

SE 192ND AVENUE  
COMPREHENSIVE PLAN AMENDMENT AND  
ZONE CHANGE REQUEST

2481.14946.01

June 2023

**Prepared for:**

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## 1.0 INTRODUCTION

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### General Information

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<b>Project Location</b>	1320 SE 192 <sup>nd</sup> Avenue Vancouver, WA 98683
<b>Parcel ID Number(s):</b>	177224000, 177224005, 177224010, 177238000, 177239000, 177240000, 177242000, Unimproved 27-foot-wide by 445.25 feet long unimproved right-of- way
<b>Comprehensive Plan Designation:</b>	Urban Low-Density (UL)
<b>Zoning:</b>	Urban Low-Density Residential (6 DU/Acre)
<b>Overlay(s):</b>	None
<b>Site Area:</b>	Approximately 10 acres

## 2.0 PROJECT SUMMARY

### 2.1 Existing Conditions

#### Description of Requested Amendment

On behalf of the applicant, Vance Development, DOWL has prepared a request for a Comprehensive Plan Amendment and concurrent Zone Change (CPA/ZC) for a group of parcels located northwest of SE 192<sup>nd</sup> Avenue and SE 15<sup>th</sup> Street intersection in East Vancouver. This request includes a Comprehensive Plan Map change from Urban Low-Density (UL) to Urban High-Density (UH) and a corresponding Zone Change from Urban Low-Density Residential, R-6 (6 dwelling units (du) per acre) to Urban High-Density Residential, R-30 (30 du per acre). A Land Use Preliminary Application form has been completed and is included with this narrative as Exhibit A.

No development requests are included with this CPA/ZC application. However, a conceptual site plan is provided and discussed briefly with the CPA/ZC to provide context for the future development scenario which could follow approval of this CPA/ZC request. A Trip Generation Comparison Report (Trip Report) has been prepared by Kittelson and Associates, Inc. (KAI) to establish trip generation estimates under both the existing and proposed zoning scenarios to identify the net increase that could be experienced if the CPA/ZC is approved. The Trip Report is included as Exhibit D. As requested by city staff during the pre-application conference, the applicant has provided the comparison as an initial step in the scoping process for a full transportation impact study (TIS) which will be prepared and submitted for review prior to the first public meeting regarding the proposal.

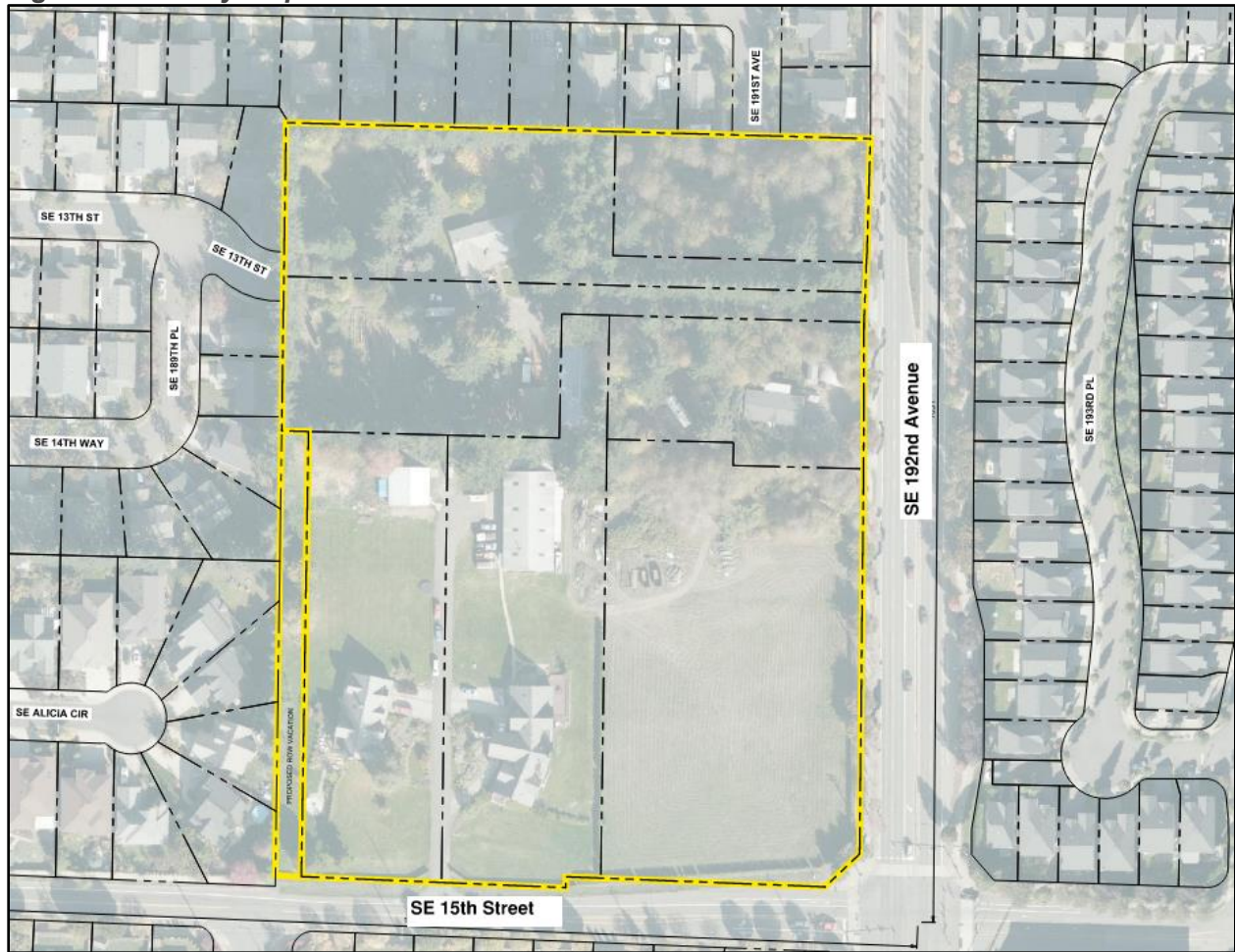
#### Existing Site Conditions

The project site consists of tax lots 177224000, 177224005, 177224010, together with a 27-foot-wide by approximately 445-foot-long unimproved right-of-way (ROW), further identified as Lots 1, 2, and 3 in the Nielsen Short Plat (Book 2, Page 634), and tax lots 177240000, 177242000, 177238000, and 177239000. The property is approximately 10 acres. Portions of the project are developed with single-family houses and appurtenant structures including carports, garages, decks, well(s), and on-site sewage facilities. There are no mapped indicators of critical areas on the project site. The project site is also relatively flat, with slopes typically ranging between 0-5 percent. A summary of the site is provided in Table 1 below. The assemblage sits northwest of the intersection of SE 192<sup>nd</sup> Avenue and SE 15<sup>th</sup> Street as reflected in the Site Vicinity Map, Figure 1, below, developed from Clark County Maps Online.

