

2018 COMPREHENSIVE PLAN AMENDMENTS STAFF REPORT

TO: City Council

FROM: Sarah Fox, Senior Planner on behalf of the Planning Commission

REPORT DATE: October 24, 2018 HEARING DATE: To be determined by Council

Public Notices: Notice of a public hearing to consider proposed comprehensive plan amendments was published in the Camas Post Record on October 11, 2018 (Legal publication #48070). Notice of intent to adopt amendments (60-day) was received by the Department of Commerce on October 2, 2018 (Material ID #25351).

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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

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 2018 announcement was published in the Camas Post Record and ran weekly the entire month of November 2017.

The City received one application during this open review cycle. The amendments are proposed by Torvale who represents properties owned by Daley, JR Merit Enterprises, LLC, and NRP LLC. The properties are currently designated as "Industrial" and are located in the western portion of the city known as "Grass Valley". Torvale proposes to amend the following parcels to a comprehensive plan designation of "Commercial" and a zone of "Regional Commercial" (RC): 125623-000; 125193-000; 125185-000; 125627-000; 125207-000; 125198-000; for a total of 50.73 acres.

At a public hearing on October 23, 2018, Planning Commission unanimously forwarded a recommendation to Council to amend the zoning of 23 acres (three parcels) that are currently zoned LI/BP to BP. Their decision is consistent with Option #3 of CMC§18.51.050(B).

II. BACKGROUND/ANALYSIS:

In 2016, the city adopted a cover to cover update to its comprehensive plan and map, titled <u>Camas 2035</u> (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.

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.

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 development has occurred in the city's downtown and along NW 38th Avenue.

Since 2016, the city gained four new commercial businesses and has three additional projects approved but not constructed yet (Refer to Table 2 of this report). One of those projects was born from a development agreement for 35.44 acres of commercial designated land that fronts NW 38th Avenue, called the "Grass Valley Master Plan". The development will include approximately half of the site for commercial and office uses to include three office buildings, and a market/commercial building. The development is expected to add 1,500 jobs to the area. The other half of the site (approx. 14 acres) will include 12 apartment buildings each with 24 units for a total of 288 units.

In summary, the city has gained new businesses, seven new commercial facilities and is gaining on the employment goals established for 2035.

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 these 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 increase in 526 residential units for a current total of 8,207 (3,342 more units needed).

Since 2016, preliminary plat¹ approval has been granted to 10 developments for a total of 252 lots. Also, in that timeframe, the city has approved four multi-family developments, with a combined multi-family unit total of 486 units.

In sum, there were 526 units added since 2016, and another 738 units that will be built over the next few years. With the new units built and others approved (not yet built), the city has approximately 2,078 units remaining to reach its residential goals to support the future population.

Residential Units

 14,000
 11,549

 12,000
 11,549

 10,000
 7,681
 8,207

 6,000
 7,681
 8,207

 4,000
 7,681
 9

 2,000
 Housing Units
 2016

III. DISCUSSION AND FINDINGS

The applicant, Torvale, proposes to amend 50.73 acres of industrially designated lands to commercial, with an associated zone of Regional Commercial (RC). The combined site currently includes 27.73 acres zoned Business Park (BP) and 23 acres zoned Light Industrial/Business Park (LI/BP).

The application also included conceptual site plans for Daley and Merit properties. The primary reason for the proposed amendment is the applicant's concern that the development standards of both the LI/BP and the BP zones are too restrictive and would prevent full development of the properties. In sum, the development standards of the RC zone are considered necessary as this zone does not have any setback standards, or limitations to lot size or structure height.

The subject properties are vacant with the exception of Sigma Design (Parcel 125198-000), and are located on sites with elevation changes. The application states that some of the properties are additionally constrained with wetlands. The surrounding properties are developed to the east and south with residential subdivisions. To the west is an electrical substation and to the southwest is the Sharp facility, along with the new middle and high schools. To the north are the industrially developed properties that house Bodycote and Karcher North America.

<u>Development Standards</u>: The development standards for LI/BP differ greatly from BP. The 100-foot front and rear setbacks as required in the LI/BP zone are not intended for properties that do not front major roadways. Those standards are also not practical on parcels that are additionally constrained with critical areas (e.g. wetland, steep slopes), as are the subject parcels of the application. The development standards for LI/BP are primarily intended to provide "campus style" landscaping along the roadways and to discourage conversion to commercial uses (*Refer to Section 18.21.010 Purpose Statement*).

Of the six parcels combined with this application, only two parcels front roadways. Sigma Design fronts NW Pacific Rim Blvd., and the other, Parcel 12518-000 (Daley) is vacant and is adjacent to NW Brady Road. The applicant noted that Sigma Design would like to expand and better utilize their site, although the use would remain high tech.

