

**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

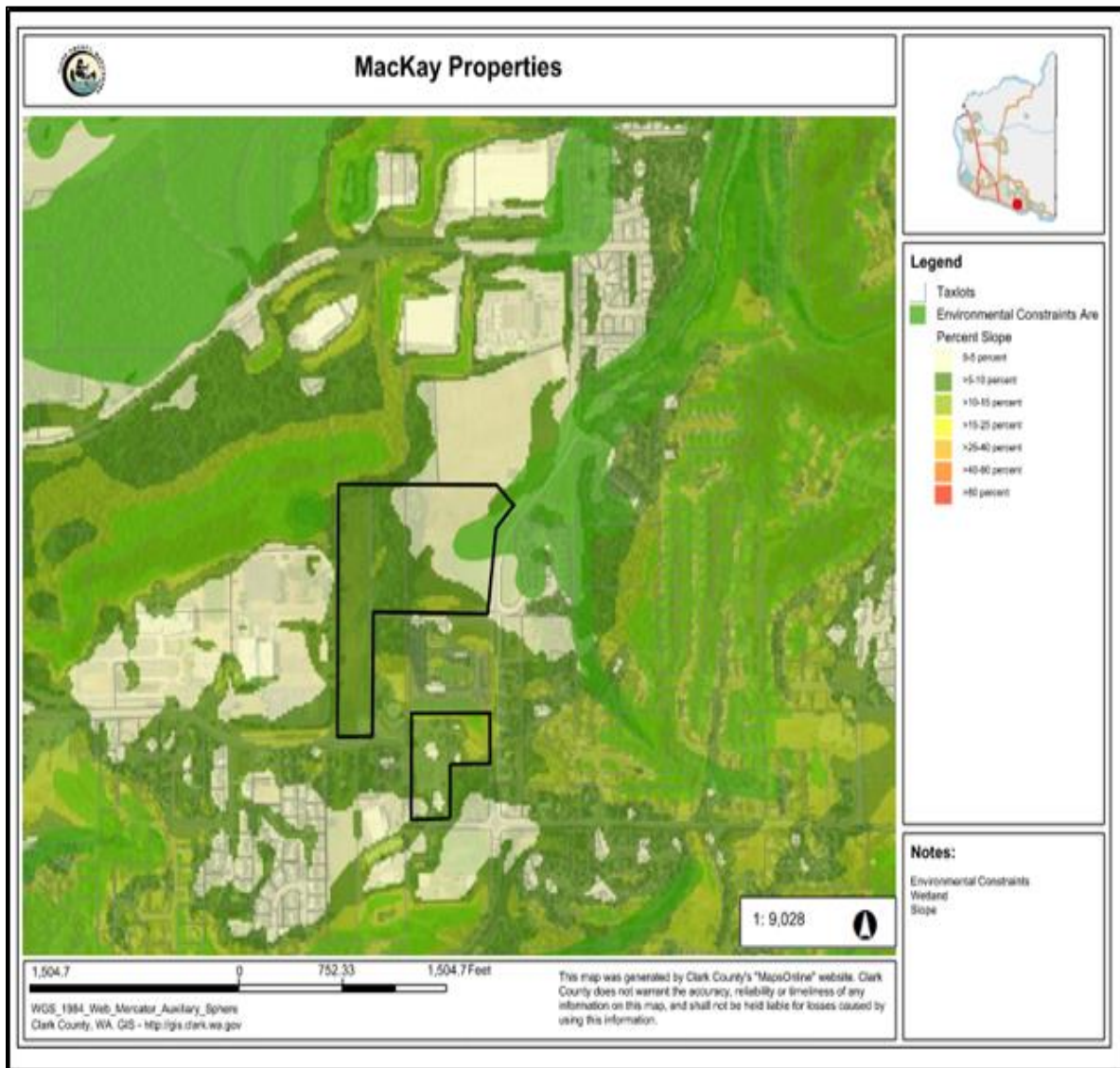
125193000	8.97	Industrial	BP
127367000	4.19	Commercial	RC
127372000	2.39	Commercial	RC

