



2019 COMPREHENSIVE PLAN AMENDMENTS

STAFF REPORT

TO: Bryan Beel, Chair
Planning Commissioners

FROM: Sarah Fox, Senior Planner

REPORT DATE: May 15, 2019

Public Notices: Public hearing notices were sent to property owners, and published in the Camas Post Record on May 2, 2019 (Publication Record #190450). Notice of application was sent to property owners in the vicinity of the proposed amendment areas on April 8, 2019. Notice of intent to adopt amendments (60-day) was received by the Department of Commerce on April 2, 2019 (Material ID #2019-S-23). The 60-day notice period ends on June 1, 2019.

State Environmental Policy Act Determination (SEPA): Notices of Determination of Non-Significance for non-project actions were published and mailed for each proposal on May 2, 2019. Comment deadline is May 16, 2019. As of the writing of this report, several comments have already been received and are enumerated as exhibits.

- City of Camas Proposed Amendments (SEPA19-11) Legal publication record #190460
- Camas Crossing Proposed Amendments (SEPA19-07 and CPA19-04) Legal publication record #190710
- Knopp Proposed Amendments (SEPA19-06 and CPA19-03) Legal publication record #190540
- Rouse Proposed Amendments (SEPA19-04 and CPA19-02) Legal publication record #190500
- Sui Hui Proposed Amendments (SEPA19-05 and CPA19-01) Legal publication record #190520

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This Staff Report will:

- Analyze the City's Comprehensive Plan policies and goals
- Analyze the issues set forth in CMC 18.51
- Provide a staff recommendation on each proposed amendment as required by CMC§18.51.030.

I COMPREHENSIVE PLAN AMENDMENT PROCESS

Each year in the months leading up to January, the City announces that proposed amendments to the Comprehensive Plan will be received for 30 days. The 2019 announcement was published in the Camas Post Record and ran weekly the entire month of November 2018.

The City received four applications during the open review cycle. All of the individual requests will increase residential density. The City also analyzed the comprehensive plan designations for properties that are located along NW 10th Avenue and Hill Street.

II BACKGROUND

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

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

The plan anticipated that the city would have a total population of 34,098 in 2035 and would add 11,182 new jobs. The city's current population according to the Office of Finance and Budget (OFM) is 23,770.

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

III LAND INVENTORY

EMPLOYMENT LANDS

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

The City has approximately 3,419 acres designated for employment (combined commercial and industrial lands), or 33% of the overall acreage. Based on Clark County's Vacant Buildable Lands Model, it is estimated that there is 1,124 net acres of vacant and underutilized employment land in Camas. The model estimates that the city needs 337 net acres of Commercial land and 493 acres of Industrial land (total of 830 net acres) to create 11,182

additional jobs by 2035. According to the calculations, there is excess capacity of 294 net acres of employment land.

Given the high-level nature of the buildable lands analysis, there may be additional land that cannot be developed when detailed site plans are researched, and alternatively, a new employer may exceed the estimated jobs per acre based on whether their industry can expand vertically instead of lineally.

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

RESIDENTIAL LANDS

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

Since 2016, preliminary plat approval has been granted to 11 developments for a total of 1,735 lots. The city has approved six multi-family developments, with a combined multi-family unit total of 642 units. Refer to Section X of this report for a detailed list of developments.

IV APPLICABLE COMPREHENSIVE PLAN GOALS & POLICIES

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

As noted at the outset of this report, all of the applications under consideration, with the exception of the city's proposed amendment at Hill Street, will increase residential density. Three of the proposals are requesting that the commercial designation be amended to multifamily.

The city classifies commercial and industrial properties as areas where we anticipate job growth, and includes goals and policies for these lands within the **Economic Development** Element of the plan. There are specific economic development policies for the "Grass Valley" area (Ch. 6), where Camas Crossing (CPA19-04) and Knopp (CPA19-03) properties are located. Camas Crossing (CPA19-04) would also be subject to the "Gateway and Corridor" goals and policies within the Land Use chapter of the plan (Ch. 1). All of the four proposals would be subject to the Housing Element's goals and policies (Ch. 2).

Economic Development (Camas 2035, Ch. 1 and Ch. 6): The Camas Crossing and Knopp Properties are located within the Grass Valley area. Relating to this area, (Sec. 1.4.2) the plan states, "*Professional office, medical, and industrial uses typify western Camas, with retail businesses supporting large campus firms.*" The city's commercial zone has a wide range of outright allowed uses to include professional office and service land uses, and has a much

shorter list of prohibited uses. The following policies are particularly applicable to the proposed amendments:

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.

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

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.

Gateways (Camas 2035, Ch. 1 and Ch. 6): "Development/redevelopment within a designated gateway or corridor must adhere to the goals and policies included in the Economic Development Element as well as the applicable development regulations and design guidelines of the Camas Design Review Manual." (page 1-4). The city designated NW 38th Avenue as a primary Gateway and Corridor to the city. There are design guidelines that are provided at Table 1-3, and these were recently adopted within the city's Design Review Manual. Some of the features that are expected within a primary gateway include: Iconic street lighting; Layered landscaping; and monument-style signage. Corridors must include: Pedestrian and bicycle amenities (bike lanes, crosswalks, and sidewalks); Signage (wayfinding, historic, and/or interpretive); Iconic street lighting; and Street trees. The following goal and policy is particularly applicable to the proposed amendments:

Gateways and Corridors Economic Development Goal, ED-6: Create attractive and welcoming entrances to the City and distinguish Camas from adjacent jurisdictions through the development of community gateways.

