



Staff Report

TO: Clark County Planning Commission

FROM: Oliver Orjiako, Director

PREPARED BY: Matt Hermen, AICP, Planner III

DATE: October 3, 2019

SUBJECT: CPZ2019-00031 AMENDMENT OF COMPREHENSIVE PLAN
AND ZONING MAPS TO REMOVE URBAN HOLDING OVERLAY

PROPOSED ACTION

This proposal seeks to amend the Comprehensive Plan and Zoning maps to remove the urban holding overlays from approximately 2,200 acres near the I-5/NE 179th Street Interchange area. Clark County's Comprehensive Plan contains specific procedural guidelines for the urban holding designation in the Vancouver Urban Growth Area. The proposal would remove the last remaining urban holding designation in the Vancouver Urban Growth Area, therefore an amendment to the Comprehensive Plan text is also proposed to remove the procedural guidelines associated with urban holding in the Vancouver Urban Growth Area, as shown on Exhibit 1.

BACKGROUND

The urban holding overlay plan designation is placed on property when it is brought into the urban growth boundary. It protects areas from premature land division and development that would preclude efficient transition to urban residential development or large-scale employment development. The urban holding overlay designation is implemented on this property by the Urban Holding-10 (UH-10) zoning overlay district. Removal of the urban holding overlay designation must be in accordance with the special implementation procedures provided for in Comprehensive Plan Chapter 14, Procedure Guidelines. Removal of the overlay is through a Type IV process.

The Comprehensive Plan identifies criteria that must be met in order to remove the urban holding overlays and authorize the implementation of the underlying urban zone. The county may remove the UH overlays from appropriate areas of sufficient size that the county can collect transportation related data, analyze the cumulative transportation impacts, and address mitigation to these impacts. In addition to transportation infrastructure, adequate system capacity for water and sewer must be demonstrated to serve urban development. The urban holding overlay designation may be removed from the subject properties pursuant to Clark County Code 40.560.010(G) and upon satisfaction of the following:

- **West Fairgrounds and East Fairgrounds:** Determination that the completion of localized critical links and intersection improvements are reasonably funded as shown on the county 6 year Transportation Improvement Plan or through a development agreement.
- **Mill Creek:** The area is bordered by NE 179th Street to the north, NE 50 Avenue to the east, NE 163rd Street to the south, and NE 34th Avenue to the west. Determination that the completion of localized critical links and intersection improvements are reasonably funded as shown on the county 6 Year Transportation Improvement Plan or through a development agreement.

The urban holding plan map and zoning overlays were applied to the areas in 2004 and 2007 with the expansion of the Vancouver Urban Growth Area, because transportation infrastructure in those areas lacked adequate capacity to accommodate urban level development. In 2008, the County approved a circulation plan for the areas that would distribute urban traffic efficiently to regional transportation facilities. In 2016, the Washington State Legislature awarded \$50 Million to the Washington Department of Transportation for improvements at the I-5/179th St. Interchange. The Legislature allocated the \$50 million for the state's biennial budget in 2023-25. The improvements needed on the Clark County's transportation system are identified in the 2015-2035 Comprehensive Plan [Page 296]. They include NE 179th St. from Delfel Rd. to NE 15th Ave., NE 15th Ave. from NE 179th St. to NE 10th Ave., NE 10th Ave. from NE 149th St. to NE 154th St. and the intersections of NE 29th Ave. and NE 50th Ave. at NE 179th St.

The criteria for removing the urban holding overlays in the West and East Fairgrounds and Mill Creek neighborhoods provide two options to reasonably fund localized critical links and intersections improvements: the 6-year Transportation Improvement Program (TIP) or a development agreement. On October 23, 2018, the Clark County Council adopted the 2019-2024 TIP. The TIP identifies prioritized transportation projects and proposed funding for design, property acquisition and construction during the next six years. Projects that are scheduled for completion of construction within the six year TIP are identified as reasonably funded. The projects, identified in the Comprehensive Plan and the previous paragraph, that build additional capacity for urban density development to occur through the removal of the urban holding overlays are not reasonably funded in the 2019-2024 TIP.

