

## STAFF REPORT

Annual Comprehensive Plan Amendments

City File Number: CPA21-01

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<b>TO:</b>	Planning Commissioners	<b>DATE:</b>	June 8, 2021
<b>FROM:</b>	Sarah Fox, Senior Planner		
<b>LOCATION:</b>	4555 and 4615 NW Camas Drive (4.80 acres)		
<b>PUBLIC NOTICE:</b>	A public hearing notice was posted on the city's website and in the Camas Post Record on June 3, 2021. Legal publication #558470.		
<b>WA Department of Commerce:</b>	Notice of intent to adopt amendments was received by the Department of Commerce on May 10, 2021 (Material ID #2021-S-2641). The 60-day notice period ends on July 5, 2021.		
<b>STATE ENVIRONMENTAL POLICY ACT (SEPA)</b>	The city intends to issue a SEPA determination of Non-Significance Non-Project Action prior to City Council meetings.		
<b>APPLICABLE LAW:</b>	Camas Municipal Code Chapters (CMC) Chapter 18.51		

### CONTENTS:

I.	COMPREHENSIVE PLAN AMENDMENT PROCESS .....	2
II.	BACKGROUND .....	2
III.	LAND INVENTORY .....	2
IV.	APPLICABLE COMPREHENSIVE PLAN GOALS & POLICIES.....	4
V.	PROPOSED AMENDMENT .....	5
VI.	PUBLIC COMMENT .....	7
VII.	STAFF RECOMMENDATION .....	7
VIII.	TABLE 1 –2021 COMPREHENSIVE PLAN ACREAGE (PROPOSED) .....	8
IX.	ZONING REGULATIONS.....	9
X.	DEVELOPMENT STANDARDS – CHAPTER 18.09 .....	10

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This Staff Report will:

- Analyze the City's Comprehensive Plan policies and goals
- Analyze the issues set forth in CMC 18.51

## I. COMPREHENSIVE PLAN AMENDMENT PROCESS

Each year in the months leading up to January, the City announces that proposed amendments to the Comprehensive Plan will be received for 30 days. The 2021 announcement was published in the Camas Post Record and ran weekly from November 5 to December 3, 2020. The City received one application (File: CPA21-01).

## II. BACKGROUND

In 2016, the city adopted a cover to cover update to its comprehensive plan and map, titled Camas 2035 (Ord. 16-010). The city's comprehensive plan guides land use development and public facility investment decisions, consistent with the state's Growth Management Act (GMA) and Clark County's Community Framework Plan.

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

The plan anticipated that the city would have a total population of 34,098 in 2035 and would add 11,182 new jobs. The city's estimated 2020 population according to the Office of Finance and Budget (OFM) is 25,140, which is a 4.3% growth from 2019. The 2021 estimates were not released at the writing of this report.

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

## III. LAND INVENTORY

### EMPLOYMENT LANDS

The city's vision for economic development (Camas 2035, Section 6.1) in part reads, "In 2035, the economy has grown to attract a variety of businesses that offer stable employment opportunities and family wage jobs in the medical and high tech fields."

The City has approximately 3,398 acres designated for employment (combined commercial and industrial lands), or 33% of the overall acreage. Based on Clark County's Vacant Buildable Lands Model, it is estimated that there is 1,124 net acres of vacant and underutilized employment land in Camas. The model estimates that the city needs 337 net acres of Commercial land and 493 acres of Industrial land (total of 830 net acres) to create 11,182 additional jobs by 2035. According to the calculations, there is excess capacity of 294 net acres of employment land.

