compliance with the City of Camas' residential zoning districts would ensure compatibility of uses as well.

**m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.**

None needed.

**9. Housing** [Find help answering housing questions](#)

**a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

This application is for a Comprehensive Plan Amendment and Rezone only. However, if approved, there is the possibility of seeing 300-400 dwelling units under subsequent development applications. The units would likely be for middle to middle-high income households with the opportunity for some low-income households. The latter income group is dependent on a builder and the marketability of lower income housing in this area of Camas.

**b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

None at this time. However, one housing unit would be eliminated upon future development.

**c. Proposed measures to reduce or control housing impacts, if any.**

None needed.

**10. Aesthetics** [Find help answering aesthetics questions](#)

**a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Not applicable.

**b. What views in the immediate vicinity would be altered or obstructed?**

Not applicable.

**c. Proposed measures to reduce or control aesthetic impacts, if any.**

Not applicable with this application.

**11. Light and Glare** [Find help answering light and glare questions](#)

**a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

Not applicable.

**b. Could light or glare from the finished project be a safety hazard or interfere with views?**

Not applicable.

**c. What existing off-site sources of light or glare may affect your proposal?**

None known.

**d. Proposed measures to reduce or control light and glare impacts, if any.**

Not applicable with this application.

**12. Recreation** [Find help answering recreation questions](#)

**a. What designated and informal recreational opportunities are in the immediate vicinity?**

Prune Hill Sports Park is across the street from one of the parcels. The northern more parcels are accessible to NW Brady/Parker Road. Ash Creek Park, which has not been developed, will be within walking distance ( $\frac{1}{4}$  to  $\frac{1}{3}$  of a mile) of the northern parcels. Grass Valley Park is within biking distance (1 mile) of the northern parcels.

**b. Would the proposed project displace any existing recreational uses? If so, describe.**

No.

**c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.**

Not applicable with this application.

**13. Historic and Cultural Preservation** [Find help answering historic and cultural preservation questions](#)

**a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

No.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

No.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

Per Clark County GIS, there are no mapping indicators of historic sites, although GIS shows low, moderate, and moderate-high archaeological probabilities and an affirmative archaeological site buffer.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

Not applicable with this application

**14. Transportation** [Find help with answering transportation questions](#)

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

The properties access NW 18<sup>th</sup> and 16<sup>th</sup> Avenues and NW Tidland Street and NW Brady Road. NW Brady Road links to State Route 14 (SR-14) less than three (3) miles from the intersection of NW 16<sup>th</sup> Avenue and NW Brady Road. The streets also feed to Pacific Rim Boulevard which feeds SE 192<sup>nd</sup> Avenue in east Vancouver. SE 192<sup>nd</sup> Avenue leads to SR-14 on the south.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

No. C-TRAN's closest transit stop is located at SE 192<sup>nd</sup> Avenue and SE 34<sup>th</sup> Street in east Vancouver, which is approximately 1.2 miles away.

- c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

Not applicable with this application.

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

No.

- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

This is an application for a Comprehensive Plan and Rezone request. However, the applicant hired Lancaster Mobley to conduct traffic generation analyses for development scenarios under commercial and business park use (current zoning) and under multifamily residential use (proposed zoning). Under current zoning, buildout could generate 11,490 weekday trips with 900 AM peak hour trips and 1,116 PM peak hour trips. Under the proposed zoning, a 'worst case' buildout scenario of 446 dwelling units could generate 3,006 weekday trip with 178 AM peak hour trips and 227 PM peak hour trips. The difference between the proposed zoning and current zoning could mean 8,484 fewer weekday trips and 722 fewer AM and 889 fewer PM peak hour trips. Lancaster Mobley did not analyze commercial vehicle and truck traffic impacts. That said, it stands to reason that buildout under current zoning would generate more commercial vehicle and truck trips than if the properties were built out as residential. The Lancaster Mobley traffic memo is attached to the SEPA checklist.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

No.

g.