Public Works has forecasted a total amount of \$66,522,000 required to improve the critical links at NE 179th St. from Delfel Rd. to NE 15th Ave., NE 15th Ave. from NE 179th St. to NE 10th Ave., NE 10th Ave. from NE 149th St. to NE 154th St., and intersection improvements of NE 29th Ave. and NE 50th Ave. at NE 179th St.

On December 4, 2018, Clark County Council approved Resolution 2018-12-05, increasing the Road Fund levy by 1% from the previous year. The increase to the Road Fund is to be dedicated to improvements in the NE 179th St./I-5 Interchange Area.

On August 20, 2019, Clark County Council approved Resolution 2019-08-05, selecting a public financing plan for public infrastructure in the vicinity of NE 179th Street and authorizing entry into developer agreements between Clark County and owners of real property in the vicinity of NE 179th Street. The public financing plan consists of \$8,800,000 of County Road Funds, a one-time allocation of \$2,000,000 of road preservation funds, \$15,400,000 of Real Estate Excise Taxes (REET-2), \$2,700,000 of County Road Funds approved by Resolution 2018-12-05, \$11,000,000 in state and federal grants, \$6,800,000 of advanced TIF payments required in the developer

agreements, \$5,300,000 of surcharges required in the developer's agreements, and \$14,500,000 in Traffic Impact Fees.

GENERAL INFORMATION

Parcel Numbers: See Exhibit 2

Location: The area is generally bounded by NW 18th Ave. on the west, NE 209th St. to the north, NE 50th Ave. to the east, and NE 154th St. to the south.

Area: ~2,200 acres

Owners: 570 assessor parcels

Exiting Land Use: Urban Low Density Residential, Urban Medium Density Residential, Mixed Use, Industrial, Commercial, and Park/Open Space.

SUMMARY OF PUBLIC INVOLVEMENT PROCESS

The Clark County Councilors held worksessions regarding funding the infrastructure improvements on January 23, 2019, March 13, 2019, June 12, 2019, and July 10, 2019. The Clark County Councilors held public hearings to select a financing option to deem reasonably funded localized transportation projects, regionally significant critical links, intersection improvements on July 16, 2019 and August 20, 2019. A draft of the proposed changes to the Comprehensive Growth Management Plan 2015-2035 Map and zoning map was sent to the Department of Commerce on August 6, 2019 in compliance with RCW 36.70A.106. A Notice of Determination of Non-Significance and SEPA Environmental Checklist were published in the Columbian newspaper on September 6, 2019. An open house was held on September 10, 2019 at Alki Middle School to inform area residents of the necessary transportation projects and urban holding removal. Property owners within 300 feet of the proposal were mailed a notice of the planning commission public hearing on September 20, 2019. A legal notice was published for the Planning Commission hearing on September 18, 2019. Three signs were posted at the location of the proposal, informing the public of the proposal, date and time of the Planning Commission's public hearing and instructions for obtaining further information. All public comments are included in the Planning Commission Hearing binder.

APPLICABLE CRITERIA, EVALUATION AND FINDINGS

CRITERIA FOR COMPREHENSIVE PLAN MAP AND TEXT CHANGES [CCC 40.560.010(F) & (K)]

- 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, city comprehensive plans, applicable capital facilities plans and official population growth forecasts.***
[CCC40.560.010(F)(1)].
- B. *The county may approve a plan text or policy change only when the amendment complies and is consistent with all the applicable requirements of the GMA and WAC, and the comprehensive plan, including without***

limitation countywide planning policies, the community framework plan, and the capital facilities plan.

[CCC40.560.010(K)(2)].

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 added in RCW 36.70A.480(1). The goals are not listed in order of priority. The GMA goal that applies to the proposed action is Goal 12.