ED-6.7: Building entrances should face the street and provide pedestrian connections from the building entrance to the sidewalk. Encourage landscaping, rather than parking, between the building and the street in order to create a welcoming streetscape.

Housing (Camas 2035, Ch. 2): The city's housing goals and policies focus on increasing housing diversity and affordability. Citywide housing goal (H-1) states, "*Maintain the strength, vitality, and stability of all neighborhoods and promote the development of a variety of housing choices that meet the needs of all members of the community.*" The Land Use element of the plan includes calculations based on existing population, and future projections of land development. The Residential and Employment Capacity table at page 1-2 of the Plan, indicates that the city has allocated enough acreage to meet our city's anticipated growth over the next 20 years. The city has tracked progress towards the housing goals since adoption in 2016 and has not identified any shortages to date.

PERMIT TYPES	2018	2017	Remaining to 2035
Single family lots/units	270	235	3,243 <i>Note: An average of 200 new units/year will accomplish this goal. There are no targets for units types (e.g. MF or affordable).</i>
Multifamily units (MF)	0	120	
Affordable units	0	0	No specific targets in Camas 2035 or CMC
Commercial	17 0	12 1	Tenant Improvements/Remodels New Construction (Dentist Building)
Industrial	0	0	No change to date

The following policies are applicable to the proposed amendments:

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

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

H-1.4: Require a percentage of newly created lots to include one or more of the following unit types (to be designated on the face of the plat): Single-story dwellings; Barrier-free dwellings (consistent with Americans with Disabilities Act [ADA] guidelines); ADUs, to be constructed concurrent with primary dwellings.

None of the 2019 comprehensive plan applications propose specific measures to provide for affordable housing or other housing types as described (above) in the housing policies of Camas 2035. Regardless, there are currently not any regulations in the development code (CMC) to require an increase in housing affordability and diversity to implement these policies.

EVALUATION

The application materials included responses to eight questions (A-H, of CMC§18.51.010). All applications also included SEPA checklists.

After considering whether or not the **current plan is deficient** per CMC§18.51.010(C), the Planning Commission must recommend whether to support, reject or defer the amendments to City Council. The code provides the following additional criteria at CMC§18.51.030:

- A. Impact upon the city of Camas comprehensive plan and zoning code;*
- B. Impact upon surrounding properties, if applicable;*
- C. Alternatives to the proposed amendment; and*
- D. Relevant code citations and other adopted documents that may be affected by the proposed change.*

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

A. SUI HUI PROPERTY (FILE # CPA19-01)

Site Description: The subject property is 2.2 acres that is located at the intersection of NW Logan Street and NW 25th Circle (Parcel #819518-123). It is currently designated Commercial (zoned Community Commercial), and the applicant requests a change to Multifamily High, with an associated zone of Multifamily 18 (MF-18). The surrounding properties are designated Commercial to the north and south; and Single-family Medium (SFM) to the east and west. There are not any zoning overlays on the subject property, such as gateways or corridors.

Discussion: A notice of application was sent to property owners within the commercial zone along Logan Street and property owners within 300-feet of the identified area. The reason staff included a larger area for consideration of a designation change, was due to the fact that all but three properties at the northeast corner of the commercial district are developed residentially. The three parcels excluded from the amendment are currently used for commercial uses, which is consistent with the comprehensive plan. One of the properties is a gas station and the other is used as a veterinary clinic. Refer to the map for this proposal at Section XI. In brief, the development of the area, in spite of the commercial designation has been almost entirely multifamily.

Specifically, at the north end of the commercial designation along NW 28th Avenue is Camas Ridge, a 51-unit apartment complex (16 units/acre). South of Camas Ridge is the Logan Place Subdivision, which includes 34 townhome lots and seven duplex lots (9 units/acre). Across from Logan Place to the east are three duplex lots, and a lot that contains 10 row houses. To the south of the subject property is Summit Hill Condominiums with 26 units (8units/acre). The average residential unit density within this commercially designated area is 10 units per acre, which is consistent with the Multifamily Low comprehensive plan designation.

The applicant proposes an associated rezone of Multifamily 18 (MF-18). After deducting area needed for infrastructure, roadway and landscaping, if approved, the net developable area would likely be 1.54 acres (70% of gross site area), which could produce 27 units. If the property were zoned Multifamily 10 (MF-10), then it could produce 15 units. Staff finds that the density of the surrounding area would warrant an associated zone of MF-10.

The current land uses aside, Staff and the applicant discussed that a proposal to only amend a single parcel could be invalidated if it meets the definition of a "spot zone". A "spot zone" is a bit of a misnomer as it refers to comprehensive plan designations rather than zoning. Spot zoning is defined as an arbitrary and unreasonable action when a small area is singled out of a larger area and is zoned totally different from and inconsistent with the classification of the surrounding land, **not in accordance** with a comprehensive plan. According to the Municipal Research and Services Center, the reasons for invalidating an illegal spot zone usually include one or more of the following: (1) the rezone primarily serves a private interest, (2) the rezone is inconsistent with a comprehensive plan or the surrounding territory, or (3) the rezone constitutes arbitrary and capricious action. In this case, if the property were to develop as designated, it would appear to be out of conformance with the area.