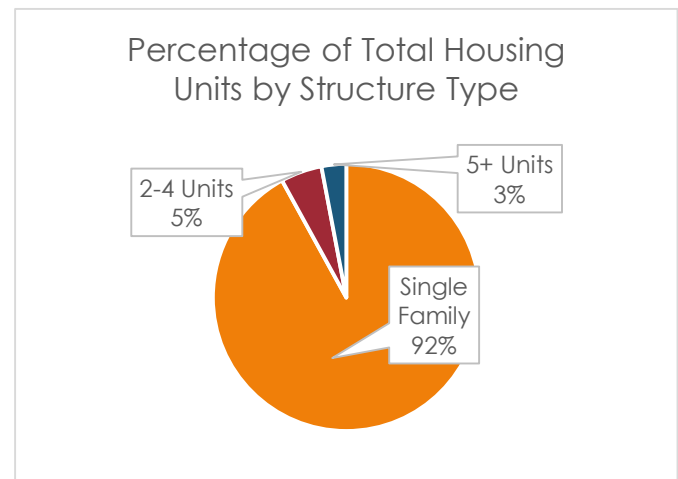
Given the high-level nature of the buildable lands analysis, there may be additional land that cannot be developed when detailed site plans are researched, or alternatively, a new employer may

exceed the estimated jobs per acre based on whether their industry can expand vertically instead of lineally.

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

## RESIDENTIAL LANDS

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



The city is nearing adoption of the Camas Housing Action Plan (HAP), which will provide a deeper level of information than the city had available with the adoption of the 2016 comprehensive plan. The HAP provides detailed background information on the city's current housing stock, and strategies to further the 2035 goals of achieving a greater mix of housing types, sizes, and affordability levels. The following charts are excerpts from the draft plan. The full draft is available on the city's webpage at the agenda page for Council ([June 7, 2021](#)) and at [www.letstalkcamashousing.us](http://www.letstalkcamashousing.us).

### Multifamily Apartment and Townhouse Developments in Camas, 2020

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

## IV. APPLICABLE COMPREHENSIVE PLAN GOALS & POLICIES

In order to support changes to the comprehensive plan, Camas 2035, the city must determine that the plan is deficient or should not continue in effect. Further, the city must agree that the proposed amendments comply with and promote the goals of the growth management act.

Commercial and industrial properties are where we focus job growth in the city. The 2035 Plan includes goals and policies for job growth within the Economic Development element of the plan (Ch. 6). The subject property is located within the "Grass Valley" area of the city, which is within an economic development target area. The applicant proposes to amend the Industrial designation to Commercial, with an associated zoning of Mixed Use.

**Employment Land Use (Camas 2035, Ch. 1):** "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."

**Housing (Camas 2035, Ch. 2):** The city's housing goals and policies focus on increasing housing diversity and affordability over the next 20 years. Citywide 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.*" The following policies are particularly applicable to the proposed amendments:

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

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

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

### **Economic Development (Camas 2035, Ch. 6):**

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

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

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## EVALUATION CRITERIA – CMC SECTION 18.51.030 (A-D)

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

After considering whether or not the current plan is deficient, the Planning Commission must recommend whether to support, reject or defer the amendments to City Council. The code provides the following criteria at CMC§18.51.030:

A. *Impact upon the city of Camas comprehensive plan and zoning code;*

*B. Impact upon surrounding properties, if applicable;*

*C. Alternatives to the proposed amendment; and*

*D. Relevant code citations and other adopted documents that may be affected by the proposed change.*

