
From: Mike Odren <mikeo@olsonengr.com>
Sent: Tuesday, May 18, 2021 10:08 AM
To: Sarah Fox
Cc: Mike Odren
Subject: Sessions Code Amendment
Attachments: Fwd: Residential Uses in Commercial Zones.eml; Fwd: Residential Uses in Commercial Zones.eml

Good morning, Sarah.

I am following up to our previous conversation regarding amending Camas Municipal Code to allow residential uses in commercial zones. In our discussion, you indicated that an analysis of the affect residential uses would have on schools and parks would be necessary. I have conferred with long range planning staff at both the City of Vancouver (Bryan Snodgrass) and Clark County (Jose Alvarez and Colete Anderson) regarding whether either of those jurisdictions contemplate permitted residential uses in commercial zones in parks or school planning. They both responded that, based on the very small residential development taking place in commercial zones, neither consider the potential impact on schools or parks significant enough to include any analysis in park or school planning. I have provided excerpts from each below and attached the email responses:

Bryan Snodgrass:

Mike

Our last official assumptions in our 2011 Comprehensive Plan are fairly outdated, and did not include assumptions for the amount of residential development occurring on commercial lands per se, but did include redevelopment assumptions citywide, a decent percentage of which are mixed use projects with a significant residential component. See appendix C of the [Plan](#)

*More recently, the County committee process to update the buildable lands assumptions is trying to address this issue head on. The group isn't done with its recommendations and we'll see what the County Council ends up adopting, but as part of that I looked at recent residential development on commercial lands in Vancouver, and included it in my [comments](#) back in June, and also included the raw data. I assume the Camas market isn't close to Vancouver in terms of demand for mixed use and apartment development, but I'd also assume its more than in the past.
Hope this helps. BRS*

Jose Alvarez:

The VBLM currently doesn't assume any residential development on commercial land unless its Mixed Use. So to the extent that parks, schools and transportation rely on the VBLM there is no data that shows any residential growth or capacity on that land.

Colete Anderson:

The county has had limited multifamily in commercial for over 20 years. The Hwy 99 subarea plan has allowed multifamily outright since 2010. In the Hwy 99 area, all new development is subject to design standards that allows development to provide amenities for the increase in population. The city of Vancouver currently allows a percentage of multifamily in commercially zoned areas that function like a type of horizontal mixed use. Similar to Camas, the county has launched a housing study to determine housing need at a variety of income levels. The scope of this project includes the possibility of allowing the Hwy 99 approach to all county commercial areas in the future.

Forecasting project specific impacts to parks, schools and transportation is part of development review and the collection of fees etc. Schools for example, are notified of a potential development, provide comment, and adjust their capital facility plans.

As can be seen above and further explained in the attached emails, neither jurisdiction has ever really contemplated potential residential uses in commercial zones from a parks, schools or transportation planning standpoint. As you know, impacts from *all* residential uses, regardless of what zone they are in, are addressed through the payment of park, school and transportation impact fees. Additionally, school districts are advised of new residential development through either advisory letters sent to them by developers/developer consultants or through SEPA, so they have advanced notice of new residential development, regardless of zone.

We also discussed limiting the parcel size that would allow second+ story residential uses in commercial zones. This makes sense in that by limiting the parcel size the amount of residential uses would also be limited while also preserving the City's goal of achieving 20 jobs per acre. This goal could be addressed through Site Plan Review for individual projects by providing an analysis of the proposed commercial uses and number of jobs proposed to ensure this goal is preserved.

I performed an analysis of the residential density that might be achieved on a 1.5 acre parcel. The limiting factor in this analysis is meeting the minimum parking requirements for both the commercial and residential uses. The assumptions would be an industry standard of a building footprint generally 25% of the parcel size, which would be an approximately 16,335 square foot building footprint (1.5 acres x 43,560 sf = 65,340 x 25% = 16,335). By basing the parking on 1 stall per 250 square feet of commercial use and 2 stalls per residential unit, only 7-8 units per acre was realized, which would be similar to the R6 zoning district. This falls way short of other Mixed Use development density requirements of 12 units per acre in the City of Vancouver and Clark County for mixed use developments. As such, while the ability to provide a wider range of housing opportunities would be realized, density would be limited by parking.

