

# Narrative

## Schwartz Comprehensive Plan Amendment and Rezone Request

The proposed Comprehensive Plan Amendment include two parcels totaling approximately 2.1 acres. The property is currently designated as Urban Low Density with a zoning of R-2. The applicant has been growing a small home-based business in the residence on parcel #177468000 and is looking to expand this business by vacating the residential use of the property and converting the residence to an office for exclusive use by the business.

Parcel #177485000 currently has a separate single-family residence which will be demolished for commercial use.

The applicant is seeking to change the comprehensive Plan Designation from Urban Low Density to Commercial and to change the zoning from R-2 to CC.

The property already has a signalized access onto SE 1<sup>st</sup> St. and has a major water and sanitary sewer line running through the site with connection points already provided for future commercial use.

Because office uses are permitted in the CC zone, this is the targeted zone for this request. This would allow an immediate expansion of the existing home-based business on the site. In the preapplication conference conducted on April 8, 2022, staff indicated that this proposal was likely to receive support from reviewers. In the conference, city staff also indicated that the preliminary application also provide additional discussion on why a Commercial designation would be more beneficial than an increase in residential density to a multifamily zone. City Staff also indicated that the applicant should consider the relative need of commercial and residential lands in the area and within the city generally. Additionally, the City review staff also requested that the applicant consider how this rezone would impact the neighboring properties to the east and west. This narrative includes responses to the approval criteria listed below. Emphasis was included in the areas that City review staff requested the applicant consider in this proposal.

Specific reasons why this property should be zoned commercial and not an increased density residential are:

- The CC zone also allows upper floor residential units to be developed allowing for both commercial and residential uses on this property as market demands.
- Modifying the zone to a multi-family zone would not support the growth of the small home-based business currently operating and seeking to expand on the site.
- The site does not meet the locational criteria for R-18 zoning because the site is not in an area occupied by a substantial amount of multifamily development (only one apartment complex being constructed across the street) and not influenced by narrow streets, on street parking congestion, local traffic congestion, alleyways, or irregular street patterns. The site is also not consistent with R-22 locational criteria where the R-22 zone is most appropriate in areas already developed to the permitted R-22 density and where R-22 is well established. The site is also not served directly by public transit, so higher density residential zoning is not the most appropriate zone.
- The site does meet all the locational criteria for the CC zone as detailed elsewhere in this narrative.

- Because the site already is developed with single family detached housing, one of the two properties is recognized as residential built in the Vacant Buildable Lands Model maintained by Clark County. The values of the existing buildings and development make conversion of this site to another medium density residential use unlikely because of the value of the existing improvements and the likely yield of residential units in the R-18 or R-22 apartment zones. Commercial uses substantially increase the value of the property and would be more likely to result in redevelopment.
- The site is not large enough for a significant multifamily project

## Existing property and surrounding uses

### Proposal Property:

The properties currently have two single family residential structures including both attached and detached garages, a shop building, and a shed. The map below generally shows the existing buildings on the site and adjacent properties. This map is intended to show uses and is not to scale.

### Abutting properties:

The properties to the west are residential with single family residential structures and shop buildings. Properties to the south are also single family detached housing. Property to the NW includes a proposed development of 8.7 acres to include a four story 124-unit apartment building, 44,750 sq ft of general retail/commercial and 8,098 sq ft of extended stay hotel units, with paved parking lot, site amenities, and storm water detention vault. The apartment building will be the first phase of the development site. To the east are also residential with single family detached homes constructed. To the North is Union High School and to the NE is a proposed food vendor complex on a 4-acre commercial site. The map below shows the neighboring properties and structures.



## Responses to approval criteria

### 20.285.050 Approval Criteria – Comprehensive Plan and Concurrent Zoning Map Amendments.

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 generally: This proposal would better utilize existing public facilities and services. Because this property has existing commercially sized water service with taps existing for connection on the property, a regional sewer line traversing the west edge of the property and a**

full signalized intersection with pedestrian crosswalks linking the site to other commercial properties and a public-school campus and multi-family housing, the commercial designation with a CC zoning would allow the site to redevelop in the future to promote efficient use of existing services.

The site currently is used for commercial purposes and the proposed change in comprehensive plan and zoning designations will allow those uses to expand.

