

Planning Commission

TO: Chair Ledell and Planning Commission

FROM: Bryan Snodgrass, Principal Planner, bryan.snodgrass@cityofvancouver.us, 360-487-7946

SUBJECT: Public hearing review of fall 2023 Comprehensive Plan and Vancouver Municipal Code (VMC) Title 20 zoning code map and text changes

HEARING DATE: 10/24/2023

REPORT DATE: 10/12/2023

PROPOSERS:

- 192nd Avenue Comprehensive Plan and Zoning Map Changes Urban Low/R-6 to Urban High/R-22 – Gary Vance, represented by Jessica Herseg of Dowl
- Miller Plan/Zone Comprehensive Plan and Zoning Map Changes Urban Low/R-9 to Urban High/R-30 – Sergei Cormanitchi, represented by Jayson Taylor of PLS Engineering
- Wood Duck Springs Comprehensive Plan and Zoning Map Changes Urban Low/R-9 to Urban High/R-22 and Commercial/General Commercial – Songbird Homes, represented by Jayson Taylor of PLS Engineering
- Datepark Zoning Map Change R-18 to R-30 – Datepark Condominiums, represented by Asha Prasad
- Comprehensive Plan and Zoning Code Text Changes - City of Vancouver Community Development Department

LOCATION: Comprehensive Plan and Zoning map changes apply to individual properties as indicated in this report. Text changes apply citywide.

RECOMMENDATION: Forward a recommendation of approval to the City Council of the map and text changes as described in this report.

I. BACKGROUND AND REVIEW PROCESS:

The Growth Management Act requires Comprehensive Plan changes to be reviewed collectively and no more than once per year. Zoning changes not involving the Comprehensive Plan may be reviewed at any time and independent of one another if needed. This staff report addresses

three Comprehensive Plan and zoning map designation changes proposed by property owners as part of the Annual Review process, one proposed zoning map designation change not requiring an associated Comprehensive Plan map change, and two Comprehensive Plan text changes and 14 zoning code text changes proposed by City staff. ¹ These items were reviewed by the Planning Commission at workshops on July 25 and September 12. The October 24 public hearing was rescheduled from October 10.

Notice of the October 24, 2023 Planning Commission public hearing was provided through publication in the *Columbian* newspaper. A SEPA Determination of Non-significance (DNS) was issued and published in the *Columbian* on September 21. Individual mailed notice was sent to property owners and occupants of lots located within 500 feet of the four proposed map changes, and the rezone sites were posted with signs. At report date only one formal comment has been received by staff on the proposed map or text changes. Informal inquiries and concerns in opposition have been raised by neighboring residents of the 192nd Street rezone.

The GMA requirement to review annual Comprehensive Plan changes concurrently is intended to allow for review of cumulative impacts. As indicated in below table, the five Comprehensive Plan changes proposed this year apply in different areas and are very small relative to citywide land supplies, and do not have significant impacts on each other.

Comprehensive Plan amendments (map or text) for cumulative assessment

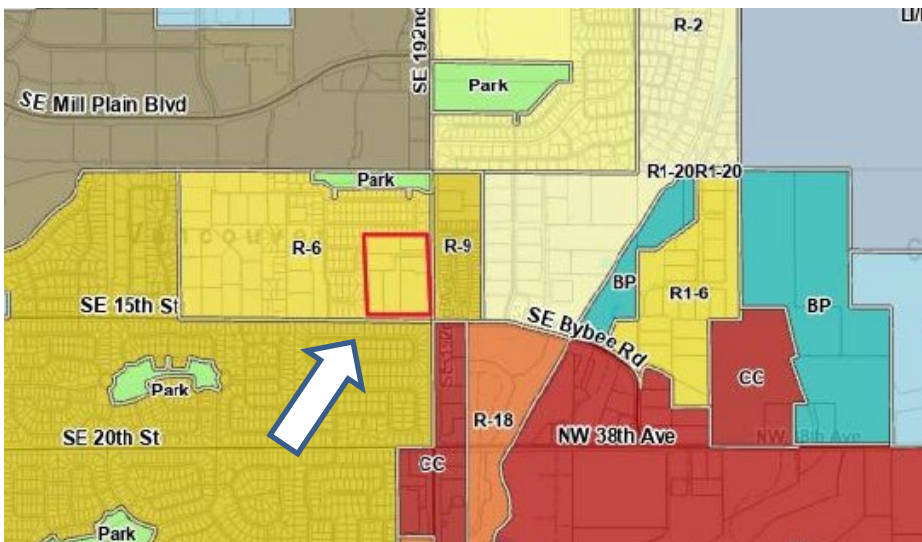
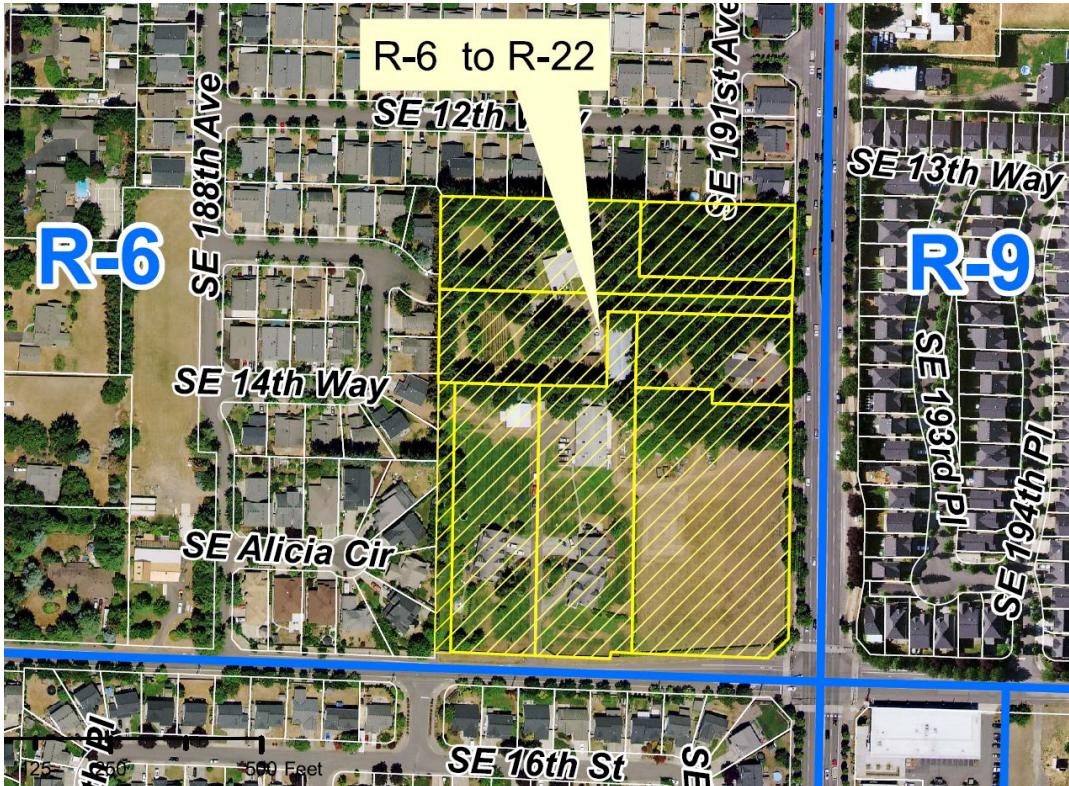
Comprehensive Plan Change Proposal	Applicable Area
192 nd Avenue map change - UL/R-6 to UH/R-22	9.8 acres on in east Vancouver
Wood Duck Springs map change - UL/R-9 to UH/R-22 and C/CC	13 acres in northern Vancouver
Miller map change - UL/R-9 to UH/R-30	4 acres in northern Vancouver
Text change to capital facilities plan to add downtown capital projects	Downtown Vancouver
Text change to parks section of Chapter 5 and adoption by reference of Parks Comprehensive Plan	Citywide

¹ As noted previously an additional proposed Comprehensive Plan and zoning change has not been included because of a dispute over its eligibility. A change from GC to R-30 is proposed on the west side of 143rd Avenue south of Fourth Plain Blvd. The property is subject to an existing development agreement which City legal staff believes precludes the City from changing to residential zoning without approval of area property owners who are also formal parties to the agreement. The applicant believes the City can do so, and has appealed the City staff determination that the rezone application is incomplete without a revised development agreement to the Hearings Examiner. If the Examiner rules in favor of the applicant, the proposal may be brought for Commission review.

II. PROPOSALS AND RECOMMENDATIONS:

A. Comprehensive Plan and zoning map changes

1. 192nd Avenue rezone – Urban Low Density/R-6 to Urban High Density/R-22 on 9.8 acres at the intersection 192nd Avenue and 15th Street



As indicated in the memorandum for the prior workshop, the site is in the Bennington Neighborhood and located in an area of detached single family homes to west and north zoned R-6, across 15th Street and 192nd Avenue to the south and east zoned R-9. On the diagonally opposite corner of the intersection 15th Street and 192nd Avenue are medical offices and restaurants zoned CC. Approximately 700 ft. north of the site is the Columbia Tech Center with a range of residential, commercial, and employment activities.

The original application proposed R-30 zoning, and envisioned 296 housing units in three and four story buildings with enhanced buffering and setbacks on the north and west perimeters directly abutting residential areas. In response to neighborhood concerns, the application has just recently been scaled down to R-22 zoning, with 210 to 223 units envisioned in two and three-story buildings. Setbacks of 35 feet are proposed for two-story buildings on the north and west sides of the property, with a 20-foot landscape buffer.

A pledge that five percent of the housing units will be affordable to households at 80% of Area Median Income (AMI) remains. The applicant is working with staff to finalize a Development Agreement to ensure that future development includes the proposed enhanced setbacks and approximate building placement, provides for affordable housing as indicated, and addresses the City Council [Interim Green Building Policy](#). A draft agreement is anticipated prior to the October 24 hearing.

An initial traffic analysis submitted with the application indicates that future development under proposed zoning would likely result in 1,457 more daily vehicle trips than development under the current zoning, and approximately 89 more trips in the evening peak hour. An expanded traffic study was provided by the applicant addressing trip distribution, which indicated that some of nearby intersections will experience incremental increases in delay times, but the Level of Service for each intersection will remain the same. These analyses were both conducted under the original proposal of R-30 zoning enabling approximately 296 housing units, so impacts should be lessened under the scaled down proposal of R-22 zoning enabling 210 to 223 units. An updated traffic analysis based on the R-22 zoning proposal is included separately with Planning Commission materials. Further traffic analysis will be undertaken at the development review stage.

The C-Tran #37 bus runs north and south along 192nd Avenue abutting the site, with service between downtown and the Fisher's Landing Transit Center, at generally 15-minute intervals.

The site is served by the Columbia Valley Elementary, Shahala Middle and Union High schools in the Evergreen School District. Information from the district on specific status of those schools is pending. Overall the district has faced a general decline in enrollment from pre-pandemic levels. District school impact fees are \$3,753 per multi-family unit. Full development of the site as envisioned if the rezone is approved would result in \$800,000 in impact fees towards District capital facilities. The Evergreen School District have indicated that the proposed rezone can be accommodated.

The applicant has initiated additional public outreach through door knocking, mailers and two community meetings in Hanna Acres park near the site, the most recent on September 28 attended by approximately 20 neighborhood residents, City staff, and the applicant team. Primary concerns raised were traffic impacts, particularly to 15th Street west of the site, and to

192nd Avenue. General concerns about neighborhood character, area growth, and public service impacts were also raised.

See Attachment A of this report for the original application narrative.

Analysis, findings, and recommendation

Staff finds that the proposed rezone complies with applicable criteria for Comprehensive Plan and zoning map changes of [VMC 20.285.050](#). It facilitates both market rate and affordable multi-family housing along a major transportation and transit corridor in very close proximity of commercial services, in an area of Vancouver generally lacking higher density multi-family housing. The need for housing, particularly denser and lower cost housing, is particularly acute presently, as the local, regional, and national housing affordability crisis continues. The City of Vancouver established an affordable housing task force in 2015, which issued recommendations in a 2016 report. Local voters approved an affordable housing levy in 2016, and renewed it in 2023. The City Council approved various zoning text changes to facilitate more and smaller housing through the Housing Code Updates project in 2022. The newly formed City Economic Prosperity and Housing department is leading the development of a citywide Housing Action Plan, and based on economic studies has identified a target of producing an average of 2500 housing units citywide per year, including 800 below market units, for the next ten years as needed to address existing local shortage of housing.

In the past two years the Washington legislature has passed a series of significant new housing laws. HB 1220 effectively requires local governments in Clark County to collectively demonstrate capacity in their upcoming 20-year Comprehensive Plans to accommodate more than 100,000 additional housing units, affordable at various income levels. Other statutory changes under HB 1110 require the cities of Vancouver, Camas and Washougal to effectively allow 4-6 unit plexes on almost all lots zoned for single family development, and under HB 1337 all local governments must allow two ADUs on single family zoned lots.

Staff finds that the proposal can assist in addressing local housing affordability needs and meeting new housing legal requirements. The proposed R-22 zoning is particularly needed to demonstrate compliance with new HB 1220 requirements to accommodate housing affordable at less than median income, which will likely be impossible to achieve citywide without higher density multi-family housing. The proposal site is an appropriate location, given the proximity of transportation and commercial services. Focusing developing in proximity to such services will also further climate objectives of the City of Vancouver, and new climate requirements in the Growth Management Act.

The applicant is also proposing mitigation measures to lessen impacts. In addition to voluntarily pledging that 5% of the units would be affordable at 80% of area median income, the applicant has scaled back the density and building heights of the original proposal in response to neighborhood concerns, while retaining enhanced setbacks and buffers on the north and west perimeters which immediately abut existing single family residences.

The proposed rezone would result in additional vehicle traffic in the vicinity, and additional children in local schools, but the additional demands on associated public facilities would be

partially offset by payment of school and traffic impact fees. Additional traffic would not result in level of service failures of local facilities.

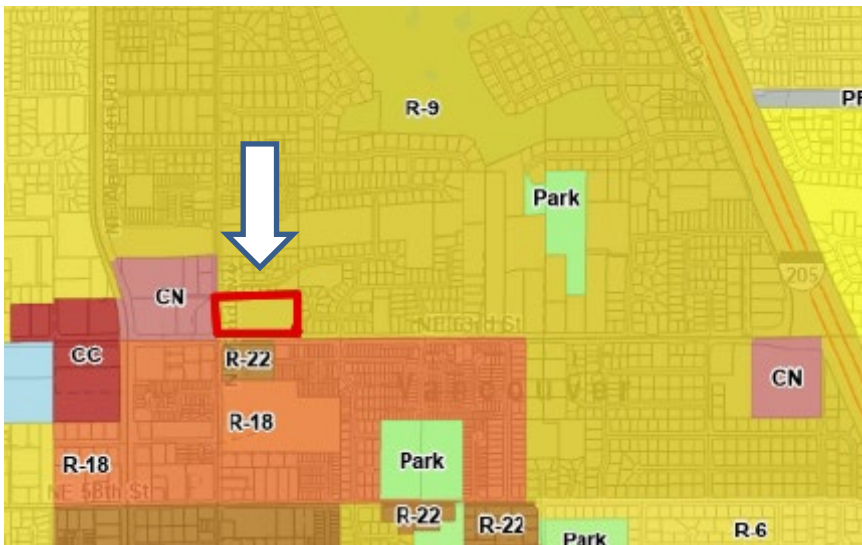
The proposed rezone would enable likely development of two and three story buildings on the site, some of which would be taller than surrounding single family homes which are predominantly two stories. However, impacts will be mitigated by enhanced buffers and setbacks on the north and west perimeter of the site directly abutting existing residential areas, and the presence of 192nd Avenue and 15th Street providing separation from residential areas to the east and south. Both 192nd Avenue and 15th Street have substantial existing street trees which will also lessen visual impacts of the proposed development to most but not all surrounding properties south and east of the rezone site. In staff's view this difference in height represents a change, not a fundamental incompatibility.

Focusing developing in proximity to such services will also further consistency with City of Vancouver [Climate Action Framework](#) adopted in 2022, and new climate requirements in the Growth Management Act.

Staff finds the proposal to be consistent with [Strategic Plan](#) focus areas of Housing and Human Needs and Vibrant and Distinct Neighborhoods. The proposal also complies with applicable [Comprehensive Plan](#) policies, particularly regarding housing options under Policy H-1, affordable housing under H-2, and housing placement near services and centers under H-5.

Staff recommends that the Planning Commission forward a recommendation of approval to the City Council.

2. Miller – Urban Low Density/R-9 to Urban High Density/R-30 on 4.1 acres at 63rd Street and 72nd Avenue



The proposal is located on the northeast corner of the intersection 63rd Street and 72nd Avenue. The rezone site contains several existing single-family homes, outbuildings, and vacant land. North and east of the rezone site are single family homes zoned R-9. West across 72nd Avenue is a City of Vancouver Fire Station and training facility. To the south across 63rd Street are newly constructed apartments (not shown in the above aerial) zoned R-22. The Miller rezone site is

approximately ¼ mile west of the proposed Wood Duck Springs rezone site also under review in 2023, and approximately 900 feet east of a major commercial center at the southwest corner of 63rd Street and Andresen.

The application envisions market rate apartments similar in style to those on the south side of 63rd if the rezone is approved. A conceptual layout included in Attachment B in this report along with the application narrative, envisions locating three apartment buildings in the center of the site, with parking along the west, north, and east perimeters. The site contains extensive wetlands, so future development likely will not be able to utilize all of the property, and may not be able to conform exactly to the conceptual layout. The maximum allowed height in the R-30 zone is 50 feet. Building locations, access points, conformance with City critical area requirements and other specifics will be determined at the time of site plan review.

Land to the south of the rezone site across 63rd Street was approved for rezone from R-18 to R-22 in 2021, with the same applicant and representative as the Miller rezone. The original applicant request and Planning Commission recommendation in that case was to R-30, which the City Council reduced to R-22 to better align with single family zoning north of 63rd Avenue.

The site is served by the Walnut Grove Elementary, Gaiser Middle and Fort Vancouver High schools in the Vancouver School District. Information from the district on specific current status of those schools is pending. Overall the district has faced a general decline in enrollment from pre-pandemic levels. District school impact fees are \$2,486 per multi-family unit.

The C-Tran #32 bus runs north and south along Andresen Road approximately 900 feet west of the site, with service between downtown and the Vancouver Mall Transit Center, at generally 30 minute intervals.

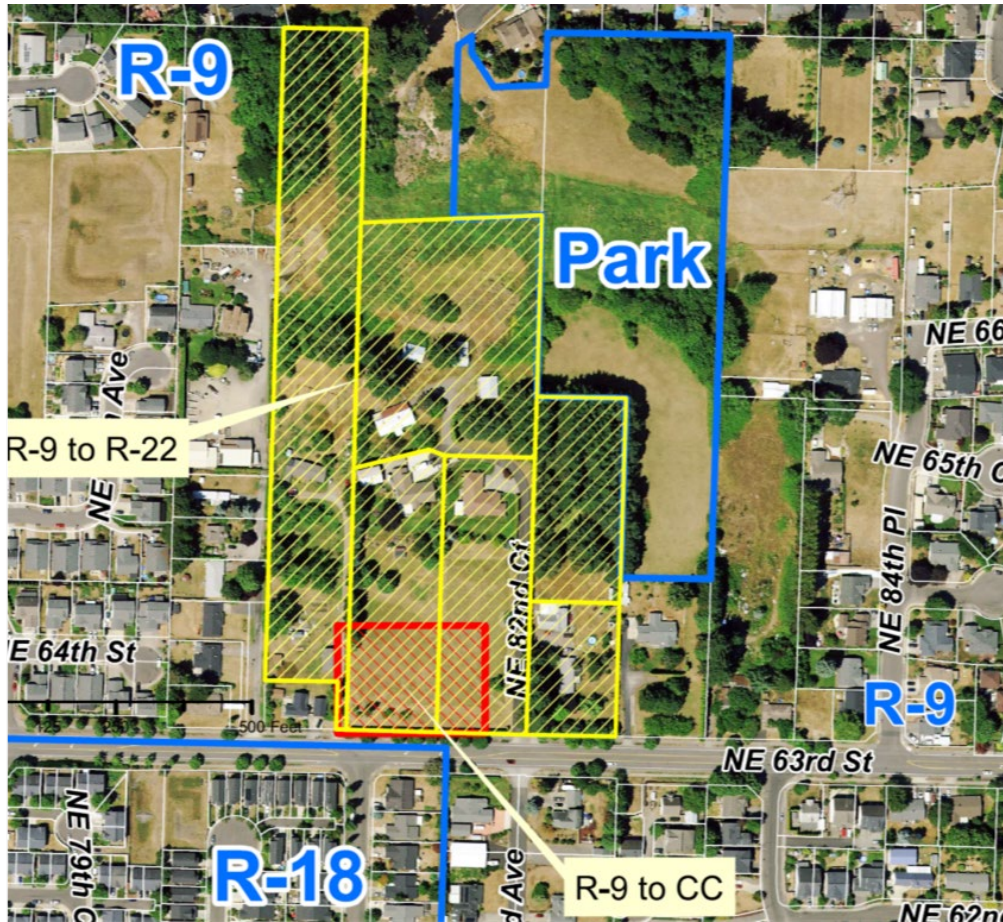
Analysis, findings, and recommendation

Staff finds that the Miller rezone proposal complies with applicable criteria for Comprehensive Plan and zoning map changes of [VMC 20.285.050](#). It facilitates market rate multi-family housing along a major roadway in very close proximity to transit and commercial services, in an area of Vancouver generally lacking higher density multi-family housing. As noted previously in this staff report, the need for housing, particularly denser and lower cost housing, is particularly acute presently, and has been the subject of recent local initiatives as well as new state mandates. Focusing developing in proximity to such services will also further consistency with City of Vancouver [Climate Action Framework](#) adopted in 2022, and new climate requirements in the Growth Management Act.

Staff finds the proposal to be consistent with [Strategic Plan](#) focus areas of Housing and Human Needs, Vibrant and Distinct Neighborhoods, and Climate and Natural Systems. The proposal also complies with applicable [Comprehensive Plan](#) policies, particularly regarding housing options under Policy H-1, and housing placement near services and centers under H-5.

Staff recommends the Planning Commission forward a recommendation of approval to the City Council.

3. Wood Duck Springs – Urban Low Density/R-9 to Urban High Density/R-22 and Commercial/CC on 13 acres at 63rd Street and 82nd Court



The proposal is located on the north side of 63rd Street approximately one mile north of Vancouver Mall. The rezone site contains several existing single-family homes, outbuildings, and vacant land. North and east of the rezone site is Kelly Meadows Park, zoned R-9. East and west along 63rd Street are large lot single family homesites also zoned R-9. To the south across 63rd Street are smaller single- family homes zoned R-18 and R-9.

The application envisions likely development of the site with a mix of up to 283 housing units, primarily new market rate apartments and townhomes, and retention of two of the existing single family homes. The application indicates townhomes are envisioned on the western portion of the site. The application estimates development envisioned if the rezone is approved would result in approximately 35% more daily trips than likely development under the current zoning. The north central portion of the site contains wetland mapping indicators, which may reduce overall site development slightly, to be determined at the time of development review.

