



STAFF REPORT
Annual Comprehensive Plan Amendments
City File Number: CPA23-01

TO: Camas City Council **DATE:** November 6th, 2023
FROM: Robert Maul, Planning Manager, Camas; Ethan Spoo, AICP, and Alec Egurrola, WSP USA Inc., Consulting Planners
LOCATION: 4511 NW 18th Avenue and 4245 NW 16th Street (Property Tax IDs # 125185000; 986055381; 125193000; 127367000; and 127372000)

APPLICABLE LAW: Camas Municipal Code (CMC) Chapter 18.51

CONTENTS:

I.	COMPREHENSIVE PLAN AMENDMENT PROCESS.....	1
II.	BACKGROUND	2
III.	LAND INVENTORY	2
IV.	APPLICABLE COMPREHENSIVE PLAN GOALS AND POLICIES	6
V.	PROPOSED AMENDMENT	19
VI.	PUBLIC COMMENT	31
VII.	RECOMMENDATIONS (Staff and Planning Commission)	31
VIII.	TABLE 1 –2021 COMPREHENSIVE PLAN ACREAGE (Proposed)	32
IX.	ZONING REGULATIONS	33
X.	DEVELOPMENT STANDARDS – CHAPTER 18.09	34

The purpose of this staff report is to provide findings for the proposed comprehensive plan and zoning map amendments for the subject parcels in compliance with Camas Municipal Code (CMC) 18.51. This Staff Report will:

- Discuss the comprehensive plan amendment process;
- Provide a background of the current comprehensive plan, *Camas 2035*;
- Discuss and analyze the City of Camas’ (the City) buildable land;
- Analyze the City’s comprehensive plan policies and goals;
- Provide an overview of the proposed amendment; and
- Address the provisions set forth in CMC 18.51 regarding comprehensive plan and zoning map amendments.

I. COMPREHENSIVE PLAN AMENDMENT PROCESS

Pursuant to CMC 18.51.020, the City accepts applications for comprehensive plan amendments during the month of January each year. The City received one application (File: CPA23-01) on

January 31, 2023, for a proposed comprehensive plan designation and zoning map amendment for the subject properties in accordance with CMC 18.51.020, comprehensive plan amendments are a Type IV process, and the City is obligated to complete initial review of the proposal within 60 days; however, environmental determination requirements may extend this period. Zoning map amendments are a Type III decision per CMC 18.51.025(B); however, the City will review this application concurrently with the Comprehensive Plan amendment. Therefore, the zoning map amendment will be subject to the review procedures of the highest level, per CMC 18.55.355. CMC 18.51.050 requires this application to be reviewed with a recommendation at a Planning Commission (Commission) public hearing and to be forwarded to City Council (Council). The Council will hold a public hearing to review and another to announce the final decision on the application.

II. BACKGROUND

In 2016, the City adopted a complete update to its comprehensive plan and map, *Camas 2035* (Ord. 16-010). The City's comprehensive plan guides land use and the City's financial plans relative to capital facilities and the provision of city services and programs, consistent with the state's Growth Management Act 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 for the following: Land Use; Housing; Natural Environment; Transportation and Street Plans; Public Facilities, Utilities, and Services; and Economic Development.

The growth plan anticipates that the city will have a total population of 34,098 in 2035 and will add 11,182 new jobs. According to Washington State's Office of Financial Management, the city's population, as of April 1, 2022, is **27,250**, which is a 4.55% increase from the 2020 Census of **26,065**. This increase is 1.06% more than the Clark County increase of 3.49%, which is in keeping with a trend of more growth than the county experiences as a whole.

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

III. LAND INVENTORY

EMPLOYMENT LANDS

The City's vision for economic development (*Camas 2035*, Section 6.1) in part reads, "In 2035, the economy has grown to attract a variety of businesses that offer stable employment opportunities and family wage jobs in the medical and high-tech fields." This element also has a goal to "maintain a diverse range of employment opportunities to support all residents and provide a setting and quality of life that attract and retain businesses" (Citywide Economic Development Goal ED-1).

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 and some school district properties that 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 downtown and near Camas Meadows.

The County's June 2022 *Buildable Lands Report* (BLR) provides a high-level estimate of the capacity of the city's employment and residential lands to accommodate jobs and residential units. Many factors can influence the actual yield of employment land, including detailed site plans showing that a given property can be developed to provide more or less land than initially assumed or the provision of more jobs per net acre than baseline assumptions. The County's next BLR is due in June 2023. The land capacity analysis in this staff report relies on adopted information and assumptions in the County's BLR and the City's comprehensive plan.

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

Between the 2016 adoption of the comprehensive plan and the issuance of the 2022 June BLR, 8 acres of industrial and 29 acres of commercial were developed, resulting in a 182-acre net **surplus** of industrial lands and a 12-acre net **deficit** of commercial lands (see Land Analysis in Section III) representing a remaining capacity of 1,638 industrial jobs and a lack of capacity of 240 commercial jobs.

The City recently approved the North Shore Subarea Plan, which amended the comprehensive plan designations and rezoned properties within its boundaries. Staff determined it was essential to concurrently review the impacts of the North Shore Subarea to residential and employment lands across the city along with this proposal and other comprehensive plan amendments in the city that have occurred since the June 2022 BLR (see Land Analysis below). The analysis in this staff report determined that the comprehensive plan amendments and zoning changes that occurred since the June 2022 BLR further reduced industrial lands but added additional commercial land resulting in a **surplus** of employment lands. This includes a 40-acre **surplus** of industrial lands and a 14-acre **surplus** of commercial lands. This means there is a 362 industrial job surplus and a 279 commercial job surplus totaling 641 jobs if this application were approved.

RESIDENTIAL LANDS

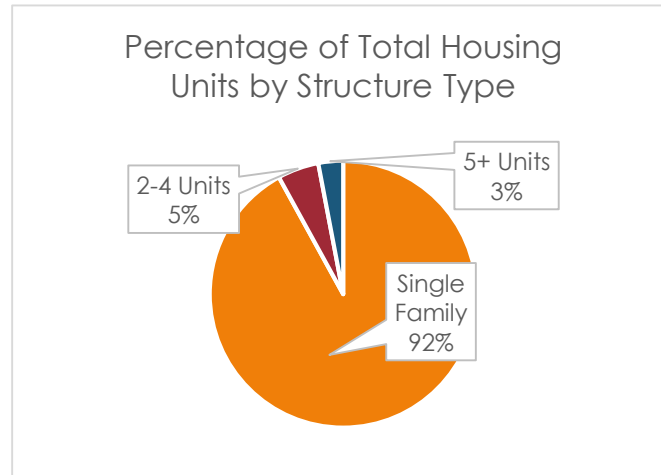
Most land in Camas is designated for single-family residential uses (45%). Together with multifamily, residentially designated lands compose approximately 53% of total acreage. *Camas 2035* states that the city must add 3,868 new residential units within residentially designated areas by 2035 to meet the annual population growth rate of 1.26 percent. The residential land area needed per *Camas 2035* is 645 acres and would accommodate 10,294 people at six units per acre and 2.66 persons per household. Land available at the time of adoption of the comprehensive plan was 876 acres with capacity for 13,981 people.

According to the June 2022 BLR, there has been an average of 368 residential units built per year and a total of 1,931 residential units have been constructed in the city since 2016. As shown below in the land analysis, when accounting for the population added between *Camas 2035* and the 2022 June BLR, there is a 3,016-population capacity **surplus** or 189 acres.

The North Shore Subarea Plan amended the comprehensive plan designations and rezoned properties within the boundaries of the subarea. Factoring in changes in the North Shore

Subarea Plan and other recent comprehensive plan and zoning map amendments, the land analysis determined that residential lands have been added with a remaining **surplus** capacity of residential land and units. This includes a 263-acre **surplus** land capacity (4,223 people) with approval of this application.

In July 2022, the City adopted the Camas Housing Action Plan (Res. 21-006), which provides detailed background information on the city's current housing stock and strategies to further the 2035 goals of achieving a greater mix of housing types, sizes, and affordability levels. The following chart is an excerpt from the plan. The full plan is available on the city's website at: <https://www.cityofcamas.us/com-dev/page/camas-housing-action-plan>.



MULTIFAMILY APARTMENT AND TOWNHOUSE DEVELOPMENTS IN CAMAS, 2022

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

Parklands at Camas Meadows, NW Longbow Lane	Townhomes	2020	24
The Casey, 5515 NW Pacific Rim Boulevard	Apartments	2022 (u.c.)	136
Green Mountain Urban Village	Apartments	2022 (u.c.)	350

LAND ANALYSIS

Figure 1: Land Analysis¹

	Employment		
	Residential	Industrial	Commercial
2016 Camas Comprehensive Plan			
Targets (People/Jobs)	34,098	4,437	6,740
Jobs Per Acre		9	20
Units Per Acre	6		
People Per Unit	2.66		
Land Area Needed (Acres)	645	493	337
Land Available (Acres)	876	660	464
Capacity (People/Jobs)	13,981	5,940	9,280

¹ The June 2022 BLR has assumed the existing commercial properties (Parcel No: 127367000 and 127372000) as Commercial Built, therefore, the actual vacant buildable land capacity for commercial lands in Camas may be greater than assumed.