**Proposed measures to reduce or control transportation impacts, if any.**

Not with this application. However, future development of the site would comply with the City of Camas' development standards for transportation impacts, including the payment of Traffic Impact Fees.

## 15. Public Services [Find help answering public service questions](#)

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

If the zone change is approved and the property develops, residential development does increase the need for all public services. Depending on the mix of housing types the demands for services will be variable. If the development attracts single headed households or 'empty nesters', the need for schools will be less than a traditional single family residential development.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

None at this time.

**16. Utilities** [Find help answering utilities questions](#)

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

Not applicable with this application. However, the utilities underlined above serve the occupied parcel and are available to serve the other properties.

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Electricity is provided by Clark Public Utilities, natural gas is provided by Northwest Natural, telephone service is provided by multiple carriers, and water, sewer, and garbage service is provided by the City of Camas.

**C. Signature** [Find help about who should sign](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.



---

SEPA Responsible Official

**Type name of signee:**

Martin L. Snell for Applicant Dan MacKay

**Position and agency/organization:** Planning Services Manager/MacKay Sposito

**Date submitted:** 1/30/2023

## D. Supplemental sheet for nonproject actions [Find help for the nonproject actions worksheet](#)

**IT IS NOT REQUIRED** to use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

**1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**

The request to amend the Comprehensive Plan and zoning district, in and of itself, will not increase discharges to water or emissions to that air, nor will it result in the production, storage, or release of toxic or hazardous substances. It will also not produce noise.

- **Proposed measures to avoid or reduce such increases are:**

If the request is approved and development of the properties moves forward, it is anticipated the developer will comply with the City of Camas' rules and regulations to avoid or reduce discharges outlined about, including the production of noise. If developed as residential, it is highly unlikely that there will be toxic or hazardous substances on the properties, which cannot be said if the current zoning of industrial and commercial remains.

**2. How would the proposal be likely to affect plants, animals, fish, or marine life?**

The request to amend the Comprehensive Plan and zoning district, in and of itself, will not affect plants, animals, fish, or marine life, which the last item is moot due to the location of the properties.

- **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

If the request is approved and development of the properties moves forward, it is anticipated the developer will comply with the City of Camas' rules and regulations to protect or conserve plants and animals.

**3. How would the proposal be likely to deplete energy or natural resources?**

The request to amend the Comprehensive Plan and zoning district, in and of itself, will not deplete energy or natural resources.

- **Proposed measures to protect or conserve energy and natural resources are:**

If the request is approved and development of the properties moves forward, it is anticipated the developer will comply with the City of Camas' rules and regulations to protect or conserve energy and natural resources. Any residential development will comply with the Washington State Energy Code, which has some of the nation's most protective rules and standards in place regarding energy conservation.

**4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

The request to amend the Comprehensive Plan and zoning district, in and of itself, will not use or affect environmentally sensitive areas or areas eligible or under study for government protection.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

If the request is approved and development of the properties moves forward, it is anticipated the developer will comply with the City of Camas' critical areas rules and regulations. Due to the location of the properties, potential impacts to floodplains or prime farmlands is moot.

**5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**

The request to amend the Comprehensive Plan and zoning district does have a potential impact on land use but not shorelines. Approving the request and rezoning the properties from commercial and industrial to residential improves the compatibility of the properties to the surrounding area. As noted elsewhere and with one exception, the surrounding area is largely developed with residential, educational, and recreational uses. Given these surrounding uses, the properties developing as residential has a more positive affect on land use compatibility than if it were to develop as commercial and industrial.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:**

If the request is approved and development of the properties moves forward, it is anticipated the developer will comply with the City of Camas' zoning rules, regulations, and standards, including with any design review guidelines that are adopted and effective at the time of development application.

**6. How would the proposal be likely to increase demands on transportation or public services and utilities?**

The request to amend the Comprehensive Plan and zoning district, in and of itself, will not increase the demands to transportation or public services and utilities. As noted, development of the properties for residential use will result in less demand on the transportation infrastructure and public services than that of commercial and industrial development.