The site is served by the Walnut Grove Elementary, Gaiser Middle and Fort Vancouver High schools in the Vancouver School District. Information from the district on specific current status of those schools is pending. Overall the district has faced a general decline in enrollment from pre-pandemic levels. District school impact fees are \$2,486 per multi-family unit.

The C-Tran #32 bus runs north and south along Andresen Road approximately ½ mile west of the site, with service between downtown and the Vancouver Mall Transit Center, at generally 30-minute intervals.

See Attachment C in this report for the application narrative.

Analysis, findings, and recommendation

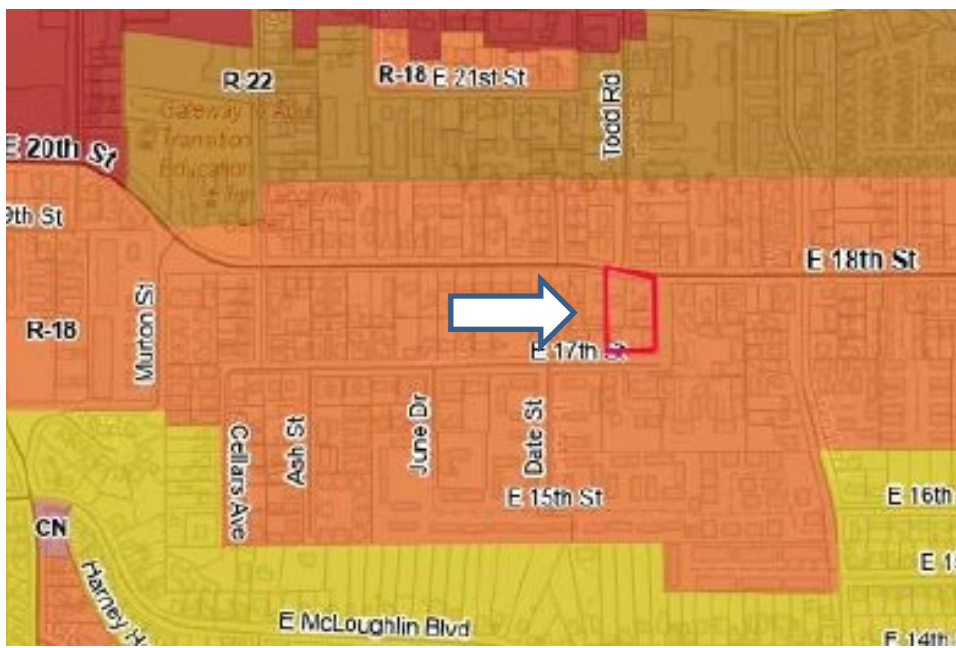
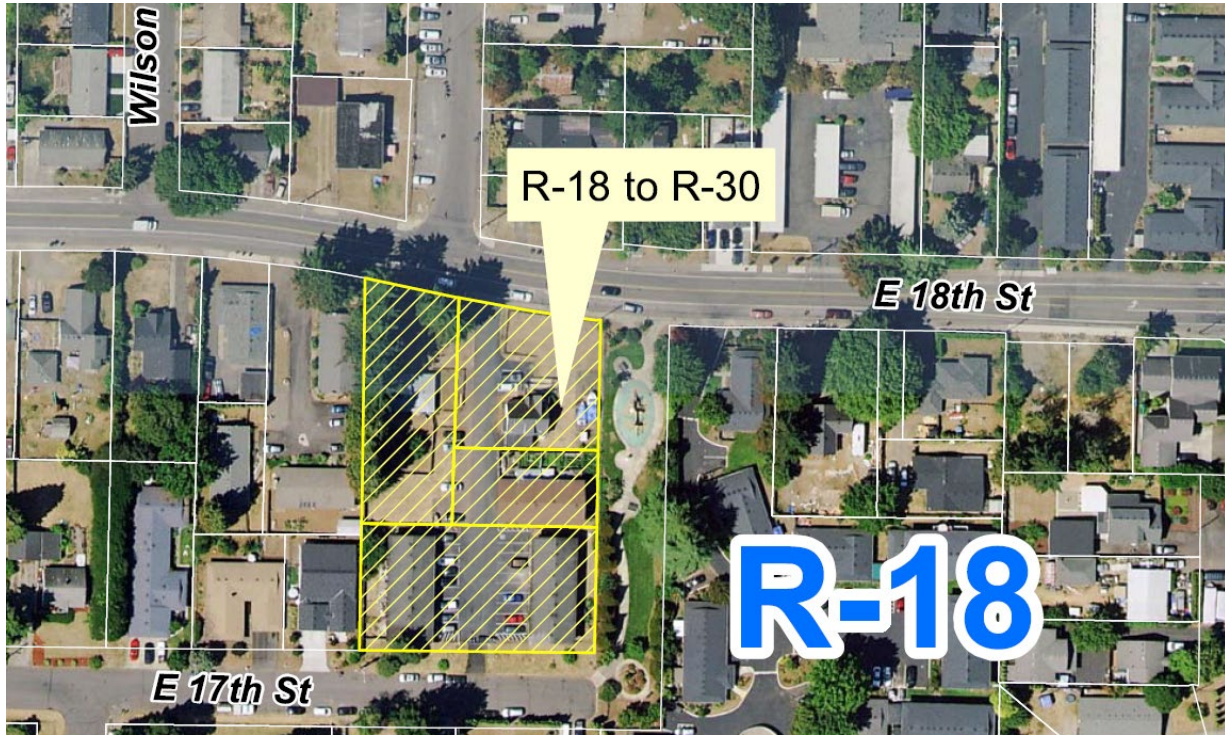
Staff finds that the Wood Duck Springs rezone proposal complies with applicable criteria for Comprehensive Plan and zoning map changes of [VMC 20.285.050](#). The rezone would facilitate significant market rate multi-family housing along a major roadway, and the commercial component of the rezone could potentially provide close by shopping and employment opportunities for residents in the development and surrounding residential areas.

Staff finds the proposal to be consistent with [Strategic Plan](#) focus areas of Vibrant and Distinct Neighborhoods, and Climate and Natural Systems. The proposal is also consistent with [Comprehensive Plan](#) policies H-1, Housing Options; H-5, Housing Placement near Services and Centers; CD-5, Mixed Use; CD-10, Complimentary Uses; CD-14, Connected and Integrated Communities; and CD 16, Sustainability.

Staff recommends the Planning Commission forward a recommendation of approval to the City Council.

1. Zoning map change

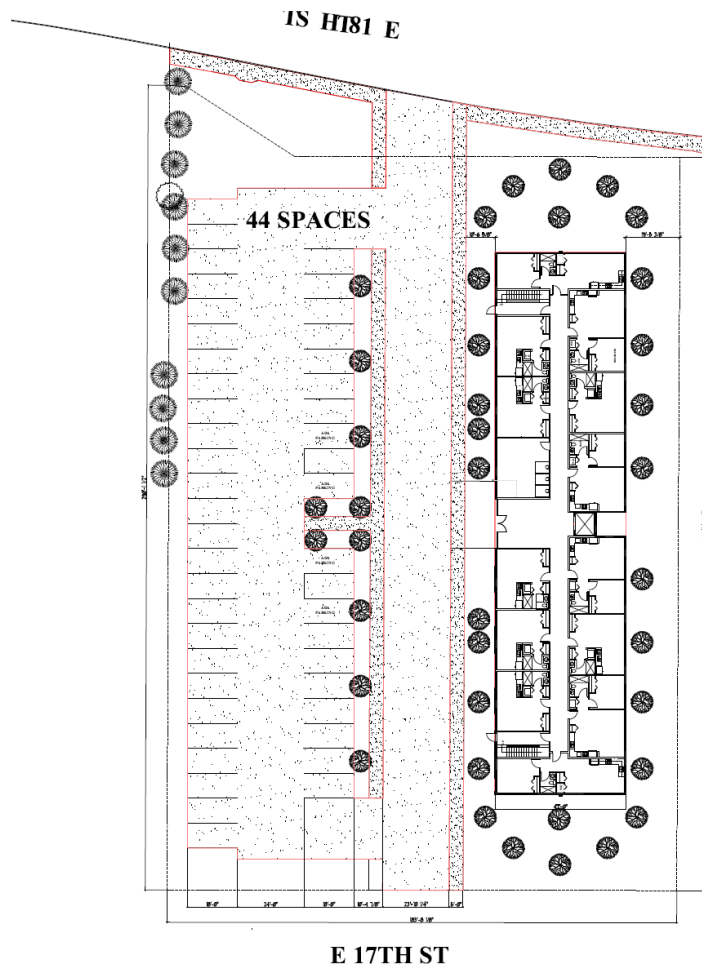
- a. Date Park – R-18 to R-30 on 1.2 acres on SE 18th Street at Todd Road in the Maplewood Neighborhood Association approximately 1000 feet south of Fourth Plain Boulevard



The proposal is located in an older residential area with a mix of housing types zoned R-18. North of the site across E. 18th Street at the intersection with Todd Road is a small apartment building and a single-family home. West of the rezone site is a single-family home and a duplex. South across E 17th Street is a single-family home and small apartment. East is MyPark, a narrow park owned and operated by the City of Vancouver.

The site contains two existing homes and 13 Second Chance rental units, owned by the rezone applicant Datepark Condominiums, a small affordable housing provider. If the rezone is approved, the application proposes to replace all of the existing structures with four buildings providing 54 affordable housing units consisting of 24 studios and 30 one-bedroom units. The City of Vancouver Community Development Department is co-sponsoring the application, consistent with existing CDD policy in support of rezone applications which staff finds are consistent with rezone criteria, and facilitate housing projects where at least 40% of units will be affordable to households earning 60% or less of Area Median Income. See Attachment D in this report for more information.

The applicant has provided a conceptual site plan indicating the buildings are proposed on the east end of the site adjacent to the park, with parking on the west side.



The applicant has provided a traffic analysis projecting development of the site as proposed under R-30 zoning would result in 327 daily vehicle trips, in comparison to 197 daily trips under buildout under the current R-18 zoning.

The site is directly served by the C-Tran #30 bus, with service on 18th Street at 30 minutes intervals.

The applicant is working with staff to finalize a Development Agreement to ensure that future development follows the conceptual site plan including its enhanced setbacks and approximate building placement, provides for affordable housing as indicated, and addresses the City Council [Interim Green Building Policy](#). A draft will be provided in advance of the October 24 hearing.

Analysis, findings, and recommendation

Staff finds that the Datepark rezone proposal complies with applicable criteria for Comprehensive Plan and zoning map changes of VMC [20.285.060](#). The proposal would allow for subsequent development of 54 units of affordable housing immediately adjacent to transit service. As noted previously in this staff report, the need for housing, particularly affordable housing, is particularly acute presently, and has been the subject of recent local initiatives as well as new state mandates. Staff finds the proposal to be consistent with [Strategic Plan](#) focus areas of Housing and Human Needs, Vibrant and Distinct Neighborhoods, and Climate and Natural Systems. The proposal also complies with applicable [Comprehensive Plan](#) policies, particularly regarding housing options under Policy H-1, affordable housing under H-2, and housing placement near services and centers under H-5. The affordable housing crisis and related recent new state housing mandates is the most relevant change in circumstances since establishment of the current zoning.

Staff recommends that the Planning Commission forward a recommendation of approval to the City Council.

B. Comprehensive Plan and Zoning Code Text Changes

Comprehensive Plan Section	Recommended Action
1. Comprehensive Plan Capital Facilities Project list (separate document adopted by reference into Comprehensive Pan)	Add two capital parking projects to citywide capital project list, Library Square/Riverwest Parking Structure, and Downtown Parking Extension Project.
2. Comprehensive Plan Chapter 5, Public Facilities and Services, Appendix E, and	<ul style="list-style-type: none"> -Amend Comprehensive Plan text on page 5-33 to clarify parks service areas as being within 1.5 miles of public access points - Amend Comprehensive Plan text on page 5-38, replacing outdated Table 5-15, the 2011-16 Parks Capital Facilities Plan, with new 2023-32 Capital Facilities Plan. - Amend Comprehensive Plan Appendix E, Documents adopted by reference, to include updated parks document references See Attachment E1 - Amend Vancouver Parks, Recreation & Cultural Services Comprehensive Plan (2022-2031) to update capital facilities plans, service area provisions, and other provisions. See Attachment E2
Zoning Code Section	Issue/Action
3. Zoning Code Definitions, Breezeway, VMC 20.150.040.A	<p>Require breezeways linking structures (so that a second structure is not separate and accessory) to include a roof.</p> <p>Breezeway. A roofed structure for the principal purpose of connecting the main building or buildings on a property with other main buildings or accessory buildings.</p>
4. Use Classifications. VMC 20.160.020	<p>Delete bus barns from the VMC 20.160.020.D.5 category of Warehouse/Freight Movement as its already covered under VMC 20.160.020.B.14 under bus facilities. Add associated fuel storage to the VMC 20.160.020.B.14 category of Transportation Facilities to clarify it is an allowed use. Add a definition for temporary uses, which are currently undefined.</p> <p><i>D.5. Warehouse/Freight Movement. Uses involved in the storage and movement of large quantities of materials or products indoors and/or outdoors; associated with significant truck and/or rail traffic. Examples include freestanding warehouses associated with retail furniture or appliance outlets; household moving and general freight storage; food banks; cold storage plants/frozen food lockers; weapon and ammunition storage; major wholesale distribution centers; truck, marine and air freight terminals and dispatch centers; bus barns; grain terminals; and stockpiling of sand, gravel, bark dust or other aggregate and landscaping materials.</i></p>

	<p>B.1.4. Transportation Facilities. Bus, trolley, streetcar, light and heavy rail transit stops, and stations and other facilities; water taxi and ferry stations; and accessory bicycle parking. Includes associated fuel storage. Excludes airports (see subsection (E)(2) of this section, Airports/Airparks); public streets and sidewalks; and heavy and light rail maintenance/switching yards (see subsection (D)(3) of this section, Railroad Yards); and heliports (see subsection (E)(7) of this section, Heliports). Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act.</p> <p>E.10. Temporary Uses. Includes uses that are temporary or interim in nature that are not subject to full compliance with the development standards for the applicable zoning district, or by which the city may allow seasonal or transient uses not otherwise permitted. Uses may include seasonal or special events involving tents, canopies, membrane structures or storage containers. Situations caused by an unforeseen event deemed by the planning official to be an emergency situation or a temporary trailer or prefabricated building for use on any commercial or industrial zoned property as temporary commercial or industrial office or space associated with the primary use.</p>						
<p>5. Measuring Lot Widths and Depths, VMC 20.170.070</p>	<p>Clarify width and depth for flag lots</p> <p>B. Criteria for measuring flag lot widths and depths. Flag lot widths and depths are measured from the midpoints of opposite lot lines of the flag portion of the lot, excluding the access stem.</p>						
<p>6. Planning Fees, VMC 20.180.060 37.A (2-9 lots)</p>	<p>Delete 'short subdivision' reference which is addressed elsewhere in the fee code</p> <table border="1" data-bbox="527 1003 1464 1121"> <tr> <td data-bbox="527 1003 673 1060">37.</td> <td colspan="2" data-bbox="673 1003 1464 1060">Subdivisions – Preliminary</td> </tr> <tr> <td data-bbox="527 1060 673 1121">A.</td> <td data-bbox="673 1060 1242 1121">2–9 lots (not qualifying as a short subdivision)</td> <td data-bbox="1242 1060 1464 1121">\$8,220.00</td> </tr> </table>	37.	Subdivisions – Preliminary		A.	2–9 lots (not qualifying as a short subdivision)	\$8,220.00
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<p>7. Decision Making Procedures for Type II Applications, VMC 20.210.050</p>	<p>Remove outdated requirement that notices be through “regular” mail only, which eliminates option of notice via email, including to parties that have already commented through email.</p> <p>F. Distribution of Notice of Application. The Notice of Application shall be published in a newspaper of local circulation and sent to the following persons by regular mail:</p> <p>J. Distribution of the Final Decision. The planning official shall provide an affidavit of mailing of the Final Decision as part of the file. The Final Decision shall indicate the date the Final Decision was mailed and demonstrate that the required Final Decision was mailed to the necessary parties in a timely manner. A Final Decision shall be sent by regular mail to:</p> <p>L. Distribution of Notice of Decision. The planning official shall provide an affidavit of mailing of the Notice of Decision as part of the file. The Notice of Decision shall indicate the date the notice was mailed and demonstrate that the required notice was mailed to the necessary parties in a timely manner. A Notice of Decision shall be sent on the same day as the Final Decision by regular mail to:</p>						
<p>8. Conditional Use Permits Submission</p>	<p>Clean up submittal requirements for electronic submittals</p>						

<p>Requirements, VMC 20.245.030</p>	<p>10. Pre-application conference summary or approved pre-application waiver, as well as additional information required in the summary. 11. One set 8 1/2" X 11" plans. 120. One copy of a <u>Completed</u> SEPA (State Environmental Policy Act) checklist (as required), on City provided form. Include SEPA processing fee, pursuant to Chapter 20.180 VMC, Fees. 131. Required processing fee for Conditional Use Permit (See Chapter 20.180 VMC). 142. Concurrency letter, addressed to Transportation Manager, with summary of project with projected traffic impacts, <u>8 1/2" X 11" site map</u> with appropriate fee. (See 20.180 VMC).</p>
<p>9. Site Plan Review Submission Requirements, VMC 20.270.040.C</p>	<p>Include location and dimensions of easements</p> <p>C. Proposed site development plan. The proposed site plan shall be drawn at the same scale as the existing conditions plan and shall include the following information: <u>5. Location, dimension, and purpose of existing easements.</u></p>
<p>10. Binding Site Plans, VMC 20.330</p>	<p>Fix broken links, add requirement for binding site plans to show easements with dimensions – See Attachment F</p>
<p>11. Lower Density Residential Districts, VMC 20.410.050 Development Standards</p>	<p>Clarify that single family streetfront standards adopted as part of 2022 Housing Code Updates apply to land divisions submitted after the 7/27/22 ordinance adoption date; Clarify role of Planned Developments, Infill, and Clusters in maximum density calculations See Attachment G</p>
<p>12. Critical Areas Protection, VMC 20.740</p>	<p>In response to new federal Flood Insurance Rate Maps (FIRM) going into effect in November, update local definitions, add reference to new FIRM maps, and modify the variance process for historic structures in the floodplain. See Attachment H</p>
<p>13. SEPA Categorical Exemptions, VMC 20.790.200</p>	<p>Pursuant to recent statutory changes allowing greater residential exemptions to facilitate housing, exempt apartments with fewer than 200 units from requiring SEPA review unless critical lands or other factors are present to trigger review</p> <p><u>1. Residential projects : those containing 20 200 multi-family dwelling units or fewer, 30 single family units or fewer, or 100 single family units or fewer on lots less than 1500 square feet in size</u></p>
<p>14. Cottage Clusters, VMC 20.950</p>	<p>Clarify definition of density bonus and common area. Address minimum lots sizes and frontages, and allowance for pre-existing homes exceeding cluster requirements. See Attachment I</p>

Analysis, findings, and recommendation

Staff finds the proposed Comprehensive plan and zoning code text amendments are consistent with applicable approval criteria of [VMC 20.285.070](#)

Proposed Comprehensive Plan changes are necessary to update existing project lists, and recognize the latest Parks, Recreation & Cultural Services Comprehensive Plan. Proposed zoning

code changes are primarily for updates, clarifications, and corrections. Updates to Vancouver zoning code SEPA provisions are to utilize recent allowances in state law to no longer automatically require SEPA review for small and mid-scale residential projects simply on the basis of the number of units involved, although review would still be required if other environmental factors are present.

Staff recommends that the Planning Commission forward a recommendation of approval of the proposed text changes to the City Council.

ATTACHMENTS:

- A. 192nd Avenue rezone application narrative
- B. Miller rezone application narrative
- C. Wood Duck Springs rezone application narrative
- D. Datepark rezone application narrative
- E1. Parks related changes to Vancouver Comprehensive Plan, 2011-2030
- E2. Changes to [Vancouver Parks, Recreation & Cultural Services Comprehensive Plan \(2022-2031\)](#)
- F. VMC 20.330, Binding Site Plans
- G. VMC 20.410, Single Family Residential District
- H. VMC 20.740.120 Frequently Flooded Areas
- I. VMC 20.950 Cottage Cluster Developments

Attachment A – 192nd Avenue rezone updated conceptual site plan and updated application narrative



2.0 PROJECT SUMMARY

2.1 Existing Conditions

Description of Original Requested Amendment

On behalf of the applicant, Vance Development, DOWL prepared a request for a Comprehensive Plan Amendment and concurrent Zone Change (CPA/ZC) for a group of parcels located northwest of SE 192nd Avenue and SE 15th Street intersection in East Vancouver, submitted in June of 2023. The request included 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). The request was supplemented with various supporting documents identified as Exhibits A-E, listed on Page 1 of this narrative. Following initial submittal of the application, a full Transportation Impact Analysis, prepared by Kittelson and Associates, Inc. and a draft Development Agreement prepared by Jordan Ramis, PC, were also submitted to the city in support of the requested amendment, these documents were submitted after the initial application and have been identified as Exhibits F and G, respectively.

Neighborhood and Public Outreach

The applicant began outreach efforts with neighbors within the vicinity of the site in early May and has continued through October. Initial contact was focused on individual property owners directly abutting the CPA/ZC site to the north and west. The applicant informed neighbors of the proposal and discussed site design commitments being proposed to address compatibility of the higher density zone with the existing neighborhood.

The applicant also organized and held two public meetings at Hanna Acres Park, on September 13th and September 28th, where he and representatives from DOWL and KAI participated in an informal presentation about the requested CPA/ZC and answered questions by attendants of the meetings.

Below is a table outlining most of the comments received during the neighborhood meetings as well as the applicant's response to those comments.

Comments from Neighbors	Applicant Response
Concern over the type, scale and density of housing anticipated on the site.	Changed request from R-30, (296 units in 3-4 story buildings) to R-22, (210-223 units in 2-3 story buildings).
Avoiding pedestrian and vehicle activity on existing neighborhood streets.	Gates and fencing at SE 191 st Avenue and SE 13 th Street will limit vehicular and pedestrian access to emergency access.
Parking demand and potential for future residents to park on adjacent neighborhood streets.	Target on-site parking ratio will exceed the minimum required by code to provide sufficient parking on site. Further, pedestrian access from neighborhoods to north and west will be blocked with fence and emergency access gate, which will discourage parking in the neighborhoods.
Traffic congestion along SE 15 th Street and SE 192 nd Avenue.	A TIA was completed to evaluate traffic impacts associated with the current and proposed zoning. As reflected in the study,

	included as Exhibit H, all study intersections will operate at an acceptable level of service under the proposed R-22 zoning.
Pedestrian and bicycle safety along SE 15 th Street.	A future development project on the subject site will include constructing sidewalks and bike lanes along the north side of SE 15 th Street adjacent to the property. The City of Vancouver should investigate additional safety concerns along SE 15 th Street.
Preserving trees and views along the edges of the property.	<ul style="list-style-type: none"> Existing trees along the west and north property lines will be preserved to the extent practical. Two-story buildings are planned adjacent to existing neighborhoods to the west and north. Applicant will preserve the two existing homes, if practical. Buildings will be two and three stories, which is similar to the predominantly two-story homes in the adjacent neighborhoods.
Providing fencing adjacent to properties to the north where none currently exists.	The applicant will ensure that there is a fence between the subject property and the neighboring properties.
No “low-income” housing.	<p>No low-income housing is proposed at the property (defined as households earning 60% or 30% of Area Median Income (AMI)).</p> <p>The project will produce between 210-223 middle-housing units which are in high demand and short supply in the market.</p> <ul style="list-style-type: none"> 5% of units will be leased to residents earning no more than 80% of AMI. 95% of the apartments will be “market rate” apartments.
Concern about overcrowding of schools.	According to the Evergreen School District, enrollment is down at nearby schools and the schools can accommodate additional students from this rezone application. Any future development will be required to pay school impact fees as prescribed by the Evergreen School District Capital Facilities Plan.

