



**Sui Hui Property (Clark County Assessor Parcel 819518-123)**

## **Application for Comprehensive Plan Amendment and Zone Change Application**

Submitted to:  
City of Camas  
Attn: Sarah Fox, Senior Planner  
616 NE Fourth Avenue  
Camas WA 98607

January 30, 2019

Prepared By:  
Otak, Inc.  
700 Washington Street, Suite 300  
Vancouver, WA 98660

Project No. 19056



# TABLE OF CONTENTS

	Page
<b>Section 1   Introduction .....</b>	<b>1</b>
Section 1.1   Background.....	1
<b>Section 2   App. for Amendments to Comp. Plan, CMC 18.51.....</b>	<b>2</b>
Section 2.1   Proposed Amendment, CMC 18.51.010(A).....	2
Section 2.2   Anticipated Impacts, CMC 18.51.010(B) .....	2
Section 2.3   Current Plan Deficiencies, CMC 18.51.010(C).....	2
Section 2.4   Supporting Comp Plan Goals, CMC 18.51.010(D) .....	2
Section 2.4.1   Camas 2035 Comp Plan Section 2.4.1, Citywide Housing.....	3
Section 2.4.2   Camas 2035 Comp Plan Section 2.4.2, Affordable Housing.....	4
Section 2.4.3   Camas 2035 Comp Plan Section 2.4.3, Senior and Special Needs Housing.....	5
Section 2.4.4   Camas 2035 Comp Plan Section 1.4.1, Citywide Land Use .....	5
Section 2.5   Functional Plan Changes Required, CMC 18.51.010(E).....	6
Section 2.6   Capital Improvements Required, CMC 18.51.010(F) .....	6
Section 2.7   Other Code and Regulatory Changes Required, CMC 18.51.010(G).....	6
Section 2.8   State Environment Policy Act Checklist, CMC 18.51.010(H).....	6
Section 2.9   Spot Zoning.....	7
<b>Section 3.0   Approval .....</b>	<b>7</b>
<b>Appendix A: Non-Project Action SEPA Supplemental Checklist</b>	
<b>Appendix B: City of Camas Community Development Department General Application Form</b>	
<b>Appendix C: Map of Proposed Amendment</b>	

## Section 1 | Introduction

The Owner proposes for consideration by Camas Planning Staff a recommendation for approval to the Camas Planning Commission and Camas City Council of a Comprehensive Plan and Map Amendment for Assessor Parcel 81958-123 (parcel).

This parcel is presently designated as Commercial, with a zoning of CC (Community Commercial). The Owner requests consideration for changing the comprehensive plan to Multi-Family High and the zoning to Multi-Family 18.

This parcel is located within a subarea of numerous properties that largely are designated for commercial uses but have developed in residential use. We support the City's consideration of an adjustment to the designations/zoning in the entire local area to better align actual development with the City's Comprehensive Plan.

Pursuant to requirements outlined in the City of Camas Pre-Application Conference Meeting Notes for Rouse File PA18-59, the following narrative describes the requested proposal in terms of specific sections of the City of Camas Comprehensive Plan, Goals and Policies.

### Section 1.1 | Background

The subject property is located at the intersection of NW Logan Street and NW 23<sup>rd</sup> Circle and is the last remaining undeveloped parcel of land in the immediate vicinity.

This undeveloped property is surrounded by a variety of development, primarily housing:

**North:** Logan Place Village | High-density, two-story zero-lot line (townhomes) development | CC Zone

**South:** Open space and/or park land | CC Zone

**East:** Summit Hills Condos | High-density, two-story zero-lot line development | RC Zone

**West:** Skyview Subdivision | Medium-density, single-family | R-7.5 Zone

The subject property is 2.2 acres in size, according to Clark County GIS Mapping. The site has moderating topography, with flat areas and localized areas of slopes on the order of 10-15%.

## **Section 2 | App. for Amendments to Comp. Plan, CMC 18.51**

### **Section 2.1 | Proposed Amendment, CMC 18.51.010(A)**

The present Comprehensive Plan designation is COM. The present Zoning Designation is Community Commercial (CC). The request is to adjust the Comprehensive Plan to a Multi-Family High designation and change the zoning to a MF-18 zone.