Table 1: Site Summary

Parcel ID	Zoning	Critical Areas	Use	Acreage
177224000	R-6	No mapping indicators	Single-Family Residential	1.43
177224005	R-6	No mapping indicators	Single-Family Residential	1.74
177224010	R-6	No mapping indicators	Vacant	2.52
177240000	R-6	No mapping indicators	Single-Family Residential	0.82
177242000	R-6	No mapping indicators	Vacant	0.79
177238000	R-6	No mapping indicators	Vacant	1.21
177239000	R-6	No mapping indicators	Single-Family Residential	1.36
Unimproved ROW	R-6	No mapping indicators	Vacant	0.28
<b>Total:</b>				<b>10.15</b>

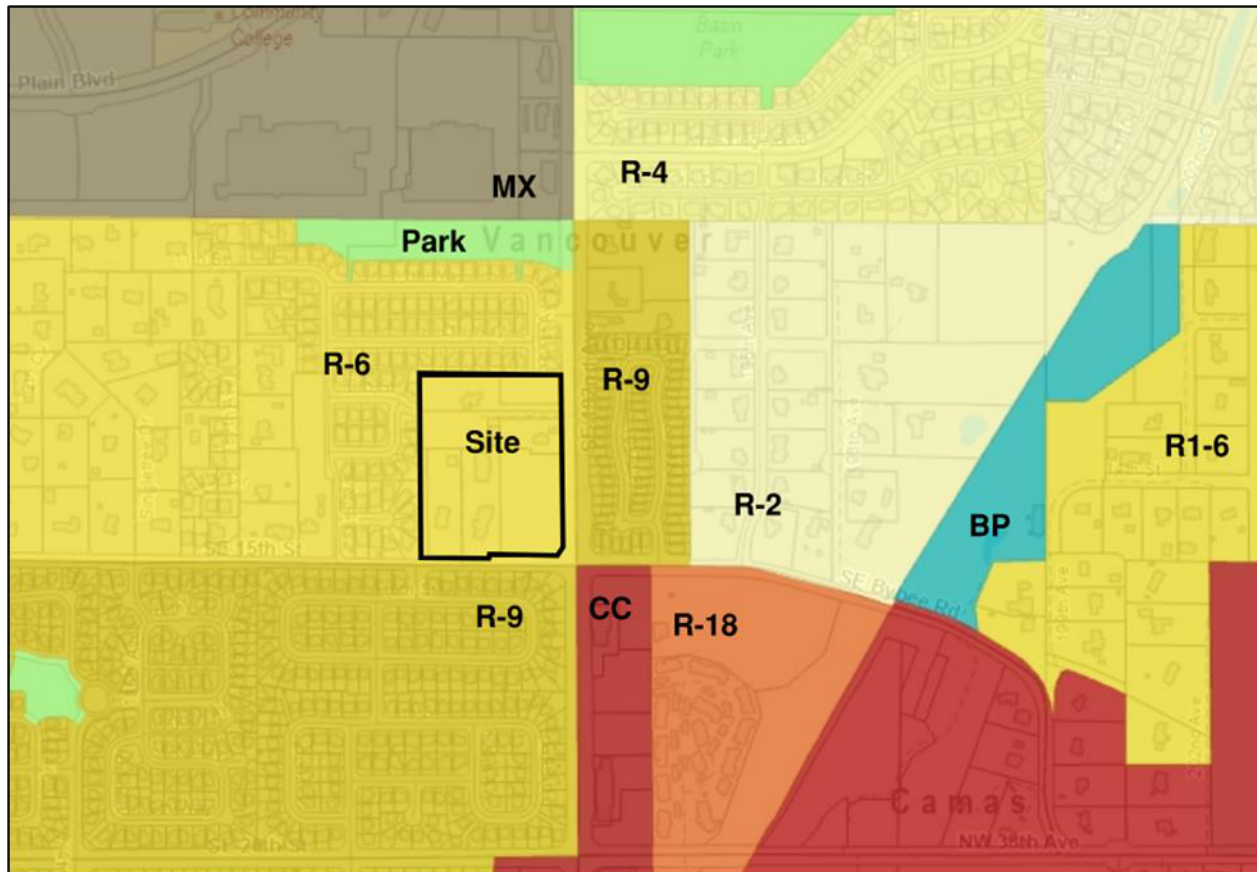
**Figure 1: Vicinity Map**



The site is bordered to the north and west by single-family dwellings, to the south by SE 15<sup>th</sup> Street and to the east by SE 192<sup>nd</sup> Avenue. Adjacent uses and underlying zoning of the land is identified in Table 2 below. Zoning in the vicinity of the project site is depicted on Figure 2, obtained from Clark County Maps Online.

*Table 2: Adjacent Uses*

	Zoning	Use
<b>North</b>	R-6	Single-Family Residential
<b>South</b>	R-9	Single-Family Residential
<b>East</b>	R-9	Single-Family Residential
<b>West</b>	R-6	Single-Family Residential

**Figure 2: Zoning Map****Public Infrastructure Projects**

There are no known public infrastructure projects planned within proximity of the CPA/Rezone property on the City's current six-year Transportation Improvement Program (TIP) or Capital Improvement Program (CIP).

**Development Agreement**

A Development Agreement (DA) is anticipated to be developed as the CPA/ZC request is evaluated by staff. The Applicant anticipates that the DA could outline site development expectations and potentially vest trips outlined in the forthcoming Transportation Impact Study (TIS). A draft would likely be provided in advance of the first public hearing regarding the proposal.

**Related Land Use Activity**

A pre-application conference request for the subject CPA/ZC was submitted and processed in 2023 (PIR 83420). A copy of the pre-application conference notes issued by City staff is included with this request as Exhibit B. Additionally, the requested amendment is subject to regulation under the State Environmental Policy Act (SEPA) and as such a non-project SEPA Checklist has been prepared and is included with this request as Exhibit C.

