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CLARK COUNTY  
WASHINGTON

## COMMUNITY PLANNING

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### PLANNING COMMISSION RECOMMENDATION

TO: County Council

FROM: Ron Barca, Planning Commission Vice-Chair

PREPARED BY: Jose Alvarez, Planner III

DATE: October 13, 2017

SUBJECT: CPZ2017-00020 Mill Plain

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### **PLANNING COMMISSION RECOMMENDATION**

The Planning Commission heard this matter on June 15, 2017 and voted 6 to 0 to approve the proposed action to amend the comprehensive plan and zoning from Urban Low (R1-6) to Commercial with Community Commercial zoning.

### **PROPOSED ACTION**

The applicant requests the comprehensive plan and zoning map be amended from Urban Low Residential with (R1-6) zoning to Commercial with Community Commercial zoning.

### **BACKGROUND**

The single family residence on 35,719 sq. ft. was not included in the 34 lot development immediately west and north of the site. There were no provisions made in that subdivision to connect to the site in the event of future development.

The parcel south of the site is zoned commercial and is located at the northwest corner of the intersection of NE 99<sup>th</sup> St and NE 117<sup>th</sup> Ave. Right-of-way acquisition at this intersection has reduced the size and commercial viability of this parcel. The applicant is proposing to amend the comp plan and zoning on the site to combine with the southern parcel for a more viable future commercial development given the limited access anticipated on SR-503.

### **GENERAL INFORMATION:**

Parcel Numbers: 200124000

Location: 10008 NE 117<sup>th</sup> Ave

Area: 35,719 sq. ft.

Owner(s): Mill Plain, LLC

Existing land use:

Site: Single Family Residence

North: Single Family Residential

South: Vacant Commercial Lot  
East: Commercial property with existing residence and dental office  
West: Single Family Residential

### **SUMMARY OF COMMENTS RECEIVED**

No comments received.

### **APPLICABLE CRITERIA, EVALUATION AND FINDINGS**

#### **CRITERIA FOR ALL MAP CHANGES**

***A. The proponent shall demonstrate that the proposed amendment is consistent with the Growth Management Act (GMA) and requirements, the countywide planning policies, the Community Framework Plan, Clark County 20-Year Comprehensive Plan, and other related plans.***

#### **Growth Management Act (GMA) Goals**

The GMA goals set the general direction for the county in adopting its framework plan and comprehensive plan policies. The GMA goals that apply to the proposed action are Goal 1, Goal 2, Goal 3, and Goal 5.

- (1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.*
- (2) Reduce Sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.*
- (3) Transportation. Encourage efficient, multi-modal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.*
- (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 disadvantaged persons and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services and public facilities.*

**Finding:** The proposed amendment is within the urban areas and would be served by public facilities and services and developed at urban densities. The proposal would allow for commercial uses providing economic opportunities. The proposed amendment would not encourage sprawling, low-density development. The site is along a C-Tran route and a State highway with limited access. Therefore, the proposed amendment is consistent with the applicable GMA Goals.

**Community Framework Plan and Countywide Planning Policies.** The Community Framework Plan encourages growth in centers, urban and rural, with each center separate and distinct from the others. The centers are oriented and developed around neighborhoods to allow residents to easily move through and to feel comfortable within areas that create a distinct sense of place and community.

Policies applicable to this proposal include the following:

*9.1.0 Encourage a balance of job and housing opportunities in each urban center. Provide sufficient land for business as well as homes. Businesses within the community should provide a range of job types for the community's residents.*

*9.1.3 Encourage businesses which pay a family wage to locate in Clark County.*

*10.1.3 Establish development standards to encourage mixed use developments in urban and rural centers, while providing buffering for each use from the adverse effects of the other.*

County-wide Planning Policy

*9.1.2 The county and cities will demonstrate their commitment to the retention of those enterprises, which have created the economic base of the county and promote their continued growth in a predictable environment, which encourages investment and job growth.*

*9.1.3 The county and cities will encourage long-term growth of businesses of all sizes, because economic diversification and stratification are important factors in overall job growth for the county and its cities.*

Finding: The proposed plan amendment and rezoning does encourage a balance of jobs and housing opportunities. The plan amendment would provide the opportunity for family wage jobs though there is no guarantee of the type of future commercial development. The lack of connectivity to the residential developments to the north and west is likely detrimental to residential development though it may act as a buffer to future commercial development.

### **Clark County 20 Year Comprehensive Plan**

The Clark County Comprehensive Plan contains many policies that guide urban form and efficient land use patterns. The most relevant goals and policies applicable to this application are as follows:

*Goal: Adopt Urban Growth Area (UGA) boundaries to efficiently accommodate residential and employment increases projected within the boundaries over the next 20 years.*

*1.4.1 Interrelated uses should generally be encouraged to locate in close proximity of each other:*

- Frequently used commercial activities and the residential areas they serve should be allowed and encouraged to locate near to one another.*

- *Schools or other frequently used public facilities and the residential areas they serve should be allowed and encouraged to locate near to one another.*
- *Commercial, industrial or other employers and the residential areas they serve should be allowed and encouraged to locate near to one another, as long as negative impacts from non-residential used on the residential areas are mitigated.*

*1.4.2 Encourage mixed-use developments, which provide opportunities to combine residential, commercial or other uses within individual structures, or within adjacent structures or developments.*

**Finding:** The proposed amendment would provide the potential for commercial and residential activities to be located near one another furthering the goals state above. However, the lack of connectivity and foresight shown by the existing residential development to the north and west should serve as a reminder that proximity without connectivity does not provide efficient access to the commercial services, be it as a pedestrian or driver.

**Goal:** *Provide commercial and industrial employment opportunities to meet the needs of Clark County citizens.*

*9.2.1 Encourage long-term business investments that generate net fiscal benefits to the region, protect environmental quality and are consistent with the objective of higher wage jobs for Clark County residents.*

*9.2.3 Promote a diverse economic base, providing economic opportunity for all residents.*

*9.2.4 Provide priority assistance to employers who pay a family wage.*

**Finding:** The proposed amendment could encourage business investment and potential employment by creating a more viable commercial site. The location along SR-503 and its shared access with the commercial property to the south would be an efficient use of the road network.

**Goal:** *Provide contextually-appropriate commercial sites adequate to meet a diversity of needs for retail, service and institutional development in Clark County.*

*9.4.2 Locate convenience-oriented retail and service developments adjacent to residential neighborhoods; encourage small-scale neighborhood commercial uses directly within residential areas.*

*9.4.3 Encourage commercial and mixed-use developments located on current or planned transit corridors; encourage transit-oriented site planning and design.*

**Finding:** The proposed amendment would provide the potential for commercial and residential activities to be located near one another furthering the goals stated above. The site is served by transit along SR-503 and NE 99<sup>th</sup> St.

**Conclusion:** Criteria A has been met.

- B. The proponent shall demonstrate that the designation is in conformance with the appropriate locational criteria identified in the Clark County Comprehensive Plan and the purpose statement of the zoning district. (See 40.560.010G(2) and 40.560.020H(2).)**

*Community Commercial (CC)*

Commercial center areas provide services to several neighborhoods in urban areas of Clark County and is implemented with the Community Commercial zone. New community commercial areas should generally be between five and 20 acres in size, spaced two to four miles from similar uses or zones, serve a population of 10,000 to 20,000, locate at minor or major arterial crossroads, serving a primary trade area between 2 to 4 miles.

40.230.010 Commercial Districts (NC, CC, GG)

A. Purpose.

1. *Neighborhood Commercial (NC) District. These commercial areas of limited size are intended to provide for the convenience shopping needs of the immediate neighborhood. This district is permitted under the neighborhood commercial and mixed use comprehensive plan designations.*
2. *Community Commercial (CC) District. These commercial areas are intended to provide for the regular shopping and service needs for several adjacent neighborhoods. This district is only permitted in areas designated as community commercial or mixed use on the comprehensive plan.*
3. *General Commercial (GC) District. These commercial areas provide a full range of goods and services necessary to serve large areas of the county and the traveling public. This district is limited to the general commercial comprehensive plan designation.*

Finding: The proposed comp plan amendment would modestly expand an existing area of community commercial therefore the proposed amendment is in conformance with both the locational criteria in the comp plan and the purpose of the proposed zoning districts.

Conclusion: Criteria B has been met.

- C. The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity. (See 40.560.010G(3).)**

Finding: The proposed map amendment is suitable for the proposed designation. The applicant submitted a market analysis indicating the need for more commercial land. As mentioned above and in the market analysis the proposed change will have a very small impact on the inventory of land to provide for planned growth. The Vacant Buildable Land Model considers the site built due to the existing residence, however the model anticipates that 10% of land considered built will redevelop.

Conclusion: The site is suitable for the requested Commercial (C) designation and Community Commercial zoning. Criteria C has been met.

- D. The plan map amendment either; (a) responds to a substantial change in conditions applicable to the area within which the subject property lies; (b) better implements applicable comprehensive plan policies than the current map designation; or (c) corrects an obvious mapping error. (See 40.560.010G(4) and 40.560.020H(3).)**

Finding: The applicant addresses this requirement in their narrative by stating that the proposed land use amendment (b) better implements applicable comprehensive plan policies than the current map designation. The limited access onto SR-503 and the lack of connection to the developments north and west of the site combined with the relatively small size of the parcel and the opportunity to expand and share access with the commercial designated land to the south are compelling arguments. Staff concurs that the proposed comprehensive plan and zoning designation would better implement the comprehensive plan policies than the current designation.

Conclusion: Criteria D has been met.

- E. Where applicable, the proponent shall demonstrate that the full range of urban public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools. Adequacy of services applies only to the specific change site. (See 40.560.010G(5) and 40.560.020H(4).)**

Finding: The site is in the Vancouver Urban Growth area. It is expected that a full range of urban public facilities and services will be available to serve commercial uses at the site. The site is currently served by public water, public transportation, transportation arterial network (See Transportation Impact Analysis) and sewer is available in SR-503 and is served by Fire District 6.

Conclusion: Criteria E has been met.

## **RECOMMENDATION AND CONCLUSIONS**

Based upon the information and the findings presented in this report and in the supporting documents, the Planning Commission forwards a recommendation of **APPROVAL** to the Board of County Councilors

**RECOMMENDATION SUMMARY**

The following table lists the applicable criteria and summarizes the findings of the staff report and Planning Commission findings for Annual Review Case CPZ2017-00020.

<b>COMPLIANCE WITH APPLICABLE CRITERIA</b>		
	<b>Criteria Met?</b>	
	<b>Staff Report</b>	<b>Planning Commission Findings</b>
<b>Criteria for All Map Changes</b>		
<b>A.</b> Consistency with GMA & Countywide Policies	Yes	Yes
<b>B.</b> Conformance with Location Criteria	Yes	Yes
<b>C.</b> Site Suitability and Lack of Appropriately Designated Alternative Sites	Yes	Yes
<b>D.</b> Amendment Responds to Substantial Change in Conditions, Better Implements Policy, or Corrects Mapping Error	Yes	Yes
<b>E.</b> Adequacy/Timeliness of Public Facilities and Services	Yes	Yes
<b>Recommendation:</b>	<b>Yes</b>	<b>Yes</b>

## **Transportation Impact Analysis**

### **Annual Review Case: CPZ 2017-00020 Mill Plain Com**

#### **Introduction**

This report provides a transportation analysis of the proposed comprehensive plan amendment and zone change. The report identifies the likely localized and general transportation impacts and shows how applicable adopted transportation policies have or have not been met by the applicant's proposal. Subsequent development will need to comply with applicable county development regulations, including standards governing the design of access and those that ensure transportation system concurrency.

#### **Requested Amendment**

The applicant is requesting to amend the Comprehensive Plan designation and zoning for parcel #200124-000. The change would be from a comprehensive plan designation of Urban Low-Density Residential (UL) with R 1-6 zoning. The applicant proposed to change the comprehensive plan designation of Commercial and zoning of CC. The subject site is 35,719 sq. ft. or 0.82 acres and is located on the west side of SR-503, north of NE 99<sup>th</sup> Street and south of NE 119<sup>th</sup> Street.

#### **Summary of Transportation Impact Findings**

The transportation analysis demonstrates that the proposed land use change would not negatively, significantly impact the transportation system. Staff recommends approval of the proposed comprehensive plan amendment and rezone of the subject parcel.

