

Community Development Department
Building • Planning • Code Enforcement

P.O. Box 9, 230 Davidson Avenue
 Woodland, WA 98674
www.ci.woodland.wa.us

Building: (360) 225-7299 / Planning: (360) 225-1048 / Fax: (360) 225-7336

STAFF REPORT & RECOMMENDATION
City of Woodland - Docket Map
Comprehensive Plan Map Amendment

ISSUE DATE: April 13, 2019

Land Use Application No.: CPA2018-010/SEP-18-008

Applicant:	City of Woodland PO Box 9 230 Davidson Avenue Woodland, WA 98674
Site Location:	See below.
Parcel Number(s) & Size:	See below.
Notice of Application & Likely DNS Issued:	November 30, 2018 January 17, 2019 March 29, 2019
Published:	December 5, 2018 December 12, 2018 January 2, 2019 April 3, 2019
Comment Due Dates:	December 19, 2018 (re-noticed) January 12, 2019 (continued to February 21, 2019) February 21, 2019 (continued to March 21, 2019) March 21, 2019 (continued to March 28, 2019) March 28, 2019 April 18, 2019 (till the close of the public testimony portion of the hearing)

I. DESCRIPTION OF PROPOSAL

The City is considering updating the Woodland Comprehensive Plan Map to meet the goals, policies, and objectives of the Comprehensive Plan. The Planning Commission has considered all submitted requests to change their comp plan designations or for the City to extend the Urban Growth Area (UGA) and to designate the property under the City's comp plan. Having reviewed those cases, the Commission is considering a recommendation for the final map which reflects the docketed map recommendations.

II. LOCATION OF PROPOSED DEVELOPMENT

The area affected by this application includes properties within the City limits as well as properties in Cowlitz County south of the high school, north of the City limits east of Interstate 5 and south of the city between the Lewis River and the railroad tracks. The properties are within various sections of Township 5 North, Range 1 E.W.M. and Range 1 W.W.M. in the area generally known as the Woodland Bottoms. The exact parcels are listed above and shown on the attached map.

III. REVIEW AUTHORITY

City Plan Amendments (Woodland Municipal Code)

Per WMC 19.08.030, applications for a Comprehensive Plan Amendment are processed and a staff report developed by staff. The Planning Commission reviews the staff report and holds an open record pre-decision hearing where the Commission will make a recommendation to be forwarded to the City Council. The City Council is thereafter responsible for making the City's decision on the Comprehensive Plan Amendments. Where those decisions involve changes to the urban growth area, decisions will be passed on to the County's Planning Commission for further review prior to the Board of County Commissioners making the final decision.

As laid out in WMC 17.84.040 the Planning Commission shall issue its recommendation within 90 days from the date of the required public hearing. Notice that the Planning Commission has made a recommendation shall be forwarded to applicants within 14 days of the decision. If the recommendation is for approval of a comp plan amendment, a copy of the decision, staff report, findings, and any special conditions considered by the commission to be controlling and necessary shall be forwarded to the City Council within 14 days of said action.

Per WMC 17.84, amendments to the comprehensive plan text and map are permitted, once initiated, after a public hearing by the Planning Commission. Notice for the public hearing was published in The Reflector as noted above, as well as distributed to the Lewis River Review, The Daily News, and The Columbian newspapers. Notice was also posted at the Woodland Post Office, City Hall, and the Police Station and mailed to approximately 1700 property owners of record within the subject area and within 300 feet of the boundaries for site specific applications.

Urban Growth Boundary Requests under GMA (RCW 36.70A)

Under RCW 36.70A.110(1), Urban Growth Areas (UGAs) shall be designated by the County in which the UGA is to be located. Because of the Growth Management Act (GMA) requirement that Comprehensive Plans be consistent (internally and externally), staff has interpreted this to mean that the City will need to request that Cowlitz County amend its Comprehensive Plan to reflect any UGA expansion that the city desires.

Additional RCW analysis is provided below.

Woodland Growth Management Element (Cowlitz County Resolution 02-078)

Adopted by Cowlitz County on April 23rd, 2002 and referred to as the Urban Growth Management Program (UGMP), this document was meant to be a bridge between the City of Woodland, which is fully planning under GMA, and Cowlitz County which is a partially planning jurisdiction.

The mission of the resolution is to *"establish an attractive urban community, clearly distinguished from valuable resource lands, discourage inefficient sprawling development, encourage a strong economic base while protecting the environment and providing efficient urban services in a fiscally responsible manner."*

For the update in 2002, the comp plan update process started in August 1999 and finished in April 2002, a 32-month process that included 23 months of advisory meetings. After four months before the PC in October of 2001 the PC made a recommendation to the City Council, who on November 19, 2001 adopted the Urban Growth Management Program (UGMP) and UGA and recommended that Cowlitz County do the same. The Cowlitz County PC recommended adoption of the Urban Growth Management Program and UGA by March of 2002 and the Cowlitz County Commission adopted them on April 23, 2002 (Resolution 02-078 and referred to as Document 6 in the 2018-19 comp plan update effort).