- **Proposed measures to reduce or respond to such demand(s) are:**

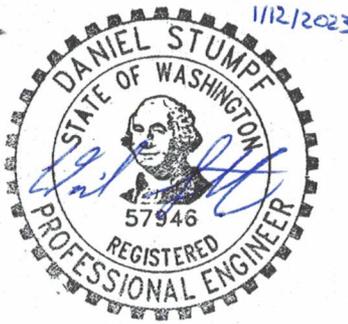
If the request is approved and development of the properties moves forward, it is anticipated the developer will comply with the City of Camas' development standards, including pertinent transportation and utilities (e.g. water, sewer, storm water) infrastructure requirements and payment of impact fees such as traffic, park and open space, fire and school impact fees. Residential development also pays system development charges (SDC's) and connection fees to offset the impact to the city's water and sewer systems.

**7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.**

The request does not conflict with any local, state, or federal laws or requirements protecting the environment.

## Memorandum

To: Dan MacKay  
From: Daniel Stumpf, PE  
Date: January 12, 2023  
Subject: Brady Road Comprehensive Plan Amendment  
Trip Generation Analysis



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## Introduction

This memorandum reports and evaluates the potential transportation impacts related to a proposed comprehensive plan amendment/zone change of five properties (assessor parcels 125185000, 125193000, 127367000, 127372000, and 986055381) located at/near 4345 NW 16<sup>th</sup> Avenue in Camas, Washington. The proposal will rezone the five properties from *Community Commercial* (CC) and *Business Park* (BP) to *Multifamily-18* (MF-18).

The purpose of this memorandum is to examine and address potential transportation-related impacts from the proposed zone change. This study reviews the site's trip generation potential under both the existing and proposed zoning designations.

## Location Description

The project site is located north of NW 16<sup>th</sup>/18<sup>th</sup> Avenue, south of NW Pacific Rim Boulevard, and west of NW Brady Road in Camas, Washington. The subject site is located in a developing mixed-use area of the City, with undeveloped & commercial/industrial uses to the north, Prune Hill Elementary School & single-family residential uses to the south, single-family residential uses to the east, and Discovery High School to the west.

The site includes five properties which encompass an approximate total of 30.99 acres. Each parcel is currently zoned and developed with the following:

- Assessor Parcel 125185000: BP, Undeveloped (11.15 acres)
- Assessor Parcel 125193000: BP, Undeveloped (8.56 acres)
- Assessor Parcel 127367000: CC, Nursery/Single-Family Residence (4.19 acres)
- Assessor Parcel 127372000: CC, Undeveloped/Outdoor Storage (2.39 acres)
- Assessor Parcel 986055381: BP, Undeveloped (4.7 acres)

Figure 1 presents an aerial image of the nearby vicinity with the project site outlined in yellow.



Figure 1: Aerial Photo of Site Vicinity (Image from Google Earth)

## Site Trips

To determine the potential impacts of the proposed change in zoning, reasonable worst-case development scenarios for the existing and proposed zones were determined utilizing data for the most traffic-intensive uses permitted within each zone.

## Existing CC and BP Zone

To determine a reasonable worst-case development scenario under the existing zoning, City of Camas Code Section 18.07.030, *Table 1 – Commercial and Industrial Land Uses*, was referenced and compared to a variety of land uses provided in the *Trip Generation Manual*<sup>1</sup>. Land uses outright permitted in each zone were compared to land uses provided in the *Trip Generation Manual*. Based on this assessment, data from the following land use codes were used:

- CC Zone: 822, *Shopping Plaza (40-150k)*, based on the square footage of gross building floor area.
- BP Zone: 770, *Business Park*, based on the square footage of gross building floor area.