No development requests are included with this CPA/ZC request. However, a conceptual site plan is provided with this request as Exhibit D and discussed briefly within the context of the CPA/ZC to provide an example of a potential development scenario for the site following approval of the requested change.

A review of the requested CPA/ZC and its consistency with elements of the City's Comprehensive Plan, Draft Housing Action Plan, Strategic Plan and applicable sections of the City's Municipal Code, and state law is offered within this narrative and supplemented by the exhibits included with the application packet.

### 3.0 REVISED CODE OF WASHINGTON (RCW)

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The applicable code provisions are set forth below with responses demonstrating the project's consistency with these provisions.

#### ***Planning Goals (RCW 36.70A.020)***

The following goals are adopted to guide the development and adoption of comprehensive plans and development regulations of those counties and cities that are required or choose to plan under RCW 36.70A.040. The following goals are not listed in order of priority and shall be used exclusively for the purpose of guiding the development of comprehensive plans and development regulations:

- (1) **Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.**

**Response:** The project site is located within the Vancouver city limits in an area currently served by public facilities and services. More specifically, water, sewer, stormwater, and franchise utilities are located along the entire project frontage on SE 192<sup>nd</sup> Avenue and along portions of the project frontage on SE 15<sup>th</sup> Street. As such, the applicant anticipates that the proposed R-30 zoning designation could be accommodated by existing urban services and that laterals to provide service to the site could be identified and addressed at the time of site development in the future. A review of transportation system capacity will be completed for the requested CPA/ZC following scoping of the TIS by city staff. If deficiencies are identified during the analysis, mitigation will be proposed and reflected in the TIS.

- (2) **Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.**

**Response:** The project site is underdeveloped and consists of single-family structures interspersed with vacant lots. Under the proposed CPA/ZC, land would be converted from low-density residential R-6 to the high-density residential R-30 zoning designation. The proposed conversion encourages higher density housing in an urban area within close proximity to employment opportunities, as well as personal and professional services located at the southeast corner of the intersection of SE 192<sup>nd</sup> Avenue and SE 15<sup>th</sup> Street. Additionally, public parks, schools and significant retail and employment opportunities are present within ½ mile of the site in either direction along SE 192<sup>nd</sup> Avenue, a major transportation corridor which is served by public transportation.

- (3) **Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.**

**Response:** As stated above, the CPA/ZC site is located in the northwest corner of the intersection of SE 192<sup>nd</sup> Avenue, a principal arterial, and SE 15<sup>th</sup> Street, a minor arterial. SE 192<sup>nd</sup> Avenue consists of two northbound and two southbound lanes a center median which is converted to a turn lane at intersections. The



roadway includes detached sidewalks and striped bike lanes on each side. SE 15<sup>th</sup> Avenue is a variable width minor arterial with one travel lane in the east and one travel lane in the west direction. The road includes striped bike lanes and detached sidewalks along the south side of the roadway adjacent to the site. The requested CPA/ZC will not impact existing multi-modal facilities present along either roadway. Frontage improvements to SE 15<sup>th</sup> Avenue, including the installation of curb, gutter, sidewalk and the continuation of bike lanes would be expected for any future development of the site whether under the existing or proposed zoning. C-Tran Route 37, referred to as the Mill Plain/Fishers Route runs along SE 192<sup>nd</sup> Avenue between Mill Plain and SE 34<sup>th</sup> Street before heading west to connect with SE 164<sup>th</sup> Avenue and the Fisher's Landing Transit Center and eventually tying back in with Mill Plain. The route continues down Mill Plain and connects with Downtown Vancouver. The proximity to public transportation as well as multi-modal facilities including sidewalks and bike lanes make the subject site an ideal location for increased density to better meet other policy goals while also supporting and eventually enhancing multi-modal facilities by constructing a missing segment of public sidewalk along SE 15<sup>th</sup> Avenue adjacent to the site.

- (4) Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.**

**Response:** The requested CPA/ZC will convert land currently zoned primarily for detached single family residential development to high-density residential which allows a much wider variety of housing types which can serve more diverse economic segments of the population. The implementation of the R-30 zone at the site will set a new density range of 22.1 units (minimum) to 30 units (maximum) and will likely result in the development of multi-family units, a product type which is not widely available in the immediate vicinity. Further, the applicant will voluntarily commit to offering 5% of units to be leased at 80% of area median income (AMI). It is likely that some or all of the existing single-family homes within the site could be removed at the time of redevelopment, however the net increase in housing inventory, and the inclusion of some units at 80% AMI that would occur with future development responds to current shortages in the market for all housing, especially middle housing and affordable housing.

- (5) Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.**

**Response:** The requested zone change permits the development of high-density residential uses which will add to the diversity of housing types and price points. The infusion of additional housing in the area will bring additional residents to the area and will reinforce economic vitality for existing and aspiring businesses within the immediate vicinity and in East Vancouver.

- (9) Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.**

**Response:** The project site has mature trees clustered along the northern and western property lines that contribute to the unique character and aesthetic of the project site. The requested CPA/ZC does not prohibit the retention of open space or passive recreational activity and the applicant intends to preserve mature trees located within a 20-foot-wide landscape buffer along the western and northern site boundaries. The preservation of mature trees along the west and north property boundary provides a substantial benefit to the site and the existing neighborhoods. While the buffer may not provide active recreation opportunities, it will enhance aesthetics and provide shade, both of which are of public benefit. A Conceptual Site Plan has been provided to illustrate a possible development scenario for the site assuming a development of 296 units. The plan incorporates the aforementioned buffer to illustrate the value it could provide to both existing residents adjacent to the site as well as future residents of this site following redevelopment. The Conceptual Site Plan is included with this request as Exhibit E.

- (11) Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.**

**Response:** The review of this proposal is anticipated to follow the procedural requirements for a Type IV legislative review, including public notice and consideration by both Planning Commission and City Council. Citizen participation and coordination are encouraged through soliciting public comments and attendance at public hearings, consistent with this planning goal. The applicant has also met with neighbors to the west of the subject site to discuss the proposal and plans to meet with neighbors north and west of the subject site prior to the first planning commission hearing.