2020 Buildable Lands Report Capacity			
Land Available (Acres)	710	667	296
Capacity (People/Jobs)	11,049	6,001	5,920
2020 Residential Capacity			
2020 Population	26,065		
Population Remaining to 2035 Target	8,033		
Surplus/Deficit Population Capacity	3,016		
Surplus/Deficit Land Available (Acres)	189		
2020 Employment Capacity			
Acres Developed (2016-2020)		8	29
Jobs Added (2016-2020)		72	580
Remaining Jobs to Target		4,365	6,160
Remaining Jobs Surplus/Deficit Capacity (2020)		1,636	-240
Remaining Land Available Surplus/Deficit (Acres)		182	-12
2020-2022 Plan Amendments			
CPA 20-02 (Net Acres)	14.39	-14.39	
CPA 20-03 (Net Acres)		-2.74	2.74
CPA 21-01 (Net Acres)		-3.29	3.29
CPA 22-01 (Net Acres)		-3.4	3.4
North Shore Subarea Plan	40	-101	21
Mackay	21.24	-16.75	-4.5
Total Acres Gained/Lost	75.63	-141.57	25.93
Post Mackay Surplus/Deficit Land Available (Acres)	265	40	14
Post Mackay Surplus/Deficit Capacity (Jobs/People)	4,223	362	279

IV. APPLICABLE COMPREHENSIVE PLAN GOALS AND POLICIES

Commercial and industrial properties are focal points for job growth for the community. The *Camas 2035* plan includes goals and policies for job growth within the "Economic Development" chapter of the plan (chapter 6), as well as for providing a sufficient land to accommodate jobs as stated in the "Land Use" chapter (chapter 1). The subject property is located within the Grass Valley area of the city, which is an area targeted for economic development in the west side of the city.

The applicant proposes to amend the Industrial and Commercial designations on the subject property to Multi-Family-High, with an associated zone change to multifamily-18 (MF-18). Relevant goals and policies are found in the land use, housing, natural environment, public facilities, and economic development chapters of the *Camas 2035* plan as discussed below.

Land Use (Camas 2035, Ch. 1): The City's overall vision is outlined in the "Land Use" chapter. This chapter covers five major land use categories and includes goals and policies.

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.

The following policies are particularly applicable to the proposed amendments:

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

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

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

Applicant Analysis: In response to land use Goal LU-1.1, the applicant states, "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." The applicant notes that in the 2021 Housing Action Plan (HAP) that one of the recommended strategies for obtaining more housing stock in the city is to consider targeted rezones during comprehensive plan updates, including identifying strategic locations, such as urban nodes, vacant land, and industrial land. This includes rezoning these strategic locations for desired residential mix and densities or reflect a built density that is higher than the current zoning.

In response to Policy LU-1.5, the applicant states the land uses that surrounded the subject commercial properties are predominantly residential and educational, with a recently approved neighborhood commercial node (Camas Station) that will absorb the majority of commercial and personal services demand in the area. Rezoning the southern properties from commercial to residential will encourage redevelopment and be a more efficient use of the land. The three northern industrial parcels are adjacent to higher density residential development, a city water reservoir, industrial property to the east (nLIGHT, Inc.) and vacant industrial land to the north. The applicant states that allowing residential development on these properties would be compatible to the adjacent uses as existing conditions of surrounding uses reinforces this compatibility. Additionally, residential development near employment presents opportunities for reduced commute trips and lengths.

The applicant responds to Policy LU-1.6 by stating the city has adequate utilities in the area to serve the development, especially with the installation of the new water reservoir adjacent to the site. Additionally, "recent improvements to the Northwest Brady/Parker corridors have improved north/south traffic flow and the planned extension of Northwest 18th Avenue will improve east/west traffic flow." As for other services and public facilities such as police, fire, and schools, the residential development of the properties will trigger payment of impact fees to mitigate any impacts of the development to these services. "Future development will add improved land values and in turn, increase the total assessed valuation and payment of property taxes," which these revenues will assist the provision of services in this area.

Staff Findings: Goal LU-1: The applicant is proposing to convert designated Industrial and Commercial lands to Multi-Family-High, which will provide and accommodate a mix of housing opportunities. Also, converting these lands to Multi-Family-High will provide increased opportunity to preserve natural resources, including wetlands on site, as residential uses have more flexibility when it comes to siting, due to smaller building footprints. Future development in this area will comply with the State Environment Policy Act (SEPA), the City's Critical Areas Ordinance, and the City's public view and open space protections, which are regulated in CMC Title 16. However, converting these lands from Industrial and Commercial will eliminate employment opportunities on these properties. Additionally, Policy LU.1 states that the City shall ensure the appropriate mix of commercial, residential, and industrial lands to meet the 20-year population

and employment projections. As discussed in Section III, the proposal, along with recent city land conversions and the June 2022 BLR, will result in a surplus of employment (industrial and commercial) lands. The balance of employment and residential land is a policy issue for the Commission and the Council's consideration.

Regarding compatibility of the use and design with the surrounding built and natural environments (Policy LU-1.3), multifamily residential may be more compatible with residential lands to the east for reasons of potential noise, fumes, light, and greater traffic from industrial and commercial uses. However, it may be less compatible for traffic and density of development with existing residential and may be less compatible with existing industrial lands to the west and commercial lands (Camas Station) to the south. The existing industrial and commercial designations may be more compatible with existing industrial and schools to the west and south, but less compatible with the existing residential adjacent to the properties, especially to the east. Multifamily residential may help preserve natural environment compatibility assuming the potential wetland on the site can be partly or wholly preserved. The development of these parcels will be required to comply with the City's zoning regulations in CMC Title 18, which would mitigate any potential compatibility issues for any eventual land use.

To ensure adequate public facilities (roads, emergency services, utilities, and schools) exist to serve new development and to mitigate any potential impacts to current residence (Policy LU-1.6), land uses of any type are required to provide adequate roads and utilities prior to occupancy under the city's concurrency requirements. Additionally, public services will be provided to the site by Camas School District, Camas Public Library, Camas Police Department, and Camas Washougal Fire Department. New development will be subject to impact fees in accordance with CMC 3.88. These impact fees include traffic, parks and open space, fire facilities, and schools to mitigate potential impacts to current residences and fund projects to improve these services for current and future residents.

Policy LU-1.7: Ensure consistency with countywide planning policies.

- Proposal is consistent with the following Clark County Comprehensive Plan 2015–2035 countywide planning policies (CPPs):
 - Policy 1.1.13 – Urban development shall be limited to areas designated by the urban growth boundary. Clark County and each local jurisdiction urban areas would have a higher average density than currently exists, approximately 4, 6 to 8, units per net residential acre depending on the specific urban area. No more than 75 percent of the new housing stock would be of a single product type (e.g., single-family detached residential or attached multi-family). This would not apply to the Yacolt urban growth area due to wastewater management issues.
 - Policy 1.1.13 Conversion of industrial or employment lands to non-industrial or non-employment center districts may occur within the following parameter: protect and preserve lands zoned heavy industrial for heavy industrial uses; protect employment center lands from conversion to residential; and consider rezoning of employment center lands to non-retail commercial or business park if the proponent can show that:
 - a) The zone change would accommodate unforeseen and rapidly changing commercial development needs and
 - b) The proposed designation is more suitable than the current designation given the land's site-specific characteristics and

- c) The proposed zone change will generate jobs at higher density than the current comprehensive plan zone allocation.
- o Policy 3.0.2 – The county and each municipality shall cooperate to ensure the preservation and protection of natural resources, critical areas, open space, and recreational lands within and near the urban area through adequate and compatible policies and regulations.
- o Policy 6.0.6 – The county, its municipalities and special districts shall work together to ensure that the provision of public facilities and services are consistent and designed to implement adopted comprehensive plans.
- o Policy 6.0.14 – Within Urban Growth Areas, cities and towns should be the providers of urban services.
- o Policy 9.1.2 – The county and cities will demonstrate their commitment to the retention of those enterprises, which have created the economic base of the county and promote their continued growth in a predictable environment, which encourages investment and job growth.
- o Policy 9.1.3 – The county and cities will encourage long-term growth of businesses of all sizes, because economic diversification and stratification are important factors in overall job growth for the county and cities.
- o Policy 9.1.7 – The county and cities will plan for long-term economic growth, which enhances the capacity of existing air shed for job-generating activities.
- o Policy 9.1.8 – The county and cities will provide for orderly long-term commercial and industrial growth and an adequate supply of land for compatible commercial and industrial development.
- o Policy 9.1.9 – The county and cities will encourage the recruitment of new business employers to absorb the increasing labor force and to supply long-term employment opportunities for county's residents who are currently employed outside of the State.
- o Policy 9.1.11 – Conversion of industrial or employment center lands to non-industrial or non-employment center districts may occur within the following parameters:
 - b) Protect employment center lands from conversion to residential.
 - c) Consider rezoning of employment center lands to non-retail commercial or business park if the proponent can show that (a) the zone change would accommodate unforeseen and rapidly changing commercial development needs and (b) the proposed designation is more suitable than the current designation given the land's site-specific characteristics and (c) the proposed zone change will generate jobs at a higher density than the current comprehensive plan zone allocation.