The existing CC zone area encompasses approximately 6.58 acres (i.e. approximately 286,600 square feet) of developable space while the existing BP zone area encompasses approximately 24.41 acres (i.e. approximately 1,063,300 square feet) of developable space. Per Camas Code Section 18.09.030, *Density and Dimensions – Commercial and Industrial Zones*, the CC zone does not have a maximum lot coverage whereas the BP zone has a maximum building lot coverage of 50%. Although the CC zone does not have a maximum lot coverage

<sup>1</sup> Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 11<sup>th</sup> Edition, 2021.

standard, it is assumed that any potentially proposed retail/commercial buildings would cover approximately 30% of the developable area while the remaining 70% of space would be dedicated to parking, public space, ROW improvements, etc. Assuming all buildings in each zone will be single story structures, the following may be constructed in each zone:

- CC Zone: Approximately 86,000 square feet of commercial building space.
- BP Zone: Approximately 531,700 square feet of commercial building space.

The reasonable worst-case development under the existing CC zone (i.e. ITE code 821) is expected to attract pass-by trips to the site. Pass-by trips are trips that leave adjacent roadways to patronize a land use and then continue in their original direction of travel. They do not add additional vehicles to the surrounding transportation system; however, they do add additional turning movements at site access intersections. A pass-by trip rate of 40 percent during the evening peak hour was determined using data from ITE code 821 of the *Trip Generation Manual*. For the purposes of this analysis, it is assumed that the morning peak hour and daily pass-by trip rates will approximately match the evening peak hour pass-by trip rate.

## Proposed MF-18 Zone

To determine a reasonable worst-case development scenario under the proposed MF-18 zone, Camas Code Section 18.07.040, *Table 2 – Residential and Multifamily Land Uses*, was referenced and compared to a variety of land uses provided in the *Trip Generation Manual*. Based on an assessment of permitted uses that could reasonably be developed within the approximate 30.99-acre site, data from land use code 220, *Multifamily Housing (Low-Rise)*, was referenced to estimate the trip generation potential of the site based on the number of dwelling units.

To determine a dwelling unit count within the site, the maximum unit per net acre density rate from City code was referenced from Section 18.09.050, *Density and Dimensions – Multifamily Residential Zones*. Under an MF-18 zone a maximum 18 dwelling units per net acre of developable space can be constructed. For the purposes of this analysis it is assumed that a reasonable 20 percent reduction in site buildable area will be necessary to accommodate streets/right-of-way improvements, public space, etc. When considering the units per net acre density and the total site acreage, the reasonable worst-case development scenario of the proposed MF-18 zone may include the construction of 446 multifamily dwelling units over 24.79 net acres of developable space.

## Trip Generation Comparison

The trip generation calculations show that under the existing CC and BP zones the subject site could reasonably generate up to 900 net new morning peak hour trips, 1,116 net new evening peak hour trips, and 11,490 net new average weekday trips. Under the proposed MF-18 zone the site could reasonably generate up to 178 morning peak hour trips, 227 evening peak hour trips, and 3,006 average weekday trips. Accordingly, the net change in trip generation potential of the site after the proposed rezone is projected to decrease by 722 morning peak hour trips, 889 evening peak hour trips, and 8,484 average weekday trips.

The trip generation estimates are summarized in Table 1. Detailed trip generation calculations are included as an attachment to this memorandum.



Table 1: Zone Change Trip Generation Summary

ITE Code	Size/Rate	AM Peak Hour			PM Peak Hour			Weekday Total	
		Enter	Exit	Total	Enter	Exit	Total		
<b>Existing CC Zone</b>									
Shopping Plaza (40-150k)	821	86,000 SF	188	116	304	373	404	777	8,126
<i>Pass-by Trips</i>	821	40%	61	61	122	155	155	310	3,250
Primary Trip Generation			127	55	182	218	249	467	4,876
<b>Existing BP Zone</b>									
Business Park	770	531,700 SF	610	108	718	169	480	649	6,614
<b>Proposed MF-18 Zone</b>									
Multifamily Housing (Low-Rise)	220	446 units	43	135	178	143	84	227	3,006
<b>Net Change In Site Trip Generation Potential</b>									
Existing Conditions (Primary Trips)			737	163	900	387	729	1,116	11,490
Proposed Conditions (Primary Trips)			43	135	178	143	84	227	3,006
<b>Net Change in Trip Generation Potential</b>			<b>-694</b>	<b>-28</b>	<b>-722</b>	<b>-244</b>	<b>-645</b>	<b>-889</b>	<b>-8,484</b>