The applicant submitted a traffic impact analysis which concluded the site could generate 396 net new daily trips when rezoned to CC zoning. The current R 1-6 zoning, when this site is fully developed, could generate 48 net new daily trips. Therefore, approval of the rezone to CC zoning would generate 348 more daily trips than the current R 1-6 zoning. .

All of the study area intersections are projected to operate at acceptable levels of service in the 2035 "Existing Zoning Build-Out" and 2035 "Proposed Zoning Build-Out."

#### **Public Comment**

The subject parcel is located adjacent to SR-503, which is a Washington Department of Transportation Facility. The applicant would need to consult with WSDOT regarding access issues during the development review phase of the project. Staff emailed a copy of the traffic study to WSDOT for their comments. Per an email dated May 23, 2017, Jeff Barsness of WSDOT indicated they had no comments regarding this annual review application. Based on other projects in the area, WSDOT will most likely require right-in/right-out access onto NE 117<sup>th</sup> Avenue, as well as, a median will need to be installed.

## **Chapter 5: Transportation**

### **Countywide Planning Policies**

5.0.8 The state, county, MPO/RTPO and local municipalities shall work together to establish a regional transportation system which is planned, balanced and compatible with planned land use densities; these agencies and local municipalities will work together to ensure coordinated transportation and land use planning to achieve adequate mobility and movement of goods and people.

Findings: The proposed amendment is consistent with the applicable Countywide Planning Policies. The proposed land use will significantly increase trips onto NE 117<sup>th</sup> Avenue (SR-503), however, the study area intersections will all operate at the county's accepted level-of-service standards. During the development review process, the applicant will have to coordinate with WSDOT and meet their standards for NE 117<sup>th</sup> Avenue.

### **County 20-Year Plan Policies**

**Goal: Develop a regionally-coordinated transportation system that supports and is consistent with the adopted land use plan.**

5.1.3 Performance standards for the regional arterial system and transit routes shall direct growth to urban centers.

Findings: As previously mentioned, the proposed amendment is consistent with the applicable Countywide Planning Policies. The location of the proposed plan amendment is in the urban area.

**Goal: Optimize and preserve the investment in the transportation system.**

5.3.1 Development projects shall adhere to minimum driveway access spacing standards along arterial and collector streets to preserve the capacity of the transportation system. The county shall also work with Washington State Department of Transportation to ensure that minimum access spacing standards for state highways.

Findings: The subject parcel accesses SR-503, which is a state facility. The Washington Department of Transportation (WSDOT) has been contacted regarding this application for their comments. During the development review stage, the applicant will need to obtain an access permit from WSDOT. The applicant most likely will only have right-in, right-out access onto SR-503, and will be required to install a median onto SR-503 to control access into and out of the subject parcel.

5.3.5 The local street system shall be interconnected to eliminate the need to use collector or arterial street for internal local traffic.

Findings: As previously mentioned, the proposed amendment is consistent with the applicable Countywide Planning Policies. During the development review stage, the applicant will need to address applicable development code regarding street circulation.





File # CP2017-00020, SN 200124000  
 T3N R2E Sec 34  
 Preliminary Land Division

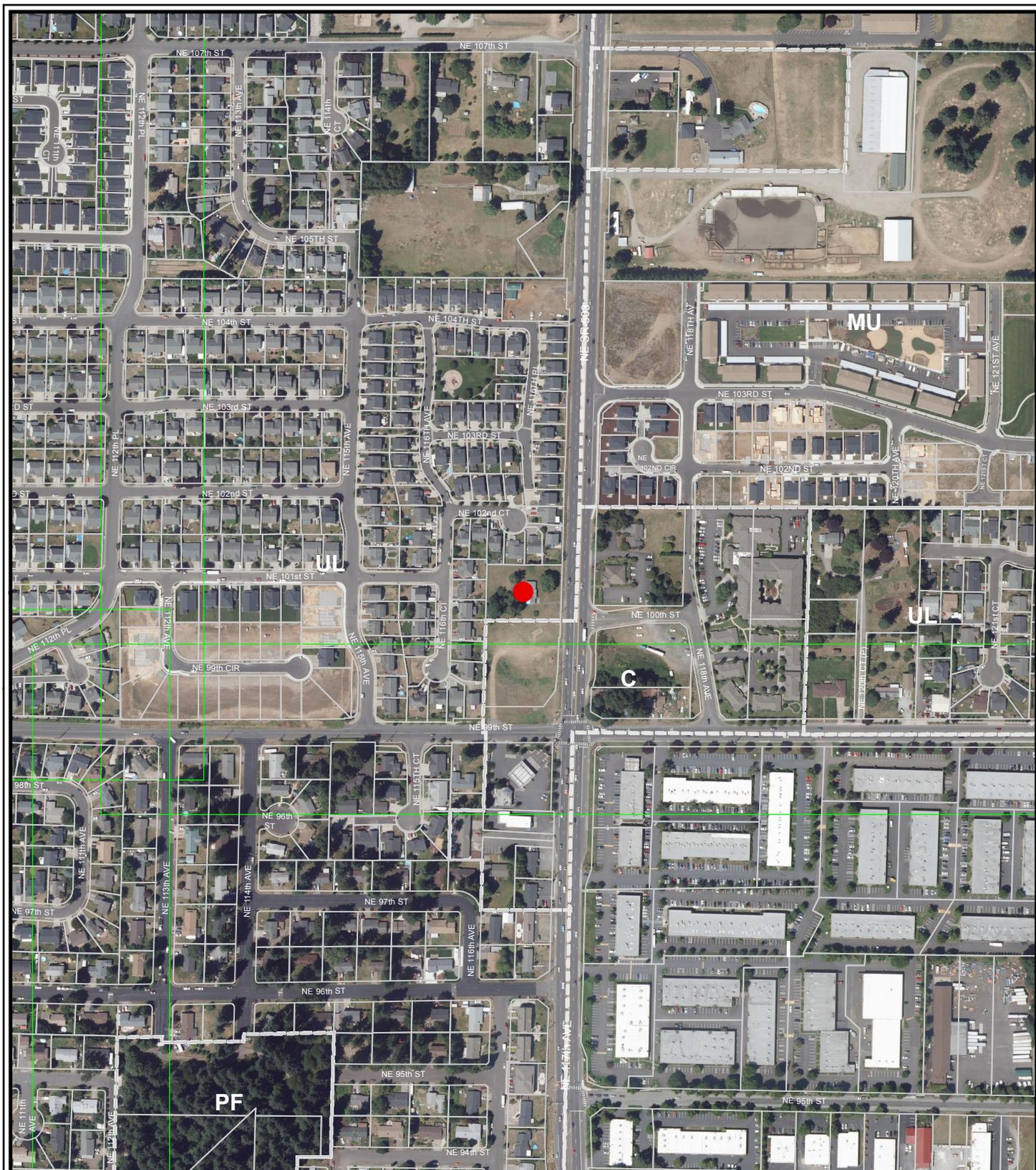
Owner: MILL PLAIN LLC

-  Subject Property
-  Zoning Boundary
-  Mining Combining District
-  Contingent Zoning
-  Urban Holding-10
-  Urban Holding-20



Geographic Information System  
 Printed on: May 24, 2017  
 Project: c:\usr\_proj\xxOrdID178352\_731791\AnnRev1.mxd ()

Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.



File # CPZ2017-00020, SN 200124000  
 T3N R2E Sec 34  
 Preliminary Land Division

Owner: MILL PLAIN LLC

- Subject Property Location
- Comp Plan Boundary
- Mining
- Industrial Reserve
- Columbia River Gorge N.S.A.



Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.

**PUBLIC HEARING ITEMS**, continued

- B. CPZ2017-00020 Mill Plain Commercial:** A proposal to amend the comprehensive plan and zoning map from a designation of Urban Low (R1-6) to Commercial (C-3) on the following parcel: 200124000.

ALVAREZ: The next item is a proposal to amend the comprehensive plan from urban low R1-6 zoning to commercial with community commercial zoning. This is approximately on three-quarters of an acre, 35,000-square feet. The parcel to the south is zoned commercial. It's located at the northwest corner of the intersection of NE 99th Street and this is 117th again. Staff is recommending approval of this.

The parcel to the south is losing some acreage for the expansion of 99th Street. It doesn't seem like it's a large expansion of commercial. The residential is not terribly viable with the access, the limited access that you can get from the State route, so we are recommending approval. It meets all of the approval criteria. Also the SEPA comment period for this application closed on June 13th and we have not received any comments on that, so the comment period's over. I'd be glad to take any questions, if you have any.

BARCA: Questions for staff? It appears none. We will open it up for public comment.

**PUBLIC TESTIMONY**

STONEX: For the record, Kurt Stonex with Olson Engineering representing the applicant and property owner.

We are in agreement with the staff report. It's another fairly logical map amendment. There's an isolated residential parcel that has limited access to SR-503 and the applicant also owns the property to the south, so they can combine this into a viable commercial corner. That's all I have, unless you have questions.

HOLLEY: Would you spell your last name.

STONEX: Stonex, S-t-o-n-e-x. Sorry, I mumbled.

BARCA: And that is the intention to combine those two properties?

STONEX: That's correct.

BARCA: Okay. Any questions for the applicant? Thank you.

STONEX: Thank you.

BARCA: And I'll bring it back to the Planning Commission. Deliberation?

**RETURN TO PLANNING COMMISSION**

SWINDELL: Again, seems pretty straightforward. It just makes sense.

BARCA: All right. Then I'll entertain a motion.

BENDER: I make a **MOTION** that we accept staff's report and recommendation for CPZ2017-00020, Mill Plain.

GRIMWADE: I'll **second** it.

BARCA: Okay. It's been motioned and seconded. Let's go ahead and do roll call.

**ROLL CALL VOTE**

SWINDELL: AYE

WRIGHT: AYE

JOHNSON: AYE

GRIMWADE: AYE

BENDER: AYE

BARCA: AYE

BARCA: Motion passes.

And we are moving to CPZ2017-00022, Riverview Estate or Asset Management & Trust.

**PUBLIC HEARING ITEMS**, continued

- C. CPZ2017-00022 Riverview Asset Mgmt. & Trust:** A proposal to amend the comprehensive plan and zoning map from a designation of Industrial (Business Park) to Urban Low with R1-6 zoning and one acre of Commercial with Neighborhood Commercial zoning on the following parcel(s): 200305000; 200326000 and 200355000.

ALVAREZ: Thank you, Councilor. This proposal is a request to amend the comprehensive plan from industrial with a BP zoning designation to urban low density residential R1-6 zoning on approximately 80 acres. This is along 152nd Avenue between 99th Street and 119th Street. You should have received a letter from the Columbia River Economic Development Council and also the City of Vancouver, and this morning, the -- well, you should have received something from the applicant in response to the staff report and I think both of the letters from CREDC and the City.



Washington State  
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March 23, 2017

Jose Alvarez, Planner III  
Clark County Community Planning  
1300 Franklin Street PO Box 9810  
Vancouver, WA 98666

Re: PAC2016-00156 Mill Plain LLC  
Comprehensive Plan Amendment and Zone Change  
SR 503, MP 2.36

Dear Mr. Alvarez:

The Washington State Department of Transportation (WSDOT) has reviewed the material submitted for this application. It is our understanding that the applicant, Mill Plain LLC, is requesting a Comprehensive Plan amendment to change the existing Urban Low Density Residential (UL) to Commercial (C), and the zone from single family residential (R1-6) to Community Commercial (C-3) for Parcel No. 200124000. This would make it compatible with the adjacent parcel to the south, Parcel No. 200910000, also owned by the applicant. Because no development plans have been submitted, WSDOT has no specific comments at this time. However, WSDOT would like to make the following general comments:

This site fronts SR 503 (NE 117<sup>th</sup> Ave.), which is under the jurisdiction of WSDOT. The applicant should be aware that they will only be permitted one access to this facility for both parcels combined. This access must be located as far north as possible, to minimize conflicts with the intersection with NE 99<sup>th</sup> Street. The access will be right-in, right out only, enforced by the existing median curb.

These comments are based on a review of this application for a Comprehensive Plan Amendment to Industrial and zone change to Light Industrial. When a proposed development is brought forward for review, there may be need for additional information by this department for further review. There may be other issues and requirements by this department that are not stated here. Other issues or requirements may include, but are not limited to drainage, illumination, access, signing, and channelization. This review does not constitute final approval of any development of this property by WSDOT.