- (12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.**

**Response:** The proposed CPA/ZC will result in an increase in density at the site, and thus higher demand on utilities than the current zoning. However, public facilities and services including water, sewer, stormwater, and franchise utilities are located along the entire project frontage on SE 192nd Avenue and along portions of the project frontage on SE 15th Street. The extension of utilities to serve development is likely and would occur at the time of site development. This, coupled with the payment of applicable impact fees and system development charges will ensure that services are adequate to serve a higher density development.

In response to feedback provided by city staff, the applicant is currently developing a TIS to evaluate the traffic impacts of the CPA/ZC. The applicant anticipates that

this TIS will evaluate level of service and that mitigation measures may be applied if necessary.

## 4.0 WASHINGTON ADMINISTRATIVE CODE (WAC)

### 4.1 Urban Density. (WAC 365-196-300)

- (2) How the urban density requirements in the act are interrelated. The act involves a consideration of density in three contexts:
- (a) **Allowed densities:** The density, expressed in dwelling units per acre, allowed under a county's or city's development regulations when considering the combined effects of all applicable development regulations.
  - (b) **Assumed densities:** The density at which future development is expected to occur as specified in the land capacity analysis or the future land use element. Assumed densities are also referred to in RCW 36.70A.110 as densities sufficient to permit the urban growth that is projected to occur.
  - (c) **Achieved density:** The density at which new development occurred in the period preceding the analysis required in either RCW 36.70A.130(3) or 36.70A.215.

**Response:** According to the 2022 Buildable Lands Inventory (BLI) prepared by Clark County, the City of Vancouver had an observed residential density of 18.3 dwelling units per acre, between 2016-2020, which exceeds the assumed residential density target of eight (8) dwelling units per acre (Clark County BLI, Figure 9). Housing developed in the city during the study period consisted of 24% single-family residential and 76% multi-family residential units, which exceeds the County-wide planning policy of no more than 75% of the new housing stock of a single product type.

Despite the residential density achieved in the study period outlined in the BLI, housing production in the city, and county as a whole, is not keeping up with population growth resulting in a deficit in housing supply. In a Housing Strategies Workshop presentation prepared by City staff and delivered to City Council in July of 2022, staff indicated that home production has not kept up with growth and demand for housing. It was determined that the County had a deficit of 13,500 units through 2019, and of that deficit, 5,670 units (42%) of the underproduction was within the City of Vancouver. Staff estimated that the City would need to produce at least 2,500 housing units annually in order to keep pace with population projections and eliminate the housing deficit within 10 years. Housing strategies were identified to help the city close the gap, including:

- Land Use: use regulatory tools to upzone land in support of more housing development at greater densities;
- Direct Investment: invest public funds into development of income-based housing not otherwise provided by the market;
- Incentives: tax and fee incentives as well as regulatory flexibility to encourage development of new additional housing and density.
- Process: development regulations and review processes that are clear, consistent, fair and efficient.

The presentation concluded with recommended short- and medium-term actions to address the housing supply deficit including re-evaluation of density goals and strategies and updates to single family zoning to achieve naturally affordable housing.

The applicant's request implements the identified "Land Use" strategy by utilizing an existing regulatory process (annual comprehensive plan amendment and concurrent zone change) to upzone the site from R-6, a low-density residential zone with a net density range of 4.5 to 5.8 units per acre, to R-30, a high-density residential zone with a net density range of 22.1 -30 units per acre. The CPA/ZC request better meets the current direction of staff and the City Council to address the housing shortage in an urbanized area of the city.

## 4.2 Land Use Element. (WAC 365-196-405)

**(2) Recommendations for meeting requirements. The land use assumptions in the land use element form the basis for all growth-related planning functions in the comprehensive plan, including transportation, housing, capital facilities, and, for counties, the rural element. Preparing the land use element is an iterative process. Linking all plan elements to the land use assumptions in the land use element helps meet the act's requirement for internal consistency. The following steps are recommended in preparing the land use element:**

**(f) Counties and cities must obtain twenty-year population allocations for their planning area as part of a county-wide process described in WAC 365-196-305(4) and 365-196-310. Using information from the housing needs analysis, identify the amount of land suitable for development at a variety of densities consistent with the number and type of residential units likely to be needed over the planning period. At a minimum, cities must plan for the population allocated to them, but may plan for additional population within incorporated areas.**

**(i) Counties and cities should select land use designations and implement zoning. Select appropriate commercial, industrial, and residential densities and their distribution based on the total analysis of land features, population to be supported, implementation of regional planning strategies, and needed capital facilities.**

**Response:** As stated previously, the 2022 BLI suggests that sufficient land capacity is available to support the forecasted population across the city through 2035, however, the BLI is applying the observed density of 18.3 dwelling units uniformly across all residential land in the city, including lands zoned for lower density which could overstate the residential land capacity based upon established zoning and related density standards.

Recent research conducted by the city indicates that there is a deficit of housing within the city and across the county. The city is developing housing strategies to not only look at opportunities to reduce the gap, but also provide for population growth through 2035, which could exceed the projections from the current Vancouver Comprehensive Plan. Actions outlined in the strategy include,

upzoning of existing residential land, revision to the Multifamily Tax Exemption (MFTE) program, code updates to remove barriers to density and more diverse housing typologies, refinement of the land use review process to increase efficiency, etc. The requested CPA/ZC will convert property zoned for detached single family residential to high density residential in an urban area with sufficient public and transportation facilities, thus presenting an opportunity for the site to develop consistent with the housing strategy.

**(j) Wherever possible, counties and cities should consider urban planning approaches that promote physical activity. Urban planning approaches that promote physical activity may include:**

**(i) Higher intensity residential or mixed-use land use designations to support walkable and diverse urban, town and neighborhood centers.**

**(ii) Transit-oriented districts around public transportation transfer facilities, rail stations, or higher intensity development along a corridor served by high quality transit service.**

**Response:** Increasing the density of the site would result in more efficient development of housing in a highly urbanized area with both employment and services. The construction of frontage improvements, including restriping of bicycle lanes and addition of sidewalks along SE 15<sup>th</sup> Street at the time of site development will connect with existing facilities on SE 192<sup>nd</sup> Avenue and will promote walkability to adjacent commercial and institutional uses in the vicinity and in particular along the SE 192<sup>nd</sup> Avenue corridor. Additionally, C-TRAN Route 37 runs north/south on SE 192<sup>nd</sup> Avenue and loops from Mill Plain to the Fisher's Landing Transit Center on SE 164<sup>th</sup> Avenue and from there, direct, and convenient access to Portland. Other significant transit facilities served by the relevant C-TRAN line include Clark College, the Vancouver Clinic, and shopping centers. The proximity of high-density residential to these significant transportation and urban service centers will reinforce economic vitality in the area.

