



Staff Report

TO: Clark County Planning Commission
FROM: Oliver Orjiako, Director *oliver orjiako*
PREPARED BY: Sharon Lumbantobing, Planner II
DATE: October 15, 2020
SUBJECT: **CPZ2020-00001 REACH COMMUNITY DEVELOPMENT INC.
REQUEST FOR A COMPREHENSIVE PLAN AND ZONING MAP
AMENDMENT**

PROPOSED ACTION

This is a proposal to amend the comprehensive plan and zoning map designation from Commercial (NC) to Urban Medium Density Residential (R-22) on three parcels, which are cumulatively 3.11 acres (104530004, 104530040 and 104600000). This amendment would enable Reach Community Development, Inc. (Reach CDI) to expand additional affordable housing units on the two vacant parcels adjacent to existing housing that serves low-income households in Clark County. As part of this request, two adjacent property owners are requesting to participate in Reach CDI's request to amend the comprehensive plan and zoning map designations on their parcels from NC to R-22 (104530016, 104530041, and 104530002). These three additional parcels total 1.1 acres. The total cumulative acres of this request are 4.21 acres.

BACKGROUND

This is a proposal to amend the comprehensive plan and zoning map designation from Commercial (NC) to Urban Medium Density Residential (R-22) on six parcels, which are cumulatively 4.21 acres (104530004, 104530040, 104600000, 104530016, 104530041, and 104530002).

R-22 zoning is "intended to provide for medium density residential development based upon consistency with the comprehensive plan and compatibility with surrounding land uses." [CCC 40.220.020].

Reach CDI, the non-profit sponsor, owns Covington Commons Limited Partnership (Covington Commons LP), which consists of three parcels that are zoned Commercial (NC). One of the subject parcels (104530004) has eight existing residential buildings with 40 affordable housing apartments, ranging in size from one to four-bedroom units. The other two parcels are vacant (104530004 and 104530040). The three subject parcels have had the Neighborhood Commercial comp plan and zoning designation since 1994 and the existing apartment buildings on parcel 104530004 were constructed between 1998 and 2000.

Reach CDI also owns two adjacent parcels to the west that are zoned R-22 (Cascadia Village Apartments: 104619000 and The Mews at Cascadia Village: 104618000. Covington Commons



LP, Cascadia Village Apartments, and the Mews at CV are known as the Cascadia Trio and collectively provide 115 affordable homes for low-income community members in Clark County.

The proposed comprehensive plan and zoning amendment would enable Reach CDI to develop 15-20 additional affordable housing units on the two vacant parcels to complement the existing affordable housing that serves low-income households in Clark County. Having the same comprehensive plan and zoning designations on all properties would assist Reach CDI with completing their resyndication process by placing all three developments into one tax credit.

Resyndication is a tax allocation process for property owners that participate in the low-income housing tax credit (LIHTC) program. Property owners who are at the end of the 15-year tax credit compliance can apply for resyndication, or new allocation of tax credits, which can be used to upgrade older properties. Resyndication will allow Reach CDI to upgrade significant systems at the three existing older properties to make them more sustainable and construct new units on the two vacant parcels. With resyndication, an old LIHTC property can continue to provide quality housing for at least another 15 years.

As part of this request, two adjacent property owners are requesting to participate in Reach CDI's request to amend the comprehensive plan and zoning designations on their parcels from NC to R-22 (104530016, 104530041, and 104530002). These three additional parcels total 1.1 acres. The total cumulative acres of this request are 4.21 acres. One of the property owners (104530002) is in discussion with Reach CDI about the purchase of their property so that Reach CDI can include this parcel in their affordable housing development.

Reach CDI has submitted a covenant agreement that runs with the land stating that the three subject parcels owned by Reach CDI will be dedicated to preserving or developing long-term affordable housing to individuals with incomes at or below 60% of the area median income (AMI) in Clark County.