Thank you for the opportunity to comment on this application. If you have need of additional information, please contact Mr. Ken Burgstahler, Southwest Region Planning Office, at (360) 905-2052.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M Williams', with a horizontal line extending to the right.

Michael Williams  
Southwest Region Planning Manager

MAW: kb

**ANNUAL REVIEW**  
**Application Written Narrative**  
**Mill Plain, LLC (PAC2016-00156)**

Property Location

The subject property is located at 10008 NE 117<sup>th</sup> Avenue, Vancouver, Washington and described as tax assessor's serial number 200124-000, and Lot 68, located in the southwest ¼ of Section 34, T3N, R2E, W.M.

Property Characteristics

There is an existing single-family residence on the property. The property is in the Vancouver Urban Growth Area. Water, sewer and other public services are available. Refer to the Developer's GIS Packet for more information. According to Clark County GIS, there are no environmental factors affecting the property. However, it is located within a Critical Aquifer Recharge Area (CARA) Category 2 and has a moderate-high archaeological probability.

The property is designated Urban Low Density Residential (UL) in the Comprehensive Plan. The current zoning is single family residential (R1-6). Surrounding properties to the north and west are zoned single family residential (R1-6), but are functionally isolated from the subject property with no potential for vehicular or pedestrian connections. Surrounding properties to the east (across NE 117<sup>th</sup> Avenue) and to the south are zoned Community Commercial (C-3). To meet WSDOT requirements for access onto SR 503, the subject property must share access with the parcel to the south (tax assessor's serial number 200091000) that is zoned Community Commercial and under common ownership with the subject property.

Proposed Request

The Applicant proposes a Comprehensive Plan Amendment to change the existing Comprehensive Plan from Urban Low Density Residential (UL) to Commercial (C) and the zoning from single family residential (R1-6) to Community Commercial (C-3) for consistency with surrounding parcels to the south and east and with the adjacent parcel to the south that shares access with the subject property onto NE 117<sup>th</sup> Avenue and NE 99<sup>th</sup> Street.

Criteria

The proposed request is consistent with all of the applicable policies and criteria in the comprehensive plan and UDC 40.560.010 and 40.560.020. This request is timely submitted in accordance with UDC 40.560.010.D.3.a and all required elements are included in this application. This is a request for a comprehensive map and zoning map amendment that is processed through a Type IV procedure pursuant to UDC 40.560.020.A.2.

The criteria for map changes are set forth in 40.560.010.G., as follows:

1. *The proponent shall demonstrate that the proposed amendment is consistent with the Growth Management Act and requirements, the countywide planning policies, the community framework plan, comprehensive plan, city comprehensive plans, applicable capital facilities plans and official population growth forecasts; and*

## Growth Management Act (GMA)

The proposal furthers several of the goals of the Growth Management Act, including:

Goal One "Urban Growth"

Goal Two "Reduce Sprawl"

Goal Three "Transportation"

Goal Five "Economic Development"

The Urban Growth Element of the GMA (Goal One) encourages development within existing urban areas where adequate public facilities and services exist, or can be provided in an efficient manner. The subject property is located within Vancouver's Urban Growth Boundary. Water and sewer services are currently provided to this area. The property is already served with urban levels of other public services, such as police and fire protection. There are existing fire hydrants in close proximity to the property.

Goal Two encourages the reduction in the inappropriate conversion of undeveloped land into sprawling, low density development. As noted, the property is already within the City of Vancouver's Urban Growth Boundary.

Goal Three encourages efficient, multi-modal transportation systems based on regional priorities and coordinated with county and city comprehensive plans. This property is served efficiently by the transportation network. C-Tran services are available nearby at NE 117th Avenue and 99th Street. Changing the zoning on this property to Community Commercial will not decrease the opportunities for multi-modal transportation.

Goal Five encourages economic development throughout the State that is consistent with adopted comprehensive plans in the area. With the proposed designation, economic opportunities will be created via job creation for the community that will exceed those currently available under the residential zoning. The creation of better and more jobs on the property will allow even more residents to live/work and shop near their home instead of having to cross the river to work in Oregon.

Goal six seeks to protect private property rights. In most cases, a property owner does not have a right to a particular zoning designation. However, allowing a property owner, consistent with the goals and policies of the Comprehensive Plan, to change the property's zoning in a manner that the property owner believes will create a more beneficial use, certainly furthers this goal.

This application presents no implications or effects upon Permit Processing (goal seven), Resource Lands (goal eight), Open Space and Recreation (goal nine), the Environment (goal ten) or any of the remaining goals of the GMA.

## Clark County Comprehensive Plan

### **Community Framework Plan Policies**

#### *9.0 Economic Development*

*Although an Economic Development Element is not required in the Comprehensive Growth Management Plan, Clark County will include this element in order to ensure that there is a balance of economic and population growth in the county and that the type of economic development which occurs contributes to maintaining and improving the overall quality of life in the county.*

#### *9.1 Framework Plan Policies*

*9.1.0 Encourage a balance of job and housing opportunities in each urban center. Provide sufficient land for business as well as homes. Businesses within the community should provide a range of job types for the community's residents.*

*9.1.1 Encourage industrial uses in major urban centers, small towns and community centers.*

*9.1.2 Revise commercial and industrial development standards to allow for mixed use developments and ensure compatibility with nearby residential and public land uses.*

*9.1.3 Encourage businesses which pay a family wage to locate in Clark County.*

*9.1.4 Encourage appropriate commercial development in neighborhoods and rural centers that support the surrounding community.*

#### *10.0 Community Design*

*Implementation of the Community Framework Plan will require attention to the details of design if it is to succeed in encouraging a sense of community and getting people to use alternative means of transportation. The following policies are intended to focus the design policies of each jurisdiction on certain key issues which must be coordinated in order to be effective.*

#### *10.1 Framework Plan Policies*

*10.1.3 Establish development standards to encourage mixed use developments in urban and rural centers, while providing buffering for each use from the adverse effects of the other.*

The residential area to the north and west is isolated from this small island of residentially zoned lands with no means of physically connecting with either vehicle or pedestrian connections. This is because the residential area is fully developed and no connections were provided. The lots are fully developed with houses and the only way to connect would be through the back yards of the existing dwellings, which is obviously not feasible.

Approval of the proposed plan amendment to change the existing Comprehensive Plan from Urban Low Density Residential (UL) to Commercial (C), and the zone from single family residential (R-6) to Community Commercial (C-3) supports these Community Framework Plan Policies for a number of reasons. Policy 10.1.3 encourages buffering uses which might conflict to prevent adverse effects of each use from impacting the other. This policy is met by straightening the boundary between the residential and commercial areas and eliminating the small island of residentially zoned land that has no means of connecting to the larger residential area to the north and west.

This also supports policy 9.1.2 by allowing for commercial uses to be developed on the subject property, while ensuring compatibility between the proposed commercial uses and the existing residential uses. Compatibility between uses will be much easier to achieve by straightening the boundary between them and eliminating the island of residential land within the larger commercial area. Since this is not a new commercial area, but merely a modest expansion of an existing one, there will be no further impacts resulting from the proposal, since any impacts of commercial uses at this area on the nearby residential area will already occur under existing zoning at the 99<sup>th</sup> Street and 117<sup>th</sup> Avenue intersection.

The subject property is more suitable for a Commercial Comprehensive Plan designation because it is located at a commercial intersection where there is greater need for commercial land and is more suitable for commercial uses land than residential use, given the existing surrounding zoning and development patterns (which is commercial on

two sides) and surrounding uses, including an gas station at the southwest corner of the intersection and fast food restaurants and a variety of offices and other retail on the southeast corner of the intersection, as well as a dental office directly across the street from the subject property. Given the proximity of commercial uses and the functional isolation from the residential area, compatibility among uses (policies 10.1.3 and 9.1.2) are better met with the proposed designation than the existing one.

Other policies, such as providing a balance of jobs and housing and sufficient land for business (Policy 9.1.0), family wage jobs (9.1.3) and appropriate commercial development in neighborhoods that support the surrounding community (9.1.4) are also better supported by a commercial designation. An industrial designation might be more likely to support family wage jobs than a commercial designation but given the proximity to residential uses and existing and planned commercial uses, a commercial designation is the only designation that makes sense at this intersection. Eliminating the island of residential use promotes a more appropriate mix of compatible uses that support the surrounding community without introducing unnecessary conflicts.

## **County 20-Year Planning Policies**

*Goal: Integrate land uses to reduce sprawl, promote physical activity through active transportation and foster neighborhood and community identity.*

### *1.4 Policies*

*1.4.1 Interrelated uses should generally be encouraged to locate in close proximity of each other:*

- Frequently used commercial activities and the residential areas they serve should be allowed and encouraged to locate near to one another.*
- Schools or other frequently used public facilities and the residential areas they serve should be allowed and encouraged to locate near to one another.*
- Commercial, industrial or other employers and the residential areas they serve should be allowed and encouraged to locate near to one another, as long as negative impacts from non-residential uses on the residential areas are mitigated.*

*1.4.2 Encourage mixed-use developments, which provide opportunities to combine residential, commercial or other uses within individual structures, or within adjacent structures or developments.*

*Goal: Optimize and preserve the investment in the transportation system.*

### *5.3 System Preservation Policies*

*5.3.1 Development projects shall adhere to minimum driveway access spacing standards along arterial and collector streets to preserve the capacity of the transportation system. The county shall also work with Washington State Department of Transportation to ensure that minimum access spacing standards for state highways are maintained.*

*5.3.5 The local street system shall be interconnected to eliminate the need to use collector or arterial streets for internal local traffic.*

*Goal: Develop specific concurrency management standards for incorporation into the development review process, to determine the precise requirements for the timing, funding and circumstances for the provision of concurrent services and facilities.*

### *6.9 Policies*

*6.9.1 Develop direct concurrency requirements for the provision of transportation, water, sewer and stormwater facilities and services into the normal development process.*

*6.10.10 Changes to the 20-Year Plan shall not be approved which impose inordinate additional net costs on mobile, centralized services such as police, fire, emergency services, school busing or solid waste services.*

## *Unincorporated County*

*The following goals and policies are not countywide and apply only to the unincorporated areas.*

*Goal: Provide commercial and industrial employment opportunities to meet the needs of Clark County citizens.*

### *9.2 Policies*

*9.2.1 Encourage long-term business investments that generate net fiscal benefits to the region, protect environmental quality and are consistent with the objective of higher wage jobs for Clark County residents.*

*9.2.3 Promote a diverse economic base, providing economic opportunity for all residents.*

*9.2.4 Provide priority assistance to employers who pay a family wage.*

*Goal: Assure an adequate supply of industrial sites to meet market demands for industrial development over the planning horizon to create an environment conducive to the startup, growth and expansion of industries.*

### *9.3 Policies*

*9.3.1 In cooperation with local jurisdictions, maintain a minimum 10-year supply of industrial land based on average absorption rates over the last five years.*

*9.3.2 Designate sites for industrial use at locations that will be accessible from roadways of arterial classification or higher, potentially served with utilities and a developable area with minimal environmental constraints such as unsuitable soils, floodplains, archaeological sites and wetlands.*

*9.3.3 Maintain an adequate inventory of properties designated for industrial use and that are suitable for a mix of business and industrial park, light and heavy industrial uses; include properties developed by both private and public entities; and provide access to multimodal transportation services including motor freight, rail and marine facilities.*

*Goal: Provide contextually-appropriate commercial sites adequate to meet a diversity of needs for retail, service and institutional development in Clark County.*

### *9.4 Policies*

*9.4.1 In cooperation with local jurisdictions, maintain an adequate supply of commercial lands within designated urban growth areas, based on average absorption rates of the last five years plus an appropriate market factor.*

- Designate sufficient commercial land for the 20-year planning period, located within designated urban growth areas;*
- Discourage removal of commercial land from the inventory that results in a less than 10-year supply of commercial sites;*
- Update inventories of commercial lands at least every ten years; and,*
- Encourage infill and redevelopment of underutilized commercial sites.*

*9.4.2 Locate convenience-oriented retail and service developments adjacent to residential neighborhoods; encourage small-scale neighborhood commercial uses directly within residential areas.*

*9.4.3 Encourage commercial and mixed-use developments located on current or planned transit corridors; encourage transit-oriented site planning and design.*

*9.4.4 Maintain design guidelines to ensure that commercial projects are developed with minimal impact on surrounding land uses, are consistent with related community appearance/design guidelines and assure pedestrian as well as vehicular access.*

*Goal: Development in urban areas and rural centers should incorporate diverse uses designed in a manner that provides for a sense of community, supports the human scale and allows for multi-modal transportation options.*

### *11.2 Policies*

*11.2.1 Encourage the development of multi-story, mixed uses and other commercial uses that utilize regional architectural styles and are at a human scale.*

*11.2.2 Encourage infill and conversion of existing single uses to mixed use centers in the urban centers and transit corridors.*

Approval of the proposed plan amendment to change the existing Comprehensive Plan from Urban Low Density Residential (UL) to Commercial (C), and the zone from single family residential (R-6) to Community Commercial (C-3) supports these County 20-Year Planning Plan Policies for a number of reasons, as discussed below. Policy 1.4.1 encourages interrelated uses to locate in close proximity of each other as long as impacts of non-residential uses on residential uses can be mitigated. Given the surrounding commercial zoning and existing commercial uses, including a gas station and fast food, it is questionable whether an island of residential use that needed to share success with commercial uses could adequately protect residential use from existing and planned surrounding commercial uses. Drawing a straight line between the commercial area and residential areas that respects the existing boundary that was created when the adjoining neighborhood was developed will allow employment uses to locate near residential uses without unduly intruding on residential uses in satisfaction of Policies 1.4.1 and 1.4.2.