The subject property is located at the intersection of NW Logan Street and NW 23<sup>rd</sup> Circle and is the last remaining undeveloped parcel of land in the immediate vicinity. This undeveloped property is surrounded by a variety of primarily residential development.

The requested change in designation and zone would allow for development that better fits the pattern of existing and surrounding development, in terms of use (housing), aesthetic (building type), and circulation patterns (traffic).

### **Section 2.2 | Anticipated Impacts, CMC 18.51.010(B)**

No detrimental impacts are anticipated because of the change, as the proposed change reflects a consistency in surrounding uses.

### **Section 2.3 | Current Plan Deficiencies, CMC 18.51.010(C)**

The current comprehensive plan of COM and zoning of Community Commercial allows for development of the subject property with a variety of commercial uses, as allowed under Camas Code 18.070.030, Table 1. Many of the allowable uses appear to be incompatible with the current development pattern and density of the neighborhood.

A detailed traffic study would be necessary for any proposed commercial uses, however experience and empirical evidence suggests that some commercial uses could have a negative impact on the present experience of the neighborhood.

### **Section 2.4 | Supporting Comp Plan Goals, CMC 18.51.010(D)**

The proposed amendment promotes general principles of the growth management act by affording land development that is consistent and compatible with surrounding uses, as well as affording density of residential housing where existing municipal/public services exist. In addition, at the following comprehensive plan Citywide Housing and Land Use goals and policies are addressed here:

## Section 2.4.1 | Camas 2035 Comp Plan Section 2.4.1, Citywide Housing

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

Policy H-1.1: The requested proposal creates a variety in the available housing options in the neighborhood, through creation of a pocket of multi-family housing in the local area. Presently, the local area surrounding the parcel is developed with housing consistent with single-family medium density (e.g., duplexes).

Policy H-1.2: The requested proposal creates an opportunity for the developer to build a multi-family, multi-storied project that is advantageous for the existing sloped and natural contours of the parcel. In addition, it is anticipated that a multi-family development would utilize existing public infrastructure, thus eliminating the need to build new impervious public infrastructure. By building vertically with multi-family, impervious roof area is minimized relative to the residential density, lessening the quantity of surface runoff. Where feasible, low impact development options for onsite runoff management will be considered.

Policy H-1.3: The requested proposal is limited to a single assessor parcel. A multi-family designation for this parcel will create a variety of housing within the *existing* and surrounding development. The parcel itself is not large enough to consider a variety of housing types.

Policy H-1.4: Not applicable. The requested proposal is limited to one (1) parcel, which is located within and surrounded by single-family medium density development. These surrounding developments occurred under conditional use in the CC Comp. Plan Designation.

Policy H-1.5: The requested proposal is intended to provide housing that is complimentary to the surrounding single-family medium development, in terms of construction type and appearance.

Policy H-1.6: The requested proposal allows for the development of both an in-fill and underutilized parcel, where urban public services are readily available. A multi-family building on the parcel is intended to be designed and constructed with features compatible to surrounding development.

Policy H-1.7: The requested proposal provides for a variety of housing type within the local area, to be reviewed and approved through the City of Camas land use approval process.

## **Section 2.4.2 | Camas 2035 Comp Plan Section 2.4.2, 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.

Policy H-2.1: The requested proposal offers a choice, variety and affordability of housing opportunity through higher-density multi-family development. Ownership of units in a development constructed on the parcel may be an option in the future.

Policy H-2.2: The Owner's would consider opportunities through incentives and/or bonuses to create housing that is financially feasible to develop and considered affordable.

Policy H-2.3: The Owner's would consider opportunities through incentives and/or bonuses to create housing that is financially feasible to develop and affordable to households earning 50-80% of Camas' MHI at time of completion of the development.

Policy H-2.4: Should the Owner and City of Camas (or other public agency or private entity, such as Vancouver Housing Authority or Housing Initiatives LLC) reach agreement on the creation of affordable housing on the parcel, the Owner will comply with conditions of the agreement for the duration of the "affordability" of the designated units within the project.

Policy H-2.5: The Owner's will consider collaborative partnerships with potential partners to create designated affordable housing.