The purpose of the RC zone, as defined at CMC18.05.050-C, "Regional commercial is the largest of the commercial zones and is designed to serve the region or significant portion of the region's population." The

¹ Refer to Table 2 of this report.

majority of the city's RC zoned land is located along major transportation corridors such as NE 3rd Avenue and NW 38th Avenue. The development standard for RC are compatible with many commercial uses that require high roadway visibility. The lack of setbacks in the RC zone is in balance with Design Review guidelines which encourage the placement of buildings next to the street to encourage more visibility, walkability, and discourages parking along those frontages.

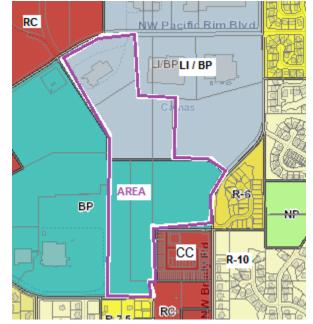
In comparison the BP development standards have setbacks of 15 feet from the front and side lot lines and requires 50 feet from the rear lot line. Setbacks are applicable to structures, and do not limit the design of other required features of a site

1- Map of Current Zoning (Subject area is outlined in purple)

to include parking. Practically speaking, new development in the RC zone –a zone without setbacks--- would not be able to construct a building that encompasses 100 percent of the site, as the development would also need to balance the required percentage of landscaping (15% of the site), and off-street parking requirements for the intended use.

The HI zone has the same development standards (or lack thereof) as the RC zone. If the development standards were the primary reason for the amendment, then the applicant could request a Zone change, or even a Zoning Text change, rather than a comprehensive plan amendment.

BP development standards are intended to be compatible with office and high tech development, which is the type of development that was illustrated on the applicant's conceptual drawings.



Development Standards Findings: Staff is supportive of those properties (map at right) that are currently zoned LI/BP to be amended to BP zoning given the frontage setbacks of the LI/BP

zone. The BP zone's minimal frontage setbacks along NW Pacific Rim will provide flexibility for landscaping and other infrastructure.

Use Authorization:

The applicant requests that the properties be designated Commercial with an associated zone of RC. The applicant's submittal included a side-by-side comparison of the allowed uses in the RC, BP and LI/BP zones. The uses allowed in both the RC and BP zone are quite similar in all of the major categories with the exception of two---Industrial and Residential.

In the RC zone industrial uses are not allowed except "optical goods" and "packaging of prepared materials". The city's industrial areas, specifically the BP and LI/BP zones, do not allow residential uses such as apartments and retirement homes. The RC Zone allows for residential uses after approval of a development agreement and other performance stipulations (Refer to Note #10, CMC18.07.030). Note 10 is applicable to both the RC and CC commercial zoning designations. Although not proposed, the MX commercial zone allows most residential uses without a development agreement and allows high-tech uses.

As discussed, the majority of the city's land area is designated as residential land. The city is on track to meet both its employment and residential goals. The uses allowed within the comparison zones are only dissimilar in a very narrow use category. The proposal to develop the sites with office uses is consistent with both industrial and commercial zones. However, approval to convert the land to RC zoning, carries a potential that all other uses within the RC zone be allowed, including conversion to residential use.

Use Authorization Findings: Staff finds that the uses between industrial (BP) and commercial (RC) designations are similar with the exception of residential uses. The conceptual development plans are compatible with BP zoning and development standards.

IV. EVALUATION CRITERIA PER CMC§18.51.030 (A - D)

A. Impact upon the city of Camas comprehensive plan and zoning code;

DISCUSSION: The combined 50.73 acres would increase the city's commercial lands 5% while decreasing the city's industrial land by 2%. The subject properties are within an area described as "Grass Valley" in the city's comprehensive plan. The applicant proposed amending the comprehensive plan map designation of the subject properties from Industrial to Commercial. Both designations are considered to be "employment".

The application has not proposed modifications to the zoning code, however if the BP zone allowed for nursing homes/retirement homes, and the RC zone allowed for high-tech uses, then differences in use authorization between the zones would be limited to development of strict residential uses such as apartments.

FINDINGS: The application proposes to modify the city's comprehensive plan map.

B. Impact upon surrounding properties, if applicable;

Discussion: The proposal to utilize the development standards for the RC zone would have the most effect on those properties across NW Brady Road and to the immediate south of the subject properties at Parker Village, given that Sigma Design is already a developed site. Residential developments generally have building setbacks of 20-feet and side yard setbacks. The commercial property to the south of the subject properties is zoned CC, but developed with a high-density residential development.

As discussed, the RC zone does not have minimum setbacks, aside from those required to fulfill landscaping and parking standards. It is not clear in the applicant's submittal how the design of development on the subject properties will be designed compatible with existing surrounding development.

Findings: Staff did not find evidence in the record of efforts to minimize impacts to the surrounding existing developments.

C. Alternatives to the proposed amendment; and

FINDINGS: No alternatives were proposed by the applicant. However, staff suggests that the entirety of the subject properties be zoned BP.