Future commercial development of the property can meet the transportation and other infrastructure requirements in Policies 5.3 and 6.9 as well as their sub-policies, and therefore these policies and sub-policies are met. See the report prepared by H. Lee and Associates.

The economic policies of Policies 9.2, 9.3 and 9.4 and their sub-policies are met by designating the property for commercial uses. A commercial designation will better serve the policy of providing a diverse economic base (Policy 9.2). The property has good access to NE 117<sup>th</sup> Ave/SR 503, an arterial or higher classification (Policy 9.3). Removal of commercial is discouraged to prevent the loss of needed jobs producing land, but this land is being proposed for commercial designation, rather than being removed from it, so the overall goal of providing an adequate supply of commercial lands for jobs is met (policies 9.3 and 9.4). Since the property is unsuitable for residential use due to its small size and isolation from other residential areas, as well as it having to share access with surrounding commercial uses, the property can be converted to commercial use without losing suitable residential land.

A sense of community and human scale (Policy 11.2) can be better provided with a commercial designation because an island of residential land protruding into a surrounding area of existing and planned commercial uses would cause conflicts between any proposed residential use of the land and surrounding commercial uses. Straightening the boundary between the commercial area and the residential area to the north and west thus better serves the purpose of these policies than the existing designation.

**Countywide Planning Policies**

*2.1 Countywide Planning Policies*

*2.1.1 The Comprehensive Plan of the county and each municipality shall identify sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing and group homes and foster care facilities. All jurisdictions will cooperate to plan for a "fair share" of the region's affordable housing needs and housing for special needs population.*

*2.1.2 Link economic development and housing strategies to achieve parity between job development and housing affordability.*

*9.1 Countywide Planning Policies*

*The following policies are countywide and apply to both incorporated and unincorporated areas.*

*9.1.1 The county and cities will demonstrate their commitment to long-term economic growth by promoting a diverse economic base, providing opportunity for all residents, including unemployed and disadvantaged persons. Growth which helps to measurably raise the average annual wage rate of community residents and preserves the environmental quality and livability of our community, is viable growth and will improve the lifestyle of Clark County residents.*

*9.1.3 The county and cities will encourage long-term growth of businesses of all sizes, because economic diversification and stratification are important factors in overall job growth for the county and cities.*

*9.1.8 The county and cities will provide for orderly long-term commercial and industrial growth and an adequate supply of land suitable for compatible commercial and industrial development.*

*9.1.9 The county and cities will encourage the recruitment of new business employers to absorb the increasing labor force and to supply long-term employment opportunities for county's residents who are currently employed outside of the State.*

Approval of the proposed plan amendment to change the existing Comprehensive Plan from Urban Low Density Residential (UL) to Commercial (C), and the zone from single family residential (R-6) to Community Commercial (C-3) supports these Countywide Planning Plan Policies for a number of reasons. Given the existing and planned commercial uses surrounding the subject property on two sides, the isolation of the property from the residential area to the north and west, and the need for the subject property to share access to NE 117<sup>th</sup> Avenue with adjacent commercial land, the property is not suitable for housing due to conflicts with surrounding uses and having to share access with the commercial property to the south. Therefore, conversion to commercial uses would further Policies 2.1.1 and 2.1.2 by providing a better jobs to housing balance without impacting the supply of land that is suitable for housing.

The proposed commercial designation will better meet the economic policies of Countywide Planning Policies 9.1.1, 9.1.3, 9.1.8 and 9.1.9 by providing better opportunities for commercial development, jobs growth for all residents, opportunities for business of all sizes and local employment opportunities, since the commercial designation will be better suited to jobs producing uses than the residential designation at a more appropriate location given the existing and planned commercial uses surrounding the subject property on two sides, its functional isolation from adjoining residential areas and the need to share access with adjacent commercial land.

## **20-Year Plan Map Amendment**

Finally, the Comprehensive Plan requires an applicant to demonstrate “that the supply of available land in the requested plan designation may be insufficient to accommodate anticipated growth.” See Comprehensive Plan, Chapter 14, Amendments to the 20-Year Plan; 20-Year Plan Map Amendment, page 266. To meet this criterion (and criterion 1 on page 266 that requires the applicant to address official population growth forecasts), the applicant is submitting a report prepared by the Responsible Growth Forum and Building Industry Association of Clark County entitled “Clark County, WA./How Many People Are We Going To Plan For?” to demonstrate that the supply of available commercial land may be insufficient to accommodate anticipated growth.

Additionally, the applicant is submitting an economic report and market analysis prepared by Cascade Planning Group to show a need for commercial land at this location.

Criterion 4 on page 266 of the Comprehensive Plan requires an applicant to demonstrate “*The requested change will not impact the character of the area to the extent that further plan map amendments will be warranted in future annual reviews unless the scope of the amendment is expanded. The county may expand the scope of any annual review.*” This criterion is met because eliminating a functionally isolated island of residential land by changing the

designation to commercial to match the adjacent land will not adversely impact the character of the area, but will in fact improve the character of the area. Straightening the boundary between these two zones will not create a situation where “further plan map amendments will be warranted in future annual reviews.” This criterion is met.

The remaining criteria on page 266 of the Comprehensive Plan are nearly identical to the five criteria of UDC40.560.010.G, and the findings above under UDC40.560.010.G (1) through (5) are incorporated herein by this reference. There are no applicable city comprehensive plan provisions relevant to this application. This request is accompanied by a parallel rezone application in compliance with criterion 5 and it will be reviewed by the Planning Commission and Clark County Board of Councilors as required by criterion 6.

2. *The proponent shall demonstrate that the designation is in conformance with the appropriate locational criteria identified in the plan; and*

The applicable locational criteria in the Comprehensive Plan include:

#### *Residential Lands*

*There are three separate categories for residential use, ranging from low to high density. Low density residential is predominantly for single-family residential development with a density range of five to ten units per gross acre. Medium density residential provides land for single-family attached housing, garden apartment and multi-family developments ranging from 1- to 22 units per gross acre and high density of 43 units per gross acre. Public facilities, churches, institutions and other special uses may be allowed in these designations if certain conditions are met. Where offices are determined to be appropriate, office residential zones can be applied in the medium and high density designations.*

#### *Urban Low Density Residential (UL)*

*This designation provides for predominantly single-family residential development with densities of between five and ten units per gross acre. Minimum densities will assure that new development will occur in a manner which maximizes the efficiency of public services. New development shall provide for connection to public sewer and water. Duplex and attached single-family homes through infill provisions or approval of a Planned Unit Development may be permitted. In addition, public facilities, churches, institutions and other special uses may be allowed in this designation if certain conditions are met. The base zones which implement this 20-Year Plan designation are the R1-20, R1-10, R1-7.5, R1-6 and R1-5 zones. The zones may be applied in a manner that provides for densities slightly higher than existing urban development, but the density increase should continue to protect the character of the existing area.*

#### *Commercial (C)*

*With the 2016 comprehensive plan update, the county has consolidated the three commercial comprehensive plan designations into one Commercial (C) comprehensive plan designation with the three commercial zoning districts remaining. Three distinct categories for urban commercial use include the following:*

#### *Community Commercial*

*A commercial center area provides services to several neighborhoods in urban areas of Clark County and is implemented with the Community Commercial zone. New community commercial areas should generally be between five and 20 acres in size, spaced two to four miles from similar uses or zones, serve a*

*population of 10,000 to 20,000, located at minor or major arterial crossroads and serve a primary trade area between 2 to 4 miles.*

As discussed above, the subject property constitutes an island that is functionally isolated from adjoining residential areas, with no opportunity for either a vehicular or pedestrian connection with the residential area that must, by its location along NE 117<sup>th</sup> Avenue (an arterial state highway) share access with adjacent commercial land. This island protrudes into an area that is designated for commercial use, with both existing and planned commercial uses. The proposal would straighten the boundary between the residential area to the north and the commercial area to the south, providing for a logical transition of uses. For these reasons, the property is much more suited to a Commercial designation than an Urban Low Density Residential designation under the locational criteria.

3. *The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity; and*

The subject property is more suitable for a Commercial designation under this criteria because it is located in an area where there is greater need for commercial land and is more suitable for commercial land, given the existing surrounding zoning (which is commercial sides) and surrounding uses, including a gas station and fast food. Given the proximity of commercial uses on two sides of the property, and its proximity to NE 117<sup>th</sup> Avenue and the 99<sup>th</sup> Street intersection, the requirement that the property share access with the commercial property to the south and the lack of any connection to the residential neighborhood, the subject property is much more suited to a Commercial designation and there are no appropriate alternatives.

4. *The plan map amendment either: (a) responds to a substantial change in conditions applicable to the area within which the subject property lies; (b) better implements applicable comprehensive plan policies than the current map designation; or (c) corrects an obvious mapping error; and*

For the reasons discussed above under Criteria 1 and 2 with respect to the applicable plan policies and more specifically the locational policies, all of which is incorporated herein by this reference, the proposed plan amendment better implements applicable plan policies than the current map designation.

5. *Where applicable, the proponent shall demonstrate that the full range of urban public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools. Adequacy of services applies only to the specific change site.*

The property is located within the existing UGA and can easily be served with public facilities and services in an efficient manner. Services such as water, sewage, storm drainage, transportation, fire protection and schools are adequate and there are existing fire hydrants in close proximity to the property. Transportation issues are addressed in the report prepared by H. Lee and Associates. Other services are demonstrated by the Developers GIS packet.

The provisions of 40.560.010.H impose “additional criteria for commercial map changes” as follows:

*Amendments to the plan map for designation of additional commercial land or for changing the zoning from one commercial district to another shall meet the following additional requirements:*

1. *A market analysis using the weighted block group centroid retrieval method shall be submitted which verifies the need for the new commercial area or center; and*
2. *A land use analysis of available commercially designated and zoned land in the market area of the proposed site shall be submitted which demonstrates that the existing commercial land is inadequate. The most recent vacant lands model must be used for the land use analysis.*

A market analysis has been prepared by Cascade Planning Group and submitted with this application to demonstrate satisfaction of this criterion and verifying the need to expand the commercial area to include this land which is unsuitable for residential use since it is functionally isolated from adjoining residential areas due to lack of any feasible transportation or pedestrian connections.

The criteria for a zoning map changes are set forth in 40.560.020.G., as follows:

1. *Requested zone change is consistent with the comprehensive plan map designation.*

The requested zone change from residential (R-6) to Community Commercial (C-3) will be consistent with the Comprehensive Plan map change requested above from UL to C.