### Vancouver Strategic Plan

The Comprehensive Plan is consistent with the Vancouver Strategic Plan updated by the City Council in 2008. The strategic plan was updated in 2014 which included 10 goals that are generally similar to the 6 policies in the previous plan. Because the adopted comprehensive plan specifically references the 2008 plan, those policies are addressed in detail here for discussion at the pre-application conference. Additional responses to the 10 goals in the 2014 plan can be provided with the future application based on the discussion in the conference. By promoting the policies in the Comprehensive Plan, the Vancouver Strategic plan is also addressed. Generally, this proposal better implements the strategic plan in the following six policy objectives as follows:

#### A Healthy, Livable and Sustainable Vancouver

The proposed change would expand commercial services into the surrounding residential neighborhoods along a major arterial equipped with sidewalks and bike lanes. This would also allow the continued growth of a local, woman owned, small business in a sustainable manner by reusing an existing structure for business growth and expansion. By allowing the growth of a locally based, woman owned, small business in a community in the immediate term and by providing an opportunity for commercial services in an area already connected for walking and biking, this proposal improves the health of the community economically and physically.

#### Transportation Mobility and Connectivity

Utilizing existing transportation infrastructure for not only vehicle connectivity, but also pedestrian and bicycle connectivity, better addresses the policies for transportation and connectivity. Shorter vehicle trips and the use of public transit would also be supported by the future redevelopment of this site. All these better addresses the policies for transportation mobility and connectivity.

#### Financial Health and Economic Vitality

This change immediately supports the growth of what is now a small home-based business and provides for future redevelopment opportunities that would not only support the community with services, but also provide employment opportunities and an increased tax base. The change in zoning would allow the expansion of employees by 5 - 10 more Clark County residents within a year of the change. This change better addresses the policies for Financial Health and Economic Vitality of the community.

#### A Safe and Prepared Community

SE 1st St. corridor is a recently improved corridor to a standard that is more consistent with commercial rather than residential use with street lighting, sidewalks, and other transportation infrastructure that directly addresses public safety. By promoting an increased intensity of use of this property, the rezone would provide for more lawful activity and more people on the property. By promoting expanded use of an already safe site, the additional activity would deter unlawful behavior by increasing observation and

lawful use. Promoting the economic reuse of this property also provides for longer term preparedness by increasing services available locally and promoting economic vitality in the community.

#### Accountable, Responsive City Government

By requesting the rezone and comprehensive plan amendment, and following the adopted procedures for this process, the proposal supports accountable and responsive government by complying with the policies and processes adopted by that government.

#### An Active and Involved Community

Allowing the expanded commercial use of this property in the short term, while providing for commercial services in the longer term will promote community health and activity on this site, as well as active use of the sidewalks, bike lanes, transportation infrastructure, and bus services that already exist, this promotes the active community lifestyle envisioned by this policy. This proposal also follows the public process established through the Comprehensive Plan Amendment and Rezone process. This provides for community involvement in the decision-making process of the city which further supports this policy.

The following Goals, Objectives and Actions from the Vancouver Strategic Plan are supported better by this request as listed:

*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 connection*

**Response:** The site proposed for commercial designation is within a 20-minute walk of the adjacent residential neighborhood. Although the commercial development of this property would be a smaller scale development due to parcel size and shape, it would support Goal 6. The smaller format commercial development also supports objective 6.1 by providing community services in proximity to a larger residential area. The increase in multifamily housing across the street at First Street Apartments/ Oliveen Apartments includes a 124-unit apartment on land zoned as General Commercial (CG) along with ground floor retail services. Oak Tree Station is also proposed in the NE corner of NW Frieberg Strunk St. and NW Lake Road/ SE 1<sup>st</sup> St. That approximately 4-acre site is proposed to house a food vendor complex to serve nearby employment and residential uses. Allowing this site to develop into a CC (Community commercial node along SE 1<sup>st</sup> St, in close proximity to other commercial and residential neighborhoods directly supports the locational criteria in VMC 20.430.025 by providing a transition from the GC zoned property to the north and the residential zoned property to the south, enhancing livability and community connection as is defined in VMC 20.430.025(C.)(1.-5.).

*GOAL 8: Strengthen commercial, retail and community districts throughout the city*

**Response:** By providing an additional 2 acres of commercial property with signalized access to SE 1<sup>st</sup> St. in the vicinity of other mixed use and commercial developments, that commercial node will be enhanced. This node is within walking distance to the public school and is within a biking distance from nearby employers, including a new business park development on the north side of Lake Rd. (SE 1<sup>st</sup> St.) ¼ mile to the east and Wafertech, as well as union high school across the street. Providing commercial land in close proximity to existing employment and residential neighborhoods would strengthen this commercial node.