Description of Revised Requested Amendment

In response to neighborhood concerns, the applicant has elected to revise the application to request a Zone Change to Urban High-Density Residential, R-22 (22 du per acre), the prior

Comprehensive Plan Map Amendment request from UL to UH is unchanged from the original request. This narrative as well as a revised Transportation Impact Analysis (TIA), prepared by Kittelson and Associates, evaluating the traffic impacts of the requested change to Urban High-Density Residential, R-22, have been provided to support the requested change to R-22. The revised TIA is included as Exhibit H. No development requests are included with this CPA/ZC application; however, a conceptual site plan has been prepared (Exhibit I) and is discussed briefly with the CPA/ZC narrative to provide context for a future development scenario which could follow approval of this CPA/ZC request.

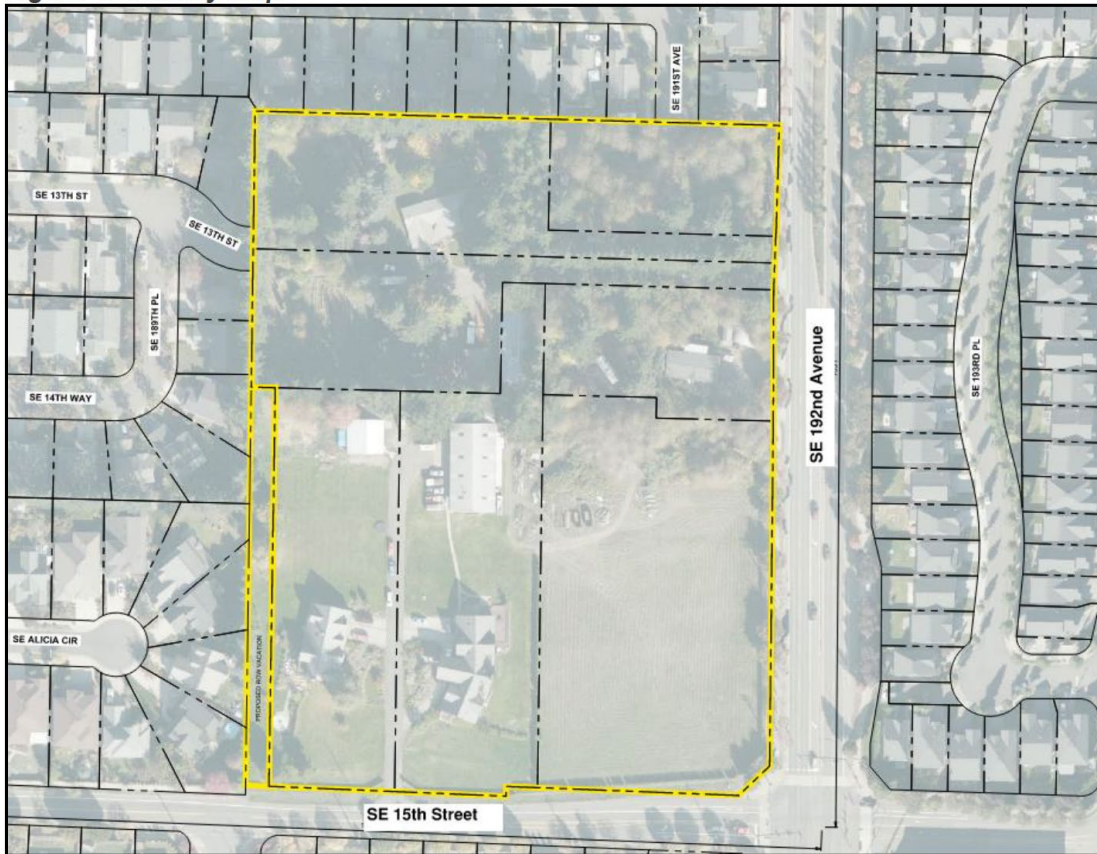
Existing Site Conditions

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 192nd Avenue and SE 15th 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
Total:				10.15

Figure 1: Vicinity Map

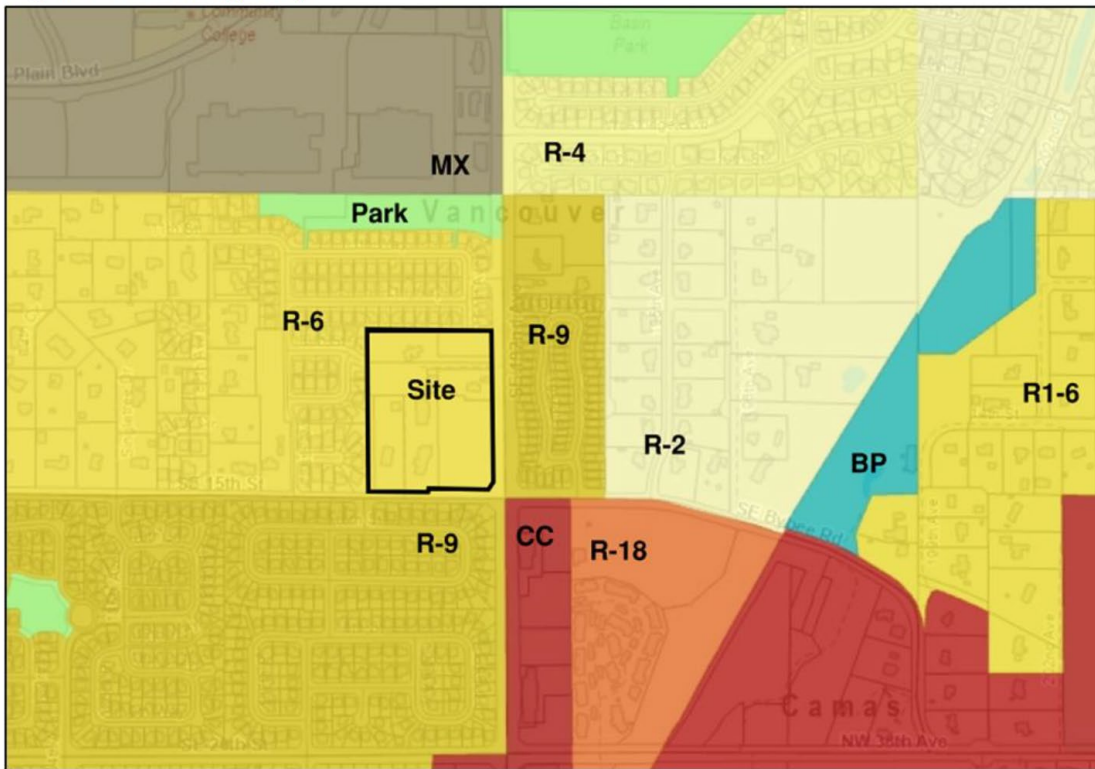


The site is bordered to the north and west by single-family dwellings, to the south by SE 15th Street and to the east by SE 192nd Avenue. Adjacent uses and underlying zoning of the land is identified in Table 2 below. Zoning in the vicinity of the project site is depicted on Figure 2, obtained from Clark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

Table 2: Adjacent Uses

	Zoning	Use
North	R-6	Single-Family Residential
South	R-9	Single-Family Residential
East	R-9	Single-Family Residential
West	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 draft Development Agreement (DA) was submitted to the city on September 8, 2023, proposing site development commitments related to the R-30 request. The city provided comments on the DA on October 11, 2023. The applicant is reviewing the comments and will submit a revised draft which aligns with the revised request to rezone the site to R-22 and addresses staff comments. The DA will include a commitment to affordable housing, green building goals, and other voluntary site development commitments provided the R-22 zone change request is approved.

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 were provided as Exhibit B with the original application request. Additionally, the requested amendment is subject to regulation under the State Environmental Policy Act (SEPA). A Non-Project Checklist was submitted as Exhibit C with the original application. The City issued a SEPA Determination of Non-Significance for the original CPA/ZC request on September 21, 2023. The applicant's request to change the proposal from a zoning of R-30 to R-22 will result in fewer housing units, and less vehicle trips associated with the rezone and as such city staff, acting as lead agency,

has determined that the original SEPA checklist and subsequent determination has adequately addressed impacts.

No development requests are included with this CPA/ZC request. However, a conceptual site plan for the R-22 zoning is provided with this request as Exhibit I 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 revised CPA/ZC request 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) 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 192nd Avenue, a principal arterial, and SE 15th Street, a minor arterial. SE 192nd 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 15th 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 15th 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 192nd Avenue between Mill Plain and SE 34th Street before heading west to connect with SE 164th 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 15th 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-22 zone at the site will set a new density range of 18.1 units (minimum) to 22 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**

3.0 REVISED CODE OF WASHINGTON (RCW)

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 192nd Avenue and along portions of the project frontage on SE 15th Street. As such, the applicant anticipates that the proposed R-22 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 TIA was completed to evaluate traffic impacts associated with the current and proposed zoning. As reflected in the study, included as Exhibit H, all study intersections will operate at an acceptable level of service under the proposed R-22 zoning. The study indicated that the existing eastbound left-turn lane at SE 192nd Avenue and SE 15th Street is expected to exceed the currently available storage length under future five-year conditions for both the current and proposed zoning and, as such, additional queuing storage would likely be required at the time of site development. The study further stated that the exact length of the eastbound left turn lane would be determined at the time of a future site development proposal and would be based upon the proposed density of the future project. The study did not identify any safety-based mitigation requirements.

- (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-22 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 192nd Avenue and SE 15th Street. Additionally, public parks, schools and significant retail and employment opportunities are present within ½ mile of the site in either direction along SE 192nd Avenue, a major transportation corridor which is served by public transportation.

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 210 to 223 dwelling 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 R-22 Alternative is included with this request as Exhibit I.

(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 worked diligently to meet with neighbors in the vicinity of the CPA/ZC site to discuss the request. The applicant attempted to meet in person with all neighbors sharing a property line with the project site and was able to talk with all but one. Additionally, two public meetings were organized and held at Hanna Acres Park September 13th and 28th. The applicant and representatives from DOWL and KAI were present at the meeting to discuss the project and answer questions. The applicant has also responded to comments and questions submitted by the public via email.

(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 for public utilities and facilities including, schools, traffic, parks, fire, water, sewer and stormwater, will ensure that services are adequate to serve a higher density development.

The revised TIA prepared by KAI, and included as Exhibit H, evaluated traffic impacts of the proposed CPA/ZC under existing R-6 zoning and proposed R-22 zoning. The study assumed that the entire site, 10.15 acres, which includes 0.28 acres of unimproved ROW, would be rezoned and subsequently developed to the maximum density, or 223 units. The findings and recommendations outlined on pages 1 and 2 of the TIA are excerpted below:

Findings

- All of the study intersections were found to operate acceptably under opening year (2027) and five-year horizon (2032) traffic conditions with reasonable worst-case development of the site under both the existing (R-6) and proposed (R-22) zoning.
- The eastbound left-turn queues at SE 192nd Avenue / SE 15th Street are anticipated to exceed the currently available storage length under future five-year 2032 background (existing zoning) and total (proposed zoning) traffic conditions during the AM and PM peak hours assuming reasonable worst-case development of the site under both the existing (R-6) and proposed (R-22) zoning.
 - Subject to City of Vancouver direction and the specific traffic impacts of potential future site development, the eastbound left-turn lane at SE 192nd Avenue / SE 15th Street may need to be extended to provide up to 175 feet of storage based on the projections in this study.
 - The actual turn lane storage length needs will depend in part on the density of site development that is proposed in the future and can be best assessed at the time of site plan application as required by the Vancouver Municipal Code (VMC, Reference 1).
 - No safety-based mitigation needs were identified based on review of historic crash data at the study intersections.
- Washington State Department of Transportation (WSDOT) volume-based criteria for providing turn lanes at the anticipated site driveways on SE 192nd Avenue and SE 15th Street are not met under either weekday AM or PM peak hour traffic conditions. Southbound volumes on SE 192nd Avenue do meet the criteria for considering a right-turn pocket or taper;

however, installation of tapers is not recommended given the presence of the bicycle lane and intersection sight distance considerations. Potential turn lane needs at the site access driveways can be revisited at the time of a future site development application.

Recommendations

- Subject to City of Vancouver direction and per standard City development review practice, future site development applications for the study site (as well as other development in the area) should continue to assess the need for additional eastbound left-turn lane queue storage on SE 15th Street at SE 192nd Avenue. The City of Vancouver can monitor turn lane storage length needs through the City's development review process and require an extension of the turn lane in conjunction with a future site plan application based on the documented turn lane storage needs at the time of site plan application in accordance with the VMC.

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).

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-22, a high-density residential zone with a net density range of 18.1 -22 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

- (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-22, high-density residential, which has a minimum of 18.1 and a maximum of 22 dwelling units per net acre. The R-22 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 223 dwelling units, a potential net increase of as many as 166 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 leasing 5% of the future housing units at 80% of AMI. The draft development agreement (Exhibit G) outlines 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: As previously discussed, following a request from City staff, the applicant retained KAI to prepare a full TIA to evaluate traffic impacts under the current zoning and proposed zoning scenarios. The original TIA submitted August 3, 2023, evaluated development under the base zone assumption as well as the R-30 alternative (Exhibit F). The TIA was subsequently revised to compare development under the

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 15th Street at the time of site development will connect with existing facilities on SE 192nd Avenue and will promote walkability to adjacent commercial and institutional uses in the vicinity and in particular along the SE 192nd Avenue corridor. Additionally, 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. 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:

current zone with development under the R-22 scenario assuming a total of 223 housing units. The revised TIA is included as Exhibit H. As discussed earlier in this narrative, the study found that study intersections would operate at an acceptable level of service under the R-22 alternative, and no safety mitigation measures were identified. The study does indicate that additional eastbound left-turn storage at the SE 192nd Avenue and SE 15th Street intersection will likely be necessary in the future following development of the site under existing and proposed zoning scenarios. A more targeted review should be completed at the time of future site development and should be based upon proposed density of the future project.

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

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

CPA/ZC would permit development of multi-family housing in a neighborhood that currently lacks multi-family housing options and within proximity of existing 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 192nd 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 and north property lines will be setback at least 35 feet from the property line and will be limited to two stories;
- Buildings adjacent to SE 15th Street and SE 192nd Avenue will be limited to three stories;
- Any three-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.

As discussed above, the applicant submitted a draft development agreement to the city on September 8, 2023, reflecting site development considerations for the original R-30 proposal. The City of Vancouver and the applicant have been reviewing language and discussing changes to the document related to affordable housing and integration of the Interim Green Building Policy goals. The applicant has generally agreed to the revisions outlined by the city and will further revise the DA to align with compatibility-related design standards proposed for the R-22 alternative.

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 R-22 Alternative, included as Exhibit I, 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 192nd Avenue (Major Arterial) and SE 15th 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 192nd 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 192nd 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 15th 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 Revised Transportation Impact Study has been prepared and is included with this request as Exhibit H. The TIA evaluated anticipated traffic volumes under the existing and proposed zoning designations. As reflected in the study and discussed throughout this narrative, the TIA found that all study intersections would operate at an acceptable level of service under the opening year and five-year horizon (2023) for both development under the current and proposed zoning scenarios. Further, no safety-based mitigation improvements were identified based upon a review of historic crash data and the study intersections. The study did reveal that the eastbound left-turn lane at the SE 192nd Avenue and SE 15th Street would likely require additional queueing storage at the time of site development under either the current or proposed zoning. Review at the time of future site development to determine the exact storage needs was recommended.

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) 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

6.1 Goal 1

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

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 18.1 and a maximum density of 22 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 neighborhoods primarily consists of single-family homes with little variability in housing types and homogenous development patterns. Businesses are located along the SE 192nd 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

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 TIA which evaluates traffic impacts associated with site development under the existing and proposed zoning. The analysis concluded that all study intersections would operate at acceptable levels of service following development of the site under either current or proposed zoning. No safety-based mitigation was identified.

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), thus presenting an opportunity for the site to develop consistent with these policies including the extension of sidewalks and bicycle lanes on SE 15th Street. Further, as recommended in the revised TIA, at the time of site development a review of the eastbound left-turn lane storage at the intersection of SE 192nd Avenue and SE 15th Street should be evaluated and expanded if deemed necessary based upon the scope and scale of the proposed development.

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-22 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

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.**

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 was previously provided 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: Similar to the R-30 zoning designation previously requested, the proposed R-22 alternative 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 likely include reconstruction of bicycle lanes and the addition of sidewalks on SE 15th Street which will improve multi-modal connectivity in the neighborhood. As reflected in the revised TIA, the eastbound left-turn queues at SE 192nd Avenue and SE 15th Street are expected to exceed the storage length currently provided on the roadway and, as such, the applicant anticipates that an extension of this turn lane will be required at the time of site redevelopment. Finally, the incorporation of specific site development compatibility considerations will facilitate integration with the existing neighborhood.

Response: This modified 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-22 (22 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 and north property lines will be setback at least 35 feet from the property line and will be limited to two stories.
- Buildings adjacent to SE 15th Street and SE 192nd Avenue will be limited to three stories.
- Any three-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. The draft DA (Exhibit G) will be revised to reflect the R-22 alternative zone change request and associated site design commitments as noted above. The DA will also address the applicant's commitment to affordable housing as well as green building goals for new buildings within the site. A revised draft is anticipated in advance of the City Council Public Hearing.

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 was submitted by DOWL on behalf of the client for review by the City, consistent with this provision. This modified request is being submitted following feedback from the public on the original proposal as discussed previously in this narrative. The applicant and consultant team has coordinated with city staff to produce supplemental materials to support the requested adjustment to R-22.

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.

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-22 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 R-22 Alternative is included with this request as Exhibit I. The plan reflects a range of between 210 to 223-unit multi-family residential development. All multi-family buildings adjacent to the north and west site boundary lines will be limited to two stories in height, generally consistent with most homes in the adjacent neighborhoods, which have a maximum building height of 35 feet, and building heights within the site will transition to three-story buildings farther to the east. Buildings adjacent to the north and west site boundaries will be setback a minimum of 35 feet, exceeding the typical side yard setback of 5 feet required by the zone. The self-imposed building height limits and increased setbacks adjacent to the north and west property lines will help ensure compatibility with surrounding uses and reduce visual impacts of the three-story structures anticipated elsewhere in the site. 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 has agreed to enter into a development agreement to memorialize site 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. The applicant is reviewing initial comments from staff regarding DA language and will submit a revised draft which aligns with the revised request to rezone the site to R-22 and addresses staff comments. The DA will include a commitment to affordable housing, green building goals, and other voluntary site development commitments provided the R-22 zone change request is approved.

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 to the extent practicable. The mature trees will serve as a natural buffer between the adjacent R-6 zoning designation and the proposed R-22 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 revised TIA was prepared to evaluate the impacts of the requested comprehensive plan amendment and

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 192nd 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 192nd 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-22 (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 192nd Avenue and SE 15th Street and is within close proximity to retail, services, and employment, including the commercial development at SE Mill Plain Boulevard and SE 192nd 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.

zone change request to UH with a zone of R-22. The study concluded that the system could accommodate the requested change but noted that the eastbound left-turn queue length at the SE 192nd Avenue and SE 15th Street intersection is anticipated to be exceeded in the future five-year 2032 background (existing zoning) and total (proposed zoning) traffic conditions and, as such, indicates that an increase in queue length will likely be necessary. KAI recommends that this be further analyzed at the time of site development review based upon the actual proposed density of development, consistent with the VMC. The Revised TIA is included as Exhibit H.

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.

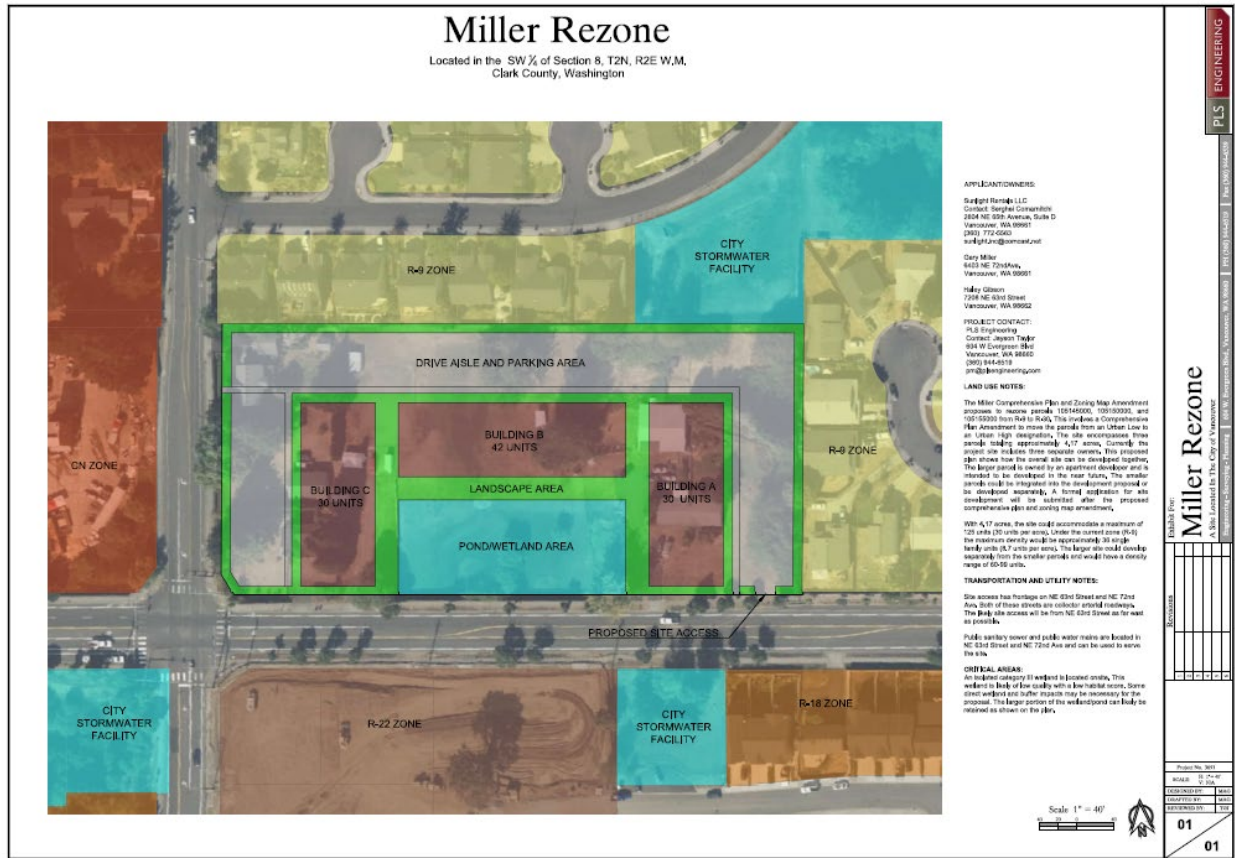
h. Provide affordable or below-market-rate housing opportunities.