The application materials did not address Policy H-2.3 or H-2.4 in regard to providing a portion of the new units to be affordable. A further discussion on this aspect of the proposal is warranted.

The current comprehensive plan designation of Commercial does not reflect the existing development pattern of the area. All of the properties in the district have been developed residentially (except three parcels at the Northeast corner).

The effect of the change would be to allow similar residential development to occur on the subject property rather than allowing an inconsistent commercial development. It would also accurately reflect the developed condition of the commercial district, for citywide buildable lands analysis.

EVALUATION CRITERIA CMC18.51.030 (A-D) and CMC18.51.010 (C)	FINDINGS
<i>Impact upon the city of Camas comprehensive plan and zoning code;</i>	An amendment of the entirety of the commercial district (except three parcels) to Multifamily would reflect current use and increase the city's multifamily land area.
<i>Impact upon surrounding properties, if applicable;</i>	A commercial development on the subject property would be inconsistent with the surrounding land uses.
<i>Alternatives to the proposed amendment; and</i>	<p>Staff proposes to amend the entirety of the district (except three parcels) to Multifamily.</p> <p>Amending only the applicant's property would appear to be a "spot zone".</p> <p>The applicant requests an associated zone of MF-18, and staff counters that MF-10 is more compatible with the surrounding built environment.</p>
<i>Relevant code citations and other adopted documents that may be affected by the proposed change.</i>	No changes identified at this time.
<i>Why the current comprehensive plan is deficient or should not continue in effect.</i>	The commercial designation of the properties in this district are inconsistent with the existing uses of the developed properties.

B. ROUSE PROPERTY (FILE #CPA19-02)

Site Description: The subject property is designated "Single-family Medium" (SFM) with a zone of Residential-7,500 (R-7.5). Properties to the north, south and west of the subject parcel are also designated SFM. To the east are properties that are designated as "Single family High" (SFH) and are developed consistent with a (repealed) zoning design standard of Residential-5,000 (R-5). Across the street to the south are properties that are designated as "Single family low" (SFL), which generally have deep yards that are encumbered by steep slopes.

Discussion: The applicant requests that subject property and the surrounding SFM district be amended to SFH similar to the designation of the district to the east. There are 425 acres within the city that are designated Single Family High, which is 8% of the overall single family designated land area. Seventy-three percent of single family designated lands are designated as Single Family Medium.

Options that are contemplated in the application are to extend the designation of the SFH area to the east to include the subject property (0.32 acres) as it would not be considered to be a spot zone. Alternatively, the city could amend the entire SFM district (10 acres) to include the subject property. The applicant provided evidence within their narrative to support either option given that a majority of the surrounding properties do not conform to the current designation.

The properties north of SW 6th Avenue are designated either SFM or SFH, with commercial properties bracketing to the west and east of the residential district. The applicant notes that the Camas West subdivision, which is adjacent to the east of the subject property does not conform

to the zoning standards of R-6 as the lot sizes are an average of 5,000 square feet. Between Trout Court and Utah Street, there are 20 properties and 12 of those (60%) do not conform to the zoning designation of R-7.5, as their lot sizes are either considerably smaller or larger than the target average of 7,500 square feet. There are another 15 lots between SW Valley Street and SW Utah Street, with four of those lots exceeding the lot size standards of the zone (26%).

The comprehensive plan policies in regard to supporting a wide variety of housing types (refer to Policies H-2.1 and H-2.3) would be consistent with this proposal as it would encourage infill development, in addition to the currently available option to build an ADU¹. There are roughly 10 lots within the SFM district that would be able to short plat into at least two lots if this amendment were approved (28%). Absent an amendment to the comprehensive plan, the properties could utilize the ADU standards to add a residential unit to their properties as the backyard area appears to be deep enough to accommodate.

The proposed amendment would increase residential density similar to other proposed 2019 amendments, however, it is not a conversion from a commercial designation.

The city anticipates that the amendment could encourage 12 new lots (e.g. two lot short plats) within this 10 acre area, and likely redevelopment of distressed properties. Increasing the number of lots in the area, and lowering lot sizes would also provide more opportunities within the area to add an Accessory Dwelling Unit to their property, as setbacks are based on the size of the lot, not by zoning.

EVALUATION CRITERIA CMC18.51.030 (A-D) and CMC18.51.010 (C)	FINDINGS
<i>Impact upon the city of Camas comprehensive plan and zoning code;</i>	The proposed amendment would maintain the single family designation. There would be a slight decrease (1%) to SFM designation if all 10 acres were amended to SFH.
<i>Impact upon surrounding properties, if applicable;</i>	As noted in the application, there are a range of lot sizes in the vicinity of the subject property. Staff anticipates that the amendment could encourage some redevelopment (28% of lots).
<i>Alternatives to the proposed amendment; and</i>	Amend only the subject property to SFH or amend the surrounding 10 acre district to SFH.
<i>Relevant code citations and other adopted documents that may be affected by the proposed change.</i>	None identified at this time.
<i>Why the current comprehensive plan is deficient or should not continue in effect.</i>	Properties north of SW 6 th are generally out of conformance with current zoning designation.