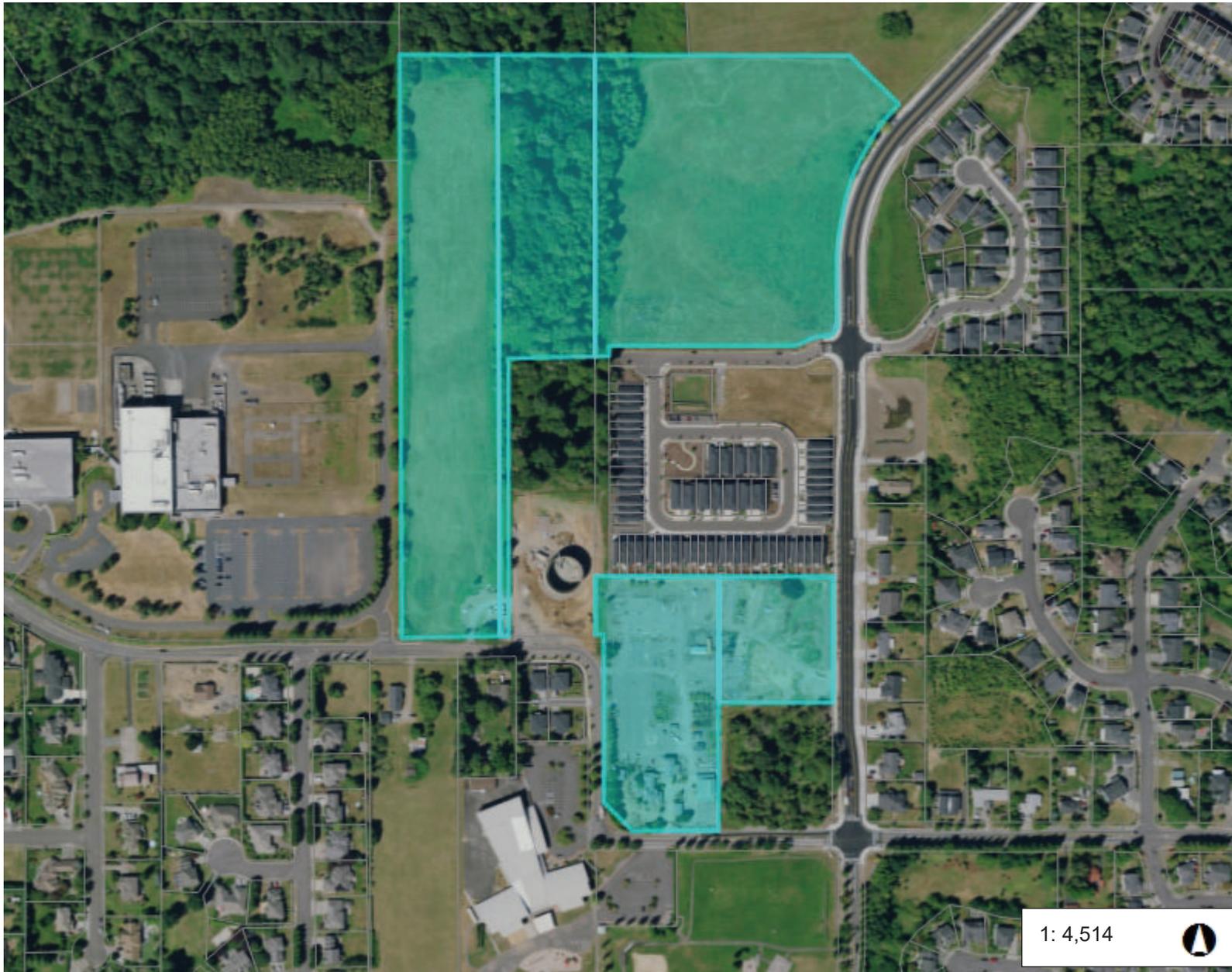
Based on the trip generation analysis the proposed zone change is expected to result in a decrease in the trip generation potential of the site for both the morning and evening peak hours as well as for a typical weekday. Since the proposal is expected to nominally impact the surrounding transportation facilities, it's recommended that no transportation impact analysis will be necessary to capture the impacts of the proposal and no specific intersection will require study. Instead the preparation of this trip generation memorandum is sufficient to report the projected impacts of the comprehensive plan amendment/zone change.