D. Relevant code citations and other adopted documents that may be affected by the proposed change.

DISCUSSION: The proposal for amending the city's comprehensive plan must also include, "An explanation of why the current comprehensive plan is deficient or should not continue in effect" per CMC§18.51.010-C. The goal for Grass Valley at Section 6.4.3 of Camas 2035, states (in part), "the City has invested in significant improvements in Grass Valley in support of high-tech industrial development, which is still the focus of this area." Further, Economic Development policy ED-3.3, states, "Protect employment land from conversion to residential uses by requiring an analysis of adequate buildable lands in Grass Valley to meet 2-year employment projections prior to land conversion approval."

FINDINGS: Given that the RC zone allows residential development (Note #10), it is not clear how the proposed amendments will "protect employment land from conversion."

V. PUBLIC COMMENT

At the writing of this report, no comments were received on the consolidated amendments.

At the public hearing on October 23, 2018, the applicant spoke on their own behalf. No other public provided testimony.

VI. RECOMMENDATION

City Council's decision on the proposed amendments may include the following actions pursuant to CMC§18.51.050 (B) (1-5):

- 1. Approve as recommended;
- 2. Approve with additional conditions;
- 3. Modify, with or without the applicant's concurrence;
- 4. Deny (resubmittal is not allowed until the next year for comprehensive plan amendments);
- 5. Remand the proposal back to the planning commission for further proceedings.
 - Planning Commission unanimously forwarded a recommendation to amend the zoning of 23 acres (three parcels) that are currently zoned LI/BP to <u>BP</u>. Their decision is consistent with Option #3 of CMC§18.51.050(B).
 - The applicant requested to amend the comprehensive plan designation of 50.73 acres of "Industrial" parcels to "Commercial" with an associated zone of RC.

MAP: PROPOSED COMPREHENSIVE PLAN AMENDMENTS

(Proposed amendment area is outlined in purple)

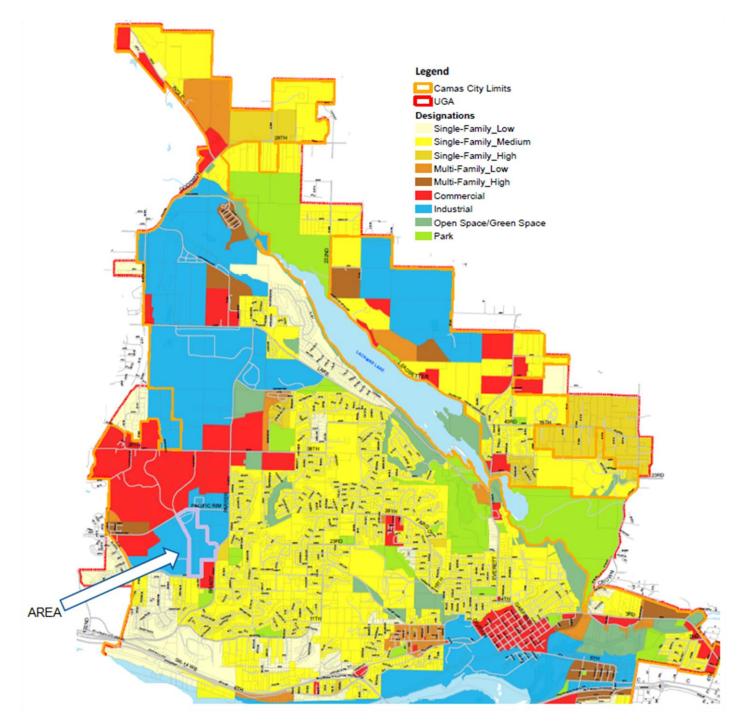


TABLE 1 –2018 COMPREHENSIVE PLAN ACREAGE (APPROX.)

Comprehensive Plan Designations	Current Acres	Proposed Change	Final Acres
Single Family Residential			
· Low Density	871	0	
· Medium Density	3617	0	
• High Density	425	0	
Multi-Family			
· Low Density	279	0	
• High Density	246	0	
Commercial	992	+50.73	1042.73
Industrial	2427	-50.73	2376.27
Park	851	0	
Open Space / Green Space	492	0	
Total acreage:	10,200		

TABLE 2 - DEVELOPMENTS APPROVED SINCE 2016 TO DATE

The following list includes those developments that have received preliminary approvals, along with those that have been built within this time frame.

Single family preliminary plats :	Lots
Dawson Ridge Subdivision	43
43rd Avenue Subdivision	12
Valley View Subdivision	36
Larkspur Subdivision	10
Kern Short Plat	2
Sundem Short Plat	2
Summit Terrace Subdivision	55
Elm Street Short Plat	4
The Village Phase 2	46
The Parklands Subdivision	42
Total	252

New multi-family developments:	Units
Hetherwood Apartments	150
6th & Birch Mixed Use	30
The Village Phase 1	30
Grass Valley Master Plan - Holland Group	288
Total	498

New Commercial /Industrial developments:

Grains of Wrath - Restaurant

Union Self-Storage

NW 38th Avenue Medical / Dental Building

Lacamas Heights Elementary School

Camas Self-Storage

Discovery High school - Project based school

Grass Valley Master Plan - Holland Group