C. KNOPP PROPERTY (FILE #CPA19-03)

Site Description: The subject property is designated "Commercial" and has commercially designated properties to the south. There is currently a residential home on the property that fronts NW Payne Street. To the north and east are multifamily designated properties, with the

¹ Accessory Dwelling Unit (ADU) development can be found at CMC Ch. 18.27. An ADU is a subordinate dwelling unit on a lot or conversion of a portion of an existing home into a separate dwelling unit.

Village at Camas Meadows (east) under construction. To the west is vacant industrial land, which is designated as Light Industrial/Business Park (LI/BP).

Discussion: The applicant requests that the comprehensive plan designation of Commercial be amended to Multifamily, with an associated rezone of MF-18.

The property is commercially designated, but does not include a gateway overlay. The comprehensive plan policies in regard that were identified at Section IV of this report in regard to the Land Use, Housing and Economic Development Elements of the plan are applicable to this proposal.

The application narrative states that the property has steep slopes at the northern portion of the property, which are not ideal for commercial development. Further it notes that residential development would better be able to incorporate the terrain without significant grading. The properties to the north and east are multifamily developments which are within a 56 acre area that was amended from LI/BP to MF in 2012. The subject property is adjacent to the multifamily district, and for that reason, expansion of the MF designation would not be a spot zone.

The city organizes many uses within the Use Authorization Table at CMC Chapter 18.07, as "Commercial" however the level of intensity varies greatly. For example, the current Regional Commercial zone would outright allow for offices, medical and veterinary clinics, along with brew pubs, grocery stores, florist shops, and fast food restaurants. The zone also allows nursing homes, hotels and apartments (with a development agreement).

The conversion of commercial lands to residential generates more need for parks and trails than a commercial use. However, the subject property is not large enough to accommodate a city park. There may be an opportunity to provide trail connections or other park amenities nearby or on a portion of the property.

The application materials did not address Policy H-2.3 or H-2.4 in regard to providing a portion of the new units to be affordable. A further discussion on this aspect of the proposal is warranted.

The property is within a commercial district that is adjacent to properties that were converted to multifamily designations in 2012. The subject property is not within a gateway or corridor area, and is not located along Lake Road, which was upgraded through grants that the city acquired to support and boost economic development.

EVALUATION CRITERIA CMC18.51.030 (A-D) and CMC18.51.010 (C)	FINDINGS
<i>Impact upon the city of Camas comprehensive plan and zoning code;</i>	The amendment would decrease commercially designated land and increase multifamily land.
<i>Impact upon surrounding properties, if applicable;</i>	Properties to the north and east of the subject properties are designated as Multifamily and those to the east are currently under construction. Refer to applicant's narrative beginning on page 5 for responses to this criterion.
<i>Alternatives to the proposed amendment; and</i>	The applicant proposed amending a portion of the property to multifamily, after approval of a short plat. The result would leave a portion of the property commercial, while amending a portion of multifamily. However, the short plat application has not been submitted to date.

<p><i>Relevant code citations and other adopted documents that may be affected by the proposed change.</i></p>	<p>The narrative at page 6 does not identify a direct trail connection or pedestrian route (sidewalk) from the property to the city's trail system.</p> <p>The city's Park, Recreation and Open Space Comprehensive Plan did not propose parks or trails in support of residential development in this area and would need to be amended and not further exacerbated.</p>
<p><i>Why the current comprehensive plan is deficient or should not continue in effect.</i></p>	<p>The applicant's narrative does not provide evidence consistent with policy ED-3.3 to support their conclusion that the comprehensive plan is deficient and should not continue.</p> <p><i>"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." – ED-3.3</i></p>

D. CAMAS CROSSING (FILE #CPA19-04) (Associated Files: ANNEX18-01; ZC15-02; ARCH15-09; CA15-03; DA15-06; SEPA15-20; Other names include Moxie Village and Kate's Crossing)

Site Description: Two of the subject properties are designated "Commercial" and properties to the south, east and west are similarly designated. To the north and immediate east, the properties are outside city limits, but within the urban growth area. One of the subject properties is outside the city limits and is designated as "Single Family Low". The applicant owns adjacent properties of approximately 20 acres, with only 4.0 acres that are proposed to be amended. The 20 acres of combined properties has been the subject of previous applications under the same name, which were proposals for mixed use developments.

Discussion: The applicant's narrative requests that the city annex Parcel # 177437-005, and amend all properties to Multifamily (MF) with an associated rezone of MF-18.

The site is commercially designated and it includes both a gateway and corridor zoning overlay. The site is adjacent to NW 38th Avenue, which was recently improved by the city through economic development grants. All of the comprehensive plan policies identified at Section IV of this report are applicable to this proposal.

The applicant's narrative includes a discussion in regard to development of the entire 20 acres and how residential development will support their future plans for a mix of uses on the site. Although not under review with this application, there are tools available for creating mixed use developments with the current zoning (Refer to Footnote 10, CMC§18.07.030 Table 1).

The narrative also states that the amendment to MF would better serve the surrounding commercially designated properties as, "there are no specific multifamily areas along NW 38th Avenue". While we recognize that there are not any multifamily designated or zoned properties adjacent to the subject site, there are multifamily and high density residential *development* in the vicinity. Approximately 0.14 miles (700 feet) to the south, The Holland Group has approval for 288 apartments that are anticipated to be built this summer. The Grandview Apartments are located 0.27 miles to the west of the subject property with 178 units at a density of 20 units per acre. Further west (past 192nd Avenue) are single family lots at a density of approximately six units per acre. Refer to Section X of this report, and the aerial photo of the site at "b".