If you have any questions or concerns regarding this analysis or need further assistance, please don't hesitate to contact us.





# Mackay Properties - 2023 CPA



### Legend

 Taxlots

### Notes:

Five properties planned and zoned Comm. or LI, LI/BP

1: 4,514



752.3 0 376.17 752.3 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
Clark County, WA. GIS - <http://gis.clark.wa.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.



TRIP GENERATION CALCULATIONS  
Source: Trip Generation Manual, 11th Edition  
Existing CC Zone

Land Use: Shopping Plaza (40-150k)  
Land Use Code: 821  
Land Use Subcategory: All Sites  
Setting/Location: General Urban/Suburban  
Variable: 1000 SF GFA  
Trip Type: Vehicle  
Variable Quantity: **86**

AM PEAK HOUR

Trip Rate: 3.53

	Enter	Exit	Total
Directional Split	62%	38%	
Trip Ends	<b>188</b>	<b>116</b>	<b>304</b>

PM PEAK HOUR

Trip Rate: 9.03

	Enter	Exit	Total
Directional Split	48%	52%	
Trip Ends	<b>373</b>	<b>404</b>	<b>777</b>

WEEKDAY

Trip Rate: 94.49

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	<b>4,063</b>	<b>4,063</b>	<b>8,126</b>

SATURDAY

Trip Rate: 116.15

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	<b>4,994</b>	<b>4,994</b>	<b>9,988</b>



TRIP GENERATION CALCULATIONS  
Source: Trip Generation Manual, 11th Edition  
Existing BP Zone

Land Use: Business Park  
Land Use Code: 770  
Land Use Subcategory: All Sites  
Setting/Location: General Urban/Suburban  
Variable: 1000 SF GFA  
Trip Type: Vehicle  
Variable Quantity: **531.7**

AM PEAK HOUR

Trip Rate: 1.35

	Enter	Exit	Total
Directional Split	85%	15%	
Trip Ends	<b>610</b>	<b>108</b>	<b>718</b>

PM PEAK HOUR

Trip Rate: 1.22

	Enter	Exit	Total
Directional Split	26%	74%	
Trip Ends	<b>169</b>	<b>480</b>	<b>649</b>

WEEKDAY

Trip Rate: 12.44

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	<b>3,307</b>	<b>3,307</b>	<b>6,614</b>

SATURDAY

Trip Rate: 2.56

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	<b>681</b>	<b>681</b>	<b>1,362</b>



TRIP GENERATION CALCULATIONS  
Source: Trip Generation Manual, 11th Edition  
Proposed MF-18 Zone

*Land Use:* Multifamily Housing (Low-Rise)  
*Land Use Code:* 220  
*Land Use Subcategory:* Not Close to Rail Transit  
*Setting/Location:* General Urban/Suburban  
*Variable:* Dwelling Units  
*Trip Type:* Vehicle  
*Variable Quantity:* **446**

**AM PEAK HOUR**

*Trip Rate:* 0.4

	Enter	Exit	Total
Directional Split	24%	76%	
Trip Ends	43	135	178

**PM PEAK HOUR**

*Trip Rate:* 0.51

	Enter	Exit	Total
Directional Split	63%	37%	
Trip Ends	143	84	227

**WEEKDAY**

*Trip Rate:* 6.74

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	1,503	1,503	3,006

**SATURDAY**

*Trip Rate:* 4.55

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	1,015	1,015	2,030

*Caution: Small Sample Size*

