



1806 SE 202nd Avenue
Camas, Washington 98607

July 07, 2017

To: City of Camas Community Development

Re: Title 18 Code Changes – 18.09 Density and Dimensions

To Planning Commission and Staff,

I am providing additional comments in response to discussions during Planning Commission hearing held on June 20, 2017.

The issue I have further comments on relates to Residential uses in Commercial zones. Attachment 1 to staff report showed that there are TWO sets of residential uses in *Table 1 - 18.07.030 Commercial and Industrial Land Uses*. The two sets are different – the first set is older and does not allow residential in some Commercial zones, and the second set was a result of adding Note 10, which allowed residential uses upon approval of a MXPDP zone overlay. Staff's final recommendation was to cross out the second set, and keep the first set.

Removing the second set of residential uses would effectively wipe out any residential potential that land owners may have relied upon when they purchased their property. I previously suggested a revision to Note 10:

Note 10 [for residential uses in certain commercial zones]: Allowed as approved in a ~~mixed use planned development (MXPDP) overlay area~~ master plan with development agreement.

Instead of changing Note 10, Staff laid out other mechanisms that could be used by an owner seeking a mix of uses on their commercial property. Here are my comments on these options:

1. Wait for the City to complete their Sub area plans

This avenue takes the planning out of the hands of the property owner. It is unknown if residential uses would be allowed at the end of this planning exercise. Subarea planning will occur on properties that have already been consolidated by a handful of owners, who have already stated their desires for inclusion of residential uses.

2. Request a Comp Plan change

This avenue is a Type IV annual process, and would require a higher level of analysis than would be required through a Type III discretionary process.

3. Request a zone code change.

This avenue is also a Type IV process, and would require a higher level of analysis than would be required through a Type III discretionary process. Staff mentioned that rezoning to the MX zone would be Type III process, however, the MX zone requires a vertical mix of uses that are not suitable for large scale suburban commercial areas (which can provide horizontal mixed uses). Staff also mentioned that the MX code will be going through an update this year, so it is unknown at this time what the state of that code will be. I also note that this current code change is changing apartments in the MX zone from Permitted to Conditional.

4. Flexible Developments

Staff also mentioned Flexible Developments as an option, but I note that that code states that *"Only permitted land uses within the underlying zoning classification shall be considered permitted within a flexible development"*. Thus, if residential is not allowed in Commercial, I don't see where this approach would be applicable.

In summary, I find no suitable Type III options to allow a commercial property owner to request residential uses in a mix of uses. Therefore, I request that Planning Commission again consider changing Note 10 to allow residential uses in noted commercial zones under an approved master plan and development agreement, perhaps with limitations of a minimum project size of 10 acres, with residential uses allowed in up to half of the project area.

Thank you for your consideration of these comments.

Sincerely,

Melanie Poe, Project Manager
Torvale, LLC
melanie@torvale.com
360-947-0347

From: [Melanie Poe](#)
To: [Community Development Email](#)
Subject: Re: Comment for Title 18 Code Changes, Planning Commission Hearing to be held July 18, 2017
Date: Friday, July 07, 2017 4:59:20 PM
Attachments: [170707 Torvale Comment Letter.pdf](#)
[ATT00001.htm](#)

To Camas Community Development,

Attached please find a comment for Planning Commission hearing to be held on July 18 2017.

Please consider and include comment as part of record of proposed Title 18 code changes.

Thank you.

Best wishes,
Melanie Poe
Project Planner
360-947-0347
melanie@torvale.com