2. *The requested zone change is consistent with the plan policies and locational criteria and the purpose statement of the zoning district.*

The requested zone change is consistent with the plan policies and locational criteria for the reasons discussed above under the criteria for a Comprehensive Plan map change, which is incorporated herein by reference. The purpose of the Community Commercial district is “intended to provide for the regular shopping and service needs for several adjacent neighborhoods.” See UDC 40.230.010.A.2. The subject property seems uniquely suited to serve this purpose given its close proximity to an established residential neighborhood and its functional isolation from the neighborhood due to lack of any opportunity for a direct vehicular or pedestrian connection. The requested zone change is consistent with this purpose statement because the straightening of the zone boundary and rezoning of the property to be consistent with the surrounding zoning on properties to the south and east will provide greater opportunities for less commercial uses consistent with the Community Commercial district while minimizing conflicts with the established neighborhood to the north and west.

3. *The zone change either:*
  - a. *Responds to a substantial change in conditions applicable to the area within which the subject property lies;*
  - b. *Better implements applicable comprehensive plan policies than the current map designation;*  
*or*
  - c. *Corrects an obvious mapping error.*

This criterion is met because the proposal better implements applicable plan policies than the current zoning map designation for the reasons discussed above under the discussion of the comprehensive plan map amendment criteria, which is incorporated herein by this reference.

4. *There are adequate public facilities and services to serve the requested zone change.*

The applicant has included a traffic study prepared by H. Lee and Associates concluding that there are adequate transportation facilities for the requested change. The public facilities for other types of utilities and services are adequate for either the current zone or the proposed zone. Services such as water, sewage, storm drainage, transportation, fire protection and schools are adequate and there are existing fire hydrants in close proximity to the property.

#### CONCLUSION

As demonstrated throughout this document, the requested amendment to the Comprehensive Plan and zoning designations for the property further the goals and policies of the County's Comprehensive Plan, comply with the applicable zoning ordinance locational criteria and purpose statements, capital facility elements and population forecasts, as well as the Growth Management Act.



**Cascade Planning  
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Land Use • Economics • Development

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## MEMORANDUM

To: **Steve C. Morasch, Landerholm**

From: Paul Dennis, AICP, Principal

Subject: Commercial Assessment of a Comprehensive Plan Amendment and Rezone Request for Mill Plain, LLC

Date: January 31, 2017

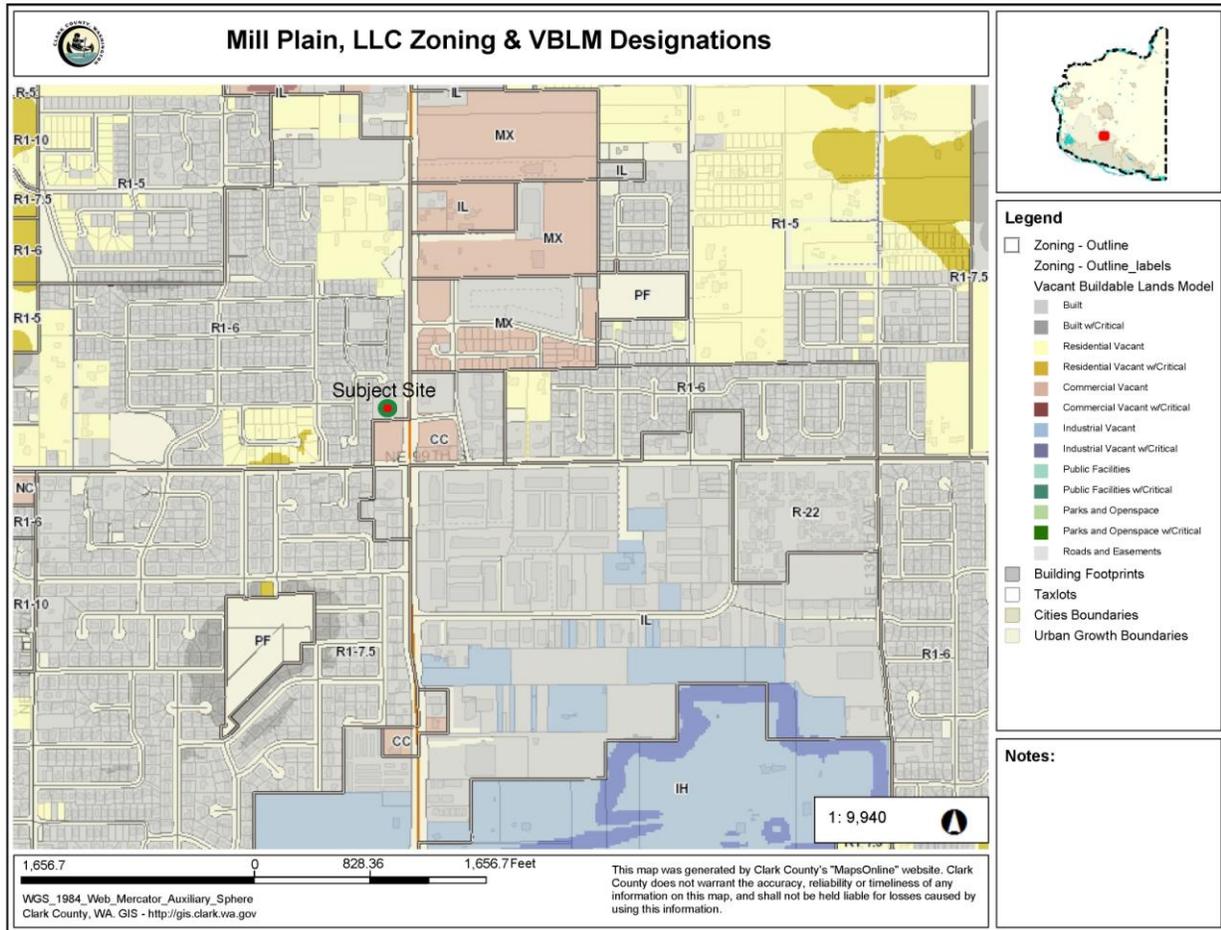
Cascade Planning Group was contracted to provide an assessment of the need for commercial development on 0.82 acres located at 9914 NE 117<sup>th</sup> Ave, Tax Lot # 200124000, Vancouver, WA 98662. The site is currently zoned R1-6. The owner has the adjacent 1.34 acre property to the south that is zoned CC. The proposal is to rezone the 0.82 acre site to CC that will create a viable commercial site – see Figure 1. According to Clark County’s Vacant and Buildable Lands Model (VBLM), the 0.82 acre site is considered built. Redevelopment would provide convenient commercial services as well as increased tax base for the County.

This market analysis focuses on the area’s need for commercial services, more specifically the need for the subject site to be rezoned to CC in compliance with the Clark County code and Comprehensive Plan requirements, including, but not limited to UDC 40.560.010.H. The location can serve the area’s growing population base, reduce travel times for local residents, build-off of business activities within the surrounding area, and generate additional tax revenue.

Specific methodology and data sources are described in each section of the report. The remainder of this market analysis update memorandum is organized as follows:

- Demographic Profile
- Commercial Demand
- Clark County VBLM
- Summary Observations

**Figure 1. Zoning & VBLM Designation Map**



Source: Cascade Planning Group using Clark County GIS Online Mapping Software.

## DEMOGRAPHIC PROFILE

**Population Trends.** With 461,000 residents, Clark County has over 20% of the region’s population. Clark County grew faster over the last two decade than the other three counties in the region. Clark County’s growth has kept pace with the region during much of this decade; only Washington County has grown faster this decade.

**Figure 2. Regional Population Trends (1990-2016)**

County	1990	2000	2010	2016	1990-2000	2000-2010	2010-2016
Clark, WA	238,053	345,238	425,363	461,010	3.79%	2.11%	1.35%
Clackamas, OR	278,850	338,391	375,992	404,980	1.95%	1.06%	1.25%
Multnomah, OR	583,887	660,486	735,334	790,670	1.24%	1.08%	1.22%
Washington, OR	311,554	445,342	529,710	583,595	3.64%	1.75%	1.63%
Region	1,412,344	1,789,457	2,066,399	2,240,255	2.39%	1.45%	1.36%

Source: U.S. Census, Oregon Population Research Center and Washington Office of Finance & Management.

Approximately 67,260 residents live within three miles of the subject site, which is the likely market area the site will serve. This equates to almost 15% of the county’s population. During the last five years, population growth was slower than the previous decade, but higher than the countywide average. Population is expected to continue to grow at a higher rate than the countywide average over the next five years.

**Figure 3. Local Population Trends (2000-2022)**

Market Area	2000	2010	2017	2022	2000-2010	2010-2017	2017-2022
3-Mile Area	45,198	59,856	67,259	72,550	2.85%	1.68%	1.53%
4-Mile Area	82,912	106,216	119,468	128,604	2.51%	1.69%	1.48%
5-Mile Area	130,468	164,463	183,591	197,258	2.34%	1.58%	1.45%
Clark, WA	345,238	425,363	461,010	490,058	2.11%	1.35%	1.02%

Source: U.S. Census, Washington Office of Finance & Management, and Claritas.

**Age Characteristics.** School age children and younger account for the largest age group, with over one-fourth of all persons living within three-miles of the subject site. However, annual growth of this group lags significantly behind all other age groups. Persons age 55 and older account for another 24% of all persons and is the fastest growing age group. While young adults (persons age 18-24) are the smallest age group, they are the second fastest growing segment of the population.

**Figure 4. Age Characteristics & Trends Within 3-Miles of Site (2010-2022)**

Age Group	# of Persons			% Distribution			Annual Growth Rate	
	2010	2017	2022	2010	2017	2022	2010-2017	2017-2022
Newborn to Age 17	17,112	17,546	17,917	28.6%	26.1%	24.7%	0.4%	0.4%
Age 18 to 24	5,229	6,318	7,211	8.7%	9.4%	9.9%	2.7%	2.7%
Age 25 to 34	8,581	8,787	8,986	14.3%	13.1%	12.4%	0.3%	0.5%
Age 35 to 44	8,873	9,679	9,895	14.8%	14.4%	13.6%	1.3%	0.4%
Age 45 to 54	7,987	8,890	9,666	13.3%	13.2%	13.3%	1.5%	1.7%
Age 55 & Older	12,075	16,039	18,874	20.2%	23.8%	26.0%	4.1%	3.3%
All Persons	59,856	67,259	72,550	100.0%	100.0%	100.0%	1.7%	1.5%

Source: U.S. Census and Claritas.

**Income Trends.** Household income within the 3-mile area is well represented within each of the income ranges. This is due to the diverse housing choices as well as employment opportunities. While 37% have an income below \$50,000, 41% have an income over \$75,000, which is similar to households within the broader 4-mile and 5-mile areas.

**Figure 5. Household Make-Up By Income Range (2017)**

Income Range	3-Mile	4-Mile	5-Mile
< \$25,000	13.7%	14.6%	15.6%
\$25,000-\$49,999	23.3%	24.1%	23.8%
\$50,000-\$74,999	21.6%	21.5%	20.7%
\$75,000+	41.4%	39.8%	39.9%
All Households	100.0%	100.0%	100.0%

Source: Claritas.

Income potential appears even more favorable when the differential tax structure of Oregon and Washington are taken into account. More of local resident gross income results in effective buying income due to lack of a state income tax on net income versus sales tax on discretionary retail spending.

## COMMERCIAL DEMAND

The need for commercial services will come from the growth of existing business, location of new companies, and consumer demand for retail goods and services. The analysis in this section evaluates current unmet market for retail and office.

**Employment Trends.** Clark County businesses employ 155,666 workers. Commercial oriented businesses employ 119,691 workers compared to 35,975 at industrial related firms. Over the last six years, Commercial sector has experienced the greatest job growth. In fact, commercial businesses have produced the same amount of job growth as the previous decade. While Industrial employment is less than one-third the size of commercial it also has experienced significant job growth, reversing trends from the prior ten years.