*GOAL 9: Build the strongest, most resilient economy in the region*

*OBJECTIVE 9.1 Create infrastructure and policies that support job creation*

**Response: The infrastructure for the commercial development already exists and has been completed. This policy change to alter the comprehensive plan and zoning for the subject property would directly support Objective 9.1.**

*OBJECTIVE 9.1.5 Facilitate creation of a small business incubator to provide business start-up capacity*

**Response: The applicant has been growing a small homes-based business in the residence on parcel #177468000 (Northern parcel) and is looking to expand this business by vacating the residential use of the property and converting the residence to an office for exclusive use by the business. The change in zoning would allow the expansion of employees by 5 - 10 more Clark County residents within a year of the change. This proposed comprehensive plan and zoning change would directly support Objective 9.1.5.**

*OBJECTIVE 9.1.6 Develop a menu of incentives to support the development and growth of small businesses to retain and grow local jobs*

**Response: In the short term, this change in zoning supports a locally based, woman owned, small business growth and expansion by allowing the natural expansion of a commercial use that started as a home-based business to grow in a financially feasible way.**

**Longer term, the property may redevelop to include other commercial uses that would meet the neighborhood needs for commercial services depending on demand. The size of this property is of a scale to provide smaller format commercial space with uses that would serve the surrounding neighborhoods and school.**

**By immediately supporting the expansion of a small home-based business and providing longer term commercially viable property in a location already provided with commercially sized utilities and transportation access on a major arterial, this furthers the public interest in both the short and long term. This requested change directly supports Objective 9.1.6**

*Table in Appendix "A" summarizing the responses to the surveys completed while developing the Strategic Plan*

**Appendix "A": What do you think the community is missing?**

**Response: Amenities was the second highest response, Economic development was 4<sup>th</sup> and housing was 5<sup>th</sup> with 10% of respondents choosing housing. Clearly this site better addresses the needs of the community by providing amenities and economic development opportunities, which are valued higher than the need for additional housing.**

**The public opinion data for the Vancouver Strategic Plan shows the community values Employment and Economic Development higher and places a greater need on these elements than on residential apartment development. This supports the request for a CC designation.**

[Policies from the Vancouver Comprehensive Plan 2011-2030 are addressed below:](#)

[Chapter 1, Community Development](#)

[Chapter 1- Community Development](#)

**The proposal to provide medium scale commercial services on this parcel in the long term would facilitate connected and walkable neighborhoods by providing commercial services to surrounding residential neighborhoods and Union High School in an area already provided with sidewalks and**



bike lanes along SE 1<sup>st</sup> St. This change better supports Community Development Policies CD-2-CD-7, CD-9 and 10, CD12-14, CD16 and 17.

Table 1-5, which includes zoning descriptions says:

*Commercial and Mixed Use-- CC Community Medium scale commercial uses and services, typically serving more than one neighborhood. Designated areas are typically between 2 and 10 acres in size, located near collector or arterial street intersections Commercial.*

- The property is greater than 2 acres, has access directly onto a major arterial, has abutting residential uses, is in an area where parcels are generally small or shallow and is bordered by lower density residential areas.
- The site has a signalized access that is more than adequate for commercial access to this site. This can be demonstrated through a transportation analysis in future application materials if requested by City Staff.
- The site is in an area where future requested conversions could be limited to no more than 10 acres.
- Although the site is separated from the Commercial and public facilities across the street, the existing signalized intersection serving this site would allow for safe pedestrian access across the physical edge of SE 1<sup>st</sup>. SE 1<sup>st</sup> St. now exists at a scale and configuration that is busier than appropriate for single family homes.
- The property at the NE corner of SE 1st and Friburg-Strunk St. was just announced as a new food truck complex, they are expecting it to be open by next Spring

Because the intended use conforms with the CC zone and the parcels generally meet the CC characteristics, CC is the requested zone with a Commercial Comprehensive Plan Designation.

*Urban Higher Density R-18, R-22. Predominantly apartments and condominiums, with some allowance for R-30, R-35, MX attached housing (such as duplexes, townhouses, and small-lot single family homes) and mixed use*

**R-18 locational criteria include:**

- *Areas occupied by a substantial amount of multifamily development, but where factors such as narrow streets, on-street parking congestion, local traffic congestion, lack of alleys and irregular street patterns restrict local access and circulation and make a lower intensity of development desirable.*

**This site does not meet this locational criterion**

**R-22 locational Criteria include:**

- *Areas already developed predominantly to the permitted R-22 density and where R-22 scale is well established.*
- *Areas well served by public transit and having direct access to arterials, such that vehicular traffic is not required to that pass through lower density residential zones; street widths must be sufficient to allow for two (2) way traffic and on-street parking in accordance with City street standards.*

**This site is not in an area already developed predominantly to R-22 densities and is not currently served by public transit. This site does not meet these locational criteria.**