Goal 12 speaks directly to public facilities and services to “ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below established minimum standards.” [RCW 36.70A.020(12)].

As part of the requirement to develop a comprehensive plan, jurisdictions are required to establish level-of-service standards (LOS) for arterials, transit service, and other facilities. [RCW 36.70A.070(6)(a)] This introduces the concept of concurrency in the GMA, which requires that needed public facilities and services be in place, or officially planned and scheduled to be put into place, concurrent with new development. This concept requires cities and counties to establish explicit levels of service, or minimum threshold measures, to determine if particular service is adequately provided.

GMA requires the County to adopt minimum level-of-service standards for transportation. The County may not approve new development applications which fail to meet the adopted minimum levels of service unless improvements are made to correct the deficiency or unless corrective measures are scheduled and funded to occur within a locally established time frame, up to a maximum of six years. The urban holding overlays were applied to the subject properties because the transportation infrastructure in the area lacks adequate capacity to accommodate urban level development; in other words, urban level development of the area would cause failure to meet minimum level of service. The reasonable funding of necessary infrastructure, which would occur after the county budget implements funding mechanisms, the CFP, TIP and TIF rate are amended, and development agreements are fully effective, would mitigate the failure.

Finding: Adequate transportation infrastructure, water service and sewer utilities are direct services needed for urban level development. The proposed comprehensive plan and zoning map amendments to remove the urban holding designation would allow for a greater demand on the public facilities that serve more intense urban development. Clark Public Utilities’ Capital Facilities Plan has demonstrated that there is adequate capacity to provide water service to the subject area. Clark Regional Wastewater District’s Capital Facilities Plan has demonstrated that there is adequate system capacity to provide sewer service to the subject area.. Clark County has identified the critical links and intersection improvements needed to support urban development in the area, including the following improvements: NE 179th St. from Delfel Rd. to NE 15th Ave., NE 15th Ave. from NE 179th St. to NE 10th Ave., NE 10th Ave. from NE 149th St. to NE 154th St., and intersection improvements of NE 29th Ave. and NE 50th Ave. at NE 179th St. On August 20, 2019, Clark County Council approved Resolution 2019-08-05, selecting a public financing plan for public infrastructure in the vicinity of NE 179th Street and

authorizing entry into developer agreements between Clark County and owners of real property in the vicinity of NE 179th Street. Several Clark County Council decisions are necessary to implement the public financing plan, including: approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements “reasonably funded”. The approval of the actions listed above will ensure adequate transportation infrastructure capacity to serve the area for this proposal.

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:

Goal 6.0 notes “the need for capital facilities to accommodate expected growth and establish policies to ensure that these facilities are available when development is occupied and to provide for the extension of public utilities to new development in a timely manner.” [Framework Plan, page 18] The following capital facilities and utilities policies apply to the proposed action:

6.1.0 Major public and private expenditures on facilities and services (including libraries, schools, fire stations, police, parks and recreation) are to be encouraged first in urban and rural centers.

6.1.1 Establish level-of-service standards for capital facilities in urban and rural areas. [Framework Plan, page 18].

These framework plan policies are implemented by Clark County Code 40.350.020 Transportation Concurrency Management System. The purpose of this section is to establish levels of service for arterial and transit routes and ensure that infrastructure required to meet such standards is built or reasonably funded before new development is approved.

Finding: The standards implemented in the Transportation Concurrency Management System are used to forecast projects that will be needed to serve future population growth. The transportation projects are identified in the Capital Facilities Plan (CFP). CFP projects that are associated with urban development in the urban holding overlay must be reasonably funded in the County’s TIP or through a development agreement for the urban holding overlays to be removed. This requirement ensures that transportation facilities are available when development is occupied. Clark County’s 2020-25 TIP will demonstrate that the projects needed to serve urban development associated with this proposal are reasonably funded following certain council actions that implement the Council’s selected public financing 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.”

Policy 6.0.3 states, “Public facilities and utility services shall be planned so that service provision maximizes efficiency and cost effectiveness and ensures concurrency.” [Comprehensive Plan, page 182].