**Figure 6. Clark County Employment Trends (2000-2016)**

Employment Sector	# of Workers			Total Growth	
	2000	2010	2016	2000-2010	2010-2016
<b>Commercial Oriented:</b>					
Retail Trade	13,567	14,983	18,117	1,416	3,134
Information	3,633	2,750	3,200	-883	450
Financial Activities	4,800	6,275	8,350	1,475	2,075
Professional and Business Services	12,483	14,483	19,258	2,000	4,775
Education and Health Services	13,842	22,167	25,133	8,325	2,966
Leisure and Hospitality	11,900	12,233	14,958	333	2,725
Other Services	3,650	4,500	5,767	850	1,267
Government	19,192	24,108	24,908	4,916	800
Commercial Sub-Total	83,067	101,499	119,691	18,432	18,192
<b>Industrial Related:</b>					
Mining, Logging, and Construction	9,817	8,342	11,883	-1,475	3,541
Manufacturing	17,283	11,533	13,542	-5,750	2,009
Wholesale Trade	4,317	5,042	6,525	725	1,483
Transportation, Warehousing, and Utilities	3,425	3,900	4,025	475	125
Industrial Sub-Total	34,842	28,817	35,975	-6,025	7,158
All Employment Sectors	117,909	130,316	155,666	12,407	25,350

**Retail Demand.** Consumers in the local market area spend over \$1.1 billion on retail goods and services. Area businesses supply \$914.8 million worth of goods and services. At first glance it would appear that area businesses are generally meeting consumer demands. However, examination of detailed store categories shows that sales leakage of \$463.7 million is occurring within 14 of 20 retail store types.

Vehicle sales and parts is the largest category of sales leakage with \$156.7 million being spent outside of the 3-mile market area; this is in large part due to the fact that most auto dealers have clustered elsewhere in the region and will most likely never locate near the subject site. Grocery is an opportunity (\$94.3 million) that is available to prospective businesses within the 3-mile market area; the limited size, but great visibility of the site could attract a specialty boutique grocery but not a large-scale national brand. Dining with sales leakage of \$41.6 million is the third largest opportunity. The site is large enough to accommodate dining and provides good visibility. Gasoline stations are another opportunity for the area, but many name brand providers already exist. Health and Personal care has \$25.0+ million

in sales leakage. While the site could accommodate smaller businesses in this category, they typically locate in larger shopping centers to take advantage of customers visiting adjacent stores.

While building materials has a significant amount of sales leakage (\$53.8 million), the majority is being captured at existing stores just outside of the 3-mile market area. Electronics and Appliances, liquor, Lawn & Garden Supplies, Clothing & Accessories, Florists, Novelty, and office supplies all have sales leakage; however, this demand is probably also being met by existing stores just outside of the 3-mile market area. Non-Store retail is sales related to internet purchases.

**Figure 7. Commercial Retail Market Opportunities (2017)**

Store Type	Consumer Expenditures	Retail Sales	Market Sales Gap
Motor Vehicle and Parts Dealers	\$239,909,112	\$83,221,083	\$156,688,029
Furniture and Home Furnishings	\$21,892,417	\$53,084,761	-\$31,192,345
Electronics and Appliance	\$18,628,044	\$15,516,567	\$3,111,477
Building Materials	\$105,914,140	\$52,090,625	\$53,823,514
Lawn, Garden Equipment, Supplies	\$9,454,692	\$3,583,438	\$5,871,255
Grocery	\$125,964,404	\$31,621,095	\$94,343,309
Convenience Stores	\$8,761,893	\$12,206,896	-\$3,445,003
Specialty Food Stores	\$5,100,519	\$13,234,632	-\$8,134,114
Beer, Wine and Liquor Stores	\$8,189,947	\$2,611,072	\$5,578,876
Health and Personal Care	\$58,177,364	\$33,139,175	\$25,038,189
Gasoline Stations	\$68,419,332	\$27,294,711	\$41,124,621
Clothing and Clothing Accessories	\$50,313,315	\$38,096,362	\$12,216,953
Sporting Goods & Personal Interest	\$21,450,399	\$37,151,294	-\$15,700,894
General Merchandise	\$123,668,342	\$322,266,711	-\$198,598,369
Florists	\$1,413,206	\$292,019	\$1,121,188
Office Supplies	\$5,562,822	\$5,463,279	\$99,544
Gift, Novelty and Souvenir Stores	\$4,450,814	\$3,863,538	\$587,276
Used & Other Merchandise Stores	\$17,738,588	\$22,751,409	-\$5,012,821
Non-Store Retailers	\$96,586,794	\$74,116,599	\$22,470,194
Foodservice and Drinking Places	\$124,794,116	\$83,150,862	\$41,643,253

Source: Claritas.

Vacancy rates at retail centers have fallen below 4% region-wide and just under 5% in Clark County. However, for the Orchards area, the subarea where the subject site is located, vacancy rates average 7.4%. This equates to 248,915 square feet. The vacant space occurs within general retail centers (66,569 square feet) and shopping centers (182,346 square feet).

Based upon the analysis above, there is \$216.2 million of sales leakage in categories that the Orchards area would be most competitive in recapturing at local retail centers. Another \$148.1 million of retail sales will be generated within categories that the Orchards area would be most competitive in capturing at local retail centers over the next 20 years from population and business growth. This \$364.3 million of potential retail sales for the area equates to approximately 910,700 square feet of retail space that would be absorbed at existing retail centers and future development. Existing retail centers could absorb 248,900 square feet, leaving 661,800 square feet for future retail centers.

**Figure 8. Commercial Retail Real Estate Market Conditions (2016)**

Sub Area	Existing Inventory		Vacancy			Under	
	# Bldg.	Total GLA	Total SF	Rate	Absorption	Construction	
<b>General Retail:</b>							
Camas/Washougal	100	655,877	17,072	2.6%	1,149	0	
Cascade Park	79	519,998	6,388	1.2%	12,904	9,000	
CBD/West Vancouver	197	1,102,758	43,414	3.9%	3,331	0	
Hazel Dell/Salmon Cr.	134	1,205,994	23,111	1.9%	-9,281	0	
Orchards	142	1,156,751	66,569	5.8%	-51,361	0	
St. Johns/Cntrl. Vancouver	266	1,686,623	38,764	2.3%	2,050	0	
Vancouver Mall	30	432,653	2,000	0.5%	7,976	0	
Clark County	948	6,760,654	197,318	2.9%	-33,232	9,000	
Portland Region	7,775	55,735,414	1,126,025	2.0%	143,231	223,510	
<b>Retail Mall:</b>							
Camas/Washougal	0	0	0	0.0%	0	0	
Cascade Park	0	0	0	0.0%	0	0	
CBD/West Vancouver	0	0	0	0.0%	0	0	
Hazel Dell/Salmon Cr.	0	0	0	0.0%	0	0	
Orchards	1	157,673	0	0.0%	0	0	
St. Johns/Cntrl. Vancouver	0	0	0	0.0%	0	0	
Vancouver Mall	1	1,080,703	0	0.0%	71,000	0	
Clark County	2	1,238,376	0	0.0%	71,000	0	
Portland Region	10	8,015,092	386,928	4.8%	129,711	0	
<b>Power Center:</b>							
Camas/Washougal	0	0	0	0.0%	0	0	
Cascade Park	2	990,694	2,326	0.2%	0	0	
CBD/West Vancouver	0	0	0	0.0%	0	0	
Hazel Dell/Salmon Cr.	1	378,151	40,143	10.6%	32,155	0	
Orchards	0	0	0	0.0%	0	0	
St. Johns/Cntrl. Vancouver	0	0	0	0.0%	0	0	
Vancouver Mall	1	580,313	0	0.0%	82,578	0	
Clark County	4	1,949,158	42,469	2.2%	114,733	0	
Portland Region	17	7,645,066	314,647	4.1%	53,720	10,112	
<b>Shopping Center:</b>							
Camas/Washougal	9	605,870	49,015	8.1%	5,748	0	
Cascade Park	37	2,172,517	156,071	7.2%	50,086	6,500	
CBD/West Vancouver	8	124,231	38,200	30.7%	600	0	
Hazel Dell/Salmon Cr.	33	1,498,839	83,077	5.5%	6,475	36,000	
Orchards	33	2,067,369	182,346	8.8%	50,943	0	
St. Johns/Cntrl. Vancouver	44	1,975,322	145,931	7.4%	35,619	0	
Vancouver Mall	2	182,460	1,444	0.8%	4,086	0	
Clark County	166	8,626,608	656,084	7.6%	153,557	42,500	
Portland Region	754	36,683,403	2,415,366	6.6%	447,299	197,951	
<b>Specialty Center:</b>							
Camas/Washougal	0	0	0	0.0%	0	0	
Cascade Park	1	191,503	0	0.0%	0	0	
CBD/West Vancouver	0	0	0	0.0%	0	0	
Hazel Dell/Salmon Cr.	0	0	0	0.0%	0	0	
Orchards	0	0	0	0.0%	0	0	

Sub Area	Existing Inventory		Vacancy			Absorption	Under Construction
	# Bldg.	Total GLA	Total SF	Rate	Rate		
St. Johns/Cntrl. Vancouver	0	0	0	0.0%		0	0
Vancouver Mall	0	0	0	0.0%		0	0
Clark County	1	191,503	0	0.0%		0	0
Portland Region	3	511,806	0	0.0%		0	0
<b>All Retail:</b>							
Camas/Washougal	109	1,261,747	66,087	5.2%		6,897	0
Cascade Park	119	3,874,712	164,785	4.3%		62,990	15,500
CBD/West Vancouver	205	1,226,989	81,614	6.7%		3,931	0
Hazel Dell/Salmon Cr.	168	3,082,984	146,331	4.7%		29,349	36,000
Orchards	176	3,381,793	248,915	7.4%		-418	0
St. Johns/Cntrl. Vancouver	310	3,661,945	184,695	5.0%		37,669	0
Vancouver Mall	34	2,276,129	3,444	0.2%		165,640	0
Clark County	1,121	18,766,299	895,871	4.8%		306,058	51,500
Portland Region	8,559	108,590,781	4,242,966	3.9%		773,961	431,573

Source: Costar.

**Office Demand.** Clark County has 11.0+ million square feet of office space. Vacancy rates have fallen, but remain higher than other real estate products. Clark County has 827,366 square feet of vacant space. Orchards is the second smallest office market in Clark County. It also has the highest vacancy rate and the only submarket that has experienced net negative absorption. This is due in large part to other submarkets having a more established professional service/corporate office presence such as CBD/West Vancouver, Cascade Park, and St. Johns/Central Vancouver. Orchards is viewed by the wider marketplace as an industrial location due to its low cost land and ease of access to major arterials/highways.

**Figure 9. Commercial Office Real Estate Market Conditions (2016)**

Sub Area	Existing Inventory		Vacancy			Absorption	Under Construction
	# of Bldg.	Total GLA	Total SF	Rate	Rate		
<b>Class A:</b>							
Camas/Washougal	1	114,000	0	0.0%		0	0
Cascade Park	15	892,156	90,286	10.1%		229,908	0
CBD/West Vancouver	8	913,460	82,456	9.0%		50,405	0
Hazel Dell/Salmon Cr.	3	125,171	20,826	16.6%		3,869	0
Orchards	1	121,164	0	0.0%		0	0
St. Johns/Cntrl. Vancouver	1	66,000	0	0.0%		0	0
Vancouver Mall	5	340,804	2,290	0.7%		3,148	0
Clark County	34	2,572,755	195,858	7.6%		287,330	0
Portland Region	201	29,794,863	2,716,572	9.1%		831,876	1,844,447
<b>Class B:</b>							
Camas/Washougal	23	418,024	24,382	5.8%		20,295	0
Cascade Park	72	1,930,520	146,544	7.6%		-29,971	0
CBD/West Vancouver	49	985,375	86,097	8.7%		17,575	0
Hazel Dell/Salmon Cr.	39	549,624	12,251	2.2%		31,202	0
Orchards	26	343,165	65,409	19.1%		-25,437	0
St. Johns/Cntrl. Vancouver	45	1,162,919	173,142	14.9%		39,935	0
Vancouver Mall	23	491,536	33,692	6.9%		25,362	0

Clark County	277	5,881,163	541,517	9.2%	78,961	0
Portland Region	1,533	45,721,103	3,711,459	8.1%	403,115	458,747
<b>Class C:</b>						
Camas/Washougal	29	145,033	0	0.0%	32,000	0
Cascade Park	35	217,542	9,395	4.3%	1,114	0
CBD/West Vancouver	192	1,101,608	43,600	4.0%	23,122	0
Hazel Dell/Salmon Cr.	47	282,868	8,849	3.1%	2,171	0
Orchards	50	236,382	11,249	4.8%	2,198	0
St. Johns/Cntrl. Vancouver	149	570,679	16,898	3.0%	-10,274	0
Vancouver Mall	3	5,996	0	0.0%	0	0
Clark County	505	2,560,108	89,991	3.5%	50,331	0
Portland Region	3,564	24,065,982	1,063,726	4.4%	197,151	0
<b>Total Office:</b>						
Camas/Washougal	53	677,057	24,382	3.6%	52,295	0
Cascade Park	122	3,040,218	246,225	8.1%	201,051	0
CBD/West Vancouver	249	3,000,443	212,153	7.1%	91,102	0
Hazel Dell/Salmon Cr.	89	957,663	41,926	4.4%	37,242	0
Orchards	77	700,711	76,658	10.9%	-23,239	0
St. Johns/Cntrl. Vancouver	195	1,799,598	190,040	10.6%	29,661	0
Vancouver Mall	31	838,336	35,982	4.3%	28,510	0
Clark County	816	11,014,026	827,366	7.5%	416,622	0
Portland Region	5,298	99,581,948	7,491,757	7.5%	1,432,142	2,303,194

Source: Costar.