GENERAL INFORMATION

Parcel Number(s): 104530004, 104530040 and 104600000 (Reach CDI)
Location: 9703 NE Covington Rd., Vancouver, WA, and two adjacent vacant parcels with no street address (Reach CDI)
Area: 3.11 acres owned by Reach CDI
Owner(s): REACH Community Development, Inc. (Covington Commons LP)

Parcel Number(s): 104530016 and 104530041
Location: 9815 Covington Rd., Vancouver, WA
Area: .38 acres (.32 and .06, respectively)
Owner(s): John and Susan Ferrell

Parcel Number(s): 104530002
Location: 9807 NE Covington Rd., Vancouver, WA
Area: .72 acres

Owner(s): Covington Development

Existing Land Use:

Site: Commercial (Neighborhood Commercial)
North: Urban Medium and Urban High Density Residential (R-18 and R-30)
South: Urban Low Density Residential (R-1.75)
East: Commercial (Neighborhood Commercial)
West: Urban Medium Density Residential (R-22)

SUMMARY OF PUBLIC INVOLVEMENT PROCESS

Sixty-day notification was sent to the Department of Commerce on March 27, 2020 under RCW 36.70A.106. A Notice of Determination of Non-Significance and SEPA Environmental Checklist was published in the Columbian newspaper on June 1, 2020. A legal notice was published on September 30, 2020 for the Planning Commission hearing. A notice of application and Planning Commission hearing was posted on the property on September 30, 2020. Public comments are included in the Planning Commission hearing packet.

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, Comprehensive Plan, City Comprehensive Plans, Applicable Capital Facilities Plans, and official population growth forecasts. [CCC40.560.010(G)(1)].**

Growth Management Act (GMA)

The GMA goals set the general direction for the county in adopting its framework plan and comprehensive plan policies. The GMA lists thirteen overall goals in RCW 36.70A.020 plus the shoreline goal in RCW 36.70A.480(1). The goals are not listed in order of priority. The GMA goals and associated Washington Administrative Code sections that apply to the proposed action are Goals 1 and 4:

Goal 1 “Urban Growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.” [RCW 36.70A.020(1)].

WAC 365-196-310(2)(f) Urban Growth Areas section states that counties planning under the GMA should facilitate urban growth as follows:

“(i) Urban growth should be located first in areas already characterized by urban growth that have existing public facilities and service capacities adequate to serve urban development.

(ii) Second, urban growth should be located in areas already characterized by urban growth that will be served by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources.”

Goal 4 Housing. “Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.” [RCW 36.70A.020(4)].

WAC 365-196-410 Housing Element section provides recommendations for meeting the element requirements. Under WAC 365-196-410(2)(a)(iii)(B), “The housing element shows how a county or city will accommodate anticipated growth, provide a variety of housing types at a variety of densities, provide opportunities for affordable housing for all economic segments of the community, and ensure the vitality of established residential neighborhoods...”

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

(A) Affordable housing;

(B) Preservation of neighborhood character; and

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

WAC 365-196-410(2)(e) states that:

“(e) Affordable housing. RCW 36.70A.070 requires counties and cities, in their housing element, to make adequate provisions for existing and projected needs for all economic segments of the community.

(i) Determining what housing units are affordable.

(A) In the case of dwelling units for sale, affordable housing has mortgages, amortization, taxes, insurance and condominium or association fees, if any, that consume no more than thirty percent of the owner's gross annual household income.

(B) In the case of dwelling units for rent, affordable housing has rent and utility costs, as defined by the county or city, that cost no more than thirty percent of the tenant's gross annual household income.

(C) Income ranges used when considering affordability. When planning for affordable housing, counties or cities should use income ranges consistent with the applicable county-wide or multicounty planning policies. If no such terms exist, counties or cities should consider using the United States Department of Housing and Urban Development (HUD) definitions found in 24 C.F.R. 91.5, which are used to draft consolidated planning documents required by HUD. The following definitions are from 24 C.F.R. 91.5:

(I) Median income refers to median household income.

(II) Extremely low-income refers to a household whose income is at or below thirty percent of the median income, adjusted for household size, for the county where the housing unit is located.

(III) Low-income refers to a household whose income is between thirty percent and fifty percent of the median income, adjusted for household size, for the county where the housing unit is located.

(IV) Moderate-income refers to a household whose income is between fifty percent and eighty percent of the median income where the housing unit is located.

(V) Middle-income refers to a household whose income is between eighty percent and ninety-five percent of the median income for the area where the housing unit is located.

(ii) Affordable housing requires planning from a regional perspective. County-wide planning policies must address affordable housing and its distribution among counties and cities. A county's or city's obligation to plan for affordable housing within a regional context is determined by the applicable county-wide planning policies. Counties and cities should review

county-wide affordable housing policies when developing the housing element to maintain consistency.

(iii) Counties and cities should consider the ability of the market to address housing needs for all economic segments of the population. Counties and cities may help to address affordable housing by identifying and removing any regulatory barriers limiting the availability of affordable housing.