Response: The implementation of the R-22 zone at the site will set a new density range of 18.1 units (minimum) to 22 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

As evidenced through this narrative and associated documents, the applicant's revised CPA/ZC request is consistent with long-range policies and regulations governing the allowance of these requests. Further, the modified request directly responds to comments and concerns raised by neighbors during the process, reducing the site's overall density allowance and limiting building heights to provide a softer transition with existing neighborhoods directly abutting the site to the north of west. 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.

Attachment B – Miller rezone conceptual layout and application narrative



Project Description

The Miller Comprehensive Plan and Zoning Map Amendment proposes to rezone parcels 105145000, 105150000, and 105155000 from R-9 to R-30. This involves a Comprehensive Plan Amendment to move the parcels from an Urban Low to an Urban High designation. The site encompasses three parcels totaling approximately 4.17 acres. Currently the project site includes three separate owners. There is not a current plan for the development of all three parcels at this time. The larger parcel is being purchased by a developer and would be developed in the near future. The smaller parcels could be integrated into the development proposal or be developed separately. A formal application for site development will be submitted after the proposed comprehensive plan and zoning map amendment.

Density:

With 4.17 acres, the site could accommodate a maximum of 125 units (30 units per acre). Under the current zone (R-9) the maximum density would be approximately 36 single family units (8.7 units per acre). The larger site could develop separately from the spaller parcels and would have a density range of 60-99 units. The existing constraints of the site have not been studied to the extent that a reliable future unit count can be provided. It would be best to assume the maximum density when evaluating potential impacts of the proposed rezone.

Traffic Impacts:

Apartment buildings generate 6.74 average daily trips (ADT) per unit and single-family homes generate approximately 10 ADT per unit according to the ITE trip generation manual. The maximum possible development could generate up to 842.5 ADT, and development under the current zone would likely generate 360 ADT. The proposed rezone could result in a 57% increase in trips that would have otherwise been planned for in this area. A traffic study specific to the future development will be completed to ensure that the existing street system has adequate capacity for the increase in trips.

Comprehensive Plan and Zoning Map Amendment Approval Criteria

VMC 20.285.050

The following discusses the criteria that must be addressed for a comprehensive plan and zoning map amendment, and how this proposal complies:

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 request is consistent with Objective 6.2.1 of the Vancouver Strategic Plan: “Develop a broader range of housing choices through incentives, changes in regulations and implementation of the Affordable Housing Task Force recommendations.” The intent of this amendment would be to allow zoning that would increase the overall supply of housing in the city, which would result in lower purchase prices and rental costs. While this does not provide “affordable housing” it goes a long way to make housing more affordable. Since the adoption of the strategic plan housing prices have continued to soar. This is partly due to a high demand for housing in the Vancouver region that far outpaces the new housing supply. Apartment units will provide additional housing at a lower price point.

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 site is within 0.25 miles of NE Andresen Rd. and approximately 2 miles from the nearest access to I-205, both major corridors in the area. Higher density residential development in this area would discourage urban sprawl.

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 site is within 0.5 miles of Raymond E. Shaffer Community Park and 1.5 miles from Orchards Community Park, providing ample recreational opportunities. Vancouver Mall, Costco and Home Depot are nearby providing employment and local shopping opportunities. A higher density multi-family residential development would integrate well with these areas.

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

Response: The south end of the site is bounded by NE 63rd Street, a collector arterial. South of the street are existing townhome and apartment developments. West of the site is a fire station. North and east of the site are existing single-family residences. This site is well positioned to be developed with a higher intensity use that will not have a significant effect on the existing neighboring uses. The site will have direct access to NE 63rd street and will not take access from the existing single-family residential streets.

d. Conserve or enhance significant natural or historical features;

Response: The applicant will hire a biologist to delineate any possible critical areas onsite and will work to avoid or minimize impacts where feasible.

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

Response: Site access will be provided directly from NE 63rd Street. Water mains are located in NE 63rd Street NE 72nd Avenue adjacent to the site. CRWWD will be the sanitary sewer purveyor. Sanitary sewer lines run along both NE 63rd Street and NE 72nd Avenue.

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

Response: Not applicable, this is a proposal for residential zoned property.

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

Response: The redevelopment of these parcels will result in an attractive development at the corner of two arterial streets.

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

Response: The proposal does not include affordable or below-market-rate housing, but the increase in housing supply will help make housing more affordable in the area. Apartments are an attractive affordable alternative in today's market.

3. Scope of review. Review and evaluation of proposed comprehensive plan or zoning map changes shall consider both the likely and possible future use of the site and associated impacts.

Response: The applicant intends to provide apartment units after the comprehensive plan and zoning map change approval. The request is a change from a lower density to a higher density, however it is still a residential zone so only residences will be proposed. Impacts created would be those of a higher density residential development, with typical impacts to local schools, emergency services and streets. Impact fees will be required to be paid to offset these impacts.

4. Cumulative Impacts. The review of individual comprehensive plan map or policy amendments, other than exceptions noted in VMC [20.285.040](#), shall also consider the cumulative transportation, land supply, and environmental impacts of other plan amendments proposed within the same annual cycle. (Ord. M-3922 § 13, 07/06/2009; Ord. M-3701 § 9, 05/02/2005; Ord. M-3643, 01/26/2004)

Response: The impacts of this development will need to be reviewed in conjunction with the other plan amendments within this review cycle.

ZONING MAP AMENDMENT APPROVAL CRITERIA

VMC 20.285.060.A. sets out the applicable zoning map amendment approval criteria not involving associated comprehensive plan map amendments.

This proposal is required to demonstrate the following:

1. How the proposal is more consistent with applicable policies of the Vancouver strategic plan and comprehensive plan than the existing designation; and
2. That a change in circumstances has occurred since the existing designation was established.

A. Consistency with Vancouver Strategic Plan

The City adopted a 2016-2021 Strategic Plan, and updated it in November 2018. The city is currently working on a new Strategic Plan, but it has not yet been adopted.

The request is consistent with Objective 6.2.1:

6.2.1 Develop a broader range of housing choices through incentives, changes in regulations and implementation of the Affordable Housing Task Force recommendations. Page 23.

In the final 2016 report the Affordable Housing Task Force discussed potential tools and programs to increase the supply of affordable housing units in the city. One of the high priority items discussed amending zoning/development regulations to encourage affordable housing options.

Option for Council Consideration	Description	Estimated Time for Staff to Develop and Present to Council	City Direct Costs/ Staff Time	Cost to Property Owner/ Developer	Potential to Increase Affordable Units	Considerations and Details Additional information to follow based on Council guidance and staff analysis.	Task Force Priority
EXPAND SUPPLY OF AFFORDABLE HOUSING							
Amend zoning/development regulations to encourage affordable housing options	<ul style="list-style-type: none"> • Allow/promote alternative housing, e.g.: <ul style="list-style-type: none"> ○ Cluster/cottage housing ○ Corner-lot duplexes ○ Micro-housing and single room occupancy (SRO) housing ○ Shared housing, including rooming/boarding houses • Reduced parking requirements 	Medium to Long	\$\$	\$	Medium	<p>Details:</p> <ul style="list-style-type: none"> • May be effective at increasing overall supply over a long period of time, but affordability not guaranteed • Marketing incentives/opportunities to property owners and developers • Can use current staff, but may be contracted out <p>Questions:</p> <ul style="list-style-type: none"> • Requires determination of priorities among several options • Need to determine appropriate level of incentives <p>Task Force comments: Support for allowing a wider variety of housing types and sizes. This option may also provide low-income homeownership units, an opportunity to address affordable housing apart from rentals.</p>	High

The intent of the option would be to increase overall supply of housing in the city which would result in lower purchase prices and rental costs. While this does not provide “affordable housing” it goes a long way to make housing more affordable. Since the adoption of the strategic plan housing prices have continued to soar. This is partly due to a high demand for housing in the Vancouver region that far outpaces the new housing supply.

In response to the strategic plan and the Affordable Housing Task Force recommendations, the City Council studied and approved housing code updates. The Housing Code Updates webpage states the following as a purpose of the update:

“Vancouver, like many communities, is facing a housing crisis. As the city continues to grow, there is a desire and need for new types of housing that would allow residents to live more affordably while also maintaining neighborhood livability. However, current city zoning rules prohibit many of these

Table 1-5. Vancouver comprehensive plan land use designations

Comprehensive Plan designation	Corresponding Zoning	General Intent
Residential		
Urban Lower Density	R-2, R-4, R-6, R-9	Predominantly single-family detached residential development, with some allowances for duplexes, townhouses, and single-family homes on small lots using infill standards
Urban Higher Density	R-18, R-22, R-30, R-35, MX	Predominantly apartments and condominiums, with some allowance for attached housing (such as duplexes, townhouses, and small-lot single-family homes) and mixed use

This request furthers the Community Development policies on page 1-14 to 1-15 of the Comprehensive Plan:

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:

- The site is near a full-service grocery store/commercial area, elementary school, community park, and C-Tran Bus route 78 on NE Andresen Rd.
 - Safeway and Walgreens are both approximately 1/4 mile from the site. This is approximately a 5-minute walk. There is also a Starbucks (inside Safeway), Chase Bank, State Farm Insurance, The UPS Store, Sprint Store, Great Clips, Nail Salon, Drive through Coffee, and Subway.
 - Walnut Grove Elementary is south of the site.
 - Raymond E Shaffer Community Park is located approximately 1/4 mile to the southeast. This is a 10-acre park that connects to another 7-acre park to the south.
 - C-Tran Bus route 78 stops at NE Andresen Rd and NE 63rd Street. This is less than a 1/2 mile from the site.
 - The northbound and southbound busses arrive every 30 min from 6:00am to 9:00am and 3:00pm to 6pm
 - The northbound and southbound busses arrive every 60 min from 9:00am to 3:00pm and 6:00pm to 10pm

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:

- This is a relatively small infill project, where the intent is to convert the existing underutilized land into an apartment housing project.

In addition, the request fulfills both CD-9, facilitating compatible uses adjacent to each other, and CD-10, placing housing near services (complementary land uses).

housing options. Changes to the development code can create opportunities for the private sector to deliver a more diverse, affordable housing stock.”

The project goals of the housing update are stated as the following:

“The goal of the project is to update City codes to allow for different, smaller and more affordable types of housing choices. Many are recommended in the Affordable Housing Task Force report (2016) and many are similar to what is allowed in Clark County and other Washington cities nearby and statewide.”

The specific goals include:

- Allowing for the development of diverse housing types to meet changing demographic needs and consumer preferences
- Expanding market rate, middle income, and affordable housing choices
- Maintaining neighborhood livability with incremental, rather than wholesale, change
- Providing more opportunities for people to live near where they work and attend school, and reduce costly commutes
- Facilitating development in areas with full existing public services

The current proposal is consistent with this plan and will help meet the City’s goals. The general proposal associated with the zone change will accomplish the following:

- The Miller Rezone project will add diversity to the housing options in the immediate vicinity of the site.
- The rezone will not have a large effect on adjacent homes as the proposed access is directly from an arterial street.
- The future project would match the style of apartments to the south and could result in an attractive development at the corner of two arterial streets.
- The site is located near schools, stores, and public transport that has the potential to reduce costly commutes.
- The project is in an area with full existing public services.

B. Consistency with the Comprehensive Plan

The applicant is requesting a concurrent change in the Comprehensive Plan designation. The current and proposed plan designations are residential and are compatible. The proposed plan results in a higher density, but can be designed to have less of an impact on the neighboring lower density community.

Chapter 3 of the Comprehensive Plan contains the City's Housing element. The Plan recognizes the need for diverse housing:

*As the baby boom generation ages over the next 20 years, there is likely to be a greater need and demand for smaller units, retirement homes, and assisted living.
Page 3-3.*

The plan notes that most residential housing is single-family housing (57%). *Id.* Housing affordability is also a City concern:

The Growth Management Act requires local jurisdictions to demonstrate that regulations allow and encourage housing for all economic segments of the community. Table 3-3 provides a breakdown of local households by income ranges, and the general share of Vancouver housing they can afford to buy or rent without having to spend more than 30% of their income.

There are several policies that would be furthered by this request, including:

*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-2 Affordability
Provide affordable housing by formulating innovative policies, regulations and practices, and establishing secure funding mechanisms. Target affordability programs toward households with incomes below the median.*

C. Change in Circumstances

The proposed zone change is in response to the current housing shortage and affordability crisis that is currently occurring in SW Washington. This shortage of housing within the area that the subject property lies represents a change in conditions or circumstances since the zoning designation was established. The proposed zone change will result in additional housing units that will increase the housing supply in the area and contribute to improving housing affordability.

According to the 2016 Affordable Housing Task Force Report issued by the City of Vancouver, it was noted that:

Vancouver, Washington and the surrounding communities are experiencing an unprecedented demand for rental units. In June 2015, the vacancy rate in Vancouver was just below 2%, down from 3.8% at the end of 2010.¹ The tightening market has led to a dramatic increase in rents. Between October 2014 and October 2015, the increase in median rent for a 2-bedroom, 1-bath unit in Vancouver was the highest in the nation at 15.6% (a jump from \$900 to \$1,040 per month). Page 2.

While this report was issued in 2016, conditions have not improved in recent years. This report recognizes that higher densities can promote more affordable housing.

CONCLUSION

Approval of this application would result in a development that can be served by existing urban public services and will provide more flexibility in density and housing types, resulting in more affordable housing.

Attachment C – Wood Duck Springs updated conceptual site plan and original rezone application narrative



Project Discussion

The Wood Duck Springs Comprehensive Plan and Zoning Map Amendment proposes to rezone parcels 105241000, 105242000, 105190005, 105190010, 105190000, 986042813 from R-9 to R-18. This involves a Comprehensive Plan Amendment to move the parcels from an Urban Low to an Urban High designation. The site encompasses six parcels totaling approximately 13.89 acres. Currently the project site includes a mix of existing single-family residences and vacant land. Future development plans for the site would likely retain two of the existing homes as an office or amenity space with the remainder of the site developed with apartments and condo/townhomes in a variety of densities. The applicant intends to provide a diversity of unit types and unit styles so that a wider range of housing needs may be met. This would include apartment units ranging from 1 to 3 bedrooms, townhouse style units that are 2 stories without garages and townhouse style units that are larger and have garages. The applicant is desirous of creating homes for sale at the bottom portion of the ownership market as they believe that the first step to wealth creation is a long-term controlled housing costs created via a 30-year mortgage. But the applicant is concerned about the negative legal environment for condominiums in Washington State at this time and would most likely create rentals for those units. One of the options that the applicant is reviewing is to build larger 3-bedroom units that could be condo converted at a later date if the liability laws become more favorable. The current applicant would likely also be the one to develop the site including site and building construction. A formal application for site development will be submitted after the proposed comprehensive plan and zoning map amendment.

Neighborhood Layout –

The applicant would propose that the 2 story tall townhouse style units would be built along the western side of the project in an attempt to build into the existing neighborhood. This is the only section of the abutting property that is expected to remain nearly the same for the foreseeable future due to the small existing lots as well as a long term commercial business; all of which are served by the existing private road that directly abuts to the projects west side. The applicant would also look at placing more townhouse units along a portion of the east side in an attempt to blend into the neighborhood as the parcel to the east with an existing house would be large enough for some infill redevelopment in the future.

The project north and a portion of the east abuts to City of Vancouver open space that is an undeveloped park. The applicant has already had discussions with the City of Vancouver Parks department in efforts to understand future park (Kelly Meadows) development plans as well as how the projects could benefit each other through better planning. This discussion included being able to generate better open space utilization, reducing expected parks impact on wetlands by moving a planned path from parks land to the applicant land, options for recreation along the trails, exploring build/PIF credits, trail connectivity, donations, trail materials within wetland buffers, land donation and overall planning and timing.

Density:

With 13.89 acres, the site could accommodate a maximum of 250 units (18 units per acre). With potential roadway dedications the net site area may be less, and the maximum unit count could be

around 235 units. Under the current zone (R-9) the maximum density would be approximately half of the proposed plan or 125 single family units.

Traffic Impacts:

Apartment buildings generate 6.74 average daily trips (ADT) per unit and single-family homes generate approximately 10 ADT per unit according to the ITE trip generation manual. Development under the proposed plan would generate 1685 ADT, and development under the current zone would likely generate 1250 ADT. The proposed rezone would result in a 35% increase in trips that would have otherwise been planned for in this area. Based on previous projects and traffic studies in the area, we do not believe the additional traffic will cause any capacity issues on NE 63rd Street. A traffic study specific to the proposed development will be completed to ensure that the existing street system has adequate capacity for the proposed development.

Additionally, this project solves a major issue around intersection spacing along 63rd by moving the access portion of this project to its east boundary directly opposite the intersection that is one of the major direct routes to the south.

Comprehensive Plan Map Amendment Approval Criteria

VMC 20.285.050

The following discusses the criteria that must be addressed for a comprehensive plan and zoning map amendment, and how this proposal complies:

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 request is consistent with Objective 6.2.1 of the Vancouver Strategic Plan: “Develop a broader range of housing choices through incentives, changes in regulations and implementation of the Affordable Housing Task Force recommendations.” The intent of this amendment would be to allow zoning that would increase the overall supply of housing in the city, which would result in lower purchase prices and rental costs. While this does not provide “affordable housing” it goes a long way to make housing more affordable. The applicant has a great deal of experience in townhouse construction and has ideas that can create even more affordable products in the for-sale market. Unfortunately, within the existing codes this would require a condominium development which currently has significant issues due to current laws and insurance issues. In the event that laws change and the project can be converted into condominiums, the site would allow for home ownership at a relatively low price point. Since the adoption of the strategic plan housing prices have continued to soar. This is partly due to a high demand for housing in the Vancouver region that far outpaces the new housing supply. The first step to increasing affordability is to increase supply so that the basic tenants of the Econ 101 supply demand curve can be followed.

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 site is within 0.5 miles of NE Andresen Rd. and approximately 1.5 miles from the nearest access to I-205, both major corridors in the area. Higher density residential development in this area would discourage urban sprawl. NE 63rd Ave is an arterial that crosses I-205 and should be expected to be even more of a corridor as redevelopment happens.

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 site is adjacent to Kelley Meadows Park and very near to Green Meadows Golf Course, providing ample recreational opportunities. Vancouver Mall, Costco and Home Depot are nearby providing employment and local shopping opportunities. A higher density residential development would integrate well with these areas. The applicant is also willing to work with the City of Vancouver Parks department on the development and integration of recreation required by the development and advantageous to the Park and the neighborhood.

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

Response: The north end of the site includes a wetland area that will create a buffer between the site and the uses to the north, directly north of that wetland area is Green Meadows Golf Course. To the east is a city park along a majority of the shared property line. At the SE corner there is a single-family residence adjacent to the site. The south end of the site is bounded by NE 63rd Street, a collector arterial. On the west end of the site the applicant is proposing to 2 story townhomes that will blend in better to the neighborhood and will abut the existing private road to the west. This site is well positioned to be developed with a higher intensity use that will not have a significant effect on the existing neighboring uses. The site will have direct access to NE 63rd street and will only be directly adjacent to one single-family home that also has redevelopment potential.

To the SW of the proposed area is an area that was developed under R-18 code while that land was under Clark County jurisdiction.

d. Conserve or enhance significant natural or historical features;

Response: The applicant will retain the existing wetland and buffer areas located on the north end of the site. Additionally, the applicant is willing to work with the City Parks department to move planned park trails out of the wetland area and onto adjoining lands, thus reducing wetland impacts. The applicant has also demonstrated unique design features in the past in an effort to enhance wetland function. If possible, they will seek to duplicate this demonstrated success.

Project Discussion

The Wood Duck Springs Comprehensive Plan and Zoning Map Amendment proposes to rezone parcels 105241000, 105242000, 105190005, 105190010, 105190000, 986042813 from R-9 to R-18. This involves a Comprehensive Plan Amendment to move the parcels from an Urban Low to an Urban High designation. The site encompasses six parcels totaling approximately 13.89 acres. Currently the project site includes a mix of existing single-family residences and vacant land. Future development plans for the site would likely retain two of the existing homes as an office or amenity space with the remainder of the site developed with apartments and condo/townhomes in a variety of densities. The applicant intends to provide a diversity of unit types and unit styles so that a wider range of housing needs may be met. This would include apartment units ranging from 1 to 3 bedrooms, townhouse style units that are 2 stories without garages and townhouse style units that are larger and have garages. The applicant is desirous of creating homes for sale at the bottom portion of the ownership market as they believe that the first step to wealth creation is a long-term controlled housing costs created via a 30-year mortgage. But the applicant is concerned about the negative legal environment for condominiums in Washington State at this time and would most likely create rentals for those units. One of the options that the applicant is reviewing is to build larger 3-bedroom units that could be condo converted at a later date if the liability laws become more favorable. The current applicant would likely also be the one to develop the site including site and building construction. A formal application for site development will be submitted after the proposed comprehensive plan and zoning map amendment.

Neighborhood Layout –

The applicant would propose that the 2 story tall townhouse style units would be built along the western side of the project in an attempt to build into the existing neighborhood. This is the only section of the abutting property that is expected to remain nearly the same for the foreseeable future due to the small existing lots as well as a long term commercial business; all of which are served by the existing private road that directly abuts to the projects west side. The applicant would also look at placing more townhouse units along a portion of the east side in an attempt to blend into the neighborhood as the parcel to the east with an existing house would be large enough for some infill redevelopment in the future.

The project north and a portion of the east abuts to City of Vancouver open space that is an undeveloped park. The applicant has already had discussions with the City of Vancouver Parks department in efforts to understand future park (Kelly Meadows) development plans as well as how the projects could benefit each other through better planning. This discussion included being able to generate better open space utilization, reducing expected parks impact on wetlands by moving a planned path from parks land to the applicant land, options for recreation along the trails, exploring build/PIF credits, trail connectivity, donations, trail materials within wetland buffers, land donation and overall planning and timing.

Density:

With 13.89 acres, the site could accommodate a maximum of 250 units (18 units per acre). With potential roadway dedications the net site area may be less, and the maximum unit count could be

The applicant would also explore solar systems atop parking lot covers as well as on top of southerly facing apartment roofs. The applicant has used innovative hot water systems, lighting, appliances and design elements to reduce energy usage and would use these as well as others to reduce the carbon footprint of this development.

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

Response: Site access will be provided directly from NE 63rd Street with access across from the existing 81st Ave intersection. A water main is located in NE 63rd Street and CRWWD will be the sanitary sewer purveyor. The site can be served with sanitary sewer with the development of parcel 105210000, and a potential easement from the park property (105240000) as well as a portion of it from sanitary sewer located within NE 63rd Street.

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

Response: Not applicable, this is a proposal for residential zoned property. The applicant is investigating commercial uses that are appropriate to the area and development and is open to having 5% of the gross floor space being commercial use.