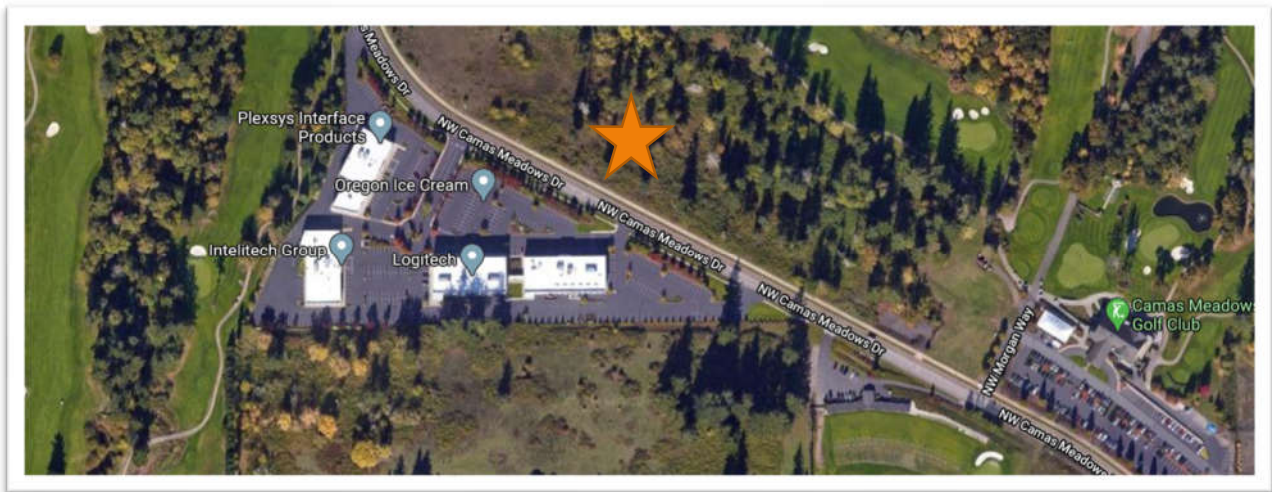
At the following section, staff will address the applicable criteria for each proposal. At Section VIII of this report, there is a summary of the proposed changes to land use acreages. There are also detailed maps of each proposal at Section X.

## V. PROPOSED AMENDMENT

### A. VANPORT PROPERTY (FILE #CPA21-01)

**Description:** Amend comprehensive plan to "Commercial" with an associated rezone to "Mixed Use" at a 4.8 acre site that is currently vacant.

**Site Description:** The combined 4.8 subject property is designated Light Industrial/Business Park (LI/BP) and is currently vacant. The same designation lies to the north, west and south of the site. To the north is the Camas Meadows Golf Course and across the street, to the south is an industrial business park. To the east of the subject site, properties owned by Lofts at Camas Meadows were amended last year to Commercial with an associated rezone of Mixed Use. Further to the southeast are multifamily designated properties, with one project, the Village at Camas Meadows under construction. Another multifamily development is located north of the golf course. To the east of the golf course, there is a Business Park zone with a mixed use development planned.



**Discussion:** The applicant requests that the comprehensive plan designation of Light Industrial / Business Park (LI/BP) on the subject parcels be amended to Commercial, with an associated rezone of Mixed Use (MX).

In order to better evaluate the proposal, the city must consider the comprehensive plan goals and policies for the Grass Valley Area (Economic Development, Chapter 6) and the zoning regulations of the proposed Mixed Use Zone. The comprehensive plan specifically requires an analysis of buildable lands, for any proposed conversions within the Grass Valley area of the city, "**ED-3.3: Protect employment land from conversion to residential uses by requiring an analysis of adequate buildable lands in Grass Valley to meet 20-year employment projections prior to land conversion approval.**" For



that reason, the applicant requested that the city include the report provided with the adjacent property proposal (File CPA20-03) "Lands Needs Analysis for Mixed Use Development on a Site in Camas, Washington" (Johnson Economics, LLC, April 2020), which was considered with that proposal.

The analysis found (Johnson Economics, page 15) that conversion of the four acre site to a mixed use development could still provide the land necessary to achieve the city's 20-year job goals given that the 2035 Plan includes excess capacity. *"An inventory of Grass Valley industrial lands find that remaining parcels are sufficient to accommodate 69% of forecasted 20-year industrial employment (Figure 3.4), while the rest of the city could also accommodate an additional 63% of the forecast. This supports the Camas 2035 finding that there is significant overcapacity of industrial lands (132% of demand), and conversion of the subject site to a different use would not violate the policy of maintaining a 20-year supply in Grass Valley."*

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

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

Amendment of a comprehensive plan designation not only includes a consideration of the comprehensive plan, development standards of the zoning, but also includes a comparison of the allowed land uses within the current zone and proposed zone in order to evaluate the merits of the proposal and any unintended consequences of such change. The allowed land uses for each zone are found within the Use Authorization Table at [CMC Chapter 18.07](#). There are 73 outright allowed uses within the MX zone and of those, there are 41 uses that are not allowed ("X") within the current zoning of the property (see list at Section XI of this report). A variety of residential uses are generally allowed in the MX zone, where they are prohibited in the LI/BP zone. The city has a level of concern that development of this site and adjacent MX properties could be entirely residential in nature, given that the MX does not mandate a mix of uses. However, there is a limit to the amount of residential development that could be built, as the MX zone includes a maximum residential density of 24 units per acre. The site would be limited to 115 units.