## CLARK COUNTY VBLM

Clark County has developed a vacant and buildable lands model (VBLM) using GIS that indicates whether land is vacant, underutilized, developed, or encumbered (e.g., contains critical lands, easements, etc.). The County’s VBLM is utilized in not only developing Comprehensive Land Use Plans for each local jurisdiction but also provides a base level analysis for sub-area plans. It is also helpful in identifying potential areas that could accommodate future commercial development.

At first glance, it appears the 3-mile market area has enough commercial supply to meet commercial demand for the 3-mile market area. However, the majority (173 acres) is zoned for regional commercial use and is located on the edge of the 3-mile market. Only about 18 acres is located central to the three-mile market area. While the regional commercial will serve consumers “big box” related retail needs, consumers within the 3-mile market area will want to have convenience related commercial services located close to where they live and work to avoid long trip times. It will be imperative that the 18 acres of community commercial be truly developable to meet these needs, such as the parcels under ownership by the applicant.

**Figure 10. Available Commercial Land Within 3-Miles of Site**

Parcel Size	Zoning			Total
	C-2	C-3	GC	
< 5,000 sf	3.30	3.34	7.83	14.47
< 2 acres	1.38	18.58	27.45	47.41
2-4.99 acres	6.06	41.51	5.70	53.27
5-9.99 acres	7.64	32.06	9.42	49.12
10-14.99 acres	0.00	0.00	10.59	10.59
15-19.99 acres	0.00	16.16	0.00	16.16
20+ acres	0.00	0.00	0.00	0.00
Sub-Total	18.38	111.65	60.99	191.02

Note: C-2 denotes community commercial. C-3 and GC stands for general (or regional) commercial.

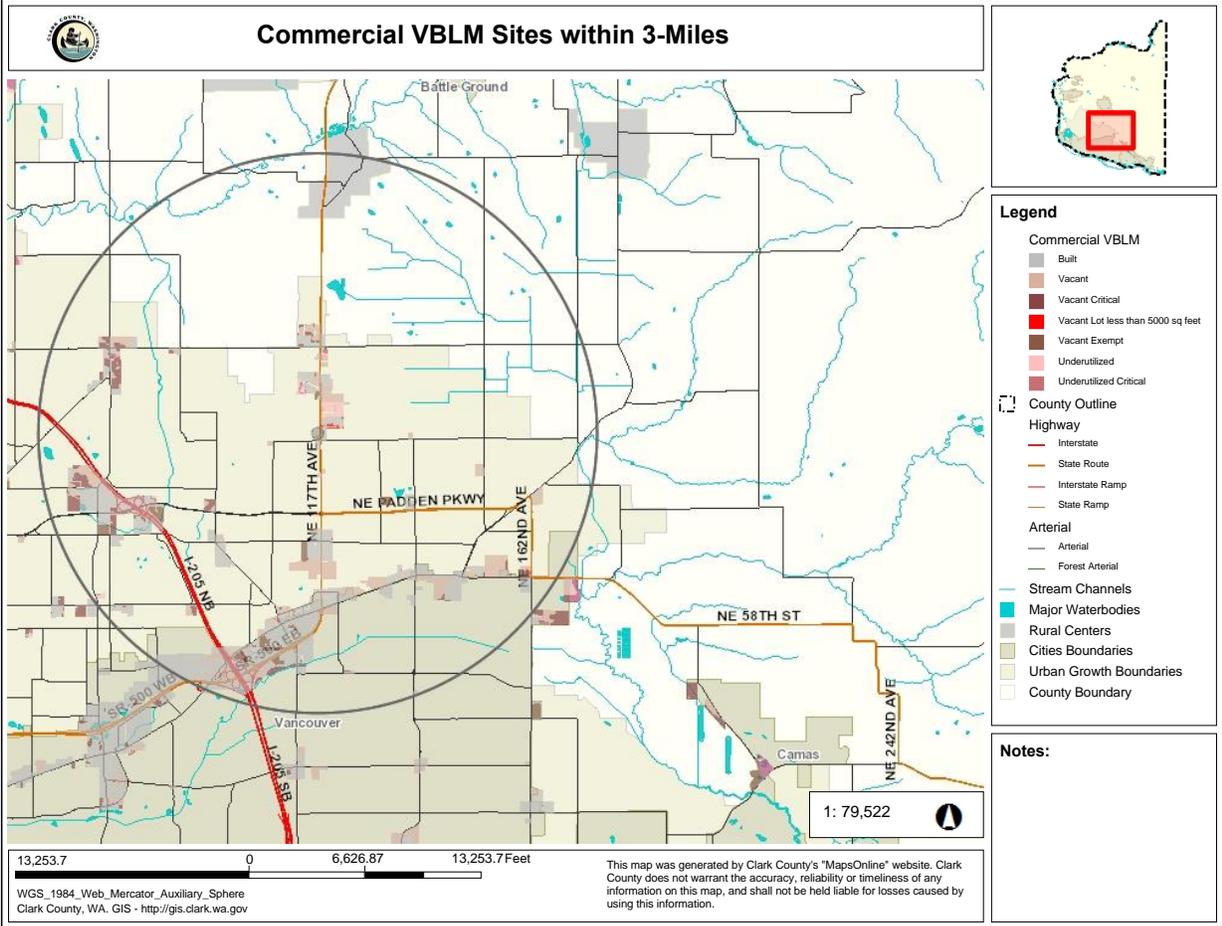
Source: Costar.

As noted in the introduction on page 1, the site is currently zoned R1-6. The owner has the adjacent 1.34 acre property to the south that is zoned CC. The proposal is to rezone the 0.82-acre site to CC that will create a viable commercial site – see Figure 1. According to Clark County’s Vacant and Buildable Lands Model (VBLM), the 0.82-acre site is considered built. Redevelopment would provide for a more flexible site plan, convenient commercial services for area customers, and increased tax base for the County.

Based upon the demand analysis in the previous section, the three-mile market area is not considered a prime commercial office market. The majority of office demand is accommodated in newer Class B space along fourth Plain, older Class C repurposed buildings along 117<sup>th</sup>, or industrial/business park buildings such as East Ridge Business Park. Therefore, retail demand will be the primary driver for commercial development. As noted in the prior section, approximately 910,700 square feet of retail demand will need to be accommodated over the next 20 years at existing retail centers and future development sites. Existing retail centers have the ability to absorb 79,825 square feet (assuming existing centers never fall below normalized conditions of 5% vacancy), leaving 830,875 square feet for future retail centers. Using a typical floor area ratio (FAR) of 0.25, that would mean 76 acres ( $830,875 \div 0.25 = 43,560$ ) of commercial land would develop to meet market demand. The adjacent southern site

is anticipated to assist in accommodating this demand. The ability to add the subject site to the southern parcel will enhance site design as well as ensure that this location will facilitate future commercial development.

**Figure 11. Clark County Commercial VBLM Sites within 3-miles**



## **SUMMARY OBSERVATIONS**

As noted in the introduction on page 1, the site is currently zoned R1-6. The owner has the adjacent 1.34 acre property to the south that is zoned CC. The proposal is to rezone the 0.82-acre site to CC that will create a viable commercial site. Redevelopment would provide for a more flexible site plan, convenient commercial services for area customers, and increased tax base for the County.

The subject site would not likely attract Class A or Class B office, as the Orchards submarket is not considered a primary office market as well as other superior commercial sites within the 3-mile market area being more than capable of accommodating the limited market interest that may arise over the next 20 years.

Based upon the earlier retail demand analysis, there is \$216.2 million of sales leakage in categories that the Orchards area would be most competitive in recapturing at local retail centers. Another \$148.1 million of retail sales will be generated within categories that the Orchards area would be most competitive in capturing at local retail centers over the next 20 years from population and business growth. This \$364.3 million of potential retail sales for the area equates to approximately 910,700 square feet of retail space that would be absorbed at existing retail centers and future development. Existing retail centers have the ability to absorb 79,825 square feet (assuming existing centers never fall below normalized conditions of 5% vacancy), leaving 830,875 square feet for future retail centers. Using a typical floor area ratio (FAR) of 0.25, that would mean 76 acres ( $830,875 \div 0.25 = 43,560$ ) of commercial land would develop to meet market demand. The adjacent southern site is anticipated to assist in accommodating this demand. The ability to add the subject site to the southern parcel will enhance site design as well as ensure that this location will facilitate future commercial development.

At first glance, it appears the 3-mile market area has enough commercial supply to meet commercial demand for the 3-mile market area. However, the majority (173 acres) is zoned for regional commercial use and is located on the edge of the 3-mile market. Only about 18 acres is located central to the three-mile market area. While the regional commercial will serve consumers "big box" related retail needs, consumers within the 3-mile market area will want to have convenience related commercial services located close to where they live and work to avoid long trip times. It will be imperative that the 18 acres of community commercial be truly developable to meet these needs, such as the parcels under ownership by the applicant.

Therefore, there is a need for this parcel to be zoned CC that can not be adequately met by the existing commercial land in compliance with UDC 40.560.010.H.

**END NOTES**

# **REPORT**

## **Mill Plain LLC Rezone Traffic Impact Study**

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January 30, 2017

**H. Lee & Associates, PLLC**

**MILL PLAIN LLC REZONE  
TRAFFIC IMPACT STUDY**



Prepared for:

Mr. Bill Maitland  
Mill Plain, LLC  
13511 SE Rivercrest Drive  
Vancouver, WA 98683

Prepared by:

**H. Lee & Associates, PLLC**  
**P.O. Box 1849**  
**Vancouver, WA 98668**  
**(360) 567-3002**

January 30, 2017

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## SECTION I STUDY SUMMARY

### INTRODUCTION

This traffic impact analysis has been prepared to assess transportation impacts related to the proposed rezone of the tax lot 200124-000 in Clark County, Washington. The existing zoning of the project site is R1-6 and the proposed rezone is CC (Community Commercial). The project site is located at 10008 NE 117<sup>th</sup> Avenue, Vancouver, WA. Figure 1 shows the project vicinity.

#### Project Description

The proposed project site is 35,719 square feet. The existing R1-6 zoning requires that the minimum single family lot size be 6,000 square feet. Based on this requirement, the project site could be subdivided into a maximum of 5 single family lots.

The build out of the proposed CC zoning was based on a floor area ratio (FAR) of 0.25. Applying this FAR to the size of the project site yields a build out of 8,930 square feet of commercial space. For trip estimating purposes, it was assumed that the commercial space would be specialty retail use.

#### Scope of Traffic Impact Study

The scope of the traffic impact study was developed from Clark County's Pre-Application Conference Summary and adjusted based on known Clark County traffic study requirements. From this information, the following intersections were determined to require analysis:

- NE 117<sup>th</sup> Avenue (SR 503)/NE 119<sup>th</sup> Street
- NE 117<sup>th</sup> Avenue (SR 503)/NE 99<sup>th</sup> Street
- NE 117<sup>th</sup> Avenue (SR 503)/NE Padden Parkway

The remainder of this report presents the following analysis:

- Existing P.M. peak hour traffic conditions in the project study area.
- The 2035 "Without Project" P.M. peak hour condition was analyzed to establish the future baseline condition for rezone analysis. The 2035 "Without Project" condition traffic volumes were derived from RTC's regional transportation forecast model. The RTC model link volumes were post processed to turning movement volumes based on the NCHRP 255 methodology and the TurnsW32 software. Since the RTC model included the build out of the project site assuming the existing zoning, these volumes were subtracted from the post-processed turning movement traffic volumes to arrive at the 2035 "Without Project" condition traffic volumes.