(iv) Counties and cities may help to address affordable housing needs by increasing development capacity. In such an event, a county or city affordable housing section should:

(A) Identify certain land use designations within a geographic area where increased residential development may help achieve affordable housing policies and targets;

(B) As needed, identify policies and subsequent development regulations that may increase residential development capacity;

(C) Determine the number of additional housing units these policies and development regulations may generate; and

(D) Establish a target that represents the minimum amount of affordable housing units that it seeks to generate.

Finding: The subject parcels are within the Vancouver Urban Growth Area and served by public facilities and services, and are located in an area of existing urban development surrounded by residentially and commercially zoned and developed land. The re-designation of this land for Medium Density Residential development is consistent with the type and intensity of uses expected in the Urban Growth Area (Goal 1). While there is a lot of residentially zoned land in the area (R-22 and R-18), there is demonstrated demand for more units of affordable housing for moderate, low income and extremely low income households. Recent funding streams have prioritized housing provision for the most vulnerable community members, targeting income levels between 0% and 30% of area median income (AMI). This has resulted in a gap of regulated housing serving families at the 30% to 100% of AMI, with families living in naturally occurring 'affordable' housing that is often in poor upkeep and oversight. The zone modification for this project enables the nonprofit sponsor (Reach CDI) to improve the systems and structures of the existing affordable housing stock while simultaneously increasing the stock of regulated affordable housing available for low-income Clark County families. Proposed development on the two vacant parcels will increase the number of affordable housing units (15-20 new units projected) that serve community members between 30-60% AMI with below-market rental rates. The proposed development will increase existing densities in an attractive manner and will be built with sustainable design and accessibility features, while maintaining the character of the existing multi-family neighborhood. Resyndication of the LIHTC projects will enable Reach CDI to upgrade significant systems at three existing older properties, in addition to adding new units on the vacant parcel.

Immediately to the north of the subject parcels (approximately 1,200 feet or .23 miles) at the intersection of NE Covington Rd. and NE 76th St., there are eight parcels zoned Community Commercial (totaling 12.49 acres) and four parcels zoned Neighborhood Commercial that serve the commercial needs of the community (totaling 3.73 acres).

The Neighborhood Commercial zoning comprehensive plan designation is intended to “provide services within walking distance for the frequent needs of the surrounding residents...and should generally be less than five acres in size spaced less than five miles from similar uses or zones, serve a population of up to 10,000, locate at a neighborhood collector or larger crossroads and serve a primary trade area within a 1.5 mile radius.” [2015-2025 Comprehensive Growth Management Plan, page 34].

The six subject parcels have been zoned Neighborhood Commercial since 1994 and have not developed as commercial. Due to their small parcel sizes and location, the subject parcels are not as well suited to commercial development as the commercial properties mentioned above at the intersection of NE Covington Rd. and NE 76th St. In addition, the Vancouver Mall is located within a 3.5 mile distance and the nearest Costco is located within a 2 mile distance. The proposed amendment is more consistent with GMA Goals 1 and 4, WAC 365-196-310, and WAC 365-196-410 than the current designation.

Community Framework Plan

The Community Framework Plan (Framework Plan) provides guidance to local jurisdictions on regional land use and service issues. The 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. The Community Framework Plan policies applicable to this proposal include the following:

2.0 Housing

“The Housing Element is to recognize the vitality and character of established residential neighborhoods and identify sufficient land for housing to accommodate a range of housing types and prices. The goal is to make adequate provision for existing and projected housing needs of all economic segments of the community. These policies are intended to coordinate the housing policies of Clark County and its jurisdictions to ensure that all existing and future residents are housed in safe and sanitary housing appropriate to their needs and within their means.

2.1 Framework Plan Policies

2.1.0 Communities, urban and rural, should contain a diversity of housing types to enable citizens from a wide range of economic levels and age groups to live within its boundaries and to ensure an adequate supply of affordable and attainable housing. Housing options available in the county include single family neighborhoods and mixed use neighborhoods (e.g., housing above commercial store fronts, traditional grid single family neighborhoods, townhouses, multi-family developments, accessory units, boarding homes, cooperative housing and congregate housing).

2.1.2 Provide housing opportunities close to places of employment.

2.1.4 All cities, towns, and the county share the responsibility for achieving a rational and equitable distribution of affordable housing.