Policy 6.0.12 states, “The county shall work with the state, each municipality and special districts to identify future needs of regional and statewide public facilities. This will ensure countywide consistency and avoid duplications or deficiencies in proposed facilities.” [Comprehensive Plan, page 183]

Finding: The public facilities needed to serve urban development have been coordinated with applicable state agencies, schools, service and utility providers. The public facilities needed to serve the urban development have been identified in the County’s Comprehensive Plan and the service providers Capital Facility Plans. The proposed amendment is consistent with polices in the Community Framework Plan and the Countywide Planning Policies.

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:

“Goal: Ensure that necessary and adequate capital facilities and services are provided to all development in Clark County in a manner consistent with the 20-year Plan.”

6.1.1 Continue to plan for and provide capital facilities and services as necessary to support development consistent with the 20-year Plan and coordinate and facilitate the planning and provision of such facilities and services by other public or private entities.

6.1.5 Assist and facilitate the siting of capital facility and service infrastructure in a manner consistent with the 20-year Plan, through appropriate land use planning and development review policies and procedures.” [2016 Plan, page 184].

Finding: The Comprehensive Plan identifies criteria that must be met in order to remove an urban holding zoning overlay and authorize the implementation of the underlying urban zone. Clark County’s Comprehensive Plan requires that prior to lifting the urban holding designation in the 179th Street/I-5 Interchange Area, the Council must determine that the completing of localized critical links and intersection improvements are reasonably funded as shown on the County’s 6-year Transportation Improvement Program of through a development agreement.

Conclusion: Clark County Council approved Resolution 2019-08-05 on August 20, 2019. Resolution 2019-08-05 selected a financing plan for public infrastructure in the vicinity of NE 179th Street and authorized entry into developer agreements between Clark County and certain property owners. The financing plan and developer agreements will be implemented upon the Council’s adoption of a future ordinance finding that the relevant critical links and intersection improvements are reasonably funded. The Comprehensive Plan’s criterion to

remove the urban holding overlays will be met upon Clark County Council's actions to implement the financing plan.

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 40.560.010F(2).)

Finding: The urban holding overlay protects areas from premature land division and development that would preclude efficient transition to urban development or large-scale industrial development. The urban holding overlay is implemented by Urban Holding-10 (UH-10) and Urban Holding-20 (UH-20) zoning overlay districts. The removal of the urban holding Comprehensive Plan and Zoning overlays is located within the Vancouver Urban Growth Area. The urban holding overlays were placed on the area because the transportation infrastructure lacked capacity to accommodate urban level development. The locational criteria apply to land use and zoning amendment proposals. The criterion evaluates whether the proposed land use would complement surrounding properties. The removal of urban holding would not introduce land uses that are inconsistent with the plan designations of the surrounding properties. The Comprehensive Plan identifies criteria that must be met in order to remove the urban holding overlays and authorize the implementation of the underlying urban zone. The county may remove the urban holding overlays from appropriate areas of sufficient size that the county can collect transportation related data, analyze the cumulative transportation impacts, and address mitigation to these impacts. Clark County has identified the critical links and intersection improvements needed to support urban development in the subject area, including the following improvements: NE 179th St. from Delfel Rd. to NE 15th Ave., NE 15th Ave. from NE 179th St. to NE 10th Ave., NE 10th Ave. from NE 149th St. to NE 154th St., and intersection improvements of NE 29th Ave. and NE 50th Ave. at NE 179th St. On August 20, 2019, Clark County Council approved Resolution 2019-08-05, selecting a public financing plan for public infrastructure in the vicinity of NE 179th Street and authorizing entry into developer agreements between Clark County and owners of real property in the vicinity of NE 179th Street. Several Clark County Council decisions are necessary to implement the public financing plan, including: approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements "reasonably funded". The approval of the actions listed above will ensure adequate transportation infrastructure capacity to serve the area for this proposal.