A few takeaways from the recent Planning Commission work session on the City of Camas' Housing Study are as follows:

- There is a need for a wider variety of housing opportunities.
- Mixed use development could be an option to provide these housing opportunities. Additionally, they would allow for walkability and access to transportation options while still preserving natural areas by combining uses (residential and commercial).
- Camas needs a wider variety of the types of housing they provide, such as vertical housing.
- New strategies should be employed to improve the variety of housing the city provides.
- Housing should focus on reducing commute distances.
- Overly restrictive codes can negatively impact housing affordability and the diversity of housing options.

By allowing limited residential uses in commercial zones (only above the first floor where commercial uses would still be required, no live/work units, limiting the size of the parcel to 1.5 acres), many of these findings from the housing study could be easily realized with just a simple code amendment. Additionally, the limited density that would be realized from such a development would have a de minimis effect on parks, schools and transportation, with each element's impacts addressed through the payment of impact fees. As such, it is respectfully requested that further transportation, school and park analysis not be required as part of the proposed code amendment. Should the city be amenable to this, I will complete the non-project SEPA checklist.

Respectfully,

Mike

Michael Odren, RLA
Landscape Architect, Land Use Planner
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Olson Engineering, Inc.
222 E. Evergreen Boulevard
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Cell (360) 921-6890

From: Mike Odren <mikeo@olsonengr.com>
Sent: Tuesday, May 4, 2021 7:59 AM
To: Mike Odren
Subject: Fwd: Residential Uses in Commercial Zones

----- Forwarded message -----

From: Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Date: Wed, Nov 18, 2020 at 11:44 AM
Subject: RE: Residential Uses in Commercial Zones
To: Mike Odren <mikeo@olsonengr.com>, Colete Anderson <Colete.Anderson@clark.wa.gov>

Mike,

The VBLM currently doesn't assume any residential development on commercial land unless it's Mixed Use. So to the extent that parks, schools and transportation rely on the VBLM there is no data that shows any residential growth or capacity on that land.

Through our Buildable Lands update process we are recommending accounting for the commercial development that is occurring within the City of Vancouver. The City has had significant residential development downtown where the CX zoning allows for residential outright, and commercial zones outside of downtown allow for a broader interpretation of mixed use (horizontal, live/work), they have also allowed low-income/affordable housing to be developed in the commercial zones as well.

As Colete mentioned most jurisdictions allow residential above commercial in most of their commercial zones it just doesn't happen so we have not accounted for that in the VBLM. Minimum and maximum densities do not seem to be addressed in those codes.

One of the challenges of assessing impacts is not knowing how much or where the residential will occur on commercial land, specifically.

Why the interest in allowing residential in commercial?



Planner III
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Jose Alvarez



From: Mike Odren <mikeo@olsonengr.com>
Sent: Wednesday, November 18, 2020 9:46 AM
To: Colete Anderson <Colete.Anderson@clark.wa.gov>
Cc: Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Mike Odren <mikeo@olsonengr.com>
Subject: RE: Residential Uses in Commercial Zones

Thanks, Colete. I look forward to hearing from Jose regarding same.

Best,

Mike

Michael Odren, RLA

Landscape Architect, Land Use Planner

Associate Principal

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Please note that I am currently working from home as our office is currently closed due to the current COVID-19 situation. However, Olson Engineering, Inc. is still open for business! If you need to call, please use my cell number listed above.

Confidentiality Notice: This e-mail message may contain confidential or privileged information. If you have received this message by mistake, please do not review, disclose, copy, or distribute the e-mail. Instead, please notify us immediately by replying to this message or telephoning us. Thank you.