### **4.3 Housing Element. (WAC 365-196-410)**

**(2) Recommendations for meeting requirements. The housing element shows how a county or city will accommodate anticipated growth, provide a variety of housing types at a variety of densities, provide opportunities for affordable housing for all economic segments of the community, and ensure the vitality of established residential neighborhoods. The following components should appear in the housing element:**

**(a) Housing goals and policies.**

**(iii) Housing goals and policies should address at least the following:**

**(A) Affordable housing;**

**(B) Preservation of neighborhood character; and**

**(C) Provision of a variety of housing types along with a variety of densities.**

**Response:** The property is currently zoned low-density residential (R-6) which permits a maximum net density of 5.8 dwelling units per acre and a minimum net density of

4.5 dwelling units per acre in accordance with VMC Table 20.410.040-1. Housing on site and in the vicinity is predominately single family and thus are not attainable to persons at all income levels. The applicant requests a CPA/ZC to upzone the site to R-30, high-density residential, which has a minimum of 22.1 and a maximum of 30 dwelling units per net acre. The R-30 zone permits a variety of housing types, including townhouses and apartments which customarily have lower rents than single family homes.

If approved, the site could provide an opportunity to infuse the market with up to 296 dwelling units, a net increase of 239 units over the existing zone. It will also likely result in development of apartments, a housing type that is not widely available in this area. Market rate units will likely have a lower monthly rental rate compared to single family detached units in the area thus offering up more options to a wider range of income levels. Finally, the applicant will commit to leaving 5% of the future housing units at 80% of AMI. The forthcoming development agreement will outline the applicant's affordable housing commitments.

#### 4.4 Transportation Element (WAC 365-196-430)

- (1) **Requirements. Each comprehensive plan shall include a transportation element that implements, and is consistent with, the land use element. The transportation element shall contain at least the following sub elements:**
- (a) **Land use assumptions used in estimating travel;**
  - (b) **Estimated traffic impacts to state-owned transportation facilities resulting from land use assumptions to assist the department of transportation in monitoring the performance of state facilities, to plan improvements for the facilities, and to assess the impact of land-use decisions on state-owned transportation facilities;**
  - (g) **Pedestrian and bicycle component to include collaborative efforts to identify and designate planned improvements for pedestrian and bicycle facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles;**

**Response:** Preliminary communications with the City indicate that a full TIS will be required in order to compare generated trips under the existing and proposed zoning designations as well as the anticipated distribution of traffic and impacts on nearby intersections. A Trip Generation Comparison Report is included with this narrative as Exhibit D to aid the City in scoping the TIS.

In advance of the TIS, the Trip Generation Comparison Report (Exhibit D) concludes that the difference between existing and proposed zoning is an additional 1,457 weekday daily trips, including an additional 70 weekday AM peak hour trips, and 89 weekday PM peak hour trips. A TIA is being prepared and will be submitted in July to be reviewed concurrently with the CPA/ZC request.

As previously discussed, C-TRAN Route 37 runs north/south on SE 192nd Avenue and loops from Mill Plain to the Fisher's Landing Transit Center on SE 164th Avenue and from there, direct, and convenient access to Portland. Other

significant transit facilities served by the relevant C-TRAN line include Clark College, the Vancouver Clinic, and shopping centers.

This proposal does not include a request for development. However, at the time of development, frontage improvements will occur consistent with the design standards for Principal Arterials (SE 192nd Avenue) and Collector Arterials (SE 15th Street), which include sidewalks and bicycle lanes consistent with this element.

## 5.0 VANCOUVER COMPREHENSIVE PLAN

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### 5.1 Community Development (Chapter 1)

#### Community Development Policies

The City of Vancouver adopts the following policies to guide land use and development in the city over the next 20 years. These policies are consistent with and implement Policy Sections 1.0, 2.0, and 12.0 of the Community Framework Plan, adopted by Clark County and local jurisdictions, and planning policies 36.70.A.020(1), (2) and (13) of the Washington Growth Management Act (see Appendix A).

#### CD-1 Citywide land supplies.

**Establish land supplies and density allowances that are sufficient to accommodate adopted long-term City of Vancouver population and employment forecast allocations.**

**Response:** The Vancouver Comprehensive Plan projects that the city's population will reach 202,300 persons and have an estimated 139,200 jobs by 2030. However, the April 1, 2022, Population of Cities, Towns and Counties annual report issued by the Office of Financial Management reported that the population estimate for the City of Vancouver reached 197,600 people in 2022. The rapid population growth coupled with underproduction of housing in the area has led to a housing deficit of approximately 5,670 units at the end of 2019 as reported by City staff during the Housing Strategies Workshop in July of 2022. The requested CPA/ZC will establish a significantly higher minimum and maximum density on the subject property which can provide some relief for the housing shortage in the short term as the city looks to update their Comprehensive Plan and incorporate housing strategies to comply with state law and to address housing insecurities in the city.

#### CD-2 Efficient development patterns.

**Encourage efficient development throughout Vancouver to ensure achievement of average density of 8 units per acre set by countywide planning policies. Encourage higher density and more intense development in areas that are more extensively served by facilities, particularly transportation and transit services.**

**Response:** As discussed, the property is currently zoned low-density residential (R-6) which permits a maximum density of 5.8 dwelling units per net acre and a minimum of

4.5 dwelling units per net acre as stated in VMC Table 20.410.040-1. The requested CPA/ZC will convert the site to high-density residential use and establish a minimum of 22.1 and a maximum density of 30 units per net acre in accordance with VMC Table 20.429.040-1. Higher density residential use within the site will introduce greater variety in housing density and types within an established area of the city with urban services, including a C-Tran bus route which serves the Fisher's Landing Transit Facility and downtown Vancouver.

As discussed, adequate public utilities and transportation facilities exist on the project site or can be extended to serve future development. Additionally, higher density development will result in additional payment of applicable impact fees and system development charge, both of which will ensure that development pays for the necessary capital improvements outlined in the adopted facility plans.