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

Response: The redevelopment of these parcels will result in an attractive development, with improved public roadways that will be designed to build in with the nearby neighborhood.

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

Response: The proposal does not include affordable or below-market-rate housing, but the increase in housing supply will help make housing more affordable in the area. Apartments are an attractive affordable alternative in today's market. If laws changed at the State of Washington level the applicant would be interested in developing smaller units that would most commonly be sold as a condominium.

3. Scope of review. Review and evaluation of proposed comprehensive plan or zoning map changes shall consider both the likely and possible future use of the site and associated impacts.

Response: The applicant intends to provide typical apartment units within the central portion of the project after the comprehensive plan and zoning map change approval and blend into the neighborhood with 2 story townhouse units along the west side. The request is a change from a lower density to a higher density, however it is still a residential zone so only residences will be proposed. Impacts created would be those of a higher density residential development, with typical impacts to local schools, emergency services and streets. Impact fees will be required to be paid to offset these impacts.

4. Cumulative Impacts. The review of individual comprehensive plan map or policy amendments, other than exceptions noted in VMC [20.285.040](#), shall also consider the cumulative transportation, land supply, and environmental impacts of other plan amendments proposed within the same

purpose of the update:

“Vancouver, like many communities, is facing a housing crisis. As the city continues to grow, there is a desire and need for new types of housing that would allow residents to live more affordably while also maintaining neighborhood livability. However, current city zoning rules prohibit many of these housing options. Changes to the development code can create opportunities for the private sector to deliver a more diverse, affordable housing stock.”

The project goals of the housing update are stated as the following:

“The goal of the project is to update City codes to allow for different, smaller and more affordable types of housing choices. Many are recommended in the Affordable Housing Task Force report (2016) and many are similar to what is allowed in Clark County and other Washington cities nearby and statewide.”

The specific goals include:

- Allowing for the development of diverse housing types to meet changing demographic needs and consumer preferences
- Expanding market rate, middle income, and affordable housing choices
- Maintaining neighborhood livability with incremental, rather than wholesale, change
- Providing more opportunities for people to live near where they work and attend school, and reduce costly commutes
- Facilitating development in areas with full existing public services

The current proposal is consistent with this plan and will help meet the City’s goals. The general proposal associated with the zone change will accomplish the following:

- The Wood Ducks Springs Rezone project will add diversity to the housing options in the immediate vicinity of the site.
- The rezone will not have a large effect on adjacent homes as the proposed access is directly from an arterial street.
- The future project would blend into the existing neighborhood as it would place 2 story townhomes on the west side by existing small lots, place apartments within the center and north portions of the project. This would also match the streetscape to the west in the R-18 zones.
- The site is located near schools, stores, and public transport that has the potential to reduce costly commutes.
- The project is in an area with full existing public services.

B. Consistency with the Comprehensive Plan

The applicant is requesting a concurrent change in the Comprehensive Plan designation. The current and proposed plan designations are residential and are compatible. The proposed plan results in a higher density but can be designed to have less of an impact on the neighboring lower density community.

annual cycle. (Ord. M-3922 § 13, 07/06/2009; Ord. M-3701 § 9, 05/02/2005; Ord. M-3643, 01/26/2004)

Response: The impacts of this development will need to be reviewed in conjunction with the other plan amendments within this review cycle.

ZONING MAP AMENDMENT APPROVAL CRITERIA

VMC 20.285.060.A. sets out the applicable zoning map amendment approval criteria not involving associated comprehensive plan map amendments.

This proposal is required to demonstrate the following:

1. How the proposal is more consistent with applicable policies of the Vancouver strategic plan and comprehensive plan than the existing designation; and
2. That a change in circumstances has occurred since the existing designation was established.

A. Consistency with Vancouver Strategic Plan

The City adopted a 2016-2021 Strategic Plan, and updated it in November 2018.

The request is consistent with Objective 6.2.1:

6.2.1 Develop a broader range of housing choices through incentives, changes in regulations and implementation of the Affordable Housing Task Force recommendations. Page 23.

In the final 2016 report the Affordable Housing Task Force discussed potential tools and programs to increase the supply of affordable housing units in the city. One of the high priority items discussed was amending zoning/development regulations to encourage affordable housing options.

Option for Council Consideration	Description	Estimated Time for Staff to Develop and Present to Council	City Direct Costs/ Staff Time	Cost to Property Owner/ Developer	Potential to Increase Affordable Units	Considerations and Details Additional information to follow based on Council guidance and staff analysis.	Task Force Priority
EXPAND SUPPLY OF AFFORDABLE HOUSING							
Amend zoning/development regulations to encourage affordable housing options	<ul style="list-style-type: none"> • Allow/promote alternative housing, e.g.: <ul style="list-style-type: none"> ○ Cluster/cottage housing ○ Corner-lot duplexes ○ Micro-housing and single room occupancy (SRO) housing ○ Shared housing, including rooming/boarding houses • Reduced parking requirements 	Medium to Long	\$\$	\$	Medium	Details: <ul style="list-style-type: none"> • May be effective at increasing overall supply over a long period of time, but affordability not guaranteed • Marketing incentives/opportunities to property owners and developers • Can use current staff, but may be contracted out Questions: <ul style="list-style-type: none"> • Requires determination of priorities among several options • Need to determine appropriate level of incentives Task Force comments: Support for allowing a wider variety of housing types and sizes. This option may also provide low-income homeownership units, an opportunity to address affordable housing apart from rentals.	High

The intent of the option would be to increase the overall supply of housing in the city which would result in lower purchase prices and rental costs. While this does not provide “affordable housing” it goes a long way to make housing more affordable. Since the adoption of the strategic plan housing prices have continued to soar. This is partly due to a high demand for housing in the Vancouver region that far outpaces the new housing supply.

In response to the strategic plan and the Affordable Housing Task Force recommendations, the City Council studied and approved housing code updates. The Housing Code Updates webpage states the following as a

Table 1-5. Vancouver comprehensive plan land use designations

Comprehensive Plan designation	Corresponding Zoning	General Intent
Residential		
Urban Lower Density	R-2, R-4, R-6, R-9	Predominantly single-family detached residential development, with some allowances for duplexes, townhouses, and single-family homes on small lots using infill standards
Urban Higher Density	R-18, R-22, R-30, R-35, MX	Predominantly apartments and condominiums, with some allowance for attached housing (such as duplexes, townhouses, and small-lot single-family homes) and mixed use

This request furthers the Community Development policies on page 1-14 to 1-15 of the Comprehensive Plan:

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:

- The site is near a full-service grocery store/commercial area, elementary school, community park, and C-Tran Bus route 78 on NE Andresen Rd.
 - Safeway and Walgreens are both approximately 1/4 mile from the site. This is approximately a 5-minute walk. There is also a Starbucks (inside Safeway), Chase Bank, State Farm Insurance, The UPS Store, Sprint Store, Great Clips, Nail Salon, Drive through Coffee, and Subway.
 - Walnut Grove Elementary is south of the site.
 - Raymond E Shaffer Community Park is located approximately 1/4 mile to the southeast. This is a 10-acre park that connects to another 7-acre park to the south.
 - C-Tran Bus route 78 stops at NE Andresen Rd and NE 63rd Street. This is less than a 1/2 mile from the site.
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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:

- This is a relatively small infill project, where the intent is to convert the existing underutilized land into an apartment housing project.

In addition, the request fulfills both CD-9, facilitating compatible uses adjacent to each other, and CD-10, placing housing near services (complementary land uses).

Chapter 3 of the Comprehensive Plan contains the City’s Housing element. The Plan recognizes the need for diverse housing:

*As the baby boom generation ages over the next 20 years, there is likely to be a greater need and demand for smaller units, retirement homes, and assisted living.
Page 3-3.*

The plan notes that most residential housing is single-family housing (57%). *Id.* Housing affordability is also a City concern:

The Growth Management Act requires local jurisdictions to demonstrate that regulations allow and encourage housing for all economic segments of the community. Table 3-3 provides a breakdown of local households by income ranges, and the general share of Vancouver housing they can afford to buy or rent without having to spend more than 30% of their income.

There are several policies that would be furthered by this request, including:

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-2 Affordability

Provide affordable housing by formulating innovative policies, regulations and practices, and establishing secure funding mechanisms. Target affordability programs toward households with incomes below the median.

C. Change in Circumstances

The proposed zone change is in response to the current housing shortage and affordability crisis that is currently occurring in SW Washington. This shortage of housing within the area that the subject property lies represents a change in conditions or circumstances since the zoning designation was established. The proposed zone change will result in additional housing units that will increase the housing supply in the area and contribute to improving housing affordability.

According to the 2016 Affordable Housing Task Force Report issued by the City of Vancouver, it was noted that:

Vancouver, Washington and the surrounding communities are experiencing an unprecedented demand for rental units. In June 2015, the vacancy rate in Vancouver was just below 2%, down from 3.8% at the end of 2010.1 The tightening market has led to a dramatic increase in rents. Between October 2014 and October 2015, the increase in median rent for a 2-bedroom, 1-bath unit in Vancouver was the highest in the nation at 15.6% (a jump from \$900 to \$1,040 per month). Page 2.

While this report was issued in 2016, conditions have not improved in recent years. This report recognizes that higher densities can promote more affordable housing.

CONCLUSION

Approval of this application would result in a development that can be served by existing urban public services and will provide more flexibility in density and housing types, resulting in more affordable housing.

Attachment D – Datepark rezone application narrative

Datepark Residence Re-zoning Narrative:

Datepark Condominium Inc is an organization that provides “Second Chance” housing to help members of our community since 2005. This organization provides sustainable housing to low-income tenants in Clark County, City of Vancouver, City of Battleground, City of Camas, and other surrounding areas. We provide affordable housing for individuals who have barriers that prevent them from meeting common rental qualifications to obtain housing elsewhere in our community.

Our organization pertains of 4 female board members, with three of the four being East Indian. We have a combined experience of over 25 years in different fields that correlate to this project, including general construction and site development, property management, and real estate. Some past projects our board members have completed are a 45-mixed use apartment complex in Gresham, Oregon and a 31-unit apartment complex in NE Portland, Oregon. We have also remodeled and updated 7 Burger King locations throughout the Portland area.

In addition to that, we have 18 years of experience operating second chance housing complexes, and pride ourselves in serving our community and helping individuals in need to have a safe and stable place to call home. Our vision for Datepark is to provide a larger number of affordable rental units to our community. We intend to develop this property, while maintaining ownership. We will then maintain control of the complex and will be operating as the owners and property management team. We do not have any plans or intention to sell the complex at any point after this development is complete.

The property is located at 3607,3701 and 3701 ½ E 18th St Vancouver, WA 98661. It has been operating as a second chance housing complex since we acquired it in 2005. It currently has 13 rental units and two houses on four parcels of land. We will be tearing down all existing buildings to construct a 4-story, 54-unit complex on the property. We are very excited about this project. This new complex will stay a second chance housing complex and be financially affordable for all. We hope to help fill the need for low-income housing, and to maximize the amount of community members we can help in having a safe and secure place to call home.

Our plan is to develop Datepark Residence into an affordable housing complex. The land is subdivided into four parcels currently zoned at R-18 making our ability to help make an impact with the housing crisis severely limited. The existing houses and townhomes are older, with a large parking lot in the middle. There is some basic existing landscaping, but aesthetically the way the property is, it will need some maintenance. The property currently has a 20-unit parking lot, which will be increased to a total of 44 parking units. We are delighted to be able to move forward with building a beautiful new complex that will also be visually pleasing to the neighborhood and community. We are currently working with our architects and engineers to ensure the complex is functional, visually attractive and appealing on all sides of the property. We realize that a view of a beautiful building is better than a plain building, an aging building, and we want all our neighbors to be happy with their new view and the changes.

Sadly, housing is a comfort many individuals in our community do not have. A home is a safe space that provides stability and security to all families and individuals. High housing costs can cause individuals and families to spend less on basic needs such as food, clothing, and health

care. In addition, everyday many individuals in our community experience mental health crises. If they had a safe haven, it would build a sense of security, and help them with a better future.

This development is in the Fourth Plain International District. Residents will have access to local city parks, major department stores, shopping, and retail commerce. This project goes hand-in-hand with Fourth Plain Forward. Increased residents in the neighborhood will directly impact the local economy by bringing in more funds spent at local surrounding businesses in the International District.

In addition to potentially lessening the impact of the financial burden of a large homeless populace, we will be adding greater value to our local economy. As stated above, our property is in the Fourth Plain International District. We are also close to cultural centers, community centers, shopping and businesses, the VA Hospital, and many other healthcare facilities. We are located on a bus line to assist our residents in visiting locations that are not within walking distance, and to help individuals travel to and from work. Our tenants will shop locally, visit, and utilize these local resources, work in our community and even help ease the “lack of workers” many businesses are struggling with.

From our years of experience, we have a rich understanding of how to assist individuals in our community who face challenges such as mental health concerns, homelessness, addiction, and other struggles. We are not only seen as landlords to these families and individuals, but they also see us as counselors, friends, and most importantly, as someone who is willing to “take a chance on them” and help provide them with stability. This project will continue to build upon our past efforts and allow us to be a better benefit and invaluable resource to our community.

Each parcel is currently zoned at R-18. Rather than developing up to four smaller buildings on each parcel, we want to group the parcels and rezone all four lots to R-30. We intend on applying for the “affordable housing density bonus”. This will double the zoning and allow us to build one 54-unit complex. The main purpose for rezoning the site is to allow us to consolidate all units into one complex. The city has approved rezoning in the past to help increase affordable housing; we are hoping to utilize this practice and apply this policy to our property. We need the city’s help to achieve our dream of becoming a beneficial resource and making a positive impact towards addressing our housing crisis while housing up to 162 individuals. With our proposed plan to keep 80% of our units below the Area Median Income (AMI) we can help create stability for individuals and families. This is why we are hoping the city will serve as the sponsor of our rezoning application.

Attachment E1 – Parks related changes to Vancouver Comprehensive Plan, 2011-2030

Page 5-33

Community parks provide a focal point and gathering place for broad groups of users. Usually 20 to 100 acres in size, community parks are used by all segments of the population and generally serve residents ~~from within a 1½-mile radius one-to-three-mile service area~~ from the park's public access points. Community parks often include recreation facilities for organized activities, such as sports fields, skate parks, community gardens and play courts as well as programming such as the amphitheater at Esther Short Park. Community parks may also incorporate such as community or senior centers. Because of their large service area, community parks require more support facilities, such as parking and restrooms. Some middle and high school sites are included in the community parkland inventory, since these facilities can serve some of the community park needs. The acquisition standard is 3 acres per 1,000 people, or a total of 278.5 additional acres needed. In urban areas where an adequate or suitable community park site is no longer available, or where areas are poorly served by a community park, VCPRD considers the modification of neighborhood park standards to compensate for the lack of a community park. Specifically, consideration is given to increasing site size and type of development of neighborhood parks to allow for increased recreation opportunities. In addition, where dense existing neighborhoods may preclude the acquisition of typical acreage for neighborhood parks, VCPRD has acquired and developed small urban parks to address the need for public park spaces in compact urban environments

Page 5-38, Capital Facilities Plan

Table 5-14. Vancouver Parks, Recreation & Cultural Services Comprehensive Plan 2023-2032
VCPRD Capital Facilities Plan for Vancouver City and UGA, 2011-2016

See Attachment B - Parks, Recreation & Cultural Services Comprehensive Plan, 2023 Capital Facilities Plan Summary

Replace existing Table 5-14 with below:

2023 Annual Review - Attachment B
 2023-2032 Capital Facilities Plan Summary - Vancouver Parks, Recreation & Cultural Services.

2023-2032 CAPITAL FACILITIES PLAN SUMMARY

Project Name	Uninflated Local Cost	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Total Estimated Local Cost	Potential Outside Funding
Project Type													
Park Acquisition	82,148,036	120,000	25,483,662	14,053,771	11,747,206	16,467,630	10,476,547	4,017,319	9,393,348	4,513,859	4,784,691	101,058,034	5,076,699
Park Development	182,367,000	4,372,000	5,618,000	8,643,855	21,214,774	43,007,961	23,875,729	30,736,472	21,092,925	33,340,114	60,260,336	252,162,165	12,113,114
Park Improvements	5,332,000	1,250,000	619,040	775,284	469,260	497,416	540,643	573,082	607,467	643,915	682,549	6,658,656	138,000
Trails Planning, Capital Repairs	17,067,210	165,000	692,180	1,593,265	11,622,184	1,537,697	405,482	451,089	1,959,230	2,626,662	478,123	21,530,912	-
Special Facility Devel. & Imp.	3,470,000	165,000	1,379,060	1,382,028	814,655	18,937	20,073	21,278	22,554	23,908	25,342	3,872,836	-
GRAND TOTAL	290,384,246	6,072,000	33,791,942	26,448,203	45,868,080	61,529,641	35,318,475	35,799,240	33,075,524	41,148,457	66,231,041	385,282,603	17,327,812

Appendix E

The following separate documents, providing technical data, analysis, and background information, are adopted as part of the Vancouver Comprehensive Plan:

I. Facilities and Services Plans

- Vancouver Parks, Recreation & Cultural Services Comprehensive Plan 2022-2031, and subsequent legislatively approved Park Plan and CFP amendments. Vancouver Parks, Recreation and Natural Areas Comprehensive Plan 2014, and 2017-2022 Capital Facilities Plan
- Vancouver Urban Parks, Recreation and Open Space Plan 2002

II. Additional Plans.

- Clark County Natural Areas Acquisition Plan – Legacy Lands Program 2022-2027 1990 Clark County Open Space Plan

Attachment E2 – Changes to Vancouver Parks, Recreation & Cultural Services Comprehensive Plan (2022-2031)

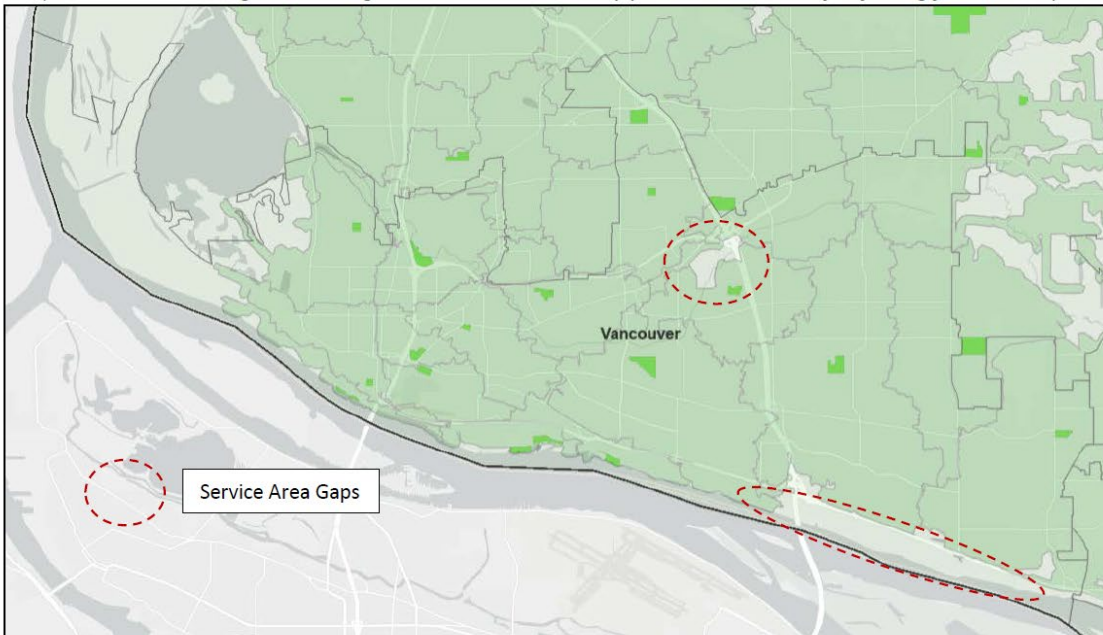
Attachment C:

Vancouver Parks, Recreation & Cultural Services Comprehensive Plan (2022-2031)

2023 Annual Review – Community Park Service Area Comparison

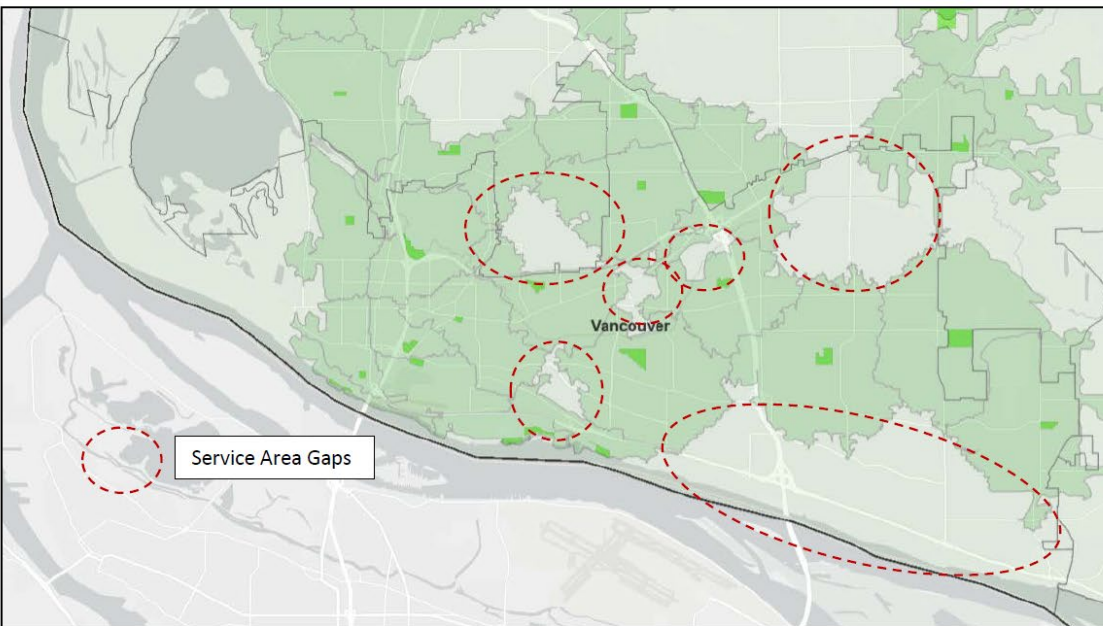
3-Mile Community Park Service Area Coverage

(Service Area coverage shown in green; includes community park service areas of adjoining jurisdictions)



1½-mile (radius) Community Park Service Area Coverage

(Service Area coverage includes community park service areas of adjoining jurisdictions)



Comparison of 3-Mile and 1½-mile Community Park Service Area Level of Service

Community Park Name	Park Acres (GIS)	Current 3-Mile Community Park Distribution Standard		Proposed 1 1/2-Mile Community Park Distribution Standard	
		Acres / 1000	LOS % of 3-Ac /1000 Standard	Ac / 1000	LOS % of 3-Ac / 1000 Standard
Bagley	16.19	0.20	7%	1.45	48%
David Douglas	40.17	0.56	19%	3.01	100%
Dollie and Ed's	9.59	0.20	7%	1.29	43%
Esther Short	5.34	0.12	4%	0.91	30%
Fenton	23.22	0.48	16%	2.14	71%
Fisher Basin	12.67	0.24	8%	1.19	40%
Leroy Haagen	29.55	0.30	10%	1.3	43%
Leverich	28.52	0.38	13%	3.5	117%
Marine	32.86	2.00	67%	71.92	2397%
Marshall	14.70	0.24	8%	5.13	171%
Memory-Mill Plain	11.24	0.20	7%	5.44	181%
Oakbrook	13.25	0.17	6%	0.99	33%
Raymond E. Shaffer	9.69	0.14	5%	0.55	18%
Vancouver Waterfront	6.88	0.18	6%	4.85	162%
Waterworks	5.46	0.08	3%	0.38	13%
Wintler Park	14.03	0.56	19%	6.02	201%
Average	17.09	0.36	13%	6.88	229%
Average w/o Marine		0.27	9%	2.54	85%
Avg w/o Marine & Waterworks		0.28	9%	2.70	90%

Attachment D:

**Vancouver Parks, Recreation & Cultural Services Comprehensive Plan (2022-2031)
2023 Annual Review - Proposed Amendments (Listed by Park Plan chapter and page)**

CLASSIFICATIONS & STANDARDS

Neighborhood Parks (pg. 57):

Neighborhood parks provide access to basic recreation opportunities for nearby residents for a healthy active lifestyle and respite, support vibrant and distinctive neighborhoods, provide opportunities for social engagement, and preserve and enhance natural resources. These parks are designed primarily for non-organized recreation. Neighborhood parks are generally three to five acres in size and designed to serve residents of all ages and abilities within ½-mile from the park's public access points, creating a half-mile, 10-minute 'walkable' service area walking distance. Sites may vary in size depending upon unique site characteristics and land availability.

