



Paul Dennis, Torvale LLC
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April 18, 2018

Dear Mr. Dennis,

The city received your application for an amendment to the comprehensive plan on January 31, 2018 (City file #CPA18-01). This letter provides initial staff review comments and an anticipated schedule for processing.

Scheduling:

- In accordance with CMC§18.51.020, staff reported to Planning Commission and City Council that the city received applications for amendments to the comprehensive plan. Public hearings are typically scheduled in the months of May and June.
- Staff has scheduled a meeting with your team on May 2nd at 3:30 p.m.

Review Comments:

1. The application materials did not include a signed authorization for 30 acres of the 70.73 acres proposed to be amended. The following parcels did not provide authorization for the application:
 - Sharp Electronics 986033-959 (20 acres) or
 - NRP LLC (Sigma) 125198-000 (10 acres)
2. The applicant proposes to amend the combined parcels to a comprehensive plan designation of Commercial with a zoning of Regional Commercial. The application addressed the criteria as required, however a few errors and omissions were identified in the information provided.
 - a. Not all of the subject parcels are zoned LI/BP. Those standards are only applicable to 13 acres¹ owned by JR Merit. The narrative should be revised to reflect the differing design standards in effect.
 - b. The design standards for the BP zone differ from the LI/BP zone. The BP zone standards includes 15-foot setbacks at the front and side lot lines and 50-foot setback at the rear of the property. Those standards are applicable to 28 acres owned by Daley et al.
 - c. The applicant does not identify particular uses that are prohibited within the current designations, which would be considered to be obstacles to development of the subject properties. If a desired (future) land use is currently prohibited within the BP or LI/BP zones, the applicant could propose a Zoning Text Amendment to focus on that specific perceived code deficiency. Refer to CMC§18.51.025 Zoning text and map amendments.
 - d. Properties that are zoned Regional Commercial allow residential development, which is prohibited in industrial zoning designation. Residential development in this area was not anticipated or included within the city's comprehensive plan.

¹ NRP property (10 acres) is also zoned LI/BP, but the property owner is not a signatory to the application to date.

3. The applicant should provide a comparative list of uses that are allowed within a regional commercial zone as compared to the current designations, in order to demonstrate a deficiency per CMC§18.51.010(C). Refer to the list of allowed uses at CMC Chapter 18.07 Use Authorization.
4. If higher intensity uses are anticipated or proposed, such as residential development, then the associated impacts on the Park System would need to be evaluated. Specifically, if the higher intensity development is in an area that was not anticipated with the adoption of the Parks, Recreation, and Open Space Comprehensive plan.
5. The applicant will be required to provide information for review and approval by the City regarding the change in highest possible water consumption, sewer volumes and traffic generation based on the proposed comp plan and zoning changes. If there are measurable increases in potential water consumption and/or sewer volumes, the applicant will be required to work with the city's consultants to update the applicable (water and/or sewer) system plan and capital improvements plan.

If trip generation is potentially increased above the accepted transportation allocation zones (TAZs) for these parcels, the applicant will be required to work with the city's consultant to provide the updated TAZ information and run the RTC traffic model to identify potential additional generated traffic improvements citywide.

If you have any questions or concerns prior to the scheduled meeting, please contact me at (360) 817-7269.

Regards,

Sarah Fox, Senior Planner