### **R-30 locational criteria**

- *Areas that are already developed predominantly to the permitted R-30 density, or areas that are within an urban center, or identified in an adopted sub-area plan as appropriate for higher density multifamily housing.*
- *Areas that are served by major arterials, where transit service is good to excellent, and where street capacity could absorb the traffic generated by higher density development.*  
**This site is not within an area already developed to the permitted R-30 densities and is not within an urban center or area designated in an adopted sub-area plan. There is also no transit service to the site. This site does not meet these locational criteria.**

### **R-35 locational criteria**

- *Areas that are developed predominantly to the intensity permitted by the R-35 zone, or areas located within an urban center, or defined in a subarea plan adopted by the City as appropriate for higher density multi-family housing.*
- *Areas that are served by major arterials and where transit service is good to excellent and street capacity could absorb the traffic generated by high density development.*  
**This site is not within an area already developed to the permitted R-35 densities and is not within an urban center or area designated in an adopted sub-area plan. There is also no transit service to the site. This site does not meet these locational criteria.**

**Because the locational criteria are met for the CC designation and not met for the criteria above for the multifamily designations, this property should be designated as CC.**

### **Applicable Policies**

*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 applicant is requesting a CC designation of the site to allow more intense use of the site as a commercial use. In the short term, redesignation of this site would support the growth of a small home-based business to expand operations on the site and eliminate the residential uses. In the future, the CC zone allows for even more intense use of the site for commercial and upper floor residential uses, providing an opportunity to meet market demands for both commercial and mixed-use residential uses. Because the re-designation of this site supports both an intensified commercial and residential use in the future, the land supply is better supported by this change.**

*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 redesignation of this site to a CC zone will encourage efficient development by better utilizing existing water, sewer, and transportation infrastructure on the site. The CC zone allows for Commercial uses as well as upper floor residential uses. Although there are no mixing**



requirements for uses in a single building mixed use development, a 4-story structure in the CC zone could provide an additional 16 dwelling units with future redevelopment meeting the goal of at least 8 dwelling units per acre. The redesignation of this property to Commercial / Mixed Use and CC zoning would encourage efficient use of existing infrastructure in an area well served by facilities, particularly transportation services. Because the site is not currently served by transit, a higher density residential designation is less appropriate.

*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 were designed to be compatible with surrounding uses.*

**Response:** Because of the value of the existing residential development on the site, it is unlikely that this site would develop at an R-18 or R-22 density because the existing assessed value exceeds the threshold for underutilized property. Allowing the conversion of this property to CC allows the expansion of the existing business into a commercial standalone use providing a path for redevelopment and future infill of the site. The land values for commercial property continually outpace those of residential land in the City of Vancouver. The existing expansion and continued value of commercial property will facilitate infill. Keeping the zoning the same or allowing the higher density residential development would not provide a pathway for intensified use of the existing commercial home-based business and would not be economically feasible. To provide for a compatible transition to a higher density, which could include higher density housing in future redevelopment, the CC zone is needed to allow expansion of the commercial use.

*CD-4 Urban centers and corridors Achieve the full potential of existing and emerging urban activity centers and the corridors that connect them, by:*

- (a) Promoting or reinforcing a unique identity or function for individual centers and corridors*
  - (b) Planning for a compact urban form with an appropriate mix of uses*
  - (c) Working with stakeholders to develop flexible standards to implement the vision for that center or corridor*
  - (d) Encouraging innovative, attractive private development that efficiently uses available land and resources*
  - (e) Establishing connectivity within each center and to other areas to provide accessibility*
  - (f) Providing a range of transportation options*
  - (g) Investing in public facilities and amenities to enhance livability*
- CD-5 Mixed-use development Facilitate development that combines multiple uses in single buildings or integrated sites.*

**Response:** Although the site is not within an urban center or designated corridor, these criteria all support the developing commercial and mixed-use node that is occurring in the immediate vicinity of this site. With the development of the 8-acre mixed use site to the north, with a hotel, apartments and space for commercial uses, and the planned development of the food vendor use on the 4 acres to the NE, this site would also promote the unique character of the local commercial node by contributing to those changes being constructed on the other two corners of the intersection. All of this supports the compact urban form with a diverse mix of uses that both support the region and the redevelopment of urbanized property in this node. The conversion of this property is also likely to encourage neighboring properties to consider similar rezone requests in future cycles, which could further emphasize this node of commercial and mixed-use

**development. There are existing utilities on the site that support a higher use of this property that resulted from investments made in public facilities. The approach to allowing the incremental redevelopment of this site, first from a home-based business to a stand-alone business, then opening the possibilities for additional commercial and residential densities on this property is also an innovative and attractive way to encourage private development and women owned small business growth.**