Community Parks (pg. 58):

Ideally a minimum of 20 to 100 acres in size, community parks are used by all segments of the population to provide a focal point and gathering place for more organized recreational uses and community events. In addition to the assets typical of neighborhood parks, community parks often include recreation improvements for organized activities such as sports fields, skate parks, picnic shelters, community gardens, trails, event spaces and public art and cultural features. Community parks may also integrate passive recreation space, natural resource areas and community facilities such as community or senior centers. Because of their larger size and palette of recreational features, community parks require more support facilities, including parking and restrooms, and can draw users from a 1½-mile service area from the park's public access points ~~three-mile service area~~. Community parks also serve as the walk-to park of those within the ½-mile service area.

Geographic Distribution Standard (pg. 66):

Additional guidelines for the provision of neighborhood and community parkland include the equitable geographic distribution of parks with designated service areas. Trust for Public Lands, Urban Land Institute and the National Recreation Parks Association provide national benchmarks for the walkability of park access. Each of these agencies promote a ½-mile (radius), 10-minute walking distance service area standard to provide walkable access to the outdoors. Ninety eight percent (98 percent) of our community outreach survey respondents strongly support the importance of the ½-mile standard for park access.

The service area coverage of neighborhood and community parks are identified on Maps 6 and 7 and are available in Section 16, Maps. Service area mapping provides a tool to identify locations with access to parks based upon the adopted distribution standard, and conversely, reveals the service area gaps that inform need for additional acquisitions. The image to the left represents a clip of the mapping model and how it follows public rights of way and easements from all points of public access to a park site to determine the applicable service area. However useful, there are limitations to this tool that we have been working to improve.

**Replace Map 7 Inset- 1½-mile ~~3-mile~~ Mile Service Area (Community Parks) *Correct title, legend, and service area layer.*

(cont. pg. 68):

Currently, all parks regardless of size, population density, socioeconomic variables, or quality of improvements have the same ½-mile radius service area for 10-minute walkable access.

Neighborhood Parks: Neighborhood Parks generally serve an area within a ½-mile (radius) service area, or 10-minute walking distance (Map 6). The walkable service areas encourage alternative modes of transportation and

reasonable access for people of all abilities from those in wheelchairs, parents pushing a stroller, the elderly using a cane, or an eight-year-old on a bicycle.

Park Type	Geographic Distribution Standard
Neighborhood Park	1/2 Mile Service Area
Community Park	3 Mile Service Area

Park Type	Geographic Distribution Standard
Neighborhood Park	1/2 mile Service Area (radius) from park public access points
Community Park	1 1/2 mile Service Area (radius) from park public access points

Based on our GIS modeling of the 1/2-mile service areas for both neighborhood and community parks, 75 percent of all city residents are within walking distance of park properties. However, not all our parks are built with quality assets. Fifteen (15) of our 107 neighborhood and community parks remain undeveloped parks, representing 14 percent of the inventory. Even if we assume all properties are built and of equal quality, 50,000 current residents remain without walkable access to a park. There's still a need for more parks to serve all residents equitably.

Community Parks - Community Parks serve an area with draw from a 1/2-mile to 1 1/2-mile 3-mile service area (Map 7). They provide the equivalent of a walk-to neighborhood park within the 10-minute service area as well as a 1 1/2-mile 3-mile service area as a drive or roll-to facility.

Further evaluation is needed to determine if future adjustments are needed to this standard.

PARK NEED & LEVEL OF SERVICE

Level of Service (pg. 100):

Skate Parks: At the present time, however, the vast majority of VPRCS's community parks do not contain skate features. In order to distribute major skate facilities more adequately throughout the community, it is suggested that the department assume a 1 1/2-mile 3-mile service area radius similar to community parks and develop skate parks in all areas of the city that are currently unserved. The 2021 NRPA standard average for cities of comparable size is 1 skate park per 110,000 residents.

Park Quantity, Quality, Safety and Sustainability Criteria (pg. 105):

The maps shown here provide an example of the potential information available with analysis by the 1/2-mile park service area. These maps identify the Level of Service within the individual park service areas by park type relative to the adopted standards of two acres per thousand residents for neighborhood parks, and three acres per thousand for community parks.

**Replace Map 20 Level of Service (Community Park 1 1/2-mile 3-mile service area) - Correct title, legend, and community park service area layer.*

The 2022 park planning process generated the first GIS analysis by individual park service area, offering detailed demographics and level of service details. A surprising result of the analysis was the low Level of Service of most existing community parks. In future Park Plan review, consideration could be given This data led to a 2023 amendment to reduce the service area reach of the community park classification from 3-miles to 1 1/2 miles, or by individual park. Doing so would significantly improves community park level-of-service metrics and provides the mapping tools and data necessary to identify service gaps and guide where additional community park assets could be added to larger neighborhood parks, or where to locate new community park acquisitions are needed. The average level of service for community parks with the narrowed service area improved from approximately 9% of the community park standard to approximately 85%. An additional approach could be expansion of the user capacity within the parks with low Level of Service through additional assets for recreational variety and sustainability of the natural and built landscape.

APPENDIX A: TERMS & ACRONYMS

Community Parks (pg. 176):

Urban Park Type, ideally 20+ acres, serving residents within a 1½-mile ~~3-mile~~ radius area. Common amenities typically include walking paths, themed play areas, open lawns, benches, shelters, picnic tables, play courts and sport fields. Parking and restrooms are needed due to the larger service area.

Neighborhood Park - Urban Park Type, typically 2–5 acres, serving residents within a ½-mile, or 10-minute walk service area. Common amenities include walking paths, play areas, open lawns, benches, picnic tables and sport courts. This is a walk-to destination to serve the local community and do not typically include supportive facilities such as restrooms and parking. Some high use areas may warrant expanded amenities and support services where community parks are not available or in higher density land use areas.

MAPS (pgs. 408-427):

- Map 7 1½-Mile ~~Three-Mile~~ Service Area (Community Parks)
**Correct title, legend & service area layer*

- Map 9 Demographic & Park Quality Matrix Analysis (1½-Mile ~~Three-Mile~~ Service Area)
**Correct title, legend & service area layer*

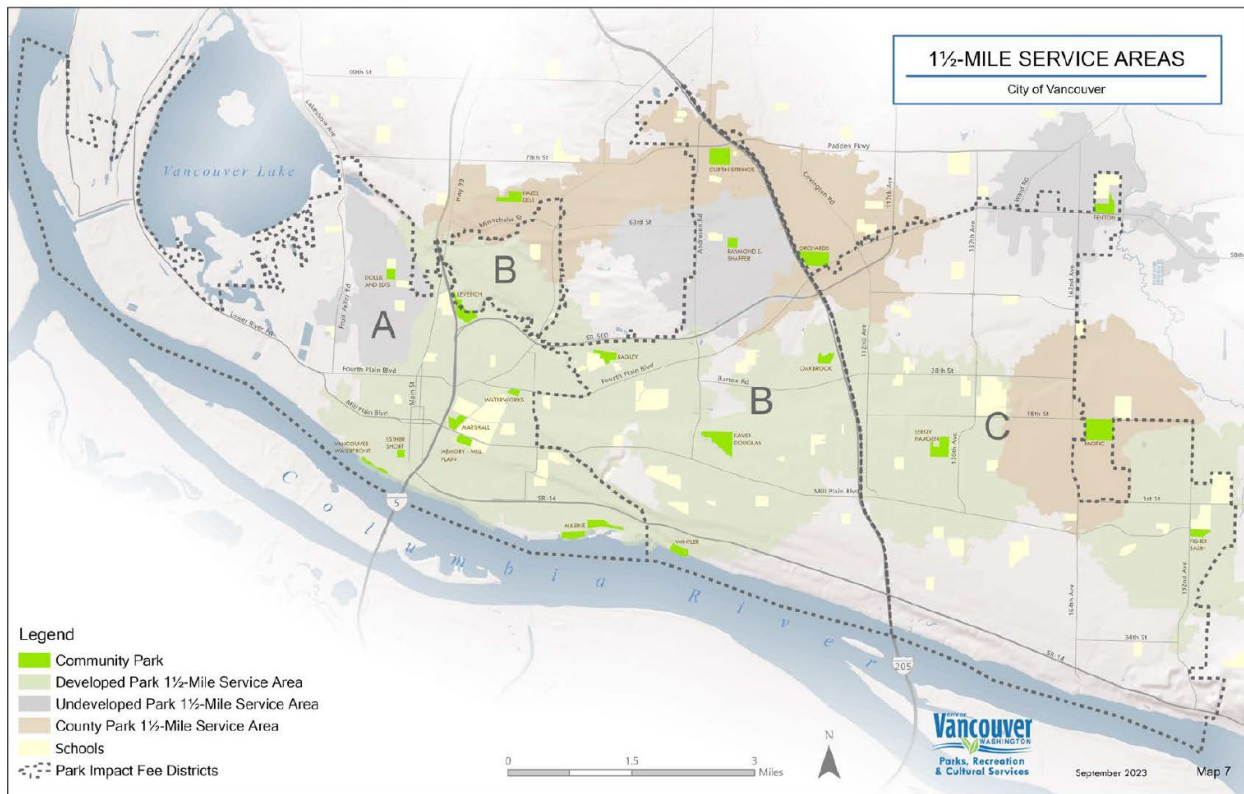
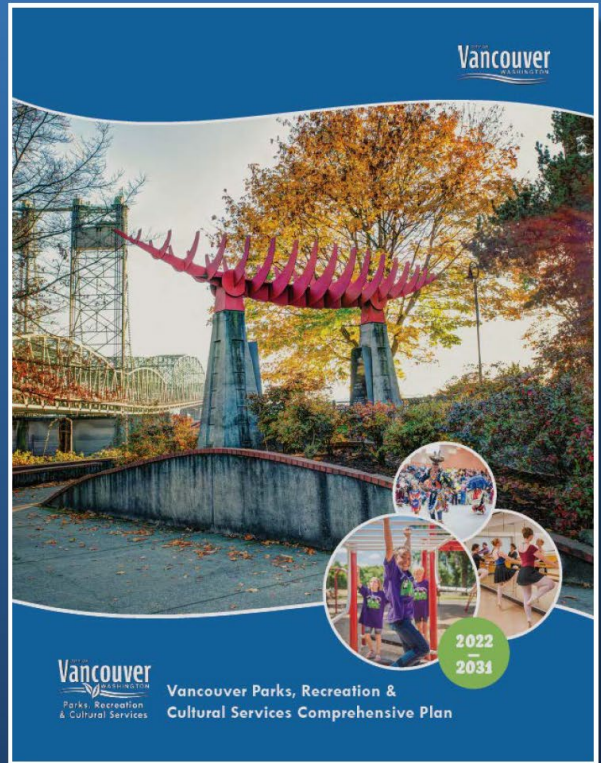
- Map 20 Level of Service (Community Park 1½-Mile ~~Three-Mile~~ Service area)
**Correct title, legend & service area layer, and values for LOS*

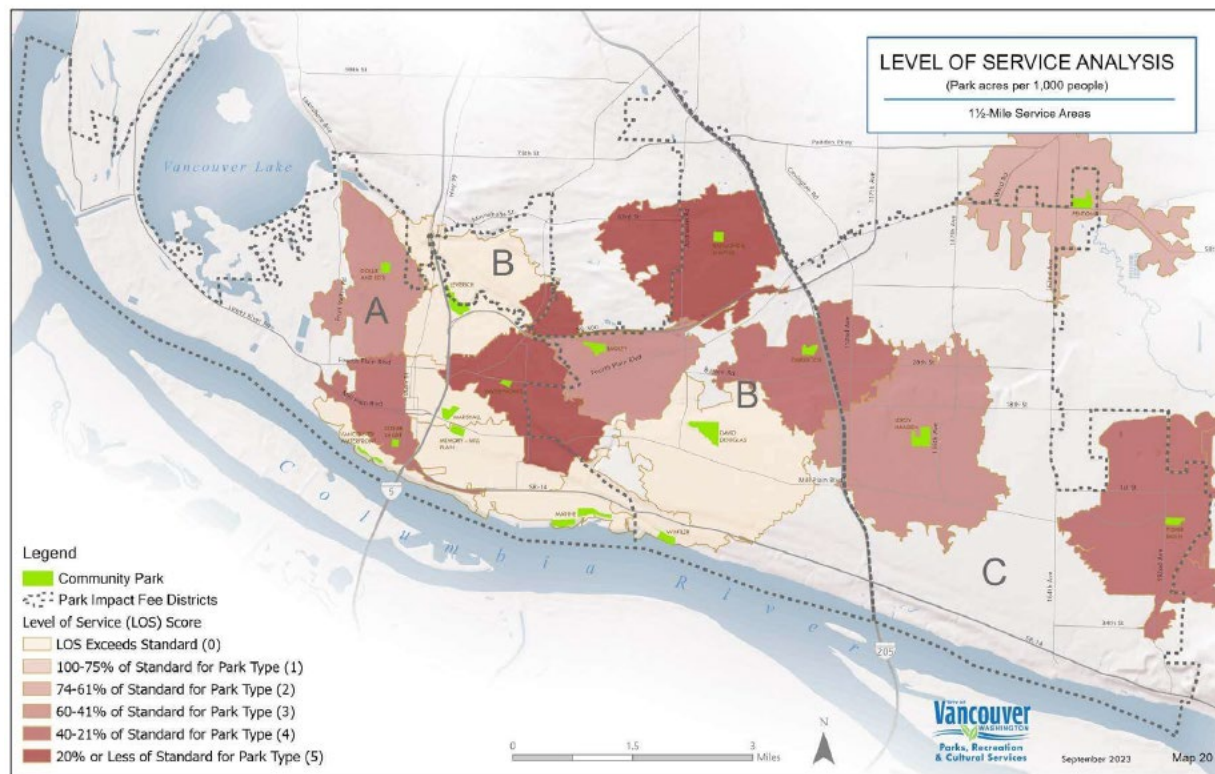
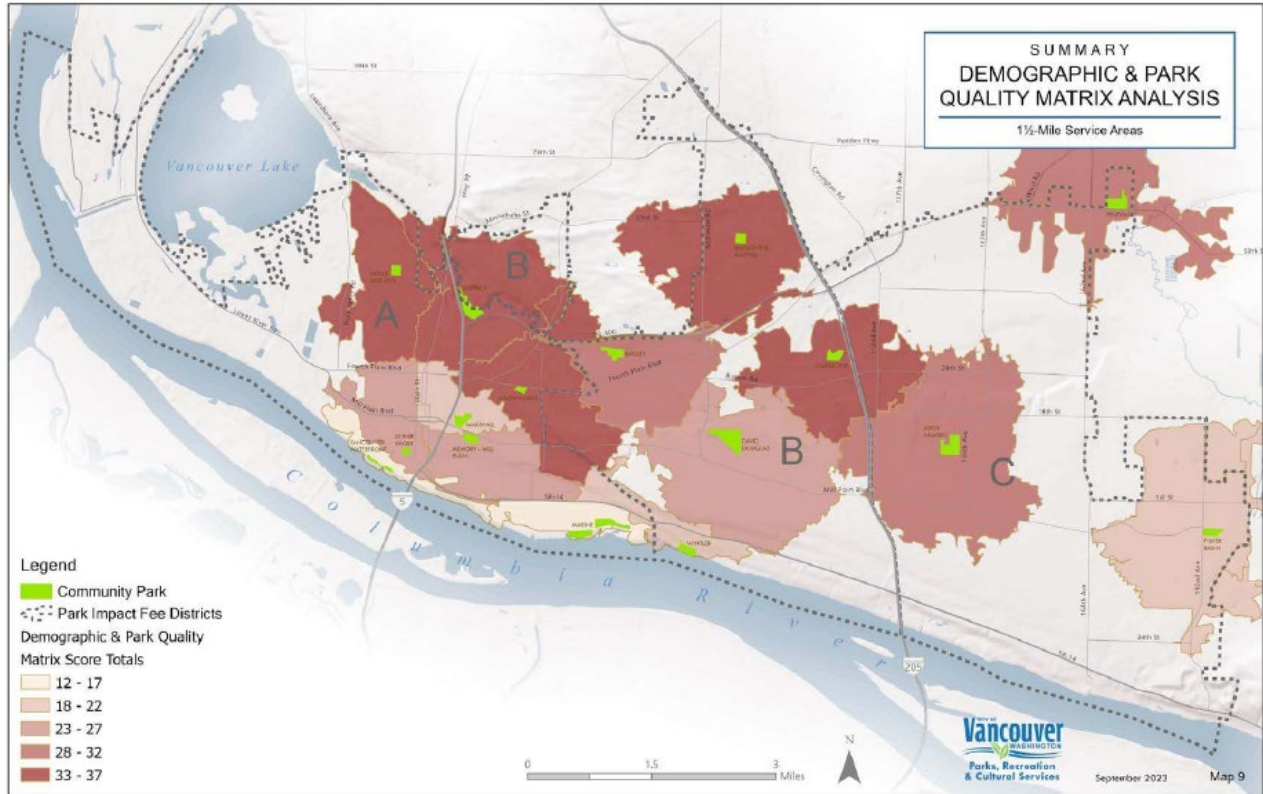
- Map 22 Park Quality & Variety – Community Park 1½-Mile ~~Three-Mile~~ Service Area
**Correct title, legend & service area layer (scores on legend will not change)*

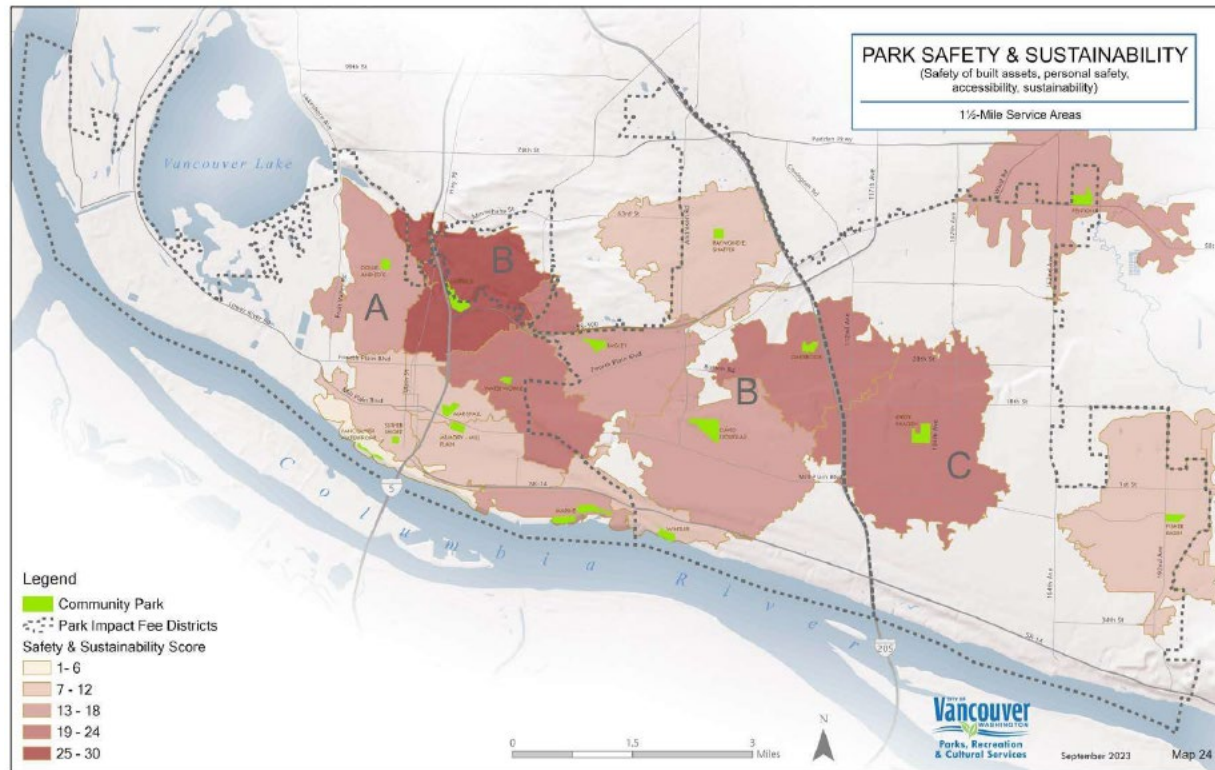
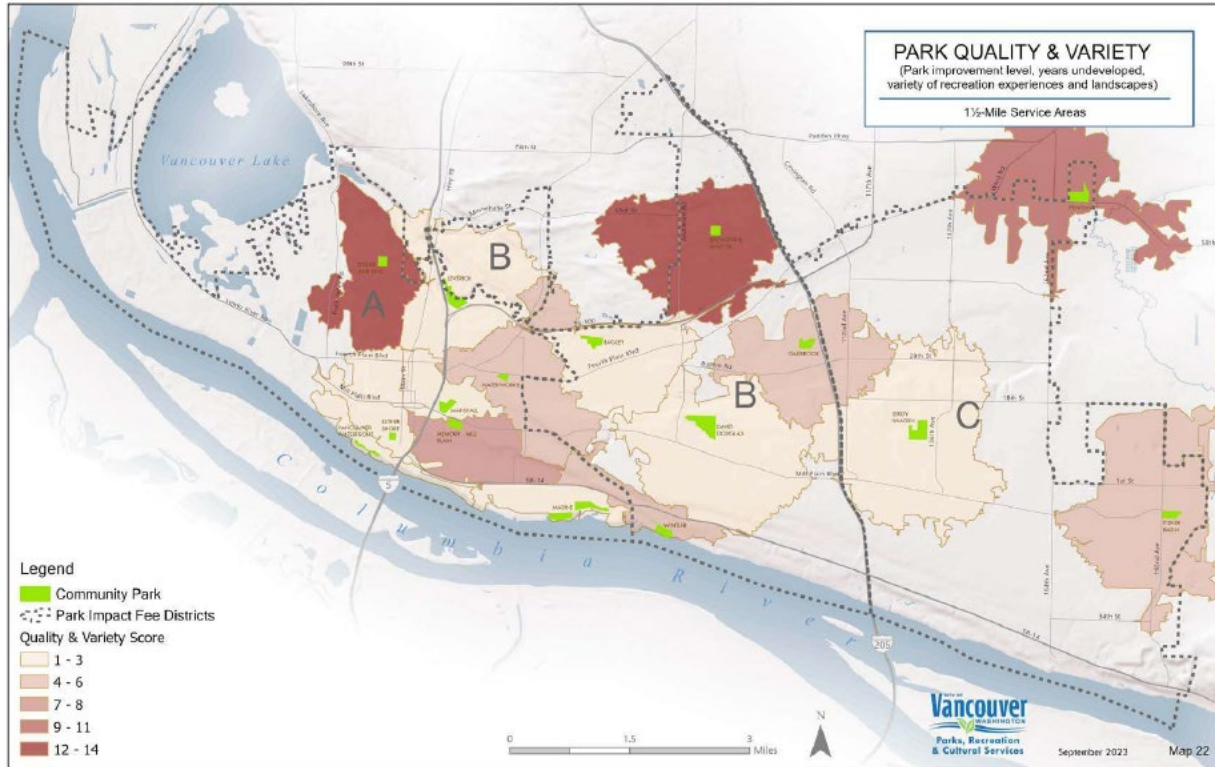
- Map 24 Park Safety & Sustainability – 1½-Mile ~~Three-Mile~~ Service Area
**Correct title, legend & service area layer (scores on legend will not change)*