Applicant Analysis: The applicant responds to four CPPs relative to the Housing chapter of Clark County's 20 Year Comprehensive Growth Management Plan and includes policies 2.1.4, 2.1.5, 2.1.6, and 2.1.7. These policies involve linking housing strategies with locations of employment sites and with the availability of public facilities and services; encouraging infill housing within

urban growth areas; and encouraging flexible and cost-efficient regulations for alternative and economically diverse housing types. The applicant states that the proposed comprehensive plan and zoning map changes will link future housing development to employment opportunities that have emerged with the development at the far western edge of Camas and along 192nd Avenue in east Vancouver. The current parcels are underutilized under the existing designations and zoning; therefore, changing the comprehensive plan and zoning map for these lands will unlock the potential for these properties to develop. The proposed change for multifamily residential will open the land to allowing the city to provide alternative housing types to meet the needs of an economically diverse population.

Staff Findings: Staff have determined that the CPPs the applicant has responded to (2.1.4 through 2.1.7) are not applicable as these are policies meant for the County and its cities to create strategies and regulations to meet these various housing policies, which, in order to regulate and shape development, are not directly applicable to the proposed amendment and zone change. However, staff have identified several CPPs as listed above.

CPP 1.1.13 limits urban development to within the urban growth boundary, which this application is located within Camas' urban growth boundary. Additionally, this policy encourages each urban area to have a higher average density than recoded at the time the County's comprehensive plan was drafted. At the time of the County's Comprehensive Plan, Camas's average density was six units per acre. Per the June 2022 BLR, Camas is exceeding this with an average density at 6.5 units per acre. Additionally, this policy encourages that no more than 75 percent of the new housing stock are to be a single product type, which Camas' is largely of single-family detached residential. The proposed comprehensive plan and zoning map change would help Camas achieve to not exceed the 75 percent goal.

Also, within CPP 1.1.13, are parameters set for the conversion of industrial or employment lands to non-industrial or non-employment centers that are also provided in CPP 9.1.11. One of these parameters is to protect employment center lands from being converted to residential and another parameter considers rezoning of employment center lands to non-retail commercial or business park if it meets the listed requirements. The proposal to convert employment lands to residential raises questions with this CPP and discourages industrial and employment lands from being converted. Staff note that the policy does not prohibit conversion of employment lands to residential but discourages this from happening to maintain the county and city's employment land base. Staff also note that the subject amendment would maintain a surplus of employment land within Camas and could therefore be interpreted as being consistent with this CPP.

As discussed further in Goal LU-1, Policy LU-1.3, Goal LU-4, Policy LU-4.1, Goal NE-1, Policy NE-1.1, Policy NE-1.5, Goal NE-2, and Policy NE-2.4, Camas will ensure the preservation and protection of natural resources, critical areas, open space, and recreational lands within its urban growth boundary as encouraged by CPP 3.0.2. Pertinent to this amendment request, residential land uses are more likely to protect critical areas onsite (wetlands) than commercial or industrial lands and would pay park impact fees to help provide parks in the city. Critical areas review would be conducted at the development review stage.

CPP 6.0.6 and 6.0.14 encourage public facilities and utility services to be planned so the provision maximizes efficient and cost effectiveness and ensure concurrency and also to ensure the provision of these facilities and services are consistent and designed to implement adopted comprehensive plans. Also, within the urban growth areas, cities shall be the providers of urban services. As discussed further in Policy LU-1.16, Goal T-7, Policy U-7, Policy WS-1, Policy WS-3, Policy SS-1, Policy SW-6, and Goal F-1, this proposal will be consistent with these public facilities and utility services CPPs. If the subject amendment were not approved, it would also be consistent with the CPPs.

CPPs 9.1.2, 9.1.3, 9.1.7, 9.1.8, and 9.1.9 are CPPs related to the creation, retention, encouragement, long-term growth, recruitment, and capacity of industrial and commercial lands and businesses. As discussed in Section III and within other *Camas 2035* policies, the proposal, along with recent city land conversions and the June 2022 BLR, will result in a surplus of employment (commercial and industrial) lands. However, this proposal is to remove employment lands, which will reduce the city's employment land capacity. Since a surplus of employment land remains, staff do not anticipate that the subject amendment would affect the City's ability to create, retain, and recruit industrial and commercial jobs. For future comprehensive plan amendments that reduce employment land capacity, as shown in Section III, the City may need to update employment assumptions based on a market study to ensure that adequate capacity remains to meet its 2035 jobs goal.

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.

The following policies are particularly applicable to the proposed amendments:

Policy LU-2.1: Attract and encourage a balance of new commercial, light industrial, and knowledge-based business, medical, and high-tech uses, and the expansion of existing businesses to provide regional and local employment.

Policy LU-2.3: Encourage shopping local and support for Camas businesses.

Policy LU-2.5: Ensure industrial development and other employment lands are compatible with adjacent neighborhoods through development and landscaping regulations and design review.

Policy LU-2.6: Encourage the development of businesses that offer family wage jobs and support the City's vision for attracting medical and high-tech industries.

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.

Policy LU-2.8: Ensure appropriately zoned land for the development of food retailers (grocery stores and farmers' markets) within a half-mile of residential areas.

Applicant Analysis: The applicant does not provide an analysis for any of the applicable goals above. Instead, they provided an analysis for Policy LU-2.4, which is to "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." They state that when coupled with the recently approved Camas Station, changing the zoning and allowing for residential development facilitates a mix of uses in the area. Due to the proximity of these uses there is a possibility of residents living in the new residential developments from the proposal to be able to walk or bike to the Camas Station development and the possibility that the residents can walk, bike, or commute without a vehicle to nearby employers. With the recent improvements to adjacent and nearby roadways, which will be further improved with future developments, the area will be well served with bicycle and pedestrian access. Keeping the land zoned for employment when it is unlikely to develop reduces the chance of realizing this policy.

Staff Findings: The proposal is to convert employment lands to residential, which reduces the city's land available for employment uses and potentially affects the capacity for jobs and variety of business types on the subject properties, which is encouraged by Goal LU-2. Furthermore, the proposed conversion may affect the ability of the City to attract and encourage new commercial, light industrial, knowledge-based business, medical, and high-tech

uses, especially in Grass Valley, as encouraged by Policy LU-2.1. This may also limit the ability of existing business to expand to provide regional and local employment in the long run, but as indicated in the submitted market analysis, the market for employment land uses may not exist at the subject location and at the current time. The market analysis further argues that the recently approved commercial project at Northwest Brady Road and Northwest 16th Avenue, Camas Station, will fulfill and absorb commercial needs in this area. Additionally, the proposed land conversion may discourage shopping local and support for Camas businesses (Policy LU-2.3) and discourage development of businesses that offer family wage jobs and support the City's vision for attracting medical and high-tech industries (Policy LU-2.6) as the proposal will reduce land available to achieve these policies. Policy LU-2.8 is to ensure appropriately zoned land for the development of food retailers within a half-mile of residential areas. The conversion of these employment lands to residential will limit the City's ability to maintain appropriately zoned land for food retailer development and ability to develop these within half-mile of residential areas. However, several acres remain of industrial and commercial lands within a half-mile of residential areas in the vicinity of the proposal for opportunity for food retailers. Staff also note that the market analysis argues that provision of multifamily housing will provide housing for workers near existing employment areas and may, therefore, attract, not discourage additional employment land development in Grass Valley.

Policy LU-2.7 encourages the protection of employment land from being converted to residential uses so the City can maintain an adequate supply of commercial and industrial land and to meet the 20-year employment projections. As provided and discussed in Section III, the proposal, along with recent city land conversions and the June 2022 BLR, would result in a surplus of both commercial and industrial lands. Additionally, Section III of This report indicates there is a surplus of residential lands and this surplus will be supplemented by the proposed conversion. Although the proposal would result in the conversion of employment lands, it would not result in inadequate supply of commercial and industrial land to meet the 20-year employment projections.