*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: The conversion of this property from lower density residential to a Commercial/ Mixed use comprehensive plan designation supports this policy by providing additional jobs and commercial services in proximity to a larger single family residential neighborhood, with some newer multi-family housing and additional commercial areas directly north of the site. This area includes sidewalks and provisions for access by bicycle and automobile. Pedestrian connections into the surrounding neighborhoods are supported by sidewalks along SE 1<sup>st</sup> St, and a signalized intersection with pedestrian crossing providing access between the other commercial, residential, and school uses to the north.**

*CD-7 Human scale, accessible development, and interaction Facilitate development that is human scale and encourages pedestrian use and human interaction.*

**Response: Because this site is a 2-acre site, the redevelopment would likely be a smaller scale than what exists to the north. The pedestrian access to the site is provided by existing sidewalks and crosswalks at the intersection on the property frontage. Redevelopment through the zoning site plan review will ensure onsite development meets this policy when the site is redeveloped, but the regional infrastructure to support this is already in place.**

*CD-9 Compatible uses Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.*

**Response: Although this site abuts a medium density residential neighborhood, there are no connections into that neighborhood directly. Screening and buffering would also be established with redevelopment to minimize any incompatibility with future redevelopment. Adverse impacts from the redesignation of this site are minimized because of the lack of any immediate connection to the neighborhood to the south and would be further mitigated to meet land use compatibility standards through future site plan review processes with any redevelopment activity. Sites to the east and west that remain residential in use would also be protected through the application of screening and landscaping through a future site plan review process.**

*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: By placing additional commercial land withing an existing intersection developing with commercial uses on the other three corners, this proposal responds directly to this policy by locating complementary uses in proximity to those already under development. Providing**

**additional commercial uses in proximity to the existing neighborhoods along a major transportation corridor also provides additional services and employment in close proximity to other similar uses and the users of those services.**

*CD-11 Archaeological and historic resources Protect and preserve cultural, historic and archaeological resources. Promote preservation, restoration, rehabilitation, and reuse of historically or architecturally significant older buildings. Continually increase knowledge and awareness of historic and archaeological resources, further developing the city's identity and allure. Work with Clark County to maintain state Certified Local Government Status.*

**Response: The site is in a higher probability archaeological area according to the City of Vancouver Predictive model. Before any ground disturbing activities related to redevelopment could occur, a predetermination survey and review by State and local archaeologists would occur to ensure that any significant archaeological or historic resources on the site were identified and preserved.**

*CD-12 Integrated area planning Promote cohesive, integrated planning of areas and sites through use of subarea planning, master planning, and planned developments, or other methods.*

**Response: The conversion of this site to a higher density employment use reflects the current development patterns to the NE and NW of the site and better reflects the property's location on a major arterial roadway with no direct link to the single-family residences to the south. The conversion of this property will support cohesive uses as this area continues to develop to utilize the infrastructure in place to serve higher intensity uses.**

*CD-14 Connected, and integrated communities Facilitate the development of complete neighborhoods and subareas containing stores, restaurants, parks and public facilities, and other amenities used by local residents.*

**Response: the subject site is proposed to be a commercial use to provide additional employment and commercial services to this developing node that already is developing to include a public school, apartments, commercial uses, a hotel, and a food village type development. These services will support surrounding residential uses connected by public sidewalks and pedestrian crosswalks at the signalized intersection on this site. This policy is directly supported by this request.**

## Chapter 2, Economic Development

**Because this change allows a more efficient use of existing utilities and infrastructure and supports the continued growth of a small local business, the policies in Chapter 2, Economic Development, are all better served by this change, specifically EC-8 which focuses on supporting the growth of new and expanding small businesses.**

### Policies

**EC-1 Jobs-housing balance Increase the ratio of jobs to residents in the City of Vancouver and the region.**

**Response: This proposal directly addresses this policy by providing additional lands for employment uses. This will help to increase the ratio of jobs to residents in the City of Vancouver and the region.**

EC-3 Public revenue enhancement Promote development that enhances revenue generation for public services.

**Response: Because this site is already served with public infrastructure and provides for an increase in tax base through increased land values and property taxes with the possibility of increased sales taxes in the future, this policy is directly supported by this proposal. There are no additional capital expenses to the city and a potential to enhance public and private revenue from this site as it transitions from residential to commercial.**

EC-5 No net loss of employment capacity Restrict zone changes or legislative land use approvals that would lessen long-term capacity for high-wage employment unless accompanied by other changes within the same review cycle that would compensate for the lost capacity or unless the proposed change would promote the long-term economic health of the city.