- Trip generation estimates for the build out of the existing zoning and the proposed zoning.
- Trip distribution and assignment of trips generated by the build out of the existing zoning and the proposed zoning.
- The 2035 “Existing Zoning Build Out” and 2035 “Proposed Zoning Build Out” conditions were analyzed and compared to each other to determine the traffic impacts of the rezone proposal.

## **SUMMARY OF FINDINGS**

The following are the findings and recommendations from the traffic analysis:

### Findings

- The “Existing Zoning Build Out” is expected to generate 48 net new daily trips, 4 net new A.M. peak hour trips (1 n, 3 out), and 5 net new P.M. peak hour trips (3 in, 2 out) trips.

The “Proposed Zoning Build Out” is expected to generate 396 net new daily trips, 0 net new A.M. peak hour trips, and 24 net new P.M. peak hour trips (10 in, 14 out) trips.

The “Proposed Zoning Build Out” is expected to generate 348 more daily and 19 more P.M. peak hour (7 in, 12 out) net new trips. In the A.M. peak hour, the “Existing Zoning Build Out” is expected to generate 4 more trips (1 in, 3 out). The increase in trips generated by the build out of the proposed rezone is nominal and does not have any significant difference in traffic impacts than the build out based on the existing zoning.

- All of the study area intersections are projected to operate at acceptable levels of service in the 2035 “Existing Zoning Build Out” and 2035 “Proposed Zoning Build Out” conditions.

### Recommendations

- Based on the traffic impact analysis documented in this report, no physical, off-site mitigation would be needed.
- Based on the traffic impact analysis documented in this report, the rezoning of the Mill Plain LLC property will not result in any significant degradation in traffic conditions nearby the project site.



# Pre-Application Conference Final Report

<b>Project Name:</b>	Mill Plain, LLC
<b>Case Number:</b>	PAC2016-00156
<b>Location:</b>	10008 NE 117 <sup>th</sup> Ave
<b>Parcel Number(s):</b>	200124000
<b>Site Size:</b>	.82 acres
<b>Request:</b>	A request to amend the Comprehensive Plan and Zoning Maps from UL (R1-6) to Commercial (Community Commercial (CC))
<b>Applicant:</b>	Mill Plain, LLC 13511 SE Rivercrest Dr. Vancouver, WA 98683 (360)609-1110 <a href="mailto:micheleme@comcast.net">micheleme@comcast.net</a>
<b>Contact Person:</b>	Olson Engineering Attn: Stacy Hickman 222 E. Evergreen Blvd. Vancouver, WA 98660 P:(360) 695-1385 F: (360) 695-8117 <a href="mailto:stacyh@olsonengr.com">stacyh@olsonengr.com</a>
<b>Property Owner:</b>	Same as applicant

**DATE OF CONFERENCE:** December 9, 2016

**STAFF CONTACT:** Jose Alvarez, Clark County Annual Review Coordinator  
(360) 397-2280 – ext. 4898 [annual.review@clark.wa.gov](mailto:annual.review@clark.wa.gov)

**PRESENT AT CONFERENCE:**

<b>Name</b>	<b>Contact Information</b>
Jose Alvarez	Clark County Community Development (see above)
Laurie Lebowsky	Clark County Community Planning (Transportation) (360) 397-2375 – ext. 4544

**Disclaimer:** The following is a brief summary of issues and requirements that were identified at the pre-application conference based on the information provided by the applicant. This summary may contain supplemental information which was not discussed in the conference and is intended to aid the applicant in preparing a complete Annual Review application and/or to provide the applicant with additional information regarding the subject site. Staff responses and information contained in this pre-application report are preliminary in nature, and do not constitute an approval or denial. The determinations contained in this report were based upon information submitted by the applicant, and may be subject to change upon further examination or in light of new or revised information contained in the formal application.

## APPLICATIONS REQUIRED

The requested Comprehensive Plan map and concurrent zone map amendments require an Annual Review/Zone Change Application to be completed. The application will be processed through the Type IV Review process. A SEPA checklist is required to be completed as a part of the Annual Review application.

### Estimated fees:\*

Combined Annual Review/Rezone.....	\$8,113.00
Issuance Fee.....	\$94.00
Environmental Checklist Review (SEPA).....	\$1,987.00
Issuance Fee.....	\$53.00

**\*Fees cited are estimated and based upon the fee schedule in effect at the time of pre-application conference and are subject to change.**

## APPLICABLE POLICIES, CODES and CRITERIA

The following list is not exhaustive of all county, state or federal regulations that may govern development of the site, but is inclusive of those addressed by the county in this comprehensive plan/zone amendment review process.

- Clark County 20 Year Comprehensive Growth Management Plan Policies
  - Chapter 1 – Land Use Element
  - Chapter 9 – Economic Development
  - Chapter 11 – Community Design Element
- Clark County Unified Development Code
  - Title 40:
    - Section 40.230 (Commercial Districts)
    - Section 40.500.010 (Procedures)
    - Section 40.560.010 (Plan Amendment Procedures)
    - Section 40.570 (SEPA)

Clark County Criteria for Map Changes (found within the text of this report)

- Section 40.560.010G (Criteria for all Map Changes)
- Section 40.560.020 (Changes to Districts, Amendments, and Alterations)
- Section 40.560.020G (Approval Criteria)

## **Comprehensive Plan Designation Map Change Criteria**

Comprehensive plan designation changes may only be approved if **all** the following criteria are met (40.560.010G) AND (40.560.010H):

- 1. The proponent shall demonstrate that the proposed amendment is consistent with the Growth Management Act and requirements, the Countywide Planning Policies, the Community Framework Plan, the Comprehensive Growth Management Plan, applicable city comprehensive Plans, and including applicable capital facilities plans and official population growth forecasts; and*
- 2. The proponent shall demonstrate that the designation is in conformance with the appropriate location criteria identified in the plan; and*
- 3. The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity; and*
- 4. The plan map amendment either: (a) responds to a substantial change in conditions applicable to the area within which the subject property lies; (b) better implements applicable Comprehensive Plan policies than the current map designation; or (c) corrects an obvious mapping error; and*
- 5. Where applicable, the proponent shall demonstrate that the full range of urban public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools. Adequacy of services applies only to the specific change site.*

## **Additional Criteria for Commercial Map Changes**

Amendments to the plan map for designation of additional commercial land or for changing the zoning from one commercial district to another shall meet the following additional requirements.

- 1. A market analysis using the weighted block group centroid retrieval method shall be submitted which verifies the need for the new commercial area or center; and*
- 2. A land use analysis of available commercially designated and zoned land in the market area of the proposed site shall be submitted which demonstrates that the existing commercial land is inadequate. The most recent vacant lands model must be used for the land use analysis.*

## **Zone Change Criteria**

The concurrent zone change may only be approved if **all** the following criteria are met (40.560.020G):

- 1. Requested zone change is consistent with the comprehensive plan map designation.*
- 2. The requested zone change is consistent with the plan policies and location criteria and the purpose statement of the zoning district.*
- 3. The zone change either:*
  - a. Responds to a substantial change in conditions applicable to the area within which the subject property lies;*
  - b. Better implements applicable comprehensive plan policies than the current map designation; or*
  - c. Corrects an obvious mapping error.*
- 4. There are adequate public facilities and services to serve the requested zone change.*

## SUBMITTED MATERIALS REVIEWED

The following materials were provided by the applicant and were reviewed by Clark County staff in advance of the pre-application conference:

- Application forms
- Narrative
- GIS Packet

## BACKGROUND

The applicant proposes to amend the comprehensive plan and rezone approximately 0.82 acres from Urban Low designation with an R1-6 zone to Commercial with a Community Commercial zone.

## SUMMARY

The following comments and issues were discussed or identified during the pre-application meeting held on December 9, 2016.

### Land Use

#### ***Comments provided by Clark County Long Range Planning, Jose Alvarez:***

Staff provided an overview of how the pre-application conference would be conducted and a summary of what information would be covered. Staff also provided Information regarding Clark County's obligation to plan under the State's Growth Management Act and the long-range, comprehensive planning exercise that concluded in 1994 with the adoption of the 20-Year Comprehensive Growth Management Plan and corresponding zone map. In 2004, 2007 and 2016 the County adopted an updated 20-Year Comprehensive Plan and zone map.

Specific to this application, staff stated that the assumption is that the current comprehensive plan and zone designation (Urban Low Density Residential, R1-6) was still applicable to this area and that the applicant will need to demonstrate that a change to a commercial zone is appropriate and consistent with the County's Growth Management Plan and Unified Development Code. Staff said that the proposal to change the designation will need to be consistent with the Growth Management Act and the county-wide planning policies, specifically the commercial policies in the comprehensive plan (Growth Management Plan). Staff proceeded to discuss with the applicant the Comprehensive Plan Designation Map Change Criteria that the applicant will need to address in an application. Staff also noted that there are similar locational criteria in the county's Unified Development Code that would need to be addressed to support a proposed change to commercial.

Staff requested the applicant be more specific in their narrative regarding the difference in development potential as commercial, particularly if combined with the adjacent property, versus the constraints to development as residential. Staff also mentioned that the Vacant Buildable Lands model showed the property as being built.

### Transportation

#### ***Comments provided by Clark County Long Range Planning, Laurie Lebowsky:***

The approval criteria require that the applicant demonstrate that adequate transportation facilities can be provided to serve the proposed designation. This can be accomplished by submitting a traffic analysis which compares a reasonable build-out scenario under the existing and proposed designations. It is recommended that the study horizon be 2037 or an equivalent

year representing build out of the adopted urban area. Network improvements should include all those projects that are in the financially constrained Regional Transportation System Plan.

Prior to conducting the traffic analysis, it would be advisable for the applicant to submit a comparison of the potential trip generation from the site under the existing and proposed designations. With that information, staff can better define the intersections likely to be affected.

Access to NE 117th Avenue (SR 503) is under Washington State Department of Transportation (WSDOT) jurisdiction. Access to SR 503 will likely need to be relocated to allow for a joint access with the property to the south. It is not likely that WSDOT would entertain a proposal for a northbound left at this location.

There is a project at the intersection of SR-503 and NE 99<sup>th</sup> St on the 6-year Transportation Improvement Plan (TIP), since the project is on the TIP, it would be safe to assume this improvement for the traffic study.

## **NEIGHBORHOOD ASSOCIATION CONTACT**

While not required of a complete application for a comprehensive plan amendment, staff recommended that the applicant talk to the neighborhood association chair for their area. The Felida Neighborhood Association president is Judy Bumbarger-Enright at (360) 699-2050 or email at: [sunnysidenava@yahoo.com](mailto:sunnysidenava@yahoo.com) Staff also encouraged the applicant to discuss the proposed land use designation change with neighbors.

## **TIME FRAMES**

January 1 through January 31 - Submit Final Annual Review Application

February 1 through to April 1 – Clark County staff will review and prepare a recommendation to the Planning Commission (**this period may be extended depending on staff work load**)

Fourth Quarter or sooner - Planning Commission will approve or deny request. If the Planning Commission approves the Board of Commissioners will review and make a final determination. If the Planning Commission denies the request, the applicant needs to appeal the denial. In practice staff forwards all recommendations to the Board of Commissioners for final resolution of the requests.

## **ADDITIONAL MATERIALS**

A complete list of required documents is contained in the Annual Review application packet. A Completed SEPA checklist is required for the final application. NOTE: Submit a copy of this summary with your final application.

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## **ATTACHMENTS/REFERENCES**

- Annual Review/Zone Change Application Form
- State Environmental Policy Act (SEPA) Review Handout
- SEPA Rules, Chapter 197-11 WAC  
<http://www.clark.wa.gov/longrangeplan/review/documents/sepa-wac.pdf>
- Clark County Growth Management Plan –  
[www.co.clark.wa.us/longrangeplan/review/adopted-plan-text.html](http://www.co.clark.wa.us/longrangeplan/review/adopted-plan-text.html)
- Clark County Code Title 40 –  
[www.clark.wa.gov/commdev/development/developcode.html](http://www.clark.wa.gov/commdev/development/developcode.html)
- Growth Management Act and Related Laws – 2004 Update – (RCW 66.70A.020 Planning goals.)

<http://www.co.clark.wa.us/longrangeplan/review/documents/gma-related%20laws-pub.pdf>

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