If the requested amendments were approved, the combined four acres could accommodate approximately 50 new units after accounting for any critical areas and infrastructure (net site area). The narrative stated that the conversion of commercial land (pages 8-10) to residential will conform to the housing goals and policies of the comprehensive plan. However the city doesn't have an adopted code or other specific method to ensure that 25% of the new units will be affordable, or that they will be single story or ADA-accessible.

EVALUATION CRITERIA CMC18.51.030 (A-D) and CMC18.51.010 (C)	FINDINGS
<i>Impact upon the city of Camas comprehensive plan and zoning code;</i>	The amendment would decrease commercially designated land at a gateway overlay district and increase multifamily land.
<i>Impact upon surrounding properties, if applicable;</i>	The city's comprehensive plan did not anticipate residential uses in this area, and for that reason, there are not any parks or trails identified to support this use or provide these citywide amenities to future residents. Refer to applicant's narrative beginning on page 5 for responses to this criterion.
<i>Alternatives to the proposed amendment; and</i>	No alternatives were proposed by the applicant.
<i>Relevant code citations and other adopted documents that may be affected by the proposed change.</i>	The city's Park, Recreation and Open Space Comprehensive Plan did not propose parks or trails in support of residential development in this area and would need to be amended.
<i>Why the current comprehensive plan is deficient or should not continue in effect.</i>	The applicant's narrative (starting at page 7) does not provide evidence consistent with policy ED-3.3 to support their conclusion that the comprehensive plan is deficient and should not continue. "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." – ED-3.3

E. STAFF PROPOSED AMENDMENTS (FILE #CPA19-05)

Hill Street (1.10 acres): The city is considering amending two parcels to a Commercial designation from Multifamily High (MFH) and Park (P). The properties include Parcel #86410-000 (no site address) that is owned by the State of Washington, and Parcel #86400-000 that is owned by Vega Gymnastics.

Parcel #86410-000 is 0.28 acres, is designated as "Park" and is not within the city's Park, Recreation and Open Space Comprehensive Plan. In the past, it was used for parking and storage for the state armory. The current designation cannot continue as it is not a city owned park property and we cannot plan for its future development.

The primary reason for the amendment is to correct an error in mapping at Parcel #86410-000, which designated property as “Park” but is not city owned. According to the definition of park zoning at CMC§ 18.05.070, “The park zoning districts provide recreation and open space functions for the long-term benefit and enjoyment of city residents, adjacent neighborhoods and visitors. These districts apply only to land held in public trust.”

The issue that staff analyzed was whether to designate the property to match the surrounding multifamily properties (MF) or whether it should be amended along with the adjacent commercially-used property.

The adjacent property, owned by Vega was originally developed as a neighborhood school, and has since that time been used as the city’s library, an armory, and now is currently being used by a gymnastics company. The property has historically been used for commercial purposes. Staff found that there is an opportunity to convert the commercially used property (Vega Gymnastics) to a conforming land use designation, when amending the park property.

Neighbors and interested citizens have submitted comments in opposition to the proposal to amend the properties to commercial designations. In general, the concern is that any commercial development would be disruptive to their neighborhood.

In response to those that shared their concerns, staff noted that the size of the state-owned property (0.28 acres), would likely only support a small-scale commercial use, such as a professional office versus a use that is retail in nature. Retail uses generally need a certain number of pass-by trips, which would not occur at the end of a dead end road. A commercial designation of the property might also support an expansion of the adjacent property.

As previously discussed in this report, the city cannot approve a spot zone. A spot zone is when a single property is rezoned to be inconsistent with the surrounding properties or comprehensive zone. However, the city could consider the two properties together for conversion to a Commercial designation. Alternatively the city could determine that there is only a need to amend the park designated property to match the multifamily designated properties that surround it.

EVALUATION CRITERIA CMC18.51.030 (A-D) and CMC18.51.010 (C)	FINDINGS
<i>Impact upon the city of Camas comprehensive plan and zoning code;</i>	The property is vacant and cannot be improved as a city park.
<i>Impact upon surrounding properties, if applicable;</i>	Concerns regarding potential commercial development on the 0.28 acre property were received by the City and are part of the record. The Vega Property would benefit from the amendment as any expansion or redevelopment of the current commercial-type use requires a Conditional Use Permit.
<i>Alternatives to the proposed amendment; and</i>	Staff proposed either amending both properties to Commercial or singularly amending the State’s property to Multifamily.
<i>Relevant code citations and other adopted documents that may be affected by the proposed change.</i>	The size of the property (0.28 acres) would not warrant amendments to the code or adopted plans.
<i>Why the current comprehensive plan is deficient or should not continue in effect.</i>	The current designation is inconsistent with the Park, Recreation and Open Space Comprehensive Plan . The designation currently prohibits residential or commercial development.

NW 10th (7.74 acres): The area under consideration is located north of NW 10th Avenue, east of NW Norwood Street, and west of Logan Street. The city has received queries over the years as to the reasons for the Single-family Low (SFL) district being surrounded by Single Family Medium (SFM), and there have been requests to amend the area to SFM. For this reason, staff analyzed the area to determine the need for an amendment.