**Response: The conversion of this property to an employment zone would help to mitigate other conversions away from employment. This policy is directly supported by this request as it increases employment land in the city.**

EC-6 Efficient use of employment land Maximize utilization of land designated for employment through more intensive new building construction and redevelopment and intensification of existing sites

**Response: this proposal directly supports the efficient use of the site to continue to support a growing business. Future redevelopment would also support expansion of the commercial employment and services on a site with adequate transportation, water, and sewer infrastructure to support continued growth. In addition to the direct impacts furthering this policy, the conversion of the site would also encourage neighboring landowners to consider similar rezones of their properties in the future, particularly to the west of the site. This initial conversion and future redevelopment options would incentivize others to consider similar opportunities in the future.**

EC-8 Small business support. Support the growth of new and expanding small business through efficient permitting, incentives, and communication.

**Response: The proposed conversion of the property to a commercial zone directly supports the growth of an existing home-based business into a stand-alone business. This directly supports the expansion of a business on this property through effective permitting. Allowing the zoning to change allows efficient use of existing resources and structures to remodel and support business growth and expansion.**

## Chapter 3, Housing

**This change also supports the housing element in chapter 3. Although this change would eliminate two residential structures, it would enhance the surrounding residential uses and promote active and livable neighborhoods promoting specifically H-5, housing near services and centers. Because of the major arterial and the lack of integration into the surrounding residential neighborhoods, and the surrounding development patterns, this property is not an ideal residential property. It is better suited as a commercial property where it can serve the needs of the surrounding neighborhoods.**

### Policies

H-3 Housing improvement Encourage preservation, rehabilitation, and redevelopment of existing housing stock. Support neighborhood-based improvement efforts.

**Response: This site is no longer a site where low density residential uses are preferred. Access to the signalized intersection on a major transportation route with no access directly to residential neighborhoods to the south have provided an opportunity to transition these residential uses to a commercial use that better utilizes the existing infrastructure and improvements both in the short term conversion of the home based business and in the longer term opportunities created by the rezone of the property to a commercial zone that would also allow residential use to support market demand in a mixed use building. Supporting the transition of this property to a higher use allows the surrounding neighborhoods to maintain their character and have additional access to commercial services and employment.**

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

**Response: This proposal to allow commercial growth and development on this parcel will provide for employment and commercial services to support the surrounding residential areas. The site is located on a major transportation arterial which provides access for pedestrian and bicycle as well as automobile access from the mixed-use development to the north and the single-family residential development to the south. Encouraging the gradual transition of this low-density residential site to a more commercial use, while allowing for mixed use residential redevelopment in the future would support an innovative approach in zoning to encourage the transition of properties to the east and west to a higher intensity use.**

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 proposed site is not served by public transit. Redesignation of this site as a higher density residential use would be inconsistent with this policy. Designating this as a commercial zone is more consistent with the comprehensive plan policies for uses.**

## Chapter 4, Environment

**Response: Redevelopment of this property would also promote the policies generally in chapter 4, Environment by allowing the reuse of an already developed property to meet the future needs of**

the community there would be less environmental impact for this property than would be the case with a new greenfield development. Redevelopment of this property would have no adverse impacts on critical areas and would allow shorter vehicle trips- or trips by bike or walking- which would reduce air emissions.

## Chapter 5, Public Services

Public Facilities and services would be better served by this proposal because the commercial use would utilize already existing infrastructure in a region where adequate capacities exist. It could also provide services to the adjacent High School as it redevelops. Making use of existing infrastructure while providing future opportunity to support an existing public facility better addresses chapter 5 than the existing use.

### Policies

*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.*

**Response:** The proposed conversion of this site from Low Density Residential to Community Commercial will allow for a more intense use of the existing urban services already installed to serve the site. The redevelopment of the site will utilize the water, sewer and transportation infrastructure that exists on the site. The commercial uses will not impact schools directly, but if residential mixed use is proposed in future redevelopment, that could impact the local school districts and parks. Police and fire services already exist to this area for urban densities. The 2-acre site conversion will not likely have any significant impact on Police and Fire Fighting services. There are no identified deficiencies in urban services in this area.

*PFS-16 Economic development in order to support the continued economic vitality of Vancouver, major transportation system investments should facilitate freight mobility, job creation, regional competitive position, and revenue growth.*

**Response:** the conversion of this site to a CC zone will allow for the expansion of an existing home-based business on the site to a full commercial based business. This supports job growth and revenue growth through an increased assessment value for the land, and potential sales tax revenues in the future with redevelopment.

*PFS-17 Vehicle miles traveled Use transportation and land use measures to maintain or reduce single occupant motor vehicle miles traveled per capita to increase system efficiency and lower overall environmental impacts*

**Response:** Allowing commercial use of this property will provide employment and commercial services in proximity to a single-family residential neighborhood. By providing services and employment in closer proximity to residential uses, there is a potential reduction in some of the vehicle miles traveled with the redevelopment of this site.