Conclusion: The removal of the urban holding overlays is appropriate for the location of the proposed area following the Clark County Council's approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements "reasonably funded".

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 40.560.010.F(3))

Finding: The map amendment proposes to remove the urban holding overlays. The underlying Comprehensive Plan designations and zoning, that have been in place since 2007, are not proposed to be amended. The Comprehensive Plan identifies criteria that must be met in order to remove the urban holding overlays and authorize the implementation of the underlying urban zone. The county may remove the urban holding overlays from appropriate areas of sufficient size that the county can collect transportation related data, analyze the cumulative transportation impacts, and address mitigation to these impacts. In addition to transportation infrastructure, adequate system capacity for water and sewer must be demonstrated to serve urban development. On August 20, 2019, Clark County Council approved Resolution 2019-08-05, selecting a public financing plan for public infrastructure in the vicinity of NE 179th Street and authorized entry into Developer Agreements between Clark County and owners of real property in the vicinity of NE 179th Street. Several Clark County Council decisions are necessary to implement the public financing plan, including: approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements “reasonably funded”. The approval of the actions listed above will ensure adequate transportation infrastructure capacity to serve the area for this proposal. Clark Public Utilities has reviewed the adopted county land use designations and the adopted countywide population target of 577,431 and has determined that the CPU Water System Plan is fully consistent with the land use provisions and the additional service demands which they entail. The Discovery Clean Water Alliance has reviewed the proposed county land use designations and determined that the Capital Plan is fully consistent with these provisions and the additional service demands that they entail.

Conclusion: The proposal to remove the Comprehensive Plan and zoning overlays will not change the underlying land uses or zoning. The map amendment is suitable to remove the urban holding designations from the subject area, following the Clark County Councilor’s approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements “reasonably funded”.

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 40.560.010F(4).)

Finding: In 2016 the Washington State Legislature allocated \$50 million to improve the I-5/NE 179th Street Interchange. This interchange reconstruction project will improve mobility and safety for travelers who use the I-5 - Northeast 179th Street interchange by making improvements that add capacity to the transportation facility. Clark County Public Works is planning on completing a series of projects along a two-mile stretch between Northeast 179th Street near Interstate 5. These projects will improve travel times, encourage economic development, optimize intersection locations, upgrade stormwater management and bring the corridor up to current road standards. On August 20, 2019, Clark County Council approved Resolution 2019-08-05, selecting a public financing plan for public infrastructure in the vicinity of NE 179th Street and authorized entry into Developer Agreements between Clark County and

owners of real property in the vicinity of NE 179th Street. Several Clark County Council decisions are necessary to implement the public financing plan, including: approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements “reasonably funded”. The approval of the actions listed above will ensure adequate transportation infrastructure capacity to serve the area for this proposal.

Conclusion: The plan map amendment does respond to a substantial change in conditions applicable to the subject area. The Clark County Council’s commitment to reasonably fund the critical links and intersection improvements, with the approval of Resolution 2019-08-05, satisfies the Comprehensive Plan’s procedural requirements to remove the urban holding overlays in the Vancouver Urban Growth Area. The approval of Resolution 2019-08-05 is a substantial change in the funding conditions of the necessary critical links and intersection improvements that are necessary to remove the urban holding overlays.

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 40.560.010F(5))