The area includes 20 properties and 19 property owners. The SFL designation dates to at least the 2004 Comprehensive Plan, which was the first comprehensive plan amendment in the city's history that converted many single family zoned areas throughout the city to higher densities in conformance with the Growth Management Act. The properties have steep slopes that rise above street level, with the easterly four properties also encumbered with stream and habitat areas. The average lot size is 16,853 square feet (sq. ft.), although there are five lots that are less than 10,000 sq. ft. The majority of the properties do not conform to setback standards of the current zone, or any zone. For example, nine of the properties (45%) have rear setbacks that are less than the depth required for their lot size. Three of the properties have four foot front setbacks. In sum, the district of 20 properties does not conform to any current zoning development standard.



If the district were amended to another residential designation, such as Single-family Medium or High, then it would appear that only the westerly group of six properties would be able to benefit from a designation change (see map above). The reasons for this would be that these properties are not encumbered by the habitat corridor, and have less steep slopes in comparison to the properties east of them. The sizes of the properties and position of current structures could allow for future short plats, and ADU development.

The city received comments both in support and in opposition to this proposed amendment. The city did not find an error in the current designation.

EVALUATION CRITERIA CMC18.51.030 (A-D) and CMC18.51.010 (C)	FINDINGS
<i>Impact upon the city of Camas comprehensive plan and zoning code;</i>	An amendment would not noticeably affect the comprehensive plan as the area would remain residential, however it would reduce the land devoted to Single Family Low.
<i>Impact upon surrounding properties, if applicable;</i>	Amending the area to Single Family Medium or High could result in short plats of six of the 20 properties included in the district (30% density increase).
<i>Alternatives to the proposed amendment; and</i>	An alternative discussed was amending only the westerly six lots, which are more likely to redevelop.

<i>Relevant code citations and other adopted documents that may be affected by the proposed change.</i>	The amendment would not affect other plans, as the area would remain residential.
<i>Why the current comprehensive plan is deficient or should not continue in effect.</i>	Staff did not find the Plan to be deficient.

VI PUBLIC COMMENT

Comments that were received prior to the publication of this report are attached to the agenda.

VII RECOMMENDATIONS

Staff recommendations for adoption (**amend**), rejection (**maintain**) or deferral are provided for each proposed amendment pursuant to CMC§ 18.51.030. Planning Commission must deliberate and forward their recommendation to Council.

CPA19-01 (Sui Hui)

Amend Commercial designation to Multifamily, with an associated zoning of MF-10, with the exception of three² parcels that shall maintain current Commercial designation.

CPA19-02 (Rouse)

Amend Single Family Medium district to Single Family High designation with an associated zoning of R-6.

CPA19-03 (Knopp)

Maintain current designation of Commercial until such time that an analysis of adequate buildable lands in Grass Valley to meet 20-year employment projections is provided.

CPA19-04 (Camas Crossing)

Maintain current designation of Commercial until such time that an analysis of adequate buildable lands in Grass Valley to meet 20-year employment projections is provided.

CPA19-05 (City)

Hill Street: Due to neighborhood concerns, amend Parcel #86410-000 (WA State) from Park to Multifamily designation. Maintain Multifamily designation at Parcel #86400-000 (Vega).

10th Ave.: Deferral to individual property owners to sponsor an application for a comprehensive plan amendment or zoning code change in the next annual review cycle.

2. The three parcels are as follows: 81958-101 (Pacwest Energy / Gas Station); 81958-116 and 81958-117 (Frey / Summit Animal Hospital)

VIII. TABLE 1 –2019 COMPREHENSIVE PLAN ACREAGE (PROPOSED)

The following acreages represents the proposals as submitted, and does not include expansions or reductions to those areas as discussed within the staff report.

Comprehensive Plan Designations	Current Acres	Proposed Change	Final Acres
Single Family			
· Low Density	871	-9.36	861.6
· Medium Density	3617	7.425	3624.4
· High Density	425	0.325	425.3
Multi-Family			
· Low Density	279		279.0
· High Density	246	11.94	257.9
Commercial	992	-10.05	982.0
Industrial	2427		2427.0
Park	851	-0.28	850.7
Open Space / Green Space	492		492.0
Total acreage:			10,200

IX TABLE 2 - DEVELOPMENTS APPROVED SINCE 2016 TO DATE

The following list includes those developments that have received preliminary approvals since 2016.	Lots	Master FILE #
Dawson Ridge Subdivision	43	SUB17-01
43rd Avenue Subdivision	12	SUB18-01
Valley View Subdivision	36	SUB18-02
Larkspur Subdivision	10	SUB18-03
Kern Short Plat	2	SP17-02
Sundem Short Plat	2	SP17-01
Summit Terrace Subdivision	55	SUB16-01
Elm Street Short Plat	4	
The Village Phase 2	46	SUB15-04
The Parklands Subdivision	42	DA15-03
Green Mountain Planned Residential Development (127 lots developed)	1,483	Various
Hancock Springs (pending)	20	SUB18-05
Total	1,755	