*PFS-22 Sewer service Provide sewers and sewer service to every Vancouver home, business, and industry at an affordable and equitable cost. Discourage development and use of on-site sewage treatment systems. Encourage existing development using septic systems to connect to public sewer as soon as available. Ensure that the infrastructure to support sewer service is in place prior to or at the time of development*

**Response: the site is currently served by public sewer and has an existing sanitary sewer across the property with potential to service future**

*PFS-23 Water service Provide safe, clean, quality drinking water to every Vancouver home, business, and industry. Discourage development and use of private drinking water wells. Provide water pressures and volumes necessary to support fire suppression hydrants and sprinkler systems. Ensure that the infrastructure to support water service is in place prior to or at the time of development*

**Response: The site is currently served by public water. This service is in place and has services stubbed out at several locations on the property for future connection.**

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: Although not in a designated or mapped corridor in the Vancouver Comprehensive Plan, approval of this proposal would encourage more intensive use and future development along the SE 1st St. corridor, which is a major arterial transportation corridor (which is not suitable for single family detached residential use). This proposal would also support the growth of distinct neighborhoods by providing a commercial node within an existing residential community. Re-use of this previously developed site also reduces urban sprawl by providing for a more intense use of already developed property.**

- 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: This proposed change would provide a commercial site adjacent to an existing residential area and public facility across the street. The 4-way signalized intersection with sidewalks, crosswalks, and vehicle circulation already integrates the site into the transportation system and allows for connectivity with neighboring properties and uses. This functional integration of the site promotes expanded commercial use, which could in the future provide shopping or commercial uses and would immediately support the expansion of a locally based, woman owned, small business providing additional employment.**

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

**Response:** This 2-acre site would support small to medium scale commercial uses in the long term. It is oriented along a major transportation corridor connecting Vancouver and Camas. Commercial use of this property is more compatible with the existing transportation corridor than is residential use, especially with the benefit of a signalized 4-way intersection at the site driveway. Existing sidewalks along SE 1<sup>st</sup>. St provide for pedestrian connectivity as does the signalized intersection with crosswalks. Future commercial use of the property would be developed under Vancouver Codes which require appropriate landscaping, screening, and buffering from neighboring uses.

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

**Response:** By allowing the redevelopment of this previously developed site, development is contained in an area without any designated critical areas or significant natural or historic features.

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

**Response:** The proposed rezone is for a property along SE 1<sup>st</sup> St. an improved major arterial roadway. There are water and sewer mains through the site, with water taps already installed for future commercial use. There are adequate water, sewer and transportation services already existing to this site.

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

**Response:** In the immediate term, the rezoning of this property will allow the growth of a small home-based business into a commercial business. This will increase the employment opportunities on this site by allowing the conversion of the existing residence to office space. This will broaden the Vancouver economy and support locally based, woman owned, small business growth. In the long term, the rezone would promote commercial development opportunities on the site which would also support employment growth and opportunities.

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

**Response:** Providing a commercial node along a major transportation corridor already connected to neighboring residences and school with sidewalks, signalized crosswalks, and bike lanes enhances the opportunities for this neighborhood and surrounding community by providing opportunities for employment, and eventually commercial services.

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

**Response:** The proposal has no impact on affordable housing.

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 immediate use of the property would be the conversion of the residential home-based business to a commercial based business in the existing residence. Because of the limited size of this property, the uses allowed in the CC zoning would be limited as not all those building programs would fit in the 2 acres proposed for rezone. There is no plan for future development, although with the zone change it is likely that this parcel would redevelop sometime in the future.

**Additional discussion on how this should be presented in the formal would be appreciated in the pre-application conference.**

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.*

**Response: This request is submitted through the annual review process. This request will be reviewed concurrently and collectively with other requests so that the cumulative impacts can be considered.**

**Describe a) the type and intensity of future development that is planned or might occur on the proposal site, b) when such development might occur, c) whether development it is likely to be proposed by the current rezone proponent, or another party**

Parcel #177485000 (Southern parcel) currently has a separate single-family residence and a shop building which would remain in the short term but may be converted or demolished for a future commercial use.

**Describe how the proposed amendment furthers the overall public interest**

June 3, 2022

Project #: 27347

Eric Hahn, PE  
City of Vancouver Public Works  
4500 SE Columbia Way  
Vancouver, WA 97668-1995

***RE: Schwartz First LLC Residential to Commercial Rezone Transportation Impacts***

Dear Eric,

Schwartz First, LLC is proposing Comprehensive Plan Map and Zoning Map Amendments to rezone two Parcels (177468000 and 177485000), located on the southwest corner of SE 1<sup>st</sup> Street/NW Lake Road/NW Friberg-Strunk Street intersection. This letter provides a comparison of the site trip generation potential under the existing residential and proposed commercial zoning. As documented herein, the rezoning would result in greater trip-making potential. However, no further traffic impact analysis should be needed to support the proposed zone change at this time given that a traffic impact study will likely be required to address the City's transportation concurrency review criteria at the time of a future site development application.