Lastly, industrial development and other employment lands are to be compatible with adjacent neighborhoods through development and landscaping regulations and design review (LU-2.5). If the proposed conversions are approved and subsequently developed as such, the residential uses will be adjacent to industrial and commercial lands to the west, north, and south. Any future development is subject to the following compatibility regulations: tree and native vegetation preservation (CMC 18.13.052), landscape buffering standards (LCMC 18.13.055) parking area landscaping (CMC 18.13.060), fences and walls (CMC 18.17.050), and design review (CMC Chapter 18.19) ensuring that any eventual land use would address compatibility concerns.

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.

The following policies are particularly applicable to the proposed amendments:

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

Applicant Analysis: Addressing Goal LU-3, the applicant states that redesignated and rezoning the properties to Multi-Family-High and MF-18 will promote a more diversified housing inventory in both density and affordability. This type of housing inventory will provide employers in the area more housing choices for workers and, therefore, reduce traffic congestion and carbon emissions due to the proximity of work and living. Additionally, as proposed, the land conversion will aid in the City's ability to provide a variety of housing types and support or exceed the overall density goal of six dwelling units per acre (Policy LU-3-1). The applicant further supports

their argument that this conversion is necessary because there has been absorption of vacant multifamily residential properties, for other uses, which will hinder the City's ability to achieve the targeted density. Also, there is limited land zoned MF-18 in the city as it has either developed or is in the North Shore Subarea, which will not develop as immediately as on the subject properties due to the lack of infrastructure and other services.

Staff Findings: The proposed amendment is to convert employment lands to residential, specifically a zone amendment to MF-18. This proposed zoning would provide opportunity for a range of housing options in accordance with Goal LU-3 and Policy LU-3.1. According to CMC 18.07.040, the outright permitted housing options are adult family homes/residential care facility/supported living arrangement, apartments, assisted living/retirement homes, designated manufactured homes, duplexes, nursing homes, permanent supportive housing, rowhouses, single-family detached, and transitional housing. Conditional uses are manufacture home parks and residential treatment facilities. Therefore, a wide range of housing options to accommodate a variety of incomes, age groups, and densities. Supporting Policy LU-3.1, and as indicated by the applicant, MF-18 allows a minimum net density of six units per acre and a maximum net density of 18 units per acre, which would help the City's goal of meeting six units per acre. It is important to note that the June 2022 BLR indicates that the City, since 2015, is exceeding this density goal for new development at 6.5 units per acre. Lastly, to ensure vibrant, stable, and livable neighborhoods (Goal LU-3) in proximity to existing commercial, industrial, and schools, new development will be subject to development and landscaping regulations and design review requirements per CMC Title 18.

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

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

The following policies are particularly applicable to the proposed amendments:

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

Applicant Analysis: The applicant states that the current designation and zoning of the subject properties are not allowed to develop with multifamily uses. The proposed redesignation and rezoning will promote the opportunity to provide a range of housing options for all ages and income levels as encouraged by Policy H-1.1. Additionally, the diversified residential inventory that could be provided by the proposal will provide nearby employers more housing choices for workers and reduce traffic congestion and carbon emissions due to proximity of work and place of residence.

Staff Findings: As outlined above in the land use housing policies, the proposed designation and zone change is to Multi-Family-High and MF-18, respectively. CMC 18.07.040 permits and conditionally permits a wide range of housing options in the MF-18 zone and will aid the City's ability to meet the needs of all members of the community (Goal H-1) and support all ages and income levels (Policy H-1.1). Staff note that there is an existing predominance of single-family residential across the city and the proposed conversion to Multi-Family-High would add housing variety and reduce the share of single-family residences as a mix of all housing types.

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.

The following policies are particularly applicable to the proposed amendments:

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

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

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

Applicant Analysis: In response to Policy H-2-1, the applicant states that the plan amendment and rezone is an opportunity for the City to support and encourage a wide variety of housing types. The city lacks an adequate supply of varied housing in type and tenancy, as indicated in the 2021 HAP. For the past few years, the city has undergone a "housing crisis" as current housing supply does not match demand. One of the factors causing this lack of supply is that the city lacks land supply of adequately zoned land that has the services ready or nearly ready for development. The redesignation and rezoning of these properties will add much needed multifamily residential to the limited supply in Camas.

Staff Findings: Staff agrees with the applicant that the proposal would foster an opportunity to provide a diversified housing stock that meets the needs of all income levels, is diverse, and provides choice (H-2 and Policy H-2.1). The City's currently housing supply is largely single-family residential, and the proposal would help the City reduce the share of single-family residential in the overall housing stock. As indicated later in this report, infrastructure is in place to support development in the near-term on this site. However, the City has added higher density lands elsewhere, such as the North Shore Subarea with the intent to provide denser and a greater variety of housing.

Policy H-2.3 requires that any comprehensive plan change that increases the residential capacity should require a quarter of the new units to be an affordable to households earning 50 to 80 percent of Camas' MHI at the time of development and the affordable housing created shall remain affordable for the longest possible term (Policy H-2.4). The proposed redesignation and rezone to MF-18 could provide an opportunity to supply diversified housing options for varying levels of incomes at this site and this zoning is more likely to supply affordable housing needs than single-family zoning. According to CMC 18.07.040 (see Section IX), the outright permitted housing options in the MF-18 zone are adult family homes/residential care facility/supported living arrangement, apartments, assisted living/retirement homes, designated manufactured homes, duplexes, nursing homes, permanent supportive housing, rowhouses, single-family detached, and transitional housing. Conditional uses are manufacture home parks and residential treatment facilities.

Natural Environment (Camas 2035, Ch.3): The city's natural environment goals and policies focus on environmental stewardship, critical areas, shorelines, and landscape enhancement and tree preservation in order to balance environmental regulations and public safety with economic development.

Environmental Stewardship Goal (NE-1): To preserve Camas' natural environment by developing a sustainable urban environment and protecting habitat and vegetation corridors.

The following policies are particularly applicable to the proposed amendments:

Policy NE-1.1: Consider the immediate and long-term environmental impacts of policy and regulatory decisions.

Policy NE-1.5: Protect, conserve, and manage existing natural resources and valuable historic and cultural areas in order to ensure their long-term preservation.

Critical Area Goal (NE-2): To preserve, maintain, and restore the City's critical areas to protect their function and values.

The following policies are particularly applicable to the proposed amendments:

Policy NE-2.4: Regulate land use and development so as to protect natural topographic, geologic, vegetative, and hydrologic features.

Applicant Analysis: No response.

Staff Response: Natural resources on the site include a possible occurrence of wetlands along Northwest Brady Road adjacent to the northeastern Industrial property as mapped by the Camas Wetlands Map. Clark County maps hydric soils around this wetland and further onto the adjacent subject parcel. Also, the middle of the three industrial parcels is mostly composed of a dense canopy of trees. The remaining lands in the industrial parcels are made up of grasses. The commercial properties were a former nursery that have little to no natural resources on site, as most of the land was improved to accommodate the use. Across all the subject parcels, there is a general slope gradient, with the northeastern industrial parcel having the least slope and lowest elevation and a general increase of elevation from the northeast corner of the site to the southeast corner. The northern sections of the commercial properties, along the property line shared with Parker Village that has the steepest slopes on site at 15 to 25 percent. Slopes that exceed 15 percent may qualify as a landslide hazard area if it meets the remaining qualifications as listed in CMC 16.59.020(b)(2) (a through c). Commercial and industrial uses require buildings with larger footprints and impervious areas, and therefore, they are less likely to preserve the natural resources and minimize grading on steeper slopes. These uses generally require more grading and are less flexible to design around and preserving natural resources. The proposed conversion to Multi-Family-High designation and MF-18 zoning is more likely to allow flexibility in site design to accommodate and preserve natural resources and may be more amenable to develop on the steeper slopes. Additionally, the memo provided by MacKay Sposito, and as further discussed in Section III, indicates that much of the employment lands in Grass Valley are encumbered by critical areas and are largely undevelopable, especially for industrial and commercial buildings. At this time, no development is proposed with a specific site plan for multifamily uses, so there is no guarantee that natural resources and critical areas would be preserved.

Transportation (Camas 2035, Ch. 4): The City's transportation goals and policies focus on streets, multimodal transportation, transit, design, and safety and traffic calming; transportation demand management; concurrency and level of service; and the multiyear financing plan.

Concurrency and Level of Service Goal (T-7): The City will maintain the adopted LOS standards for all arterials, transit routes, and highways.

Policy T-7.2: Require new development to demonstrate that adequate person trips are available, or that multi-modal improvements to the transportation system are made to accommodate the impacts concurrent with the development.

Applicant Analysis: None provided.