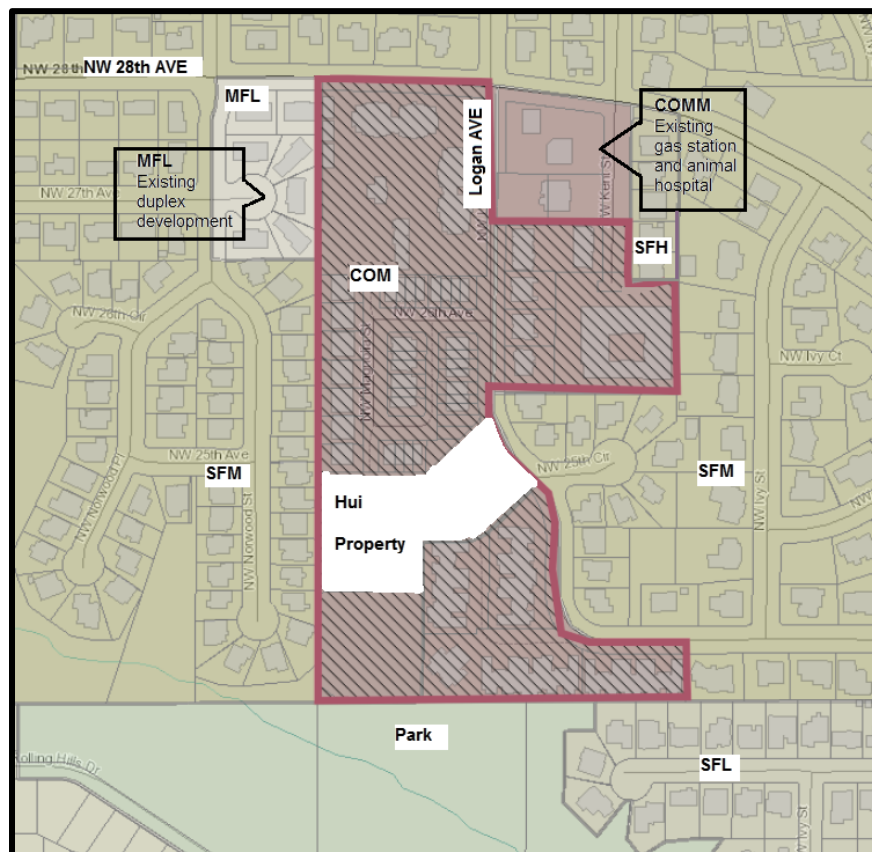
New multi-family developments:	Units	Built?
Hetherwood Apartments	150	NO
Riverview Apartments	120	YES
6th & Birch Mixed Use	30	NO
The Village Phase 1	30	NO
Parklands Multifamily	24	NO
Grass Valley Master Plan - Holland Group	288	NO
Total	642	

New Commercial /Industrial developments:	Built?
Grains of Wrath - Restaurant	YES
Union Self-Storage (under construction)	NO
NW 38th Avenue Medical / Dental Building	YES
Lacamas Heights Elementary School	YES
Camas Self-Storage (under construction)	NO
Discovery High school	YES
Grass Valley Master Plan - Holland Group	NO
Pumpkin Property Office Development	NO
Three Rivers Development Office Building	NO
Lacamas View Care Facility	NO
Samson Sports – Expansion	NO

X FIGURES OF EACH PROPOSED AMENDMENT

SUI HUI PROPERTY (CPA19-01)

Description: The property is designated "Commercial" and has commercially designated properties to the north and south. To the east and west are properties that are designated "Single family Medium". The development pattern to the north and south of the Hui Property is at multi-family densities and development styles. To the south is Summit Hills, a condominium development at 8 units per acre. To the north lies the Logan Place development with a mix of row houses and duplexes at 9 units per acre, and the Camas Ridge Apartments at 16 units per acre.



ROUSE PROPERTY (CPA19-02)