Policy H-2.6: The Owners will consider collaborative partnerships with potential partners to create designated affordable housing, and where the partner may provide financial assistance to qualifying low-income residents to maintain or repair the health and safety features of their homes.

Policy H-2.7: Not applicable to the requested proposal.

### **Section 2.4.3 | Camas 2035 Comp Plan Section 2.4.3, Senior and Special Needs Housing**

Goal H-3: Encourage and support a variety of housing opportunities for those with special needs, particularly those with challenges relating to age, health, or disability.

Policy H-3.1: The requested proposal creates multi-family (and generally more affordable) housing in the urban area where public services are readily available.

Policy H-3.2: The requested proposal is limited to one (1) parcel, which is located within and surrounded by single-family medium density development. It is anticipated that the development will be focused on providing a maximum residential density, as allowed by the City. The geographic conditions, size of the parcel, and lack of available off-street parking do not afford a site that is viable for community social and health services.

Policy H-3.3: The requested proposal, if approved, will afford the opportunity for a development that may provide units that are readily accessible to seniors and/or those with special needs.

Policy H-3.4: The requested proposal is for a parcel of land that, due to existing conditions and site contours, does not lend itself to development of single-story houses.

### **Section 2.4.4 | Camas 2035 Comp Plan Section 1.4.1, 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.

Policy LU-1.1: The requested proposal supports the City's goal to provide a variety of residential opportunities for residents as the community grows, through increased density on in-fill property that is located where urban services are readily available to serve both a project and the residents of a development. Further, the requested proposal, although small in size, affords more absorption of the planned increase in population through urban development and reduction on pressure to continue suburban sprawl.

Policy LU-1.2: The requested proposal, if approved, affords for in-fill development on an underutilized parcel. At this parcel, public services are readily available and due to the small size of a potential future multi-family project, there would not be anticipated a significant demand created for additional public services.

Policy LU-1.3: The requested proposal, if approved, affords the development of a use that is both compatible in use and design of both the built structures and the natural environment. Surrounding development is single-family medium. The requested proposal is for multi-family high zoning, in order to maximize the development potential (multi-storied, hillside) of the unique natural conditions of the parcel.

Policy LU-1.4: This Citywide land use policy is not directly applicable to the requested proposal.

Policy LU-1.5: The requested proposal fulfills this Citywide land use policy, through encouragement of in-fill development of underutilized urban parcels.

Policy LU-1.6: The requested proposal is proposed on an urban parcel that surrounded by residential development and served by existing public facilities. Impacts on current residents are anticipated to be limited or non-existent and presuming that off-street parking for residents of a new development to be provided per City of Camas land use development requirements.

Policy LU-1.7: The requested proposal is in compliance with general County-wide planning policies, which encourage urban in-fill development on parcels with existing public services.

Policy LU-1.8: The requested proposal, if approved, will result in the opportunity for an urban development on an underutilized parcel. A proposed project will comply with City of Camas land use and engineering development requirements, including the study of the feasibility of onsite capture, management and reuse of surface runoff.

Policy LU-1.9: The requested proposal, if approved, will afford the opportunity for urban development on an underutilized parcel. Where financially feasible and within the context of the existing development, a project may consider artistic opportunities.

## **Section 2.5 | Functional Plan Changes Required, CMC 18.51.010(E)**

No changes to the City's functional plans are anticipated necessary to support the request.

## **Section 2.6 | Capital Improvements Required, CMC 18.51.010(F)**

No City capital improvements are anticipated necessary to support the request.

## **Section 2.7 | Other Code and Regulatory Changes Required, CMC 18.51.010(G)**

No changes to other city or county codes are anticipated necessary to support the request.

## **Section 2.8 | State Environment Policy Act Checklist, CMC 18.51.010(H)**

Appendix A includes the non-project action SEPA checklist supplemental.



## **Section 2.9 | Spot Zoning**

This parcel is located within a subarea of numerous properties that are designated for commercial uses but have developed in residential use.

We support the City's consideration of an adjustment to the designations/zoning in the entire local area to better align actual development with the City's Comprehensive Plan.