- Map 25 2022-2031 Capital Facilities Plan Projects
**Correct title, legend, and determine if any of the stars for project locations need to change*

2023 Annual Review
Parks, Recreation & Cultural Services Comprehensive Plan
 Map Amendments – Attachment E

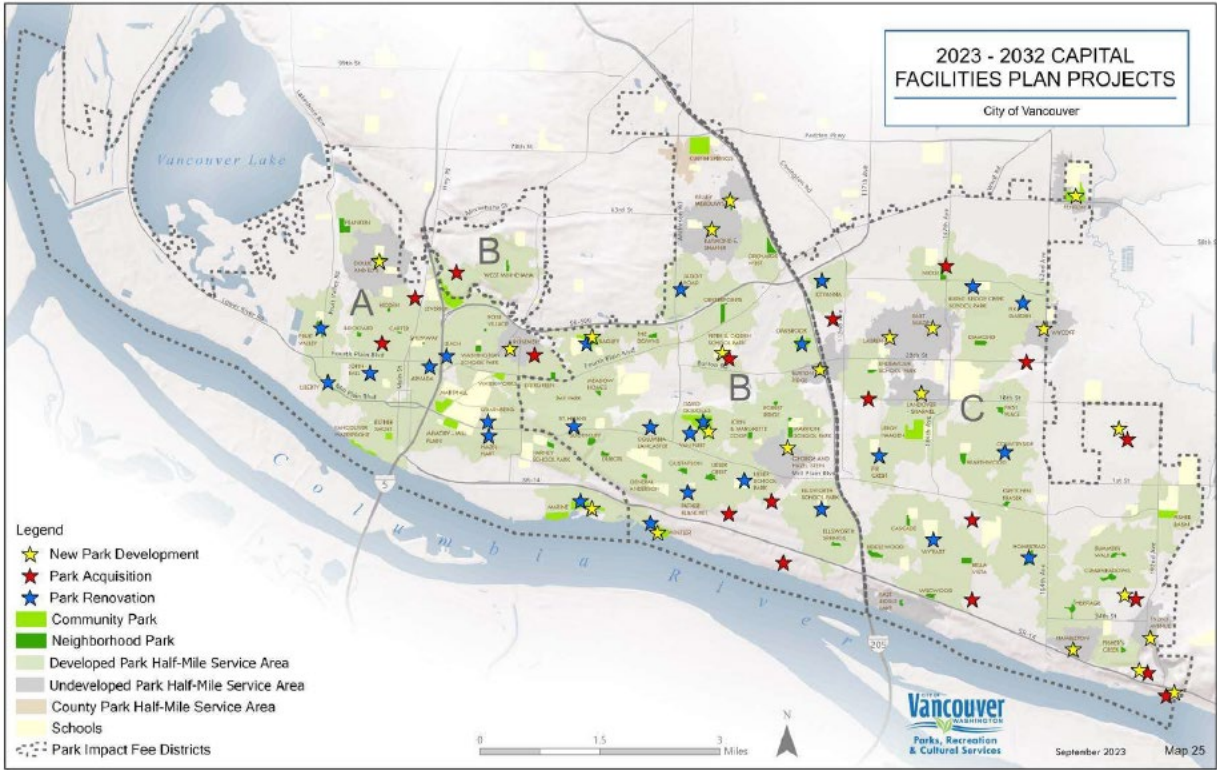






2023 - 2032 CAPITAL FACILITIES PLAN PROJECTS

City of Vancouver



Legend

- ★ New Park Development
- ★ Park Acquisition
- ★ Park Renovation
- Community Park
- Neighborhood Park
- Developed Park Half-Mile Service Area
- Undeveloped Park Half-Mile Service Area
- County Park Half-Mile Service Area
- Schools
- ⬢ Park Impact Fee Districts

Attachment F – VMC 20.330, Binding Site Plans

Purpose. The purpose of the binding site plan process is to provide an alternative to the standard subdivision process for specific types of development. The binding site plan shall only be applied for the purpose of dividing land for:

- A. Sale or for lease of commercially- or industrially-zoned property as provided in RCW [58.17.040\(4\)](#);
- B. A division for the purpose of lease as provided in **applicable** RCW [59.17.040\(5\)](#) when no other structure other than manufactured homes or travel trailers are permitted to be placed upon the land; provided, that the land use is in accordance with the requirements of this Title; and
- C. Condominiums as provided in **applicable** either RCW [64.32](#) or [64.34](#) consistent with RCW [58.17.040\(7\)](#). (Ord. M-3643, 01/26/2004)
- C. Preliminary plat information. The applicant shall provide the following information:
 1. Existing conditions plan. The following information shall be provided on one or more to-scale drawings:
 - a. A vicinity map showing streets and access points, pedestrian and bicycle pathways, transit stops and utility locations within a given radius of the site;
 - b. The site size, dimensions and orientation relative north;
 - c. The location, name and dimensions of public and private streets adjoining the site;
 - d. The location of existing structures and other improvements on the site, including structures, driveways, parking, loading, pedestrian and bicycle paths, passive or active recreational facilities or open space and utilities;
 - e. Elevation of the site at 2' contour intervals for grades 0% to 10% and at 5' contour intervals for grades more than 10%;
 - f. The approximate location of significant natural conditions as available from the City's and/or County's GIS system such as:
 1. The 100-year flood plain;
 2. The location of drainage patterns and drainage courses;
 3. Unstable ground (lands subject to slumping, slides or movement);
 4. High seasonal water table or impermeable soils;
 5. Areas having severe soil erosion potential;
 6. Areas having severe weak foundation soils;
 7. Significant wildlife habitat or vegetation;
 8. Slopes in excess of fifteen percent (15%);
 9. Significant historic, cultural or archaeological resources, rock outcroppings.

10. Location, dimension, and purpose of existing easements.

2. *Preliminary Binding Site Plan. The proposed preliminary binding site plan shall include the following information presented on one or more drawings:*

- a. *The proposed site and its dimensions and area.*
- b. *Proposed lots, tracts and easements including dimensions and total acreage.*
- c. *Abutting properties or, if abutting properties extend more than 100' from the site, the portion of abutting properties within about 100' of the site, and the approximate location of structures and uses on abutting property or portion of the abutting property.*
- d. *The location and dimensions of development if proposed, including the following:*
 1. *Streets and other rights-of-way and public or private access easements on and adjoining the site;*
 2. *All parking and circulation areas;*
 3. *Loading and service areas;*
 4. *Active or passive recreational or open space features;*
 5. *All utilities;*
 6. *Existing structures to be retained on the site and their distance from property lines;*
 7. *Proposed structures on the site, including signs, fences, etc., and their distance from property lines if known at time of land division; and*
 8. *The location and type of proposed outdoor lighting and existing lighting to be retained if known at time of land division.*
 9. *Location, dimension, and purpose of existing easements.*

Attachment G – VMC 20.410, Single Family Residential Districts

20.410.050 Development Standards.

A. Compliance Required. All developments must comply with:

1. All of the applicable development standards contained in the underlying zoning district, except where the applicant has obtained a variance(s) in accordance with Chapter [20.290](#) VMC.
2. All other applicable standards and requirements contained in this title.

B. Development standards. Development standards in low-density residential zoning districts are contained in Table 20.410.050-1 and apply to land divisions approved after the effective date (07/27/2022) of this ordinance (M-4377). These apply to all primary dwellings and accessory buildings on the site. For additional regulations governing accessory buildings, see Chapter [20.902](#) VMC.

20.410.040 Minimum and Maximum Densities.

A. Purpose. The purpose of this section is to establish minimum and maximum densities in each residential zoning district. To ensure the quality and density of development envisioned, the maximum density establishes the ceiling for development in each zoning district based on minimum lot size. To ensure that property develops at or near the density envisioned for the zone, the minimum density for each zoning district is set at just above the maximum density of the next less intense zone.

B. Maximum and minimum densities. The maximum and minimum densities for the low-density residential districts are contained in Table 20.410.040-1.

Table 20.410.040-1. Minimum and Maximum Densities and Lot Sizes^{1,2}

Zone	Minimum Lot Size	Maximum Net Density	Maximum Average Size	Minimum Net Density
R-2	20,000 sf	2.2	30,000 sf	1.8
R-4	10,000 sf	4.4	19,000 sf	2.3
R-6	7,500 sf	5.8	10,500 sf	4.5
R-9	5,000 sf	8.7	7,400 sf	5.9
R-17	2,000 sf	21.8	4,900 sf	8.8

¹ The minimum and maximum density factors shall only be used for calculating densities of planned unit developments governed by Chapter [20.260](#) VMC, infill development, density transfer, cottage clusters and situations where an existing house is allowed on a larger than maximum lot size per subsection (C)(2)(c) of this section (Exceptions). Minimum and maximum densities shall be calculated based on the gross area of the site minus any public rights-of-way, street tracts, private road easements, lots for dwellings existing on December 11, 2004, or designated critical areas.

Attachment H – VMC 20.740.120 Frequently Flooded Areas.

This section shall apply to all special flood hazard areas within the boundaries of the city of Vancouver.

A. *Designation.* Frequently flooded areas are the areas of special flood hazards identified by the Federal Insurance Administration Administrator and the Federal Emergency Management Agency (FEMA), respectively, in scientific and engineering reports entitled Flood Insurance Study: Clark County, Washington and Incorporated Areas, Volumes 1 and 2 (Numbers 53011CV001A and 53011CV002A, respectively) effective September 5, 2012, and any revisions thereto, with accompanying Flood Insurance Rate Maps (FIRMs and their digital version, DFIRMs) and any revisions thereto, which are hereby adopted by reference and declared to be part of this chapter. The Flood Insurance Study (FIS), FIRMs and DFIRMs are available from the planning official, 415 West 6th Street, Vancouver, WA 98660. (See VMC [20.150.040](#), Meanings of Specific Words and Terms, for definitions for “areas of special flood hazards,” “floodplain,” “floodway,” and “frequently flooded areas.”)

When base flood elevation (BFE) data has not been provided in frequently flooded areas (Zone A), the planning official shall obtain, review, and reasonably utilize any base flood elevation and floodway data available from a federal, state or other source in order to administer the provisions of this chapter. This best available information for flood hazard area identification shall be the basis for regulation until a new FIRM/DFIRM is issued.

B. *Compliance.* All development within special flood hazard areas is subject to the terms of this chapter and other applicable regulations.

C. *Penalties for Noncompliance.* See VMC [20.740.090](#).

D. *Abrogation and Greater Restrictions.* This chapter is not intended to repeal, abrogate, or impair any existing easements, covenants, or deed restrictions. However, where this chapter and another ordinance, easement, covenant, or deed restriction conflict or overlap, whichever imposes the more stringent restrictions shall prevail.

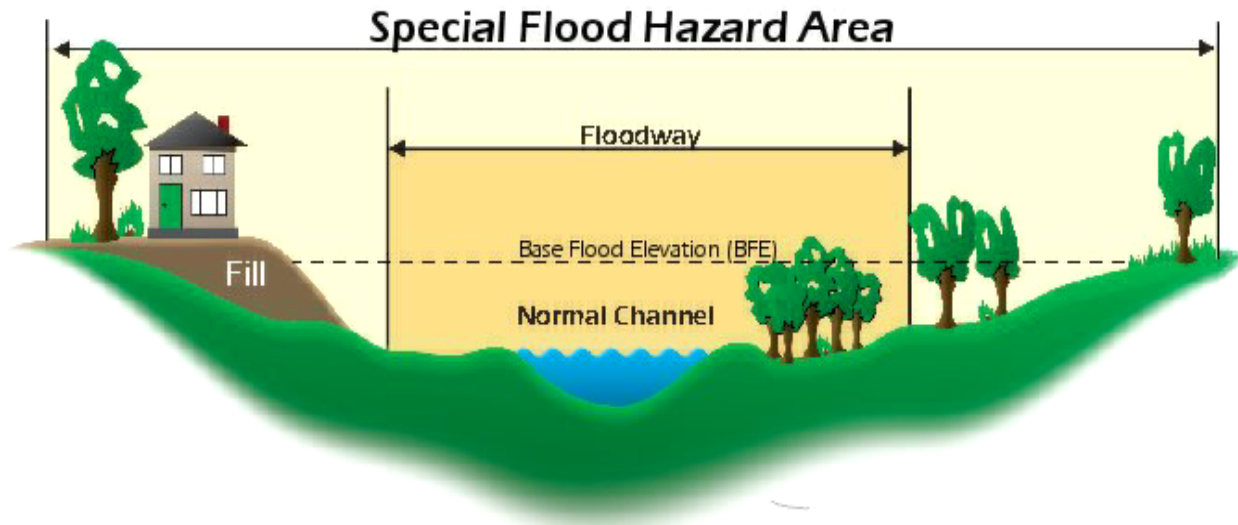
E. *Interpretation (Not Mandatory).* In the interpretation and application of this chapter, all provisions shall be:

1. Considered as minimum requirements;
2. Liberally construed in favor of the governing body; and
3. Deemed neither to limit nor repeal any other powers granted under state statutes.

F. *Warning and Disclaimer of Liability.* The degree of flood protection required by this chapter is considered reasonable for regulatory purposes and is based on scientific and engineering considerations. Larger floods can and will occur on rare occasions. Flood heights may be increased by manmade or natural causes. This chapter does not imply that land outside the areas of special flood hazards or uses permitted within such areas will be free from flooding or flood damages. This chapter shall not create liability on the part of the city of Vancouver, any officer or employee thereof, or the Federal Insurance Administration Administrator for any flood damages that result from reliance on this chapter or any administrative decision lawfully made hereunder.

G. *Severability.* This chapter and the various parts thereof are hereby declared to be severable. Should any section of this chapter be declared by the courts to be unconstitutional or invalid, such decision shall not affect the validity of the chapter as a whole, or any portion thereof other than the section so declared to be unconstitutional or invalid.

Figure 20.740.120-1. Frequently Flooded Areas/Areas of Special Flood Hazards



Adapted from *Floodplain Management: A Local Administrator's Guide to the National Flood Insurance Program, Fifth Edition, FEMA Region 10*

H. Designation of the Floodplain Administrator (44 CFR 59.22(b)(1)). The land use program manager is hereby appointed to administer, implement, and enforce this chapter by granting or denying development permits in accordance with its provisions. The floodplain administrator may delegate authority to implement these provisions.

1. Duties and Responsibilities of the Floodplain Administrator. Duties of the floodplain administrator shall include, but not be limited to:

a. Development Review. Review all proposed developments to:

i. Determine whether a floodplain permit is required;

ii. Make interpretations where needed as to the exact location of special flood hazard area boundaries, with respect to the flood insurance study maps and zoning district boundaries.

b. Permit Review. Review all development permits to determine that:

i. The permit requirements of this chapter have been satisfied;

ii. All other required state and federal permits have been obtained;

iii. The site is reasonably safe from flooding;

iv. The proposed development is not located in the floodway. If located in the floodway, assure the encroachment provisions of Section 5.4-1 are met;

v. Notify FEMA when annexations occur in the special flood hazard area.

I. Additional Critical Areas Report Requirements. In addition to the Critical Areas Report requirements in VMC [20.740.050](#), the following information shall be submitted. Elevation data shall reference the NAVD 1988 Datum.

1. Base (100-year) flood elevation in relation to mean sea level. When base flood elevation has not been provided or is not available from an authoritative source, it shall be generated by the applicant for developments which contain at least 50 lots or 5 acres, whichever is less.
 2. Elevation in relation to mean sea level, of the lowest floor (including basement) of all existing and proposed structures.
 3. Elevation in relation to mean sea level to which any structure's lowest floor (including basement) is raised to be at least 1 foot above the base flood elevation or for nonresidential flood-proofed structures, the elevation in relation to mean sea level to which any structure is flood-proofed.
 4. Location of the channel migration zone. See the Clark County Shoreline Inventory & Characterization Report, Volume 1, Lewis and Salmon-Washougal Watersheds and Rural Areas, Map 27, Potential Channel Migration Zone (CMZ) Areas for general locations of channel migration zones. The actual location of the channel migration zone on site must be identified by a qualified professional and mapped in accordance with the submittal requirements of VMC [20.740.050](#).
 5. Description of strategies taken to avoid, minimize, and mitigate unavoidable impacts to public safety. When the base flood elevation has not been provided or is not available from an authorized source (VMC [20.740.120\(A\)](#)), the Critical Areas Report shall include a discussion of how and whether the proposed development would be reasonably safe from flooding. Historical data, high water marks, photographs of past flooding and other available information will be used as the basis for this discussion and conclusion.
 6. Certification, documentation, and demonstration by a qualified professional of how the applicable standards of VMC [20.740.120\(J\)](#) will be met. To support the "no rise" analyses required in VMC [20.740.120\(J\)\(1\)](#), the documentation required in the most recently updated or amended FEMA Region 10 publication, Floodplain Management: A Local Floodplain Administrator's Guide to the National Flood Insurance Program shall be submitted.
- J. Performance Standards. Except as noted, the following standards apply to all structures and development (including but not limited to the placement of manufactured homes, substantial improvement, roads, railroads, trails, dikes, levees, or water, sewer, stormwater conveyance, gas, power, cable, fiber optic or telephone facilities) in all areas of special flood hazards and channel migration zones (CMZs). Additional restrictions apply in the floodway.
1. Encroachments.
 - a. Designated Floodway: Prohibited Encroachments. The following are prohibited in the floodway:
 1. Water wells ([20.740.120\(J\)\(4\)\(a\)](#)).
 2. On-site waste disposal systems ([20.740.120\(J\)\(5\)\(a\)](#)).
 3. Residential structures or other structures for human habitation including but not limited to:
 - a. Building envelopes within subdivisions ([20.740.120\(J\)\(9\)\(a\)](#));
 - b. New construction or reconstruction of residential structures ([20.740.120\(J\)\(10\)\(b\)\(1\)](#));
 - c. Placement or replacement of manufactured homes (all types) ([20.740.120\(J\)\(10\)\(b\)\(2\)](#));
 - d. Critical facilities housing vulnerable populations and emergency services ([20.740.120\(J\)\(12\)\(a\)](#)); and
 - e. Recreational vehicles ([20.740.120\(J\)\(13\)\(a\)](#)).

b. *Designated Floodway: Allowed Encroachments.* In areas where the base flood elevation has been provided and a regulatory floodway has been designated, other encroachments including but not limited to fill, new construction, replacement structures, substantial improvements and other development shall be prohibited unless:

1. Certification by a qualified professional (in this case, a registered professional engineer) is provided demonstrating through hydrologic and hydraulic analyses performed in accordance with standard engineering practice that the proposed encroachment would not result in a net increase in base flood elevation (less than 0.00 feet, rounded) or flood velocity during the occurrence of the base flood discharge. At a minimum, such "no rise" analyses shall include a step-backwater analysis and a conveyance compensation analysis as required in the most recently updated or amended FEMA Region 10 publication, *Floodplain Management: A Local Floodplain Administrator's Guide to the National Flood Insurance Program*; and

2. The applicable standards of VMC [20.740.120\(J\)\(2\)](#) through [\(J\)\(15\)](#) are also met.

c. *No Designated Floodway: Allowed Encroachments.* In areas where the base flood elevation has been provided but a regulatory floodway has not been designated, no encroachments including but not limited to new construction, substantial improvement, or other development (including fill) shall be permitted, unless:

1. The applicant has demonstrated that the cumulative effect of the proposed development, when combined with all other existing and anticipated development will not increase the water surface elevation of the base flood more than one foot at any point; and

2. The applicable standards of VMC [20.740.120\(J\)\(2\)](#) through [\(J\)\(15\)](#) are also met.

d. *Other Areas of Special Flood Hazards and CMZs.* In areas of special flood hazards except the floodway or where the BFE has not been provided, or in channel migration zones, encroachments, including but not limited to fill, new construction, replacement structures, substantial improvements and other development shall be prohibited, unless:

1. A qualified professional provides certification demonstrating that the proposed project would not result in a net loss of flood storage capacity; and

2. The applicable standards of VMC [20.740.120\(J\)\(2\)](#) through [\(J\)\(15\)](#) are also met.

2. *Property Damage.* Development shall not result in adverse impacts to other properties either upstream or downstream.

3. *Drainage.* Drainage paths around structures and on slopes shall be adequate to guide floodwaters around and away from proposed structures and adjacent properties.

4. *Water.*

a. Water wells are prohibited in the floodway.

b. In areas of special flood hazards except the floodway and in CMZs, water wells shall be constructed to withstand a 100-year flood without adversely impacting groundwater quality (WAC [173-160-171](#)).

c. All new and replacement water supply systems shall be designed to minimize or eliminate infiltration of flood waters into the system.

5. *Waste.*

a. On-site waste disposal systems are prohibited in the floodway.

b. In areas of special flood hazards except the floodway and in CMZs, on-site waste disposal systems shall be located to avoid flood damage to them or release of contaminants from them during a base flood event.

c. New and replacement sanitary sewage systems shall be designed to minimize or eliminate infiltration of flood waters into the systems and discharge from the systems into flood waters.

6. Construction Materials and Methods.

a. Construction methods and practices shall minimize flood damage.

b. Construction materials and utility equipment shall be resistant to flood damage. For guidance on flood-resistant materials see the most current FEMA Technical Bulletin 2, Flood-Resistant Materials Requirements.

c. Electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities shall be designed and/or otherwise elevated or located so as to prevent water from entering or accumulating within the components during a base flood event. For guidance on the placement of building utility systems, see the most current FEMA Publication #348, Protecting Building Utilities from Flood Damage.