Staff Findings: All developments, whether commercial, industrial, or residential, would be required to maintain adopted levels of service and improve roadways to City standards. The applicant submitted a Traffic Memo by Lancaster Mobley that provides a trip generation comparison between the existing comp plan designations and zoning to the proposed. Under the existing designations (Industrial and Commercial) and zonings (BP and RC), the site could generate up to 900 a.m. peak hour trips, 1,116 p.m. peak hour trips, and 11,490 average weekday trips. Under the proposed comp plan designation (Multi-Family-High) and zoning (MF-18), the site could generate 178 a.m. peak hour trips, 227 p.m. peak hour trips, and 3,006 average weekday trips. The proposal would result in a net decrease of 722 a.m. peak hour, 889 p.m. peak hour, and 8,484 average weekday trips from the existing designations and zonings.

Public Facilities (Camas 2035, Ch.5): This element includes the goals and policies for public facilities and services to be provided concurrent with anticipated growth. The element also identifies strategic plans and actions to maintain or improve services. The identified goals and policies were given consideration based on a framework of budgetary and operational guidelines as described throughout this element.

Parks and Recreation Goal: Preserve and enhance the quality of life in Camas through the provision of parks, recreation programs, recreation facilities, trails, and open spaces.

Applicant Analysis: None provided.

Staff Findings: *Camas 2014 Parks, Recreation, and Open Space Comprehensive Plan Update* indicates in the Park System concept map that a trail is proposed along Northwest Brady Road and Northwest 16th Avenue and adjacent to the subject parcels. No proposed parks are located on the subject properties. Any development on the subject site will be required to construct the proposed trails at the time of development.

The following policies are particularly applicable to the proposed amendments:

Policy U-7: Plan public utility services so that service provision maximizes efficiency and cost effectiveness and ensures concurrency.

Policy WS-1: Extend adequate public water service throughout the City's urban areas. An adequate public water system is one that meets Washington requirements and provides minimum fire flow as required by the Fire Marshal.

Policy WS-2: Provide safe, clean, high quality drinking water to residents.

Policy WS-3: Ensure water infrastructure is designed to City standards and is in place prior to land development.

Policy SS-1: Extend public sanitary sewer services, which is required within urban areas, throughout urban areas. Service may be provided outside urban areas to serve areas where imminent health hazards exist.

Policy SW-3: Meet water quality standards by providing best management practices for development activities.

Policy SW-6: Require new development or redevelopment to comply with the *Camas Stormwater Design Standards Manual* and design criteria.

Franchise Utilities Goal (F-1): To ensure that energy and communication facilities and their services are available to support development when they are needed.

Applicant Analysis: No response.

Staff Findings: Utilities, including water, sewer, stormwater, and franchise utilities would be made available during development and required to be provided during construction for either industrial and commercial uses or multifamily residential uses. These utilities will be designed and installed in accordance with City standards to ensure quality and safety standards for the provisions of these utilities.

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

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.

The following policies are particularly applicable to the proposed amendments:

Policy ED-1.7: Support retention, expansion, and recruitment of local businesses with a commitment to the community.

Policy ED-1.10: Encourage complementary businesses throughout the City to support industry clusters and leverage resources.

Applicant Analysis: The applicant mostly responds to Policy ED-1.1, which Staff determined was inapplicable to the proposal as it is a policy aimed at directing the City to create tools or guidelines to attract health care and high-tech, sustainable, and innovative industries. Since it is a City-level directive, it would not be applicable to applicants. However, the applicant highlights that redesignating and rezoning these parcels to Multi-Family-High and MF-18 would be a tool to attract the listed industries. Due to the subject site's proximity to employment lands, if the site were to be residentially developed, it would provide housing near employment areas to cut down on commute trips and lengths, provide housing options for a wide spectrum of employees, and provide housing near amenities such as parks, schools, and convenience retail. Therefore, the applicant believes that providing these higher density residential developments in proximity to amenities and employment will attract workers of all incomes, which will also further attract and retain diverse industries.

Additionally, the market analysis provided by the applicant indicates that due to the slow absorption rate of the industrial and commercial lands in recent years, there is sufficient employment lands to last 400 years and 50 years, respectively. The City's projections do not match actualization. Therefore, according to this analysis, there will be sufficient employment lands to remain with this conversion and still meet Goal ED-1.

Staff Findings: As shown in the Land Analysis in Section III of this report, there remains a surplus of employment lands if the subject amendment is approved. A reduction of employment lands could, but would not likely, impact the City's ability to meet these goals and policies.

Additionally, conversion of these lands from employment to residential may reduce the amount of land to encourage complementary businesses throughout the city to support industry clusters and leverage resources (Policy ED-1.10). The reduction of these employment lands may limit the ability to provide complementary industries and businesses next to each other in Grass Valley. But, as the applicant notes, there is little to no demand for employment uses on these lands.

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 improving environmental quality.

The subject properties are located on the periphery of Grass Valley and the following policies are particularly applicable to the proposed amendments:

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

Applicant Analysis: The applicant provided a citywide analysis of land capacity showing that adequate employment land remains to meet the City's jobs goal. The market analysis provided by the applicant, further highlighted in Section IV, indicates that due to the very low absorption rate and realization of industrial and commercial lands, the City's 20-year employment lands need projection is much smaller than planned. The market analysis indicates there is low demand for these land use types in Camas and that the actual rate of absorption of these industrial and commercial lands will last 400 and 50 years, respectively. Additionally, the market analysis indicates there is much higher demand and absorption of residential lands, and at the current rate, there are 12 years left of residential lands. Therefore, the conversion of these lands to Multi-Family-High will have minimal impacts of employment land needed and shall maintain the Grass Valley economic goal and policy above, while providing much needed multifamily housing.

Staff Finding: The City has not adopted a formal boundary for Grass Valley. The proposal is for a conversion of Industrial and Commercial lands on or near Grass Valley to Multi-Family-High, which will reduce available employment land for the City to promote a cooperative industrial business park per Goal ED 3. However, any development on this land will be subject to CMC Chapter 16, which include SEPA and critical areas review for sustainable development and improve environmental quality along with development.

Staff have performed a land analysis that includes this proposal as further provided in Section III. This analysis indicates that there is a surplus of employment (commercial and industrial) and residential lands throughout the city. However, the proposed conversion from employment to residential may reduce available employment land to accommodate the above Grass Valley economic development goal and policy.

Impacts on Utilities and Transportation Plans

Public works staff reviewed the proposed comprehensive plan and zone change and considered the potential substantive impacts to the city's sewer, water, and transportation systems and plans. The applicant submitted a Traffic Memo by Lancaster Mobley that provides a trip generation comparison between the existing comp plan designations and zoning to the proposed. Under the existing designations (Industrial and Commercial) and zonings (BP and RC), the site could generate up to 900 a.m. peak hour trips, 1,116 p.m. peak hour trips, and 11,490 average weekday trips. Under the proposed comp plan designation (Multi-Family-High) and zoning (MF-18), the site could generate 178 a.m. peak hour trips, 227 p.m. peak hour trips, and 3,006 average weekday trips. The proposal would result in a net decrease of 722 a.m. peak hour, 889 p.m. peak hour, and 8,484 average weekday trips from the existing designations and zonings. Any development of the site will be subject to maintain adopted levels of service and improve roadways to City standards. The applicant also provided an analysis of potential impacts to the water and sewer systems with the changes. Generally nothing significant for sewer impacts, but there will need to be additional analysis done at the project level for water which could lead to limitations on numbers of units.

V. PROPOSED AMENDMENT

A. MACKAY PROPERTIES (FILE #CPA23-01)

Description: The applicant proposes that the City amend the comprehensive plan for five parcels from Industrial (24.82 acres) and Commercial (6.58 acres) to Multi-Family-High (31.40 total acres) with a corresponding rezone from BP and RC to MF-18. The industrial lands are currently vacant, and the commercial lands were formerly a nursery with a single-family detached home.

Site Location and Description:



The subject properties are located generally to the northwest of the Northwest 16th Avenue/Northwest Brady Road intersection. The three northern parcels are designated Industrial with BP zoning and the two southern parcels are designated Commercial with RC zoning. Lands to the north and west of the Industrial-designated parcels are also designated industrial. To the south are lands designated Single-Family Medium and Commercial and to the east lands are designated Single-Family High. To the north of the Commercial designated parcels is a parcel with the same designation that lies between the subject Industrial and Commercial properties. Lands designated as Single-Family Medium are to the west, south, and east of the Commercial properties, as well as land designated as Park to the south. Existing land uses include vacant land to the north (owned by Analog

Devices, Inc), an attached housing development (Parker Village) and city water reservoir to the south, industrial (nLIGHT, Inc and Camas School District property) to the east, and a single-family residential detached development (Kates Cove) to the west. The southern two properties are bounded by an attached housing development to the north (Parker Village), the city water reservoir, and Prune Hill Elementary School to the west, Prune Hill Sports Park and an approved commercial development (Camas Station) to the south, and larger lot single-family detached residences (Victoria Hills) to the east.