The requested proposal primarily serves a public interest. As previously detailed, the proposal affords the opportunity to:

1. Develop an in-fill and underutilized urban parcel with existing public services
2. Affords the opportunity for a development that better fits with the natural environment and existing conditions of the parcel (sloped and bracketed by existing development)
3. Affords the development of housing that creates a variety and choice of options for residents
4. Creates an opportunity for development of housing that may be considered more affordable than single-family residential development
5. Creates an opportunity for collaborative partnership with public or private affordable housing developers.

## **Section 3.0 | Approval**

We appreciate the City's consideration of this requested proposal for a Comprehensive Plan and Zoning Change for the Sui Hui property.

The narrative provided details the reasonable and defensible justification for an approval of the requested action. By approving this request, the City will provide for the creation of an opportunity for development of an infill parcel that advances the goals and policies of the Camas 2035 Comprehensive Plan.

## **Appendix A**

Non-Project Action SEPA Supplemental Checklist

## D. supplemental sheet for nonproject actions [\[help\]](#)

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

*The proposal to change from commercial use to residential of the subject property is not expected to increase negative impacts on the environment.*

Proposed measures to avoid or reduce such increases are:

*Not applicable.*

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

*The proposal is not expected to affect plants, animals, fish or marine life.*

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

*Not applicable.*

3. How would the proposal be likely to deplete energy or natural resources?

*The proposal is not expected to deplete energy or natural resources.*

Proposed measures to protect or conserve energy and natural resources are:

*Not applicable.*

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

*The proposal is not likely to use or affect environmentally sensitive areas.*

Proposed measures to protect such resources or to avoid or reduce impacts are:

*Not applicable.*

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposal is not likely to affect land and shoreline use.

Proposed measures to avoid or reduce shoreline and land use impacts are:

Not applicable.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposal to change from a commercial to residential use is likely to increase demands on public services and utilities, depending on the nature of a future residential development. Additional studies (e.g., Traffic Impact Assessment) would be prepared, as required by the local agency, to plan and address any significant demands on public services.

Proposed measures to reduce or respond to such demand(s) are:

Not applicable, at this time.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The proposal is not anticipated to conflict with local, state or federal laws or requirements for the protection of the environment.

## **Appendix B**

City of Camas Community Development General Application Form



Community Development Department | Planning  
 616 NE Fourth Avenue | Camas, WA 98607  
 (360) 817-1568  
[communitydevelopment@cityofcamas.us](mailto:communitydevelopment@cityofcamas.us)

General Application Form

Case Number:

**Applicant Information**

Applicant/Contact: Otak, Inc./Tim Leavitt, PE Phone: ( 360 ) 906.9432

Address: 700 Washington Street, Suite 300

Street Address	E-mail Address	
Vancouver	WA	98660
City	State	ZIP Code

**Property Information**

Property Address: Intersection of NW Logan St and NW 25th Circle 81958123

Street Address	County Assessor # / Parcel #	
Camas	WA	98607
City	State	ZIP Code

Zoning District Community Commercial Site Size 2.22 acres

**Description of Project**

Brief description:  
 Request to review and approve of a comprehensive plan and zone change from the current Community Commercial zoning to multi-family, consistent and compatible with adjacent and surrounding uses.

Are you requesting a consolidated review per CMC 18.55.020(B)? YES  NO

Permits Requested:  Type I  Type II  Type III  Type IV, BOA, Other

**Property Owner or Contract Purchaser**


Owner's Name: Hui Sui Phone: ( 360 ) 907.7008

Address: 8103 SE Evergreen Highway

Street Address	Apartment/Unit #	
Vancouver	WA	98674-2302
City	State	Zip

**Signature**

I authorize the applicant to make this application. Further, I grant permission for city staff to conduct site inspections of the property.

Signature:  Date: 11.29.19

Note: If multiple property owners are party to the application, an additional application form must be signed by each owner. If it is impractical to obtain a property owner signature, then a letter of authorization from the owner is required.

Date Submitted:	Pre-Application Date:	<input type="checkbox"/> Electronic Copy Submitted	Validation of Fees
Staff:	Related Cases #		

**Appendix C**  
Map of Proposed Amendment