Location: 617 SW Trout Court

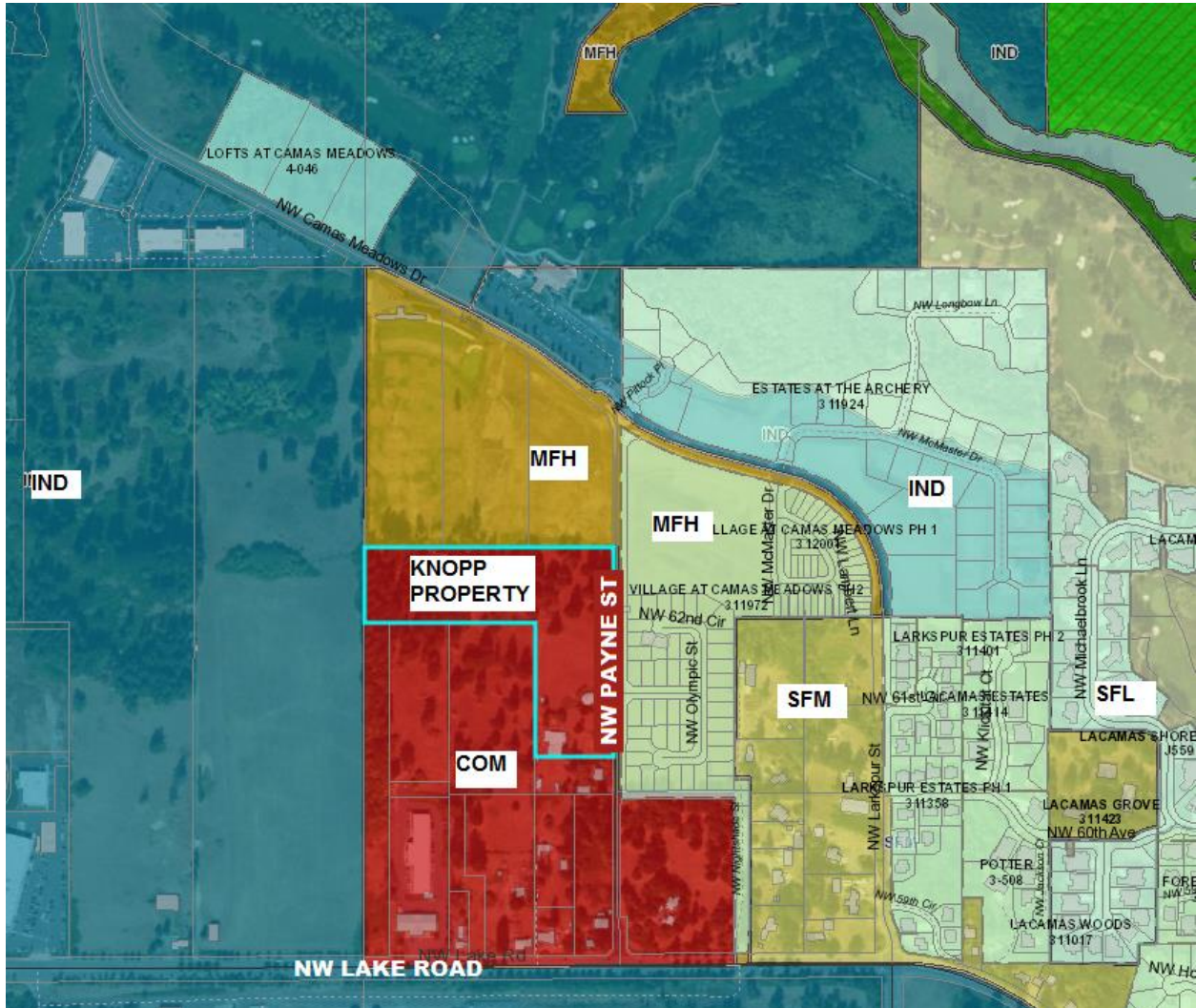
Description: Property is designated as "Single family Medium" and has the same designation to the north, south, and west. To the east are properties that are designated as "Single family High" and are developed similar to a (repealed) zoning design standard of Residential-5,000. Across the street to the south are properties that are designated as "Single family low" which generally have deep yards which are encumbered by steep slopes.



KNOPP PROPERTY (CPA19-03)

Location: 6201 NW Payne Street

Description: Property is designated "Commercial" and has commercially designated properties to the south. To the north and east are multifamily designated properties, with the Village at Camas Meadows (east) under construction. To the west is vacant industrial land.



CAMAS CROSSING (CPA19-04)

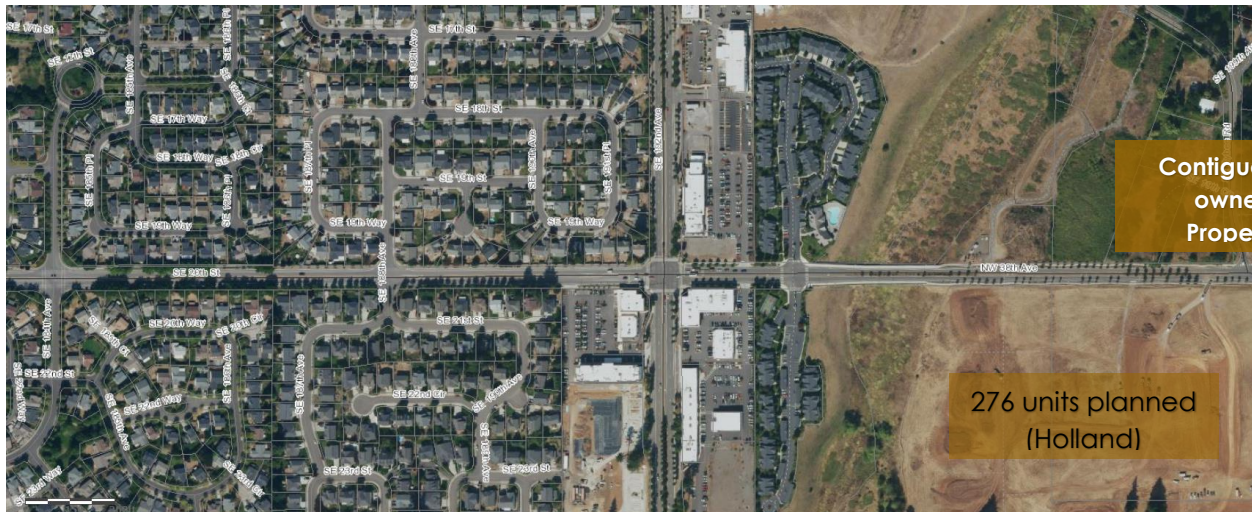
Location: NW 38th Avenue and SE 202nd Ave

Description: The property is designated "Commercial" and properties to the south, east and west are similarly designated. To the north and east, the properties are outside city limits, but within the urban growth area. One of the subject properties, and to the north of the site are designated as "Single Family Low".

(A) Comprehensive Plan Designations



(B) Aerial photo of surrounding development pattern



CITY PROPOSALS (CPA19-05)

Hill Street (**Yellow Box**): The city is considering amending the area outlined in yellow to be changed from Multifamily High (MFH) and Park (P) to Commercial (COM).

NW 10th (**White Box**): The city is considering amending this Single Family Low (SFL) area to Single Family Medium or High (SFM or SFH).