2.1.7 Encourage creative approaches to housing design to:

- accommodate higher densities attractively;
- increase housing affordability;
- ensure that infill development fits with the character of the existing neighborhood; and
- develop demonstration projects to assist the private sector to achieve infill goals.

2.1.12 All cities, towns, and the county are to provide increased flexibility in the use of new and existing housing development to increase the potential for re-use,

preservation of existing affordable housing, shared living quarters, use of accessory structures as housing, etc.”

[Framework Plan, page 13-14].

Finding: The proposed comprehensive plan and zoning amendment from Commercial (NC) to Urban Medium Density Residential (R-22) on three parcels will increase the number of affordable and attainable housing units in the county. The proposal supports the Community Framework Plan Housing policies that require the county to provide an adequate supply of affordable and attainable housing. The proposed development will increase existing densities in an attractive manner and will be built with sustainable design and accessibility features, while maintaining the character of the existing multi-family neighborhood. The subject site is located within the Vancouver UGA in an area of existing urban development, surrounded by parcels zoned medium density residential and adjacent to other parcels zoned Neighborhood Commercial. The proposed change is consistent with the Housing policies in the Framework Plan.

Countywide Planning Policies (CWPP)

The GMA, under RCW 36.70A.210, requires counties and cities to collaboratively develop Countywide Planning Policies (CWPP) to govern the development of comprehensive plans. The WAC 365-196-305(1) states “the primary purpose of CWPP is to ensure consistency between comprehensive plans of counties and cities sharing a common border or related regional issues. Another purpose of the CWPP is to facilitate the transformation of local governance in the urban growth areas, typically through annexation to or incorporation of a city, so that urban governmental services are primarily provided by cities and rural and regional services are provided by counties.”

Land Use

- “1.1.3 Urban growth shall be located primarily in areas already characterized by urban growth that have existing public facility and service capacities to adequately serve such development and second in areas already characterized by urban growth that will be served by a combination of both existing public facilities and services that are provided by either public or private sources. Urban governmental services shall be provided in urban areas.” [2016 Plan, pages 41].

Housing

- “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, multi-family 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.
- 2.1.3 Link transportation and housing strategies to assure reasonable access to multi-modal transportation systems and to encourage housing opportunities in locations that will support the development of public transportation.

- 2.1.7 Encourage flexible and cost efficient land use regulations that allow for the creation of alternative housing types which will meet the needs of an economically diverse population.” [2016 Plan, pages 72].

Finding: The subject parcels are located within the Vancouver Urban Growth Area in an area of existing urban development and adjacent to a commercially zoned area. The site is supported by C-TRAN’s #7 fixed route bus service and other urban services. The Countywide Planning Policies encourage sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, and multi-family housing. The plan amendment would provide more units of affordable housing in a location supported by public transportation and other urban services and in close proximity to jobs. The proposed plan amendment and rezoning is consistent with the policies in the Countywide Planning Policies and would result in affordable housing opportunities for an economically diverse population.

Comprehensive Growth Management Plan 2015-2035 (2016 Plan)

The 20-year Comprehensive Growth Management 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:

Land Use

“Goal: Encourage more compact and efficiently served urban forms and reduce the inappropriate conversion of land to sprawling, low-density development.

- 1.3.1 Urban densities and uses may occur throughout the urban growth area if it is provided with adequate services. Development and redevelopment in the UGA should be strongly encouraged to occur in greater intensity in major centers, transit routes and other areas characterized by both existing higher density urban development and existing urban services. Development and redevelopment should be encouraged to occur with less intensity in areas where urban development is of lower density or has not yet occurred, or in areas where urban services do not yet exist. [2016 Plan, page 46].

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

- 1.4.1 Interrelated uses should generally be encouraged to locate in close proximity of each other.
- 1.4.2 Encourage mixed-use developments, which provide opportunities to combine residential, commercial uses within individual structures, or within adjacent structures or developments.” [2016 Plan, pages 46-47].

Housing

“Goal: Provide for diversity in the type, density, location, and affordability of housing throughout the county and its cities. Encourage and support equal access to housing for rental and homeowners and protect public health and safety.

- 2.2.2 Encourage a variety of housing types and densities, including mixed-use centers, services, and amenities.
- 2.2.4 Develop a fair share housing allocation that provides low and moderate income housing targets for cities and urban growth areas. The program should include a housing inventory, incentives, and financing mechanisms.
- 2.2.6 Encourage a variety of housing types and densities in residential neighborhoods.
- 2.2.9 The county should take appropriate action to encourage the preservation and expansion of the current stock of federally subsidized affordable housing.