Discussion: The applicant requests that the comprehensive plan designation of Industrial and Commercial on the subject parcels be amended to Multi-Family High with a corresponding rezone from BP and RC to MF-18.

To better evaluate the proposal, the City must consider the citywide comprehensive plan goals and policies, and those goals and policies for the Grass Valley area (Economic Development, Chapter 6). The comprehensive plan specifically requires an analysis of buildable lands, for any proposed conversions within Grass Valley, **“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.”**

Summary of Applicant's Land Need Analysis for Multifamily Residential Development

For this request, the applicant submitted a report titled "Land Need Analysis for Mixed Use Development on a Site in Camas, Washington" (Johnson Economics, LLC, December 2022). The stated purpose of this report is to evaluate the feasibility of multifamily residential and commercial development on the subject site. Furthermore, analysis in the report compares the suitability of the site for alternative zoning and uses (BP, RC, and MF-18) based on market and planning criteria.

Current Land Capacity vs. Demand (Camas 2035)

The Johnson Economics report indicates that there has been very limited demand for flex buildings of a tech/research and development format, similar to the buildings from the 1990s to the north and west of site. Additionally, the site is not suitable for heavy manufacturing and lacks proximity to commercial areas and easy highway access. Therefore, only a small portion of industrial and office demand can be captured on site, especially with an average absorption rate of less than one acre per year (pg. 8). The report notes that the demand for commercial can likely be captured in neighborhood centers, such as the proposed Camas Station project located adjacent to the site's commercially designated parcels. Camas Station is providing 14,000 square feet of gas, coffee, convenience, and additional retail and service. The report notes the potential for additional establishments in this location is limited due to the lack of traffic exposure (pg. 8).

The report also outlines the findings of Clark County's Vacant Buildable Lands Model and *Camas 2035* relative to land capacity. Figure 3.3 of the report (pg. 11) shows a net surplus across employment and residential lands: 255 acres and 429 acres, respectively. Relying on Clark County's Buildable Lands Report for the pace of development for five years (2016 to 2020), the report states there is sufficient land supply for commercial (over 50 years), industrial (over 400 years), and residential (12 years) uses. While commercial and industrial development tends to be 'chunky,' meaning development does not happen on a linear 6-acre or 1.6-acre rate per year (pg. 6), it stands to reason that there is more surplus land supply for commercial and industrial development than there is for residential development. This point is underscored in the Grass Valley area, where the report notes an adequate supply of space and land for commercial/industrial use and a constrained supply for residential use. The constrained residential supply reinforced by the Kielo at Grass Valley, a multifamily development in the northern portion of Grass Valley as demonstrated by the high average absorption rate (31 units/month) showing strong demand for this use (pg. 22).

Employment Demand Analysis

Johnson Economics undertook analysis of forecasted growth rates for office space, retail, industrial, and flex-space uses. The analysis indicates a trend of weak office space demand and an increased demand for retail office space. However, the increasing demand of online retailers will further reduce the need for retail spaces.

Occupancy of industrial space, including flex and specialty buildings, averaged 1.4 acres of positive absorption annually, since 2016, which indicates there is very low demand for industrial uses. The analysis reports that the projected 20-year growth for industrial lands (493 acres) as reported by the June 2022 BLR does not match actual growth as indicated by the market analysis (1.1 acres per year or 22 acres in 20 years), reinforcing the very low demand for industrial uses and lands.

The applicant concludes with the following "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" (pp. 26).

Residential Demand Analysis

The Johnson Economics report includes an in-depth analysis of the market for housing in Camas for the past 20 years and for the next five years (2022 to 2027). The analysis shows a trend of households growing older (pg. 23) and for higher income households than in the previous two decades (pg. 24).

The report forecasts that demand will support nearly 1,300 units over the next five years and will represent a wide array of household incomes (pg. 24). Specifically, the demand will be for single-family detached (758 units), single-family attached (154 units), and multifamily (358 units). At an assumed density of 18 units per acre, the multifamily demand would have an absorption rate of 4.3 acres annually. Assuming 10 units per acre for the attached single-family residential, absorption would be 3.1 acres per year. 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 period (pg. 24).

The report notes that residential growth has been stronger than expected in Camas and reflects countywide growth. Much of this growth can be attributed to job growth in Camas and East Vancouver as well as the demand for safe and attractive suburban housing during COVID. Additionally, there has been a large shift across the region in demand from single-family housing to multifamily housing as single-family homes have become increasingly unattainable for a growing share of the population. Across Clark County, the housing share has evolved to match this pattern and demand; however, Camas has not made this shift to the same degree. Therefore, the analysis infers there is 'pent-up' demand for multifamily housing. The analysis references the City's 2021 HAP, which finds a need for additional multifamily and attached single-family homes that can accommodate low- and middle-income households. Furthermore, additional higher density housing will likely help employment growth in Camas by providing a workforce that brings needed labor closer to or within Camas.

Report Conclusions

The applicant concludes with the following **"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."** The applicant believes the site is a desirable location for housing, both from a community standpoint and from the perspective of renters, buyers, and developers. Additionally, the site is less suitable for employment uses and is less likely to be developed considering current and anticipated market conditions. **MF-18 Zoning in Camas**

According to the Camas Zoning Map (last updated July 21, 2021), the MF-18 zone generally occurs in the far eastern and northern areas of Camas. In the eastern areas of the city, there is MF-18 zoning south of State Route (SR) 14 and west of Washougal/Camas city boundaries; north and west of Northeast 3rd Avenue and North Shepherd Road; and south of Northeast 3rd Avenue, between Louis Bloch Park and the Lacamas Creek. In the northern areas of the city, there are lands zoned MF-18 north of Lacamas Lake (prior to the North Shore Subarea) east of Northeast 232nd Avenue south of Lacamas Lake Elementary School and an area between Northeast 3rd Street and Southeast Leadbetter Road. To the northwest, there are lands zoned MF-18 between Northwest Lake Road and Northwest Camas Meadows Drive and north of Northwest Camas Meadows Drive and east of Northeast Goodwin Road. Lastly, there are MF-18

zoned lands north of Southeast 34th Street and east of the Vancouver/Camas city boundaries. It is important to note that since this zoning map was adopted, a large area north of Lacamas Lake, the North Shore Subarea, has been recently been approved by the Council, which has removed the MF-18 zoning in this area and replaced with North Shore High Density Residential. Therefore, there are fewer MF-18 zone lands in the city.

BP Zoning in Camas

According to the Camas Zoning Map, the BP zone generally occurs in the west and northwestern areas of the city and north of Lacamas Lake (prior to the Northshore Subarea). Much of the land is outright zoned BP or zoned LI/BP. A large area of this land includes the Grass Valley area, where the proposed amendment is located. It also important to note that with the adoption of the North Shore Subarea, much of the BP-zoned land located north of Lacamas Lake has been redesignated and rezoned to commercial (North Shore Commercial), employment (Mixed Employment), and residential lands (North Shore Higher Density and Lower Density Residential), which has resulted in a net loss of industrial lands and jobs potential in this area captured in the Land Analysis in Section III of this staff report.

RC Zoning in Camas

According to the Camas Zoning Map, lands with RC zoning are largely made up of lands in Grass Valley located at the western side of the city, north and west of Northwest Pacific Rim Boulevard and south of Northwest 38th Avenue. There are small pockets of RC zoning throughout the city, including north of Northwest Lake Road and east of Northwest Payne Street, to the far east of downtown along the Washougal/Camas cities boundary, and south of downtown just east of the East Camas Slough Bridge, between SR-14 and the Columbia River.

Amendment of a comprehensive plan designation not only includes 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 to evaluate the merits of the proposal and any unintended consequences of such change. A variety of residential uses are generally allowed in the MF-18 zone, where they are prohibited in the both the RC and BP zones. Whereas a variety of commercial, retail, and industrial uses are allowed in the RC and BP zones but are prohibited in the MF-18 zone. The allowed land uses for each zone are found within the Use Authorization Table at [CMC Chapter 18.07](#) and Section IX of this report.

EVALUATION CRITERIA – CMC 18.51.010(A – H), 18.51.025(B)(2)(A – F), AND 18.51.030 (A-D)

The application materials must include responses to general questions for comprehensive plan map amendments (CMC 18.51.010[A-H]) and zone change criteria (18.51.025[b][2][a-f]) as discussed below. Additionally, further below is a staff evaluation of the comprehensive plan amendment criteria (18.51.030 [A-D]) for the subject request.

After considering whether the current plan is deficient, the Planning Commission must recommend whether to support, reject or defer the amendments to City Council.