\* 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.*

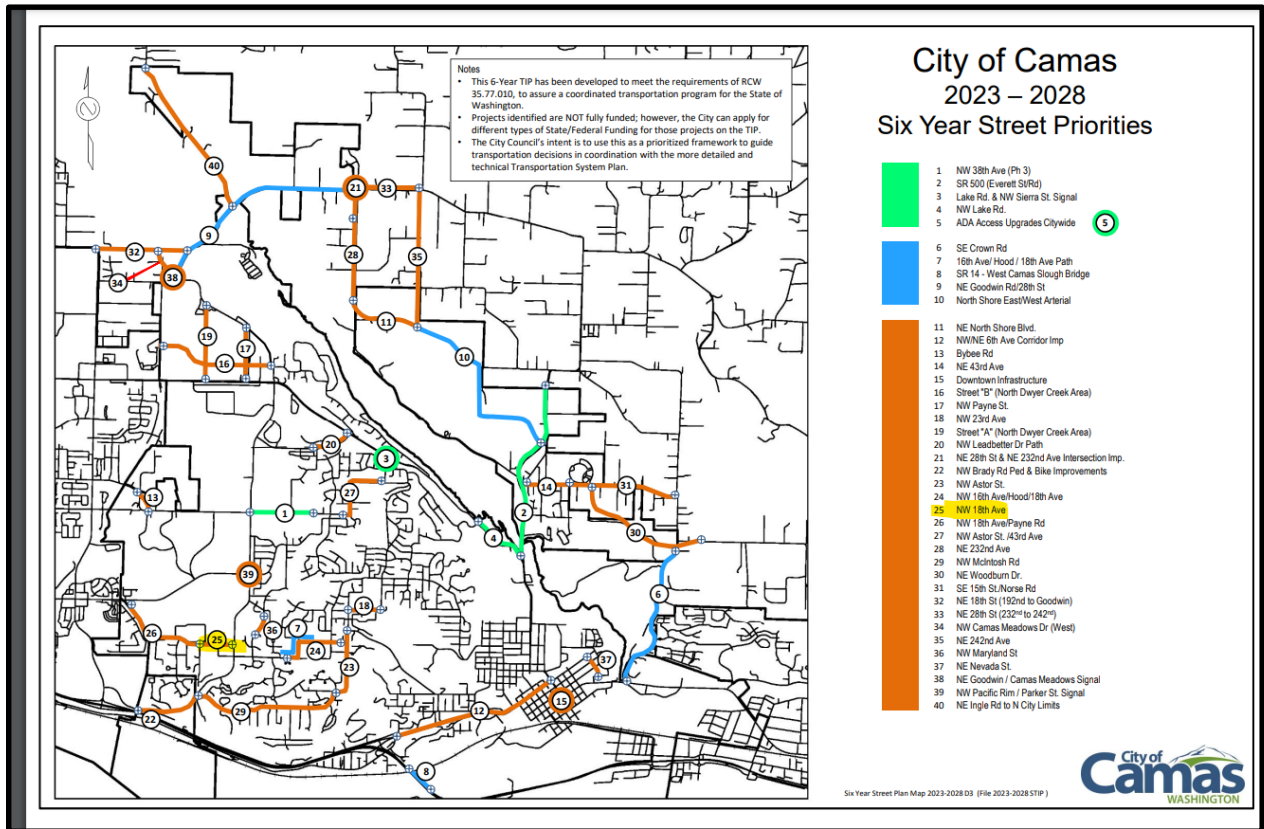
**F. A statement of what capital improvements, if any, would be needed to support the proposed change which will affect the capital facilities plans of the city;**

*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.*

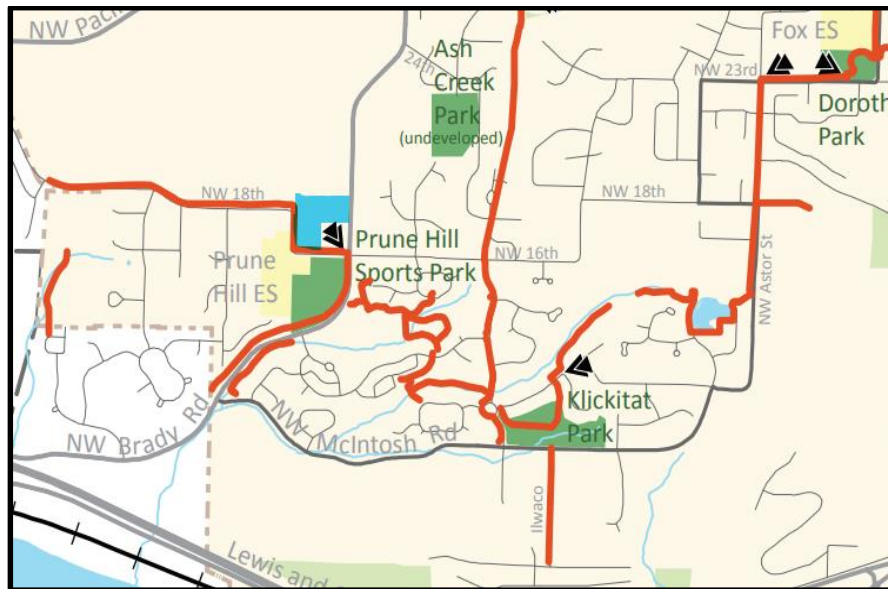
LU-3.5: Where neighborhoods adjoin natural areas or trails, ensure connections through neighborhoods to enhance access to recreation amenities.

*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.*