<b>EVALUATION CRITERIA</b> <b>CMC18.51.030 (A-D) and CMC18.51.010 (C)</b>	<b>FINDINGS</b>
<b>Impact upon the city of Camas comprehensive plan and zoning code;</b>	The amendment would decrease industrial lands and increase land for residential or mixed use development.

<b>Impact upon surrounding properties, if applicable;</b>	The city did not identify any detrimental effects to adjacent properties if this change was approved.
<b>Alternatives to the proposed amendment; and</b>	The applicant did not propose an alternative.
<b>Relevant code citations and other adopted documents that may be affected by the proposed change.</b>	Staff is unaware of any other city plans that would be affected if these four acres were amended.
<b>Why the current comprehensive plan is deficient or should not continue in effect.</b>  Specifically: "Protect employment land from conversion to residential uses by requiring an analysis of adequate buildable lands in Grass Valley to meet 20-year employment projections prior to land conversion approval." – Policy ED-3.3	The neighboring site provided evidence to support the amendment. Refer to "Lands Needs Analysis for Mixed Use Development on a Site in Camas, Washington" (Johnson Economics, LLC, April 2020)

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

**Staff Recommendation: Support amendment to change the Industrial designated properties to Commercial with an associated rezone to Mixed Use (MX).**

## VI. PUBLIC COMMENT

At the writing of this report the city received two letters from the public. Comments that were received in writing prior to the publication of this report are attached to the agenda.

## VII. STAFF RECOMMENDATION

Staff recommends that Planning Commission conduct a public hearing, deliberate and forward their recommendation on the proposed amendments to Council.

VIII TABLE 1 –2021 COMPREHENSIVE PLAN ACREAGE (PROPOSED)

Comprehensive Plan Designations	Current Acres	CPA21-01	Final Acres
Single Family			
· Low Density	866.86		866.86
· Medium Density	3608.65		3608.65
· High Density	437.49		437.49
Multi-Family			
· Low Density	311.01		311.01
· High Density	256.21		256.21
Commercial	974.56	4.8	979.36
Industrial	2402.00	-4.8	2418.20
Park	850.72		850.7
Open Space / Green Space	492.00		492.0
Total acreage:	10,200		10,200

Zoning**	2020	CPA21-01	Final 2021 Acreage
<b>Parks/Open Space</b>			
Neighborhood Park (NP)	145.14		145.14
Special Use (SU)	164.09		164.09
Open Space (OS)	421.55		421.55
<b>Industrial</b>			
Heavy Industrial (HI)	858.58		858.58
Light Industrial (LI)	91.83		91.83
Business Park (BP)	542.63		542.63
Light Industrial/Business Park (LI/BP)	795.55	-4.8	790.75
<b>Residential</b>			
Residential-15,000 (R-15)	716.30		716.30
Residential-12 (R-12)	925.43		925.43
Residential-10,000 (R-10)	989.29		989.29
Residential-7,500 (R-7.5)	1534.34		1534.34
Residential-6,000 (R-6)	191.11		191.11
Multifamily Residential-10 (MF-10)	224.39		224.39
Multifamily Residential-18 (MF-18)	312.70		312.70
<b>Commercial</b>			
Downtown Commercial (DC)	72.22		72.22
Mixed Use (MX)	41.86	4.8	46.66
Regional Commercial (RC)	597.93		597.93
Neighborhood Commercial (NC)	10.57		10.57
Community Commercial (CC)	237.44		237.44
<b>Total Acres</b>	<b>8872.95</b>		<b>8872.95</b>

\*\*Does not include UGB areas



## IX ZONING REGULATIONS

### USE AUTHORIZATION TABLE – CHAPTER 18.07

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

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

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

## X DEVELOPMENT STANDARDS – CHAPTER 18.09

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

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

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

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

Notes:

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