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

EVALUATION CRITERIA	FINDINGS
---------------------	----------

CMC 18.51.010 (A-H)	
<p>A detailed statement of what is proposed and why.</p>	<p>The applicant is proposing to request a change of the comprehensive plan designations of Industrial and Commercial to Multi-Family-High and the zoning districts from BP and RC to MF-18.</p> <p><u>Applicant Analysis</u></p> <p>Varied reasons are provided, including surrounding lands being converted from industrial and commercial; long-term industrial and commercial land vacancy; burdensome topography and geometries; and high demand for multifamily residential.</p> <p><u>Staff Finding</u></p> <p>Further detail is provided in this staff report and the applicant materials.</p>
<p>A statement of anticipated impacts of the change, including the geographic area affected, and issues presented by the proposed change.</p>	<p><u>Applicant Analysis</u></p> <p>The applicant states that the proposed plan amendment would address industrial and commercial development related issues associated with the site as there are challenges of parcel sizes and configurations, environmental and slope constraints, challenging access, and surrounding incompatible land uses that would make industrial and commercial development on the site difficult. Additionally, the recently approved Camas Station makes the existing commercial land unsuitable for commercial development because the market demand has been absorbed by this project. The City is planning to extend Northwest 18th Avenue through the site to connect to Northwest Brady Road, which will reduce the ability of the commercial lands to develop.</p> <p>For the northern industrial parcels, physical and locational attributes, coupled with weak market conditions for the uses allowed in the BP zone create conditions that are infeasible for the site to industrially develop.</p> <p>Converting the lands from industrial and commercial to residential will result in a</p>

	<p>positive impact on transportation infrastructure. The submitted traffic memo indicates there will be an overall decrease of AM and PM peak-hour trips as compared with commercial and industrial development and total weekday trips.</p> <p><u>Staff Finding</u></p> <p>Staff find that the conversion of land designated for industrial and commercial uses to residential land will remove employment capacity. After factoring in the subject requested plan amendment, a surplus of employment land exists in the city under both the applicant's and staff analysis. Conversion to a residential designation may provide greater compatibility for existing residential uses in the surrounding area but could present some compatibility concerns for employment zoned land to the west and north.</p> <p>Additionally, the submitted traffic memo by Lancaster Mobley indicates that the proposed land conversion would result in an overall decrease of a.m. peak hour, p.m. peak hour, and total average weekday trips when compared to the existing land designations and zoning. Therefore, conversion to residential designation may provide greater compatibility with traffic generated for the existing residential uses and schools in the area.</p>
<p>An explanation of why the current comprehensive plan is deficient or should not continue in effect.</p>	<p><u>Applicant Analysis</u></p> <p>The westernmost designated industrial properties contain slop constraints and are narrow and long, which are problematic with setbacks imposed by the development code. Additionally, the northeastern industrial parcel has wetland constraints and is adjacent to housing developments. These properties have been vacant for many years with this designation and there has been next to no development on industrial lands in this area and will likely remain vacant for many years. It is an economic detriment to retain employment properties that are likely to not develop due to a shadow inventory and prevents the</p>

	<p>City from growing its future employment base.</p> <p>The two commercial properties are not large enough to attract anything but neighborhood-scaled development. The recent approval of the Camas Station (consisting of a gas station, convenience store, coffee shop, and other retail and personal services) will absorb the market demand for commercial in the area. Larger footprint commercial development is not feasible for these properties due to topography, traffic impacts generated, congestion during nearby school operations, and market conditions.</p> <p><u>Staff Finding</u></p> <p>Many of the development constraints noted by the applicant including narrow dimension of the western parcels, slope, and wetland make industrial development difficult. Staff note that residential development may better fit the narrow western parcels and may provide a better opportunity to preserve the wetland and slopes, although there is no guarantee that the wetland would be preserved. The presence of existing residential to the west may present compatibility issues for industrial development associated with traffic, noise, fumes, and lighting that may be more prevalent than with multifamily development.</p> <p><u>Conversion of industrially designated land may promote further conversion of industrial land in Grass Valley in the future. The applicant's analysis incorporates market demand for uses and staff's analysis looks at land supply only in the absence of demand.</u></p>
<p>A statement of how the proposed amendment complies with and promotes the goals and specific requirements of the growth management act.</p>	<p><u>Applicant Analysis</u></p> <p>The proposed amendment will provide land supply needed to meet the citywide Land Use Goal LU-1 and Policy LU-1.1 which are to directing the City to ensure the appropriate mix of employment and residential lands, while respecting the natural environment and existing uses and accommodate the</p>

land need projections for the 20-year planning horizon.

The proposal will meet the intent of Goal H-1 and Policy H-1.1, which is to promote development of housing variety to meet a wide spectrum of needs, including all ages and income levels, while maintaining strength, vitality, and stability of all neighborhoods.

The amendment will also help address the need for housing diversity and choice as indicated by the Camas' 2021 HAP. There is a low supply of multifamily developments in the city and a low supply of housing in general, which is a common theme across the state. These issues have caused changes to the Growth Management Act to remove barriers to produce housing of all types and income levels since housing demand is far surpassing supply, while the supply is of limited variety.

Amending the land use designation and zoning district to Multi-Family-High and MF-18 will improve the gap in opportunity for housing diversity and choice.

Staff Finding

Staff agree that the proposed plan amendment will address multiple policies addressing housing supply and diversity including LU-3.1, H-1.1, H-2.1, H-2.3, and H-2.4. These policies are individually addressed in Section IV of this report. The balance between employment and residential lands is a policy decision for the Commission and Council. Staff note that using adopted, countywide assumptions about jobs and people per acre and assumptions in the City's comprehensive plan, that the surplus supply of employment land is low. Future comprehensive plan amendments that further reduce the supply of employment land may reduce the supply below targets using these assumptions. The City may need to update its assumptions during a future comprehensive plan amendment to be based on a market analysis rather than using countywide assumptions.

<p>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.</p>	<p><u>Applicant Analysis</u></p> <p>The subject properties are currently served by city services and capital facilities. Recent improvements have been made to the city's water system in the area; therefore, the change does not substantially affect capital facilities plans. The City's General Sewer/Wastewater Facility Plan shows that the system can accommodate a build-out scenario of over 18,500 dwelling units and nearly 53,000 people. The properties are not within a shoreline environment and, therefore, require no changes to the Shoreline Master Program.</p> <p><u>Staff Finding</u></p> <p>Staff find that no other plan changes are required if the proposed amendment is adopted.</p>
<p>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.</p>	<p><u>Applicant Analysis</u></p> <p>The City's Six Year Transportation Improvement Program map shows the extension of Northwest 18th Avenue, through the two commercial properties, from Northwest Tidland Road to Northwest Brady Road. Any development on these properties would require to build-out this extension.</p> <p><u>Staff Finding</u></p> <p>Future development of these properties will require system improvements pursuant to adopted plans.</p>
<p>A statement of what other changes, if any, are required in other city or county codes, plans, or regulations to implement the proposed change.</p>	<p><u>Applicant Analysis</u></p> <p>No changes are proposed to city or county codes, regulations, or plans to implement the proposed amendment.</p> <p><u>Staff Finding</u></p> <p>Staff concurs that no changes are proposed to city or county codes, regulations, or plans to implement the proposed</p>

<p>The application shall include an environmental checklist in accordance with the State Environment Policy Act (SEPA).</p>	<p><u>Applicant Analysis</u></p> <p>The application includes a completed SEPA checklist.</p> <p><u>Staff Finding</u></p> <p>Staff concurs that a completed SEPA checklist was provided.</p>
---	---

<p>EVALUATION CRITERIA</p> <p>CMC 18.51.025(B)(2)(a – f)</p>	<p>FINDINGS</p>
<p>The map amendment shall be consistent with the policies and provisions of the comprehensive plan including the comprehensive plan map.</p>	<p>Applicant Analysis</p> <p>None provided.</p> <p>Staff Finding</p> <p>Staff has provided a consistency analysis of applicable Camas 2035 policies. Please see Section IV for further analysis.</p>
<p>The amendment shall be compatible with the uses and zoning of the adjacent properties and surrounding areas.</p>	<p>Applicant Analysis</p> <p>None provided.</p> <p>Staff Finding</p> <p>Multifamily residential may be more compatible with residential lands to the east for reasons of potential noise, fumes, light, and greater traffic from industrial and commercial uses. However, it may be less compatible for density of development with existing residential and may be less compatible with existing industrial lands to the west and commercial lands (Camas Station) to the south. The existing Industrial and Commercial designations may be more compatible with existing industrial and schools to the west and south, but less compatible with the existing residential adjacent to the properties, especially to the east.</p>
<p>The amendment is warranted due to changed circumstances, error, or because of a</p>	<p>Applicant Analysis</p> <p>None provided.</p>