Finding: The Comprehensive Plan defines direct and indirect concurrency services. Direct concurrency services are transportation infrastructure and indirect concurrency services include water and sewer. These services are necessary support urban development. Other indirect services include schools, fire protection, law enforcement, parks and open space, solid waste, libraries, electricity, gas and government facilities. The urban holding overlays are in effect due to the lack of direct concurrency services to serve urban development on the subject area. Clark Public Utilities’ Capital Facilities Plan has demonstrated that there is adequate capacity to provide water service to the subject area. Clark Regional Wastewater District’s Capital Facilities Plan has demonstrated that there is adequate system capacity to provide sewer service to the subject area. Clark County will provide and maintain public streets in the subject area. Clark County has identified the transportation projects that are needed to serve urban development of the subject area. The transportation projects are critical links and intersection improvements that must be reasonably funded and constructed in 6-years to maintain Clark County concurrency standards. On August 20, 2019, Clark County Council approved Resolution 2019-08-05, selecting a public financing plan for public infrastructure in the vicinity of NE 179th Street and authorized entry into Developer Agreements between Clark County and owners of real property in the vicinity of NE 179th Street. Several Clark County Council decisions are necessary to implement the public financing plan, including: approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements “reasonably funded”. The approval of the actions listed above will ensure adequate transportation infrastructure capacity to serve the area for this proposal. On September 3, 2019, Clark County approved the school impact fee increase and re-adopted the 2015-2021 capital facilities plan for the Ridgefield

School District. The school district is anticipating the need for a new elementary, middle and high school as some of the reasons for the increased impact fees.

Conclusion: The full range of urban services can be adequately provided to remove the urban holding designations from the subject area, following the Clark County Councilor's approval of the 2020-2025 Transportation Improvement Program (TIP), approval of the proposed funding package for the 2020 budget, amending the Capital Facilities Plan (CFP), increasing Traffic Impact Fees (TIF), and declaration of the critical links and intersection improvements "reasonably funded". Clark Public Utilities has reviewed the adopted county land use designations and the adopted countywide population target of 577,431 and has determined that the CPU Water System Plan is fully consistent with the land use provisions and the additional service demands which they entail. The Discovery Clean Water Alliance has reviewed the proposed county land use designations and determined that the Capital Plan is fully consistent with these provisions and the additional service demands that they entail. Criterion E will be met following the Clark County Councilors implementation of the public financing plan for public infrastructure in the vicinity of NE 179th Street.

RECOMMENDATION AND CONCLUSIONS

In order to deem the critical links and intersection improvements reasonably funded, the Clark County Council has to officially make financial decisions that fund the necessary projects. The Clark County Council has selected a public financing plan to reasonably fund the critical links and intersection improvements.

Based on the information presented in this report, staff recommends that the Planning Commission forward a recommendation of **APPROVAL** of the proposal to remove urban holding overlays on the subject properties; consistent with the County Councilors adopting a formal finding that the critical links and intersection improvements needed to create transportation capacity sufficient to accommodate the trips generated by the proposal are reasonably funded.

The following table lists the applicable criterion and summarizes the findings of the staff report for CPZ2019-00024. The Planning Commission findings will be added to the table after public deliberation at the Planning Commission hearing scheduled for this application.

COMPLIANCE WITH APPLICABLE CRITERIA		
Criterion for Policy/Text Amendments	Criteria Met?	
	Staff Report	Planning Commission Findings
Criteria for All Map Changes		
A. Consistency with GMA, Countywide Policies, Community Framework Plan, & Comprehensive Plan	Met	
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 Urban Public Facilities and Services	Met	
Criteria for Plan Text Changes		
A. Initiated and Approved by the County	Yes	
B. Consistency with GMA, Countywide Policies, Community Framework Plan, & Comprehensive Plan	Met	
Recommendation:	Approval	



EXHIBIT 1

COMPREHENSIVE PLAN TEXT AMENDMENT

Chapter 14 Procedural Guidelines

Special Implementation Procedures

The comprehensive plan map contemplates one land use method to assure the adequacy of public facilities needed to support urban development within urban growth areas. That method is to apply an Urban Holding District combined with urban zoning.

Urban Holding

When development polices require a legislative action prior to urban development occurring, the county applies the Urban Holding Plan Map and Zoning Overlay with a specific underlying urban zone. In these cases, identified criteria are established that must be met in order to remove the urban holding zoning and authorize the underlying urban zone. Under certain circumstances a Master Plan or Sub-Area Plan which includes how and when an area develops and with what uses, may be required. In most cases, city plan policies may require annexation prior to development.