**CD-3 Infill and redevelopment.**

**Where compatible with surrounding uses, efficiently use urban land by facilitating infill of undeveloped properties, and redevelopment of underutilized and developed properties. Allow for conversion of single to multi-family housing where designed to be compatible with surrounding uses.**

**Response:** The retention of the existing low-density residential zoning designation will result in the site remaining underdeveloped in an area with a surplus of single-family homes. The proposed CPA/ZC will permit high-density development in an urban area and lead to desired infill development, consistent with the desired effect of this policy.

**CD-6 Neighborhood livability.**

**Maintain and facilitate development of stable, multi-use neighborhoods that contain a compatible mix of housing, jobs, stores, and open and public spaces in a well-planned, safe pedestrian environment.**

**Response:** Existing neighborhood primarily consists of single-family homes with little variability in housing types and homogenous development patterns. Businesses are located along the SE 192<sup>nd</sup> Avenue corridor to the north and south of the site. The requested CPA/ZC offers a transition between the adjacent low-density residential (R-6) to the north and west and the major arterial roadways located south and east of the site. Within the context of the immediate area, the requested CPA/ZC would permit development of multi-family housing in a neighborhood that currently lacks multi-family housing options and within proximity of developed commercial development centers with stores, restaurants and other personal and professional services, public and higher education facilities and various public parks and recreational facilities which are connected by pedestrian sidewalks and bicycle paths along SE 192<sup>nd</sup> Avenue and served by C-Tran Route #37.

**CD-9 Compatible uses.**

**Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.**



**Response:** Zoning designations adjacent to the project site consist of R-6 to the north and west and R-9 located across public roads to the south and east. The requested CPA/ZC would permit a higher density than those adjacent uses. In an effort to ensure compatibility with adjacent uses and to minimize any impact, the applicant is proposing to implement the following design requirements:

- Buildings adjacent to the west property line will be setback at least 50 feet from the property line and will be limited to three stories;
- Buildings adjacent to the north property line will be setback at least 45 feet from the property line and will be limited to three stories;
- Any four-story building will be setback at least 120 feet from the north and west property line;
- A 20-foot-wide landscape buffer will be provided along the north and west property lines and will consist of existing mature trees to the extent practical.

The applicant will proceed with the submittal of a development agreement that will formalize its commitment to these compatibility-related design standards.

The request is for a CPA/ZC, and therefore a formal development plan has not yet been developed. However, a conceptual plan has been included with this application to illustrate a possible development scenario under the proposed CPA/AC. The Conceptual Site Plan, included as Exhibit E implements the setbacks, building height and buffer standards detailed within this section and demonstrates how thoughtful site planning can produce a high-density residential development that is compatible with adjacent low density residential.

#### **CD-10 Complementary uses.**

**Locate complementary land uses near one another to maximize opportunities for people to work or shop nearer to where they live.**

**Response:** As discussed, the requested CPA/ZC would permit multi-family housing in an area currently lacking housing variety. The addition of multi-family housing offers more diversity in housing options to broader economic segments of the population in an urbanized area with adjacent commercial and institutional uses, connected by public sidewalks, bicycle lanes and a public transit line.

## **5.2 Housing (Chapter 3)**

### **Housing Policies**

**The City of Vancouver adopts the following policies to ensure an adequate supply of housing for all economic segments of the community. These policies are consistent with and implement Policy Section 2.0 of the Community Framework Plan, adopted by Clark County and local jurisdictions, and planning policy 36.70.A.020(4) of the Washington Growth Management Act (see Appendix A).**

**H-1 Housing options. Provide for a range of housing types and densities for all economic segments of the population. Encourage equal and fair access to housing for renters and homeowners.**

**H-4 Innovative zoning. Encourage innovative housing policies that provide for affordable housing and maintain neighborhood character.**

**Response:** The subject property is located at the intersection of two major roadways within the city, SE 192<sup>nd</sup> Avenue (Major Arterial) and SE 15<sup>th</sup> Street (Minor Arterial) with existing residential development primarily consisting of single family detached homes. Major retail, business and service centers are located along the SE 192<sup>nd</sup> Avenue to serve east Vancouver residents. Development of the site following approval of the requested CPA/ZC will result in a significantly higher yield of housing units, will introduce a housing type not broadly available in the immediate area and will provide a combination of market rate rental units and affordable rental units (80% of AMI) which will serve broader economic segments of the population and will help address an immediate housing need identified by the city.

**H-5 Housing placement near services and centers. Facilitate siting of higher density housing near public transportation facilities and in designated centers and corridors.**

**Response:** The requested CPA/ZC will result in higher density housing in an area with adequate public transportation facilities including SE 192<sup>nd</sup> Avenue, which is improved with sidewalks, bicycle lanes and is served by public transportation. Further, at the time of redevelopment, it is anticipated that frontage improvements would be completed along SE 15<sup>th</sup> Street, including the installation of sidewalks and restriping of bicycle lanes currently present within the road. Consistent with the Transportation System Plan, the subject site is located within the “Special Transit Service Area”, a designated center, thereby consistent with these policies.

### 5.3 Public Facilities and Services (Chapter 5)

#### Transportation

The Vancouver Transportation Plan Vision establishes the framework for improving the city’s transportation system and is supplemented by the updated Transportation Analysis (2011) and regionally coordinated with the MTP and Clark County Transportation Resource Document (2002). The Transportation Analysis (2011) and reference plans provide extensive information about the transportation system conditions, forecast travel demands and patterns, and corresponding transportation system improvement needs.

**PFS-1 Service availability. Consider water, sewer, police, transportation, fire, schools, storm water management, and parks as necessary facilities and services. Ensure that facilities are sufficient to support planned development.**

**PFS-2 Service standards. Establish service standards or planning assumptions for estimating needed public facilities, based on service capabilities, local land use designations and nationally recognized standards. Use LOS standards to encourage growth in designated centers and corridors**

**PFS-4 Transportation system. Develop and maintain an interconnected and overlapping transportation system grid of pedestrian walkways, bicycle facilities, roadways for automobiles and freight, transit and high-capacity transit service. Include support programs such as traffic operations, transportation demand management, neighborhood traffic management, and the regional trails program. Work towards**

**completing and sustaining individual components and programs to ensure success of the entire system.**

**Response:** A Trip Generation Comparison Report is included with this request as Exhibit D and discusses trips under existing and proposed zoning designations. Forecasted travel demands and patterns and corresponding transportation system improvement needs, and if appropriate, mitigation measures will be outlined in a pending full TIS consistent with the above referenced policies.