Goal: Plan for increasing housing needs of low-income and special needs households.

- 2.3.2 Clark County or local jurisdictions shall plan for low-income and special needs housing that is well served by public transit.

Goal: Promote an active role in affordable housing using a combination of regulatory, partnership, and finance techniques.

- 2.5.1 Ensure that policies, codes and regulations, including public development covenants, provide the opportunity to site affordable housing types, in particular, off-site manufactured homes and accessory units.
- 2.5.2 Enhance provision of affordable housing for persons with incomes less than 30 percent of the median family income by using available federal and state programs and by promoting public/private partnerships with focus on affordability range.

Goal: Support diversity in the mix of housing types in the community, while improving home ownership tenure.” [2016 Plan, pages 72-74].

Finding: The proposed designation of this land from Commercial to Urban Medium Density Residential (R-22) supports multiple goals and policies in the comprehensive plan and is consistent with the type and intensity of uses expected in the Vancouver Urban Growth Area. The designation would provide 15-20 additional affordable housing units in the county, while also supporting the upgrade of systems and fixtures of the existing 115 units of affordable housing present within the community. There is demonstrated demand for affordable housing units. Increasingly, families in the 30-60% of the average median income (AMI) level are left out of funding priorities, as more vulnerable populations (below 30% AMI) receive limited resources for development. This project represents an opportunity to enhance the existing stock of regulated affordable housing and add additional units to serve low-income families in Clark County. Proposed development on the vacant parcel will increase the number of affordable housing units that serve community members between 30-60% AMI with below-market rental rates. The proposed development will increase existing densities in an attractive manner and will be built with sustainable design and accessibility features, while maintaining the character of the existing multi-family neighborhood. Immediately north of the subject parcels at the intersection of NE Covington Rd. and NE 76th St., there are nine parcels zoned Community Commercial and four parcels zoned Neighborhood Commercial that serve the commercial needs of the community. The proposed amendment is consistent with policies in the 2016 Plan.

Conclusion: Criterion A has been met.

- B. The proponent shall demonstrate that the designation is in conformance with the appropriate locational criteria identified in the plan and the purpose statement of the zoning district. [CCC 40.560.010(G)(2) and CCC 40.560.020(G)].**

Urban Medium Density Residential (UM)

“This designation provides land for single family attached housing, garden apartment and multi-family developments ranging from 10 to 22 dwelling units per gross acre. Minimum densities assure that areas build out to the density planned, ensuring that the urban areas accommodate anticipated residential needs. Areas planned for urban medium residential use and assisted living facilities shall be located near commercial uses and transportation facilities in order to efficiently provide these services. Public facilities and institutions are allowed under certain conditions. The implementing base zones in this designation are the R-12, R-18, and R-22 zones.” [2016 Plan, page 33].

- A. “Purpose.
1. The residential (R-12, R-18, R-22, R-30 and R-43) districts are intended to provide for medium and higher density residential development based upon consistency with the comprehensive plan and compatibility with surrounding land uses. The following factors will be considered in the application of one (1) of these districts to a particular site:
 - a. Properties designated urban medium density residential on the comprehensive plan should not exceed a density of R-22. Urban high density residential areas are appropriate for densities in the R-30 and R-43 districts.
 - b. Proximity to major streets and the available capacity of these streets, adequacy of public water and sewer, vehicular and pedestrian traffic circulation in the area, proximity to commercial services and proximity to public open space and recreation opportunities. Development within these districts will be reviewed to ensure compatibility with adjacent uses including such considerations as privacy, noise, lighting and design.” [CCC 40.220.020(A)].

Neighborhood Commercial

“These Commercial center areas provide services within walking distance for the frequent needs of the surrounding residents and are implemented by the Neighborhood Commercial base zone. These areas are located in the urban growth boundary and will general be small areas which are generally designed to serve neighborhoods. Development in these areas will be designed to be compatible with the surrounding residentially zoned neighborhoods. New neighborhood commercial areas should generally be less than five acres in size spaced less than five miles from similar uses or zones, serve a population of up to 10,000, locate at neighborhood collector or larger crossroads and serve a primary trade area within a 1-5 mile radius” [2016 Plan, page 33].