<p>demonstrated need for additional property in the proposed zoning district.</p>	<p>Staff Finding</p> <p>Staff find that the amendment may be warranted as indicated by the provided market analysis as further discussed in Section III. The city currently has limited MF-18 zoned lands with a limited supply and high demand for diverse housing options. The proposal may provide an opportunity to supply a variety of housing options for varying income levels.</p>
<p>The subject property is suitable for development in conformance with zoning standards under the proposed zoning district.</p>	<p>Applicant Analysis</p> <p>None provided.</p> <p>Staff Finding</p> <p>Staff has determined that the subject properties are suitable for those developments allowed in proposed MF-18 zoning and its zoning standards. MF-18 zoning may be more suitable than developments under the current BP and RC zoning due to topographical, geometric restrictions, siting, and dimensional requirements for these zones.</p>
<p>Adequate public facilities and services are likely to be available to serve the development allowed by the proposed zone.</p>	<p>Applicant Analysis</p> <p>The applicant provided a technical memorandum to the City dated May 17th, 2023 from Olson Engineering to analyze the impacts to the water and sewer systems by changing the uses from commercial to residential.</p> <p>Staff Finding</p> <p>Staff find that there are adequate public facilities and services available to serve developments allowed by MF-18 zoning.</p>
<p>Specific information about the intended use and development of the property.</p>	<p>Applicant Analysis</p> <p>None provided.</p> <p>Staff Finding</p> <p>The applicant did not provide a direct response to this item or has indicated the exact intended use of the subject properties. However, Staff have determined</p>

	with the market analysis and the applicant's narrative and response to other code sections that the intended use for the site is generally multifamily residential.
--	---

EVALUATION CRITERIA CMC 18.51.030 (A-D) and CMC 18.51.010 (C)	FINDINGS
Impact upon the city of Camas comprehensive plan and zoning code;	<p><u>Staff Finding</u></p> <p>The amendment would decrease industrial lands by 24.82 acres and commercial lands by 6.58 acres with a 31.4-acre increase of land for residential development. There would be no impact on the City's zoning code.</p>
Impact upon surrounding properties, if applicable;	<p><u>Staff Finding</u></p> <p>The City did not identify any detrimental effects to adjacent properties if this change is approved. See response to Policy LU-1.3 below for further analysis. The conversion to residential would be more consistent with existing residential uses in the vicinity including than would industrial and commercial uses, which may have additional light, noise, fumes, and traffic impacts.</p>
Alternatives to the proposed amendment; and	<p><u>Staff Finding</u></p> <p>The applicant submitted a Land Use Analysis that compared potential development under current zoning (BP and RC) and potential development under designated MF-18 zoning (Johnson Economics, LLC, December 2022). The report finds and supports the conversion of industrial and commercial land to high density residential land, without significantly impairing the ability to meet future industrial and commercial demand. See Section IV for further information on the market analysis.</p> <p>The Commission can recommend, and the Council can take one of three actions: (1) Approve the requested plan amendment and corresponding zone change as</p>

	requested, (2) deny the requested plan amendment and zone change, or (3) approve part, but not all of the requested amendment. As an example, Commission could recommend and Council could decide to approve the amendment and zone change for the industrially designated/zoned property, but not for the commercially designated/zoned portion.
Relevant code citations and other adopted documents that may be affected by the proposed change.	<p><u>Staff Finding</u></p> <p>Public Works staff has provided a memo stating that it has considered the comprehensive plan amendment and zone change of the subject site, considering the transportation plans and find the potential impact negligible.</p>

VI. PUBLIC COMMENT

At the time of publication, no public comments have been received for this proposal for the Planning Commission workshop.

VII. RECOMMENDATIONS

Planning Staff Recommendation: The Planning Commission forwarded a recommendation for approval. Staff recommends that the Council conduct a public hearing, consider testimony, and render a decision.

VIII. TABLE 1 –2023 COMPREHENSIVE PLAN ACREAGE (PROPOSED)

Comprehensive Plan Designations	Current Acres	CPA23-01	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	+31.4	287.61
Commercial	984.36	-6.58	977.78
Industrial	2292.20	-24.82	2267.38
Park	850.72		850.7
Open Space / Green Space	492.00		492.0
Total acreage:	10,200		10,200

Zoning**	2020	CPA23-01	Final 2023 Acreage
Parks/Open Space			
Neighborhood Park (NP)	145.14		145.14
Special Use (SU)	164.09		164.09
Open Space (OS)	421.55		421.55
Industrial			
Heavy Industrial (HI)	858.58		858.58
Light Industrial (LI)	91.83		91.83
Business Park (BP)	542.63		542.63
Light Industrial/Business Park (LI/BP)	785.75	-24.82	760.93
Residential			
Residential-15,000 (R-15)	716.30		716.30
Residential-12 (R-12)	925.43		925.43
Residential-10,000 (R-10)	989.29		989.29
Residential-7,500 (R-7.5)	1534.34		1534.34
Residential-6,000 (R-6)	191.11		191.11
Multifamily Residential-10 (MF-10)	224.39		224.39
Multifamily Residential-18 (MF-18)	312.70	+31.4	344.1
Commercial			
Downtown Commercial (DC)	72.22		72.22
Mixed Use (MX)	51.56		51.56
Regional Commercial (RC)	597.93	-6.58	591.35
Neighborhood Commercial (NC)	10.57		10.57
Community Commercial (CC)	237.44		237.44
Total Acres	8872.95		8872.95

** Does not include UGB areas

IX ZONING REGULATIONS

USE AUTHORIZATION TABLE – CMC CHAPTER 18.07

Comparison of land uses that are allowed (“P”), conditionally allowed (“C”), prohibited (“X”) and/or temporary use (“T”) in the MF-18, BP, and RC Zones.

Zoning Districts	MF-18	BP	RC
Adult family home	P	X	X
Assisted Living	P	X	X/P ¹
Bed and Breakfast	C	X	X
Designated manufactured home	P	X	X
Duplex or two-family dwelling	P	X	X
Group Home	X	X	X
Home Occupation	P	X	X/P ¹
Housing for the disabled	P	X	X/P ¹
Apartment/multifamily/row houses	P	X	X/P ¹
Residence accessory to and connected with a business	X	X	X/P ¹
Residential Treatment Facility	C	X	P
Single-Family dwelling	P	X	X
Sober Living homes	P	X	X
Transitional Housing	P	P	P
Manufactured home park	C	X	X
Nursing/rest/convalescent home	P	X	X
Permanent supportive housing	P	X	X
Automobile repair	X	P	P
Automobile sales	X	P	P
Bakery	X	P	P
Banks	X	P	P
Department Store	X	P	P
Gas/fuel station	X	P	P
Grocery, large scale	X	C	P
Grocery, small scale	X	P	P

Zoning Districts	MF-18	BP	RC
Hospital, emergency care	X	P	P
Laundry/dry cleaning (retail)	X	P	P
Medical or dental clinics	X	P	P
Office supply store	X	X	P
Parcel freight depots	X	P	P
Pharmacy	X	P	P
Professional office(s)	X	P	P
Public agency	X	P	P
Recycling collection point	X	C	T or C
Restaurant	X	P	P
Restaurant, fast food	X	P	P
Warehousing, wholesale and trade	X	P	C
Warehousing, bulk retail	X	X	C
Food production or treatment	X	P	C
Community club	C	P	P
Church	C	P	P
Library	C	P	P
Museum	C	P	P
Open Space	P	P	P
Private, public, or parochial school	C	P	P
Trade, technical, businesses college	C	P	P
College/university	X	P	P
Bed and breakfast	C	X	X
Animal training, kennel, boarding	C	P	P
Day care center	P	C	C

¹ See CMC 18.07.030 – Table 1, Note 10.

X DEVELOPMENT STANDARDS – CMC CHAPTER 18.09

Comparison of development dimension standards that apply to the MF-18 Zone and the RC and BP Zones.

	MF-18	RC	BP
Maximum Density (dwelling units/net acre)	18	n/a	n/a
Minimum lot area (square feet)	2,100	None	½ acre
Minimum lot width (feet)	26	None	100
Minimum lot depth (feet)	60	None	100

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. Residential development along a flanking street shall have a minimum side setback of 15 feet.

Minimum front yard (feet)	10/20 (at garage front)	Note 1	15
Minimum side yard (feet)	3 ^{Note 2}	None	15
Minimum rear yard (feet)	10	None	50'
Lot Coverage: Lot coverage (percentage)	65	None	50%
Building Height Maximum building height (feet)	50 ^{Note 3}	None	None

Notes:

1. Residential dwelling units shall satisfy the front setbacks of CMC Section 18.09.040 Table 2, based on comparable lot size.
2. The non-attached side of a dwelling unit shall be three feet, otherwise a zero-lot line is assumed.
3. Maximum four stories but not to exceed height listed.