This proposal does not include a request for development. However, at the time of development, frontage improvements will occur consistent with the design standards for Principal Arterials (SE 192<sup>nd</sup> Avenue) and Collector Arterials (SE 15<sup>th</sup> Street) adopted by the City. The completion of frontage improvements advances the policies of the Comprehensive Plan by completing a missing segment of the public sidewalk along the roadway and improving the roadway to meet standards.

## 6.0 VANCOUVER STRATEGIC PLAN

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### 6.1 Goal 1

**Ensure our built urban environment is one of the safest, most environmentally responsible and well maintained in the Pacific Northwest.**

#### Objective 1.1

**Develop and maintain a safe, balanced and innovative transportation system that will meet the needs of future generations.**

**Response:** As specified earlier in this response, the applicant has provided a Trip Generation Comparison Report that outlines the change in vehicular trips anticipated under the proposed R-30 zoning designation compared to the current R-6 zone. A TIS will be prepared in support of this request that addresses the applicant’s proposed CPA/ZC and consistency with the City’s TSP.

This proposal does not include a request for development. However, at the time of development, frontage improvements will occur consistent with the design standards for Principal Arterials (SE 192<sup>nd</sup> Avenue) and Collector Arterials (SE 15<sup>th</sup> Street), thus presenting an opportunity for the site to develop consistent with these policies.

### 6.2 Goal 6

**Facilitate the creation of neighborhoods where residents can walk or bike to essential amenities and services — “20-minute neighborhoods”.**

#### Objective 6.1

**Support a strong, active neighborhood program that enhances livability and community connections.**

**Response:** The proposed R-30 zoning designation will permit high-density residential development, create diversity of housing options within a largely homogenous housing area, and will be immediately adjacent to commercial and employment

uses. The prevalence of high-density residential in an urban environment well served with public community services is consistent with the intent of this policy.

## 7.0 VANCOUVER MUNICIPAL CODE

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### 7.1 Text and Map Amendments (Chapter 20.285)

#### 7.1.1 Applicability (20.285.020)

**A. Types of proposals. The following types of proposals are reviewed under this chapter:**

1. **Map amendments to the comprehensive plan or to VMC Title 20 zoning designations applying to one or more properties.**
2. **Development agreements that are included with property specific comprehensive plan or zoning map changes being reviewed under this chapter.**

**Response:** This request is for a Comprehensive Plan Amendment from Urban Low-Density (UL) to Urban High-Density (UH) and a corresponding Zone Change from Urban Low-Density Residential, R-6 (6 DU/Acre) to Urban High-Density Residential, R-30 (30 DU/Acre).

In an effort to ensure compatibility with adjacent uses and to minimize any impact, the applicant is proposing to implement the following design requirements:

- Buildings adjacent to the west property line will be setback at least 50 feet from the property line and will be limited to three stories;
- Buildings adjacent to the north property line will be setback at least 45 feet from the property line and will be limited to three stories;
- Any four-story building will be setback at least 120 feet from the north and west property line;
- A 20-foot-wide landscape buffer will be provided along the north and west property lines and will consist of existing mature trees to the extent practical.

In an effort to ensure compatibility with adjacent uses and to minimize any impact, the applicant is proposing to implement certain site design requirements to achieve compatibility with adjacent uses and is also interested in vesting transportation trips following review and acceptance of the forthcoming TIS. As such, the applicant anticipates submittal of a Development Agreement (DA). The applicant anticipates the DA will be submitted and reviewed concurrently with the CPA/ZC request. A draft is anticipated in advance of the first Planning Commission Workshop.

### 7.1.2 Initiation (20.285.030)

A. Proposals reviewed under this chapter may be initiated by property owners or their representatives, the city of Vancouver, or private citizens or groups as follows:

1. **Map Changes.** Property owners or any individual, group or organization may initiate comprehensive plan and associated zoning map designation changes applying to one or more properties, through submittal of an annual review application and associated fees specified in Chapter 20.180 VMC. Standalone zoning changes not requiring a comprehensive plan change shall be subject to zone change application and associated fees per Chapter 20.180 VMC

**Response:** A CPA/ZC is submitted by DOWL on behalf of the client for review by the City, consistent with this provision.

### 7.1.3 Review Process (20.285.040)

B. **Pre-Application.** Comprehensive plan or zoning map amendments proposed by private parties shall require a pre-application conference. The conference shall be scheduled upon receipt of a complete Map Amendment Pre-application Form. Based on the information provided, the pre-application conference is intended to provide for a discussion of major issues and concerns and possible staff recommendation. Staff will provide a written summary within 14 days following the conference. Pre-application conferences are nonbinding, and do not vest the development rights of the proposals involved. Pre-application conferences shall not be required for city-initiated map amendments, or text amendments initiated by any party.

**Response:** A Pre-application Conference for this CPA/ZC was submitted and processed in 2023 (PIR 83420). A copy of the final comments issued by City staff are included with this request as Exhibit B.

### 7.1.4 Approval Criteria – Comprehensive Plan and Concurrent Zoning Map Amendments (20.285.050)

A. Overall proposed map amendments reviewed under this chapter shall be approved only if demonstrated by the proponent to be in the public interest, as based on a review of all applicable principals from the following:

1. How the proposal is more consistent than the existing designation with applicable policies of the Vancouver strategic plan and comprehensive plan.

**Response:** The proposed R-30 zoning designation permits high-density residential use in an urban environment lacking variety in housing, both in terms of affordability and type. The addition of housing units in the area is consistent with recent studies which reflect a significant housing deficit across Clark County and within the City of Vancouver. Development of the site following approval of the requested CPA/ZC will result in a higher yield of housing units, will introduce a housing type

not broadly available in the immediate area and will provide a combination of market rate rental units and affordable rental units (80% of AMI) which serve broader economic segments of the population. Further, the request is consistent with actions outlined in the city's Housing Strategies presentation before the City Council in July of 2022 which included upzoning land to increase density.

As detailed in prior sections of this narrative, the request is consistent with Community Development, Housing and Public Facilities elements of the Comprehensive Plan in that it facilitates dense residential development in an urban area with adequate public services, including utilities, and is adjacent to employment and personal services such as grocery, restaurant and leisure. Redevelopment of the site is expected to include the completion of frontage improvements which will improve multi-modal connectivity in the neighborhood. Further, a TIS is also being completed to evaluate project impacts on the transportation system and verify level of service is or can be maintained. Finally, the incorporation of specific site development compatibility considerations will facilitate integration with the existing neighborhood.