From: Colete Anderson <Colete.Anderson@clark.wa.gov>
Sent: Wednesday, November 18, 2020 9:17 AM
To: Mike Odren <mikeo@olsonengr.com>
Cc: Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: RE: Residential Uses in Commercial Zones

Hi Mike,

Good questions and very complicated as jurisdictions are reevaluating housing needs along with other vital uses.

The county has had limited multifamily in commercial for over 20 years. The Hwy 99 subarea plan has allowed multifamily outright since 2010. In the Hwy 99 area, all new development is subject to design standards that allows of multifamily in commercially zoned areas that function like a type of horizontal mixed use. Similar to Camas, the county has launched a housing study to determine housing need at a variety of income levels. The scope of this project includes the possibility of allowing the Hwy 99 approach to all county commercial areas in the future.

Forecasting project specific impacts to parks, schools and transportation is part of development review and the collection of fees etc. Schools for example, are notified of a potential development, provide comment, and adjust their capital facility plans.

The 20-year periodic update of the comprehensive plan and estimating future needs through the Vacant Buildable Lands Model is at a 300,000 foot level. The county is currently in the process of reviewing the model parameters to establish a better residential/jobs estimate for commercial property based on recent trends. Detailed model specific questions are Jose's to address.

Best regards,
Colete



Colete Anderson
Program Manager II
COMMUNITY PLANNING

564.397.4516



From: Mike Odren <mikeo@olsonengr.com>
Sent: Wednesday, November 18, 2020 7:38 AM
To: Colete Anderson <Colete.Anderson@clark.wa.gov>
Cc: Mike Odren <mikeo@olsonengr.com>
Subject: Residential Uses in Commercial Zones

Good morning, Colete.

I am working on a possible zoning code amendment in the City of Camas to allow limited residential uses in their commercial zones, similar to what Clark County allows in their zoning code. One question that has come up is the impact of allowing residential uses in commercial zones and the possible impact to parks, school and transportation planning. Did/does the county contemplate a certain number of residential units/uses in commercial zones when considering parks plans, proximity to schools/school planning or transportation planning? If so, what are the assumptions Clark County uses when figuring in the number of possible residential units (i.e. units per acre of commercially-zoned parcels)? Or does the county figure any residential uses in commercial zones as a de minimis number that doesn't rise to the level of needing to be considered? Or something in between?

Any assistance you can provide in this regard would be greatly appreciated!

Thanks in
advance!

Mike

-

Michael Odren, RLA

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From: Mike Odren <mikeo@olsonengr.com>
Sent: Tuesday, May 4, 2021 7:57 AM
To: Mike Odren
Subject: Fwd: Residential Uses in Commercial Zones

----- Forwarded message -----

From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Date: Fri, Nov 20, 2020 at 4:45 PM
Subject: RE: Residential Uses in Commercial Zones
To: Mike Odren <mikeo@olsonengr.com>

Mike

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Hope this helps. BRS

From: Mike Odren <mikeo@olsonengr.com>
Sent: Wednesday, November 18, 2020 7:29 AM
To: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Cc: Mike Odren <mikeo@olsonengr.com>
Subject: Residential Uses in Commercial Zones

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Good morning, Bryan.

I am working on a possible zoning code amendment in the City of Camas to allow limited residential uses in their commercial zones, similar to what the City of Vancouver allows in their zoning code. One question that has come up is the impact of allowing residential uses in commercial zones and the possible impact to parks, school and transportation planning. Did/does the city contemplate a certain number of residential units/uses in commercial zones when considering parks plans, proximity to

schools/school planning or transportation planning? If so, what are the assumptions the City of Vancouver uses when figuring the number of possible residential units (i.e. units per acre of commercially-zoned parcels)? Or does the City figure any residential uses in commercial zones as a de minimis number that doesn't rise to the level of needing to be considered? Or something in between?

Any assistance you can provide in this regard would be greatly appreciated!

Thanks in
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