- 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.” [CCC 40.230.010].

Finding: The subject parcels are located in close proximity to existing commercially zoned parcels along NE Covington Rd. that have higher traffic counts. The proposal to change the zoning of the subject parcels to Urban Medium Density Residential (R-22) will provide more affordable housing units in an area already zoned multi-family residential (R-18 and R-22) and is in conformance with the appropriate locational criteria. There is a demonstrated demand for affordable housing in the county. The site has the availability of public water and sewer and is located near a minor arterial with public transit (C-TRAN's #7) and bike lanes. The proposed re-designation is in conformance with both the locational criteria in the comprehensive plan and the intended purpose of the proposed zoning districts.

Conclusion: Criterion B is 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. [CCC 40.560.010(G)(3)].

Finding: Urban Medium Density Residential (R-22) is intended to provide for multi-family developments ranging from 10 to 22 dwelling units per gross acre. One of the subject parcels owned by Reach CDI has been developed with multi-family residential since 1997 while two of the other adjacent subject parcels are vacant. The proposed designation of these parcels to Urban Medium Density Residential will maintain the character of the existing multi-family neighborhood and will provide more units of affordable housing to serve community members between 30-60% of the average median income (AMI) with below-market rental rates. The parcels owned by Reach CDI are adjacent to three other parcels zoned Neighborhood Commercial along NE Covington Rd., which have requested to participate in this request for a comprehensive plan and zoning designation amendment. All of the subject parcels are suitable for the requested Urban Medium Density Residential (R-22) comprehensive plan designation. Having the same comprehensive plan and zoning designations on the three subject parcels as the other adjacent parcels owned by Reach CDI would assist Reach CDI with completing their resyndication process by placing all three developments into one tax credit. Resyndication will allow Reach CDI to upgrade significant systems at the three existing older properties to make them more sustainable and construct new units on the two vacant parcels. With resyndication, an old LIHTC property can continue to provide quality housing for at least another 15 years. There are no other alternative sites in the vicinity that will allow for this.

Conclusion: Criterion C is 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. [CCC 40.560.010(G)(4)].

Finding: The proposed land use amendment (b) better implements applicable comprehensive plan policies than the current land use designation of commercial. An Urban Medium Density Residential designation of the six subject parcels will maintain the character of the existing multi-family neighborhood and will provide 15-20 more units of affordable housing to serve

community members between 30-60% of the average median income (AMI) with below-market rental rates. As noted in Criteria A above, the designation of these parcels to Urban Medium Density Residential is more consistent with the Housing policies in WAC 365-196-410, the 20-Year Growth Management Plan, and the County Wide Planning Policies than the current designation and would better serve the community by: 1) providing more units of affordable housing for an economically diverse population, 2) encouraging the preservation and expansion of the current stock of federally subsidized affordable housing, 3) planning for low-income and special needs housing that is well served by public transit, 4) ensuring that policies, codes and regulations, including public development covenants, provide the opportunity to site affordable housing types, and 5) providing affordable housing for persons with incomes less than 30 percent of the median family income by using available federal and state programs and by promoting public/private partnerships with focus on affordability range. One of the property owners (104530002) is in discussion with Reach CDI about the purchase of their property so that Reach CDI can include this parcel in their affordable housing development to provide more units of affordable housing.

Conclusion: Criterion D is 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. [CCC 40.560.010(G)(5)].**

Finding: The full range of urban public facilities and services are available to serve residential uses at the site. The parcels are served by the Vancouver Water District, Clark Regional sewer district, Fire District 5 and Clark County Sheriff's office. The parcels are also served by the Vancouver school district. The site is within C-Tran's service area and is currently served by a transportation arterial network. A Transportation Impact Analysis (TIA) waiver was granted by the County Engineer/Public Works Director, in accordance with CCC 40.560.040(A)(2)(c)(6). Clark County Public Works submitted a Transportation Impact Analysis which shows a decrease in trips as a result of this request from 688 daily trips under the current Neighborhood Commercial zoning to 153 daily trips in the proposed R-22 zoning, a net decrease of 535 trips per day (See Transportation Analysis).

Conclusion: Criterion E is met.

RECOMMENDATION AND CONCLUSIONS

Based on the information and the findings presented in this report and in the supporting documents, the staff forwards a recommendation of **APPROVAL** to Clark County Planning Commission. The following table lists the applicable criterion and summarizes the findings of the staff report for CPZ2020-00001.

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