## REZONE PROPOSAL

The proposal would change the current Comprehensive Plan designation from Residential to Commercial, and the current zoning designation from Lower-Density Residential District (R-2) to Community Commercial (CC). The total acreage of the parcels is approximately 2 acres.

## TRIP GENERATION COMPARISON

Trip estimates assuming site development under the existing and proposed zoning were calculated using average trip rates obtained from the *Trip Generation Manual, 11<sup>th</sup> Edition* (Reference 1). Per City practice, average trip rates were used for all daily trip estimates. Site trip generation under respective reasonable "worst-case" development scenarios was compared to determine the net difference in daily and peak hour trips as described below.

### ***Existing Zoning Trip Generation***

A reasonable "worst-case" development scenario under the existing residential zoning was identified based on a review of the City of Vancouver land use criteria and development standards. From this criteria, it was determined that the site could theoretically accommodate up to four single-family residential homes. Table 1 summarizes the trip generation profile for four single-family homes. All trip

estimates were prepared using average rates recognizing the fitted equations do not return to zero and thus are not appropriate for the small number of homes (four).

**Proposed Zoning Trip Generation**

A reasonable “worst-case” development scenario under the proposed zoning was identified based on a review of the City of Vancouver land use criteria for Community Commercial (CC) zoning. Three types of permitted land uses were determined to generate the highest levels of trip making including a High Turn Over Sit-Down Restaurant at a size of approximately 7,000 square feet, a General Office Building covering approximately 40% of the total site area (34,800 square feet), and a similarly sized 34,800 square feet Medical-Dental Office Building. A comparison of these three land uses is shown in Table 1. Of these three permitted uses, a 34,800 square feet Medical-Dental Office Building was found to generate the highest number of daily and peak hour trips, and therefore represents a reasonable “worst-case” land-use scenario under the proposed CC zoning.

**Table 1. Trip Generation Comparison**

Land Use	ITE Code	Size	Weekday Daily Trips	Weekday AM Peak Hour Trips			Weekday PM Peak Hour Trips		
				Entry	Exit	Total	Entry	Exit	Total
Existing Zoning Site Development Potential									
Single Family Detached Housing	210	4 Units	38	1	2	3	2	2	4
Proposed Zoning Site Development Potential									
High Turn Over Sit-Down Restaurant <sup>1</sup>	932	7,000 sq. ft.	750	37	30	67	38	25	63
General Office Building <sup>2</sup>	710	34,800 sq. ft.	377	47	6	53	8	42	50
Medical-Dental Office Building <sup>2</sup>	720	34,800 sq. ft.	1,253	73	20	93	41	97	138
<b>Difference = Proposed - Existing</b>			<b>+1,215</b>	<b>+72</b>	<b>+18</b>	<b>+90</b>	<b>+39</b>	<b>+95</b>	<b>+134</b>

<sup>1</sup>Average peak hour trip rates assumed; no fitted equations provided. Note, no pass-by trips applied.

<sup>2</sup> Fitted equation peak hour trip rates assumed per *Trip Generation Manual, 11<sup>th</sup> Edition* guidance

Comparing the two reasonable maximum development scenarios, development under the proposed Community Commercial zoning is estimated to generate 90 more trips occurring during the AM peak hour and 134 more trips occurring during the PM peak hour.

**NEXT STEPS**

Based on the analysis presented herein, an increase in commuter peak hour vehicle trips associated with the proposed rezoning can be expected if the property is redeveloped to its reasonable worst-case potential and compared to the current zoning trip potential. However, given that a formal traffic impact study will likely be required to address the City’s transportation concurrency review criteria at the time of a future site development application, no further traffic impact analysis should be needed to support the proposed zone change at this time.

Please contact us if you have questions or need additional information.

Sincerely,  
KITTELSON & ASSOCIATES, INC.



Matt Hughart, AICP  
Principal Planner



Sreelekha Gudimella  
Technician I



Chris Brehmer, PE  
Senior Principal Engineer

## REFERENCES

1. Institute of Transportation Engineers. *Trip Generation Manual, 11<sup>th</sup> Edition*. 2021.



Chris Brehmer

Digitally signed by Chris Brehmer  
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Date: 2022.06.03 10:18:12-0700