Similarly, the request is consistent with both neighborhood development and transportation goals outlined within the Vancouver Strategic Plan in that it seeks to site dense residential development within an existing urban area interconnected with roads, sidewalks, bicycle lanes and public transportation routes. Further, the proximity to personal and professional services as well as employment and educational opportunities along the SE 192<sup>nd</sup> Avenue corridor reinforces connectivity within the existing neighborhood.

**2. How the proposal is more consistent than the existing designation with each of the following objectives as applicable:**

- a. Encourage more intensive development to locate in major urban centers and corridors, particularly downtown Vancouver. Encourage development of distinct neighborhoods served by commercial nodes, and discourage urban sprawl and strip commercial development;**

**Response:** The project site is located in an urban area adjacent to developed neighborhoods, and the SE 192<sup>nd</sup> Avenue corridor which has significant retail, commercial, employment, education and public uses. Under the proposed CPA/ZC, the land would be converted from low-density residential R-6 (UL) to high-density residential R-30 (UH). The proposed conversion encourages higher density in the immediate area, in close proximity to areas of employment (commercial zoning to the southeast and mixed-use institutional zoning farther north and south) with adequate urban services. It also supports new housing strategies which are in development by the city to address a significant deficit in housing inventory within the city.

- b. Provide development of uses which are functionally integrated with surrounding areas and neighborhoods in terms of local shopping, employment, recreational or other opportunities;**

**Response:** The retention of the existing low-density residential zoning designation will result in the site remaining underdeveloped in an area with a surplus of single-family homes. The requested zone change permits the development of high-density residential uses which will add to the diversity of both housing variety and associated rental costs. The site is located at the intersection of SE 192<sup>nd</sup> Avenue and SE 15<sup>th</sup> Street and is within close proximity to retail, services, and employment, including the commercial development at SE Mill Plain Boulevard and SE 192<sup>nd</sup> Avenue. The area also includes a variety of educational facilities including Columbia Valley Elementary School, Illahee Elementary School and Shahala Middle School and Union High School as well as the Columbia Tech Center Campus of Clark College, all within 1.5 miles of the site. Public recreational areas including Fisher Basin Community Park, Hannah Acres Park and Columbia Tech Center Park are also within approximately 1 mile of the site. The area is also served by a multi-modal transportation network consisting of sidewalks, bicycle lanes and public transit which connect with many of the service, education and recreational amenities outlined above.

**c. Provide development which is compatible and integrated with surrounding uses in terms of scale, orientation, pedestrian enhancements, and landscaping;**

**Response:** The greatest difference in terms of development scale between the existing and proposed zoning designations is likely the maximum building height. Whereas the existing R-6 zone allows buildings of up to 35 feet in height, the proposed R-30 zone allows buildings of up to 50 feet in height. Site design considerations can be implemented to reduce the affect the change in building height could have on adjacent uses. A Conceptual Site Plan is included with this request as Exhibit E. The plan reflects a 296-unit multi-family residential development. All multi-family buildings adjacent the property boundary lines will be three stories in height, transitioning from the maximum building height in low-density residential zoning designations (35 feet maximum) to a four-story structure. The applicant anticipates a four-story building could be situated towards the center of the site, but not closer than 120 feet from the west or north property line. This self-imposed setback will help ensure compatibility with surrounding uses and reduce visual impacts of the larger structures which will have a maximum height of 50 feet in compliance with R-30 standards. Maintaining consistency with the adjacent neighborhoods and commercial buildings diagonal from the project site will be achieved through a combination of orientation and siting requirements and screening by the mature tree canopy along the northern and western property boundaries. As stated previously, the applicant is prepared to enter into a development agreement to memorialize design standards which restrict building heights and setbacks relative to the east and north property lines to achieve compatibility and integrate with the existing neighborhood.

**d. Conserve or enhance significant natural or historical features;**

**Response:** There are no mapped indicators on or immediately adjacent the project site to suggest the presence of significant natural or historical features. While not identified as a significant natural feature, the applicant intends to preserve the mature tree canopy along the northern and western property boundaries. The

mature trees will serve as a natural buffer between the adjacent R-6 zoning designation and the proposed R-30 zoning designation, while providing privacy and visual enhancement of the site.

**e. Provide adequate provision of transportation, water, sewer, and other public services;**

**Response:** The project site is located in an area with existing public facilities, including road, water, sewer, and other public services. Additionally, a TIS will be prepared and submitted in support of this request that demonstrates the proposed R-30 zoning designation is compatible with transportation facilities, consistent with the intent of this provision.

**f. Provide significant family wage employment opportunities and broadening of the Vancouver economy;**

**Response:** Development of the project will create permanent property management/leasing and maintenance jobs, as well as temporary design, engineering, and construction jobs for the community. No commercial or industrial uses are proposed with this project.

**g. Provide for the formation and enhancement of neighborhoods and communities; and**

**Response:** The requested zone change permits the development of high-density residential uses which will add to the diversity of both housing variety and a broader range of economic groups. The increased density in the area will further support existing and new businesses in the area thus strengthening the neighborhood. The resulting development permitted under the proposed zoning designation would reduce sprawl and develop the site to its best use. The applicant also anticipates the project site will provide new pedestrian amenities that enhance walkability along public roadways and between adjacent neighborhoods.

**h. Provide affordable or below-market-rate housing opportunities.**

**Response:** The implementation of the R-30 zone at the site will set a new density range of 22.1 units (minimum) to 30 units (maximum) and will likely result in the development of multi-family units, a product type which is not widely available in the immediate vicinity and is more affordable to broader economic groups. Additionally, the applicant will voluntarily commit to offering 5% of units to be leased at 80% of AMI through the forthcoming DA.

## 8.0 CONCLUSION

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As evidenced through this narrative and associated documents, the applicant's CPA/ZC is consistent with long-range policies and regulations governing the allowance of these requests. Furthermore, the increase in housing yield and density is consistent with recent studies and policy discussions led by the City related to housing availability, diversity and affordability and directly implements an identified strategy to upzone land to encourage housing development. It is for



these reasons and others outlined within this narrative that the applicant respectfully requests the City of Vancouver's approval of this application.