Battle Ground, Camas, La Center, Ridgefield, Washougal, Yacolt and Woodland Urban Growth Areas

These areas may only undergo urban development following annexation, or consistent with an Intergovernmental Agreement which responds to a significant opportunity for a major employer if immediate annexation is not geographically feasible.

Vancouver Urban Growth Area

The Vancouver Urban Growth Area is divided into larger sub-areas. Each of these areas has unique circumstances as described below that shall be met in order to remove the Urban Holding Overlay and authorize an urban zone which is consistent with the Comprehensive Plan. The county will remove the UH overlay to appropriate areas sufficient in size that the county can collect transportation related data, analyze the cumulative transportation impacts and address mitigation to these impacts. ~~The urban holding overlay designation may be removed pursuant to Clark County Code 40.560.010 upon satisfaction of the following:~~

- ~~1. **Mill Creek:** The area is bordered by NE 179th Street to the north, NE 50 Avenue to the east, NE 163rd Street to the south, and NE 34th Avenue to the west. Determination that the completion of localized critical links and intersection improvements are reasonably funded as shown on the county 6 Year Transportation Improvement Plan or through a development agreement.~~
- ~~2. **West Fairgrounds and East Fairgrounds:** Determination that the completion of localized critical links and intersection improvements are reasonably funded as shown on the county 6 year Transportation Improvement Plan or through a development agreement.~~

EXHIBIT 2

URBAN HOLDING OVERLAY PARCELS

608163000	604445000	117442000	117425000	181232000	116960000	181203000
602661000	608467000	117461000	117390000	181293000	116915005	181499000
117431001	602524000	117461005	181235000	181513000	116910000	182170000
610047000	608473000	117370000	117400000	181512000	181447000	182168000
986031758	610925000	117431000	117150000	116970000	116820000	181694010
608673000	610052000	181306000	117146000	116915000	181300000	181695000
986031755	610873000	179417000	181234000	116890000	181286000	181704000
601250000	605884000	179356000	181309000	181458000	116930000	181686000
602921000	603395000	179168000	117765060	181258000	116913000	182198000
608805000	986050548	179174000	117141000	116815000	181453000	181710000
608454000	607318000	179094000	117180000	181448000	116810000	181696000
606490000	610975000	117750000	117170000	181225000	116680000	182203000
610535000	607077000	117700000	181316000	116675000	116710000	181711000
611430000	986027435	117730000	117765056	116700000	181460005	182183000
600053000	605059000	181228000	181539000	116660000	116685000	182180000
601855000	600494000	181236000	181540000	116684000	181442000	117767002
611493000	605208000	117761000	181251000	116701000	181495000	117767004
602160000	986033531	117710000	181295000	181454000	181497000	182393010
610755000	986034012	181227000	181517000	181291000	179416000	182381000
603106000	604263000	117711000	181455000	181208000	179414000	182157000
606946000	601684000	117500000	117142000	181238000	179183000	182184018
986031756	603200000	117490000	117765091	181202000	181472000	182188000
986028524	601541000	117450000	117765090	181223000	116635000	182174000
610053000	600456000	181221000	181557000	181459000	116566000	182184010
611431000	610628000	179178000	117062000	181579000	116560005	182184012
601465000	611466000	179143000	117060000	181268000	116636000	185571000
610556000	607156000	179414005	181207000	181277000	116610000	181735000
600499000	986050390	179100000	181317000	181548000	116590000	181689000
606402000	604679000	179414010	181532000	181519000	116570000	181705000
610048000	986042655	179184000	181509000	117180005	181262000	181687000
605661000	603791000	179152000	181533000	117145000	116600000	181476005
605060000	606654000	179157000	117080000	117765095	116550000	181304000
610051000	606400000	179147000	117121000	117140000	181264000	181694005
602363000	610947000	117751000	117123000	181198000	181244005	181741000
605054000	605798000	181183000	117122000	181278000	181496000	181284000
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