7. Anchoring. All new construction including substantial improvements and all types of manufactured homes shall:

a. Be elevated on a permanent foundation and securely anchored to an adequate foundation system to prevent flotation, collapse, or lateral movement of the structure resulting from hydrodynamic and hydrostatic loads including the effects of buoyancy.

b. Be installed or placed using methods and practices that minimize flood damage. Manufactured home placement shall follow the guidance in the most current FEMA P-85, Protecting Manufactured Homes from Floods and Other Hazards.

8. Enclosed Areas Below the Base Flood Elevation.

a. Enclosed areas below the base flood elevation shall be used only for vehicle parking, building access, or storage.

b. New or substantially improved enclosed areas below the base flood elevation shall be constructed in accordance with.

1. VMC [20.740.120\(J\)\(7\)](#), Anchoring

2. VMC [20.740.120\(J\)\(10\)\(c\)\(2\)\(d\)](#), Residential Construction

3. VMC [20.740.120\(J\)\(6\)\(b\)](#) and [\(J\)\(6\)\(c\)](#), Construction Materials and Methods

c. Enclosed areas below the BFE shall not be considered to be the lowest floor when they are not part of a basement and meet the requirements of VMC [20.740.120\(J\)\(10\)\(d\)](#).

d. Crawlspace Construction. Crawlspaces are a type of enclosed area below the BFE. Crawlspaces constructed at or above the lowest adjacent exterior grade are preferred. (Note: Insurance premiums for structures with below-grade crawlspaces will be higher than those with the interior elevation at or above the lowest adjacent exterior grade.) Refer to the most current FEMA Technical Bulletin 11, Crawlspace Construction for Buildings Located in Special Flood Hazard Areas (available from the Planning Official) for more information. Crawlspaces:

1. Are prohibited in areas with flood velocities greater than five feet (5') per second unless designed by a qualified professional (in this case an architect or professional engineer).

2. Shall meet the requirements of VMC [20.740.120\(J\)\(8\)\(a\)](#) through [\(J\)\(8\)\(c\)](#), Enclosed Areas below the BFE.
3. Shall not be considered “basements” for the purposes of VMC [20.740.120](#) when constructed according to the following standards:
 - a. The interior grade of a crawlspace below the base flood elevation must not be more than 2’ below the lowest adjacent exterior grade.
 - b. The height of the below-grade crawlspace, measured from the interior grade of the crawlspace to the top of the crawlspace foundation wall must not exceed 4’ at any point.
 - c. The crawlspace must be equipped with a drainage system that removes floodwaters from the interior area of the crawlspace in a reasonable period of time after a base flood event.
9. Subdivisions.
 - a. All subdivisions shall be designed:
 1. To ensure that no residential structure or other structures for human habitation are located in the floodway even though lots may extend into the floodway;
 2. To avoid placement of any structures in areas of special flood hazards and in CMZs;
 3. Where it is not possible to design a subdivision in a manner to avoid placement of any structures in areas of special flood hazards or CMZs, the subdivision shall be designed to minimize or eliminate potential flood damage.
 - b. All subdivisions shall have facilities such as sewer, gas, power, cable, fiber optic, telephone, stormwater and water systems located and constructed to minimize or eliminate flood damage. (See VMC [20.740.120\(J\)\(2\)](#), Property Damage; VMC [20.740.120\(J\)\(4\)](#), Water; VMC [20.740.120\(J\)\(5\)](#), Waste; VMC [20.740.120\(J\)\(6\)](#), Construction Materials and Methods; and VMC [20.740.120\(J\)\(7\)](#), Anchoring.)
 - c. All subdivisions shall have adequate drainage provided to reduce exposure to flood damage. (See VMC [20.740.120\(J\)\(3\)](#), Drainage.)
10. Residential Construction (Including Manufactured Homes).
 - a. Residential Construction in the Floodway.
 1. New construction and reconstruction of residential development including placement and replacement of all types of manufactured homes is prohibited in the floodway, **unless sited as a temporary use in accordance with subsection.**
 2. Existing residential structures and manufactured homes in the floodway are nonconforming, but may be repaired or improved, provided:
 - a. The repair or improvement does not increase the ground floor area of the structure; and
 - b. The repair or improvement does not result in adverse impacts to other properties either upstream or downstream; and
 - c. The cost of the repair or improvement does not exceed 50% of the market value of the structure either:
 1. Before the start of repair or improvement where there is no damage to the structure; or

2. Before flood or other damage to the structure occurred.
- d. Any project for improvement of a structure to correct existing violations of state or local health, sanitary, or safety code specifications which have been identified by the Planning Official and which are the minimum necessary to assure safe living conditions may be excluded from the 50%.
- e. Any project for improvement to a structure identified as a historic place may be excluded from the 50%.
- b. Residential Construction in Other Areas of Special Flood Hazards and CMZs. In areas of special flood hazards except the floodway and in channel migration zones:
 1. New residential construction and reconstruction, including all types of manufactured homes and other structures for human habitation shall meet all the provisions of this chapter, including VMC [20.740.120\(J\)\(8\)](#) and [\(J\)\(10\)\(c\)](#) through [\(J\)\(10\)\(d\)](#).
 2. New placement or replacement of all types of manufactured homes shall meet the standards of VMC [20.740.120\(J\)\(7\)](#), Anchoring.
 3. Repair or Substantial Improvement. All provisions of this chapter (including the elevation standards of VMC [20.740.120\(J\)\(8\)](#) and [\(J\)\(10\)\(c\)](#) and [\(J\)\(10\)\(d\)](#)), all state and local health, sanitary, safety codes, and where applicable, historic preservation codes shall be met when the cost of repair or improvement of an existing residential structure exceeds 50% of the market value of the structure either:
 - a. Before the start of repair or improvement where there is no damage to the structure; or
 - b. Before flood or other damage to the structure occurred.
 - c. Elevation.
 1. BFE Established. The lowest floor (including basement) of new residential structures (including but not limited to reconstruction, substantial improvement, the placement or replacement of all types of manufactured homes) shall be elevated at least one foot above base flood elevation. Structures shall be elevated using means other than fill (such as extended foundation or other enclosure walls, piles, or columns) whenever feasible. Mechanical equipment and utilities shall be waterproofed or elevated at least one foot above the BFE.
 2. No BFE. In areas where the base flood elevation has not been provided or is not available from an authorized source (VMC [20.740.120\(A\)](#) and [\(I\)\(5\)](#)) and the Critical Areas Report demonstrates to the satisfaction of the Planning Official that the proposed development would be reasonably safe from flooding, new residential construction (including but not limited to substantial improvement and the placement of manufactured homes) shall be elevated at least 2' above the highest adjacent grade. (Note: Failure to elevate at least 2' above the highest adjacent grade may result in higher insurance rates.)
 - d. Fully Enclosed Areas Below Lowest Floor. Fully enclosed areas below the lowest floor that are subject to flooding are prohibited unless designed to automatically equalize hydrostatic flood forces on exterior walls by allowing for the entry and exit of floodwaters. Designs for meeting this requirement must be certified by a qualified professional (in this case, a registered professional engineer or architect), or must meet or exceed the following minimum criteria:
 1. Contain a minimum of 2 openings having a total net area of not less than 1 square inch for every 1 square foot of enclosed area subject to flooding;
 2. The bottom of all openings are no higher than 1 foot above grade; and
 3. Openings permit the automatic entry and exit of floodwaters even when equipped with screens, louvers, or other coverings or devices.

For guidance on flood openings, see FEMA Technical Bulletin 1-93, Openings in Foundation Walls.

4. A garage attached to a residential structure, constructed with the garage floor slab below the BFE, must be designed to allow for automatic entry and exit of floodwaters.

11. Nonresidential Construction. New construction and substantial improvement of any nonresidential structure shall either be elevated (subsection [\(J\)\(11\)\(a\)](#) or [\(J\)\(11\)\(b\)](#) of this section) or flood-proofed (subsection [\(J\)\(11\)\(c\)](#) of this section):

a. Be Elevated: BFE Established.

1. Have the lowest floor, including basement, elevated at least one foot above the base flood elevation or elevated as required by ASCE 24, whichever is greater;

2. Meet the same standards for space below the lowest floor as described in subsections [\(J\)\(8\)\(d\)](#) and [\(J\)\(10\)\(d\)\(1\)](#) through [\(J\)\(10\)\(d\)\(3\)](#) of this section; and

3. Have mechanical equipment and utilities waterproofed or elevated at least one foot above the BFE, or as required by ASCE 24, whichever is greater.

b. Be Elevated: No BFE.

1. In areas where the base flood elevation has not been provided or is not available from an authorized source (VMC [20.740.120\(J\)\(2A\)](#) and [\(3.120\(B\)\(5\)\)](#) and the Critical Areas Report demonstrates to the satisfaction of the Planning Official that the proposed development would be reasonably safe from flooding, new nonresidential construction shall be elevated at least 2' above the highest adjacent grade. Failure to elevate at least 2' above the highest adjacent grade may result in higher insurance rates; and

2. Meet the same standards for space below the lowest floor as described in [20.740.120\(J\)\(8\)\(d\)](#) and VMC [20.740.120\(J\)\(10\)\(d\)](#); or

c. Be Flood-Proofed. Together with attendant utility and sanitary facilities shall:

1. Be flood-proofed so that below one foot (or more) above the base flood elevation, the structure is watertight with walls substantially impermeable to the passage of water or dry flood-proofed to the elevation required by ASCE 24, whichever is greater;

2. Have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy;

3. Be certified by a registered professional engineer or architect that the design and methods of construction are in accordance with accepted standards of practice for meeting provisions of this subsection based on their development and/or review of the structural design, specifications and plans. Such certifications shall be provided to the Planning Official as set forth in VMC [20.740.120\(L\)](#).

12. Critical Facilities.

a. Critical facilities housing vulnerable populations and emergency services shall be prohibited in the floodway.

b. In areas of special flood hazards except the floodway and in CMZs, construction of new critical facilities shall be prohibited unless the applicant demonstrates that:

1. No feasible alternative site is available; and either:

a. The lowest floor, entrances, egresses, and to the extent feasible access routes are elevated to three feet above the base flood elevation or to the elevation of the 500-year flood, whichever is higher; or

b. The applicant demonstrates that other measures would ensure that in the event of a flood, the facility would remain safe and fully operational and that potentially harmful materials would not be displaced by or released into floodwaters. Such measures shall be conditions of approval of the Critical Areas Permit.

13. Recreational Vehicles.

a. Recreational vehicles shall be located outside the floodway.

b. Recreational vehicles in areas of special flood hazard except the floodway and in CMZs shall either:

1. Be on the site for fewer than 180 consecutive days;

2. Be fully licensed and ready for highway use, on its wheels or jacking system, attached to the site only by quick disconnect-type water, sewer, stormwater, gas, power, cable, fiber optic, telephone, and security devices, and have no permanently attached additions; or

3. Meet the requirements of VMC [20.740.120\(J\)\(7\)](#), Anchoring; VMC [20.740.120\(J\)\(8\)](#), Enclosed Areas below the Base Flood Elevation; and VMC [20.740.120\(J\)\(10\)\(c\)](#), Elevation.

14. Appurtenant Structures (Detached Garages and Small Storage Structures). For A zones:

a. Appurtenant structures used solely for parking of vehicles or limited storage may be constructed such that the floor is below the BFE, provided the structure is designed and constructed in accordance with the following requirements:

i. Use of the appurtenant structure must be limited to parking of vehicles or limited storage;

ii. The portions of the appurtenant structure located below the BFE must be built using flood-resistant materials;

iii. The appurtenant structure must be adequately anchored to prevent flotation, collapse, and lateral movement;

iv. Any machinery or equipment servicing the appurtenant structure must be elevated or flood-proofed to or above the BFE;

v. The appurtenant structure must comply with floodway encroachment provisions in Section 5.4-1;

vi. The appurtenant structure must be designed to allow for the automatic entry and exit of floodwaters in accordance with Section 5.2-1 (5);

vii. The structure shall have low damage potential;

viii. If the structure is converted to another use, it must be brought into full compliance with the standards governing such use; and

ix. The structure shall not be used for human habitation.

b. Detached garages, storage structures, and other appurtenant structures not meeting the above standards must be constructed in accordance with all applicable standards in Section 5.2-1.

c. Upon completion of the structure, certification that the requirements of this section have been satisfied shall be provided to the floodplain administrator for verification.

15. *Alteration of Watercourse.*

- a. *The planning official shall notify adjacent communities and the state coordinating agency, Washington State Department of Ecology, prior to any alteration or relocation of a watercourse, and submit evidence of such notification to the Federal Insurance Administration Administrator.*
- b. *Alteration or relocation of a watercourse shall be allowed only after:*
 - i. *Certification by a qualified professional that the alteration or relocation:*
 - A. *Is the only feasible alternative or is part of a restoration project approved by the appropriate state or federal agencies;*
 - B. *Will not diminish the flood-carrying capacity of the watercourse;*
 - C. *Will not block side channels;*
 - D. *Will be accomplished using soft armoring techniques wherever possible;*
 - E. *Will avoid to the extent possible and then minimize and mitigate removal of vegetation including downed woody vegetation; and*
 - F. *Will not endanger development in the channel migration zone.*
 - ii. *The applicant provides assurance acceptable to the planning official of maintenance of the relocated channel such that the flood carrying capacity of the watercourse is not diminished.*

16. *Changes to Special Flood Hazard Area.*

- a. *If a project will alter the BFE or boundaries of the SFHA, then the project proponent shall provide the community with engineering documentation and analysis regarding the proposed change. If the change to the BFE or boundaries of the SFHA would normally require a letter of map change, then the project proponent shall initiate within 180 days of the information being made available, and receive approval of, a conditional letter of map revision (CLOMR) prior to approval of the development permit. The project shall be constructed in a manner consistent with the approved CLOMR.*
- b. *If a CLOMR application is made, then the project proponent shall also supply the full CLOMR documentation package to the floodplain administrator to be attached to the floodplain development permit, including all required property owner notifications.*
- K. *Variances and Minor Exceptions. Variances as interpreted in the National Flood Insurance Program are based on the principle that they pertain to a physical piece of property. They apply to the land and are not personal in nature, do not pertain to the structure, its inhabitants, or economic or financial circumstances. The development standards contained in VMC [20.740.120](#), Frequently Flooded Areas are required by the Federal Emergency Management Agency (FEMA) under the National Flood Insurance Program (NFIP) to protect life and property from flood damage.*

Variances from the NFIP standards of VMC [20.740.120](#) shall meet the approval criteria and other requirements of VMC [20.740.120\(K\)](#) in addition to any other applicable variance criteria or requirements (e.g., VMC [20.290](#) or VMC [20.760](#)). Variances from the NFIP standards of VMC [20.740.120](#) shall be processed as Type I or II variances or shoreline variances as appropriate, not as Minor Exceptions (VMC [20.740.070](#)).

Variances or minor exceptions from other critical area standards (any standards of VMC [20.740](#) not in Section VMC [20.740.120](#)) shall meet the applicable criteria and follow the applicable procedures for the relief requested (VMC [20.740.070](#), VMC [20.290](#), or VMC [20.760](#))

1. NFIP variances may be allowed:

a. For Historic Structures. NFIP variances may be issued for the repair, reconstruction, rehabilitation or restoration of structures listed on the National Register of Historic Places, the Washington Heritage Register, Washington's Heritage Barn Register, Washington's Historic Property Inventory Database, Clark County Cultural Resources Inventory, or Clark County Heritage Register, provided: Historic Structures upon a determination that the proposed repair or rehabilitation will not preclude the structure's continued designation as a Historic Structure and the variance is the minimum necessary to preserve the historic character and design of the structure. This variance possibility is only available to those structures that are:

- i. Listed individually in the National Register of Historic Places (a listing maintained by the Department of Interior) or preliminarily determined by the Secretary of the Interior as meeting the requirements for individual listing on the National Register;
- ii. Certified or preliminarily determined by the Secretary of the Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined by the Secretary to qualify as a registered historic district;
- iii. Individually listed on a state inventory of historic places in states with historic preservation programs which have been approved by the Secretary of the Interior;
- iv. Individually listed on a local inventory of historic places in communities with historic preservation programs that have been certified either:
 - a. By an approved state program as determined by the Secretary of the Interior or
 - b. Directly by the Secretary of the Interior in states without approved programs.
- v. The proposed development will not preclude the structure's continued designation as a historic structure;

b. From the Elevation Standard. An NFIP variance from the elevation standard may be issued for new construction and substantial improvements to be erected on a small or irregularly shaped lot contiguous to and surrounded by lots with existing structures constructed below the base flood elevation. As the lot size increases the technical justification required for issuing the variance increases.

c. From the Flood-proofing Standard for Non-Residential Buildings. NFIP variances may be issued for nonresidential buildings to allow a lesser degree of flood-proofing than watertight or dry flood-proofing where it can be determined that such action:

1. Will have low damage potential;
2. Complies with all other NFIP variance criteria except VMC [20.740.120\(K\)\(1\)\(a\)\(2\)](#);
3. Complies with VMC [20.740.120\(J\)\(4\)](#), Water; VMC [20.740.120\(J\)\(5\)](#), Waste; VMC [20.740.120\(J\)\(7\)](#), Anchoring; and VMC [20.740.120\(J\)\(9\)](#), Subdivisions.

d. For Allowed Development within the Floodway. NFIP variances may be issued for development within a floodway only when the requirements of VMC [20.740.120\(J\)\(1\)\(b\)](#) are met.

2. *NFIP Variance Approval Criteria.* NFIP variances from elevation and flood-proofing standards, and for development in the floodway (VMC [20.740.120\(K\)\(1\)\(a\)\(2\)](#) through (4) may be granted only if the applicant demonstrates that the requested action conforms to all of the following criteria:

- a. *The NFIP variance is the minimum necessary, considering the flood hazard, to afford relief.*
- b. *The applicant has demonstrated good and sufficient cause.*
- c. *Failure to grant the NFIP variance would result in exceptional hardship to the applicant. (Exceptional hardship for an NFIP variance is described in a FEMA memorandum dated July 22, 1986 entitled Resource Materials on NFIP Variance Criteria available from the Planning Official.)*
- d. *Granting the NFIP variance will not result in increased flood heights or velocities, additional threats to public safety, significantly increased property damage potential, extraordinary public expense, or conflict with existing local laws or ordinances.*

e. *Demonstration that the following factors have been considered:*

1. *The danger that materials may be swept onto other lands to the injury of others;*
2. *The danger to life and property due to flooding or erosion damage;*
3. *The susceptibility of the proposed facility and its contents to flood damage and the effect of such damage on the individual owner;*
4. *The importance of the services provided by the proposed facility to the community;*
5. *The necessity to the facility of a waterfront location, where applicable;*
6. *The availability of alternative locations for the proposed use which are not subject to flooding or erosion damage;*
7. *The compatibility of the proposed use with existing and anticipated development;*
8. *The relationship of the proposed use to the comprehensive plan;*
9. *The safety of access to the property in times of flood for ordinary and emergency vehicles;*
10. *The expected heights, velocity, duration, rate of rise, and sediment transport of the flood waters and the effects of wave action, if applicable, expected at the site; and*
11. *The costs of providing governmental services during and after flood conditions, including maintenance and repair of facilities such as sewer, gas, electrical, stormwater, and water systems, and streets and bridges.*

3. *Notices Required.* A notice to the applicant is required whenever a variance is approved, approved with conditions, or denied. Such notice shall include the decision and the reasons for the decision. When a variance from the elevation standard is approved or approved with conditions, such notice shall state that the structure will be permitted to be built with a lowest floor elevation below that normally required with respect to the base flood elevation and that the cost of flood insurance will be commensurate with the increased risk resulting from the reduced lowest floor elevation.

L. *Information to be Obtained and Maintained.*

1. *For all new and substantially improved structures and development, the planning official shall complete Section B of a current elevation certificate and obtain and record on that certificate:*

- a. For elevated (rather than flood-proofed) structures and development, the actual (as-built) elevation in relation to mean sea level of the lowest floor (including basement), and whether or not the structure contains a basement.
 - b. For nonresidential, flood-proofed structures, the elevation to which the structure was flood-proofed. All flood-proofing certifications shall also be maintained.
 - c. Maintain all records pertaining to development in frequently flooded areas subject to the provisions of this chapter, VMC [20.740](#), for public inspection.
2. Records of Variance Actions. The planning official shall keep records of all variance actions and report any approved variances to the Federal Insurance Administration **Administrator** upon request.
 3. Records of Appeal Actions. The planning official shall keep records of all appeal actions. (Ord. M-4325 § 3, 2020; Ord. M-4020 § 2, 2012; Ord. M-4017 § 9, 2012; Ord. M-3844 § 2, 2007; Ord. M-3692 § 2, 2005)

Attachment I – VMC 20.950 Cottage Cluster Developments

20.950.020 Applicability.

A. *Permitted zones and required minimum project size.* Cottage cluster housing developments shall be allowed on properties 20,000 square feet or larger in size, in the R-17, R-9, R-6, R-4 and R-2 zoning districts. **Lot size minimums of the underlying zone are not applicable to cottage cluster developments.**

B. *Permitted Uses.* Cottage cluster development uses shall be limited to attached and detached single-family homes and associated outbuildings, public or private open space, and parking areas. Duplexes or attached single-family homes may constitute no more than 20 percent of the total number of units. Home occupations pursuant to Chapter [20.860](#) VMC shall be permitted only if there are no employees residing off site. Accessory dwelling units pursuant to Chapter [20.810](#) VMC shall be permitted only if located entirely within the single-family homes.

C. The narrow lot development standards in Chapter [20.927](#) VMC and R-17 zoning district standards of Chapter [20.410](#) VMC shall not apply to cottage housing developments. (Ord. M-4377 § 2(d), 2022)

20.950.030 Site Development and Design Standards.

A. *General Standards.*

1. Cottage housing developments may be allowed at up to **two times** ~~200 percent~~ of the maximum density of the underlying zone, including any accessory dwelling units.

2. Cottage housing developments shall contain a minimum of four and a maximum of 12 units in a cluster; provided, that a cottage development may contain up to two clusters.

3. Each single-family cottage shall not exceed 1,600 square feet in total floor area, and each duplex cottage 3,000 square feet. Floor areas of attached or detached garages and outbuildings shall count towards these size limits, with the exception of the first 200 hundred square feet of garage or outbuilding per single-family cottage, or 400 square feet per duplex. **Existing single-family homes may remain on site but will be counted toward the total density.**

4. Building heights may not exceed 25 feet within 50 feet of the project site perimeter, and 30 feet elsewhere in the site. Roofs higher than 18 feet shall be pitched at a ratio of at least 6:12.

5. Covered porches shall be at least 60 square feet, with no dimension less than five feet.

6. Buildings shall be set back at least 10 feet from the nearest public or private road, and at least five feet from other buildings. Building setbacks to exterior property lines shall be that of the underlying zoning district.

B. *Cottage Orientation.* Cottages must be clustered around a common courtyard and must meet the following standards:

1. At least 75 percent of the cottage units shall be located within 25 feet of a common **courtyard**, **and** shall have covered porches and main entries which face the common courtyard **or an adjacent public street.**