Resolution 02-078 represents an agreed upon set of guidelines for how the City and County will handle development in and outside the City's UGA. Chapter II Policies and Procedures includes policies for coordinating long-range and current planning efforts and for the annual review of requested amendments. Chapter III Revising the Urban Growth Boundary outlines the process for sizing and creating the UGA at the time the resolution was adopted.

The resolution authorizes the City of Woodland to perform annual and five-year reviews of the Comprehensive Plan. UGA expansions are specifically identified as amendments that can be reviewed during either an annual or a five-year update process.

Furthermore, for five-year reviews, the UGMP states it shall be updated as part of the City's GMA required Comprehensive Plan review process and states that Woodland and Cowlitz shall:

- 1) Establish the effectiveness of the overall program in fulfilling the purpose and intent of urban growth management.
- 2) Review, evaluate local and regional trends and policies, urban service plans, service facilities and economic and environmental factors as they may be affected by the program.
- 3) Propose and implement changes, if needed, to improve the programs policies, procedures, and boundary as a result of the above evaluation.
- 4) Propose changes in the City and County Comprehensive Plans, urban service plans, ordinances and other planning procedures as a result of the above evaluation.

(It should be noted that the latest GMA-mandated update was completed in 2016.) However, staff continued to try to implement these items as discussed below in the Findings section of this staff report. (Staff calls them "items" because they are not technically goals or policies but appear to be aspirational statements.)

The resolution further provides for applicant parameters, amendment to the UGA guidelines, and responsibilities and procedures for the process, none of which are codified in the Woodland Municipal Code but which the staff has worked to comply with.

Lastly, the resolution outlines criteria for the amendment of the City's UGA.

IV. FINDINGS

NOTE: Project specific analysis and PC recommendations are in **BLUE**. Supplemental staff analysis and recommendations are in **RED**.

Background

Finding 1: Cowlitz County Resolution 02-078, outlines how the Cowlitz-Wahkiakum Governmental Conference (now CWCOG) and Cowlitz County (and its jurisdictions) developed strategies for growth starting as early as 1977 and culminating in the 2002 adoption of Resolution 02-078 (recorded as AFN 3147189). This document outlined a process and set of goals/policies for UGMP and how planning would occur.

Within that document is a statement that the *"objective is not to discourage or limit growth, but rather to direct it in such a way as to minimize the cost in terms of dollars, associated environmental impacts and the preservation of rural lands and open spaces."* (Page 4 of 29)

Further, the document laid out that in addition to *"minimizing public service and facility costs, a number of other benefits can accrue from an urban growth management program:*

- *Effective and efficient use of existing investment and coordinated lands use and capital facility decisions;*
- *An adopted program showing the City's expansion and service area adds certainty to the benefit of local officials, citizens and development interests;*
- *The city gains some control over its own future, gaining a formal voice in what the County approves in the unincorporated portion of the urban area adjacent to City limits;*
- *With urban-level growth directed into the City and its expansion area, the City's tax base and position as a social, economic, and cultural center is enhanced; and*
- *Agricultural and forest lands surrounding the City can be conserved, energy saved, and the City's existing character maintained."*

Finding 2: The City of Woodland has an adopted Growth Management Act (GMA) compliant plan which plans for a 2036 population projection of 9,274 and 3,566 housing units. (The comp plan amendment was processed in 2015 and the latest plan was adopted March 22, 2016.)

Finding 3: As outlined in Resolution 02-078 on Page 6 of 29, the City and County performed outreach efforts that resulted in the adoption of an UGM program and updates to the County Comprehensive Plan (2002). Since that time, the City has adopted updates to its comp plan including major updates in 2005 and 2016, with 2016 being a required GMA update.

Finding 4: The 2016 comp plan land use assumptions are outlined in Table 3-1. Staff reviewed those assumptions and performed a vacant buildable land calculation for the land within the City limits and the existing Urban Growth Area (UGA). Those calculations can be found in Document #32 of case CPA-18-010 and are incorporated by reference.

Table 3-1 shows that the City projected a 2.3% growth rate, adding 3,566 people to the City by using the 174 acres of undeveloped residential land within the City limits and the UGA.

The plan likewise predicts that the adopted land supply for commercial and industrial users is adequate to accommodate 2,480 commercial jobs on the 124 acres of commercial zoned land, and 2,192 industrial jobs on the 548 acres of industrial zoned land within the city and UGA.

Amendments to the Urban Growth Area

Finding 5: On Page 13 of the resolution (Page 14 of 29 according to the recording stamp) Section D lays out the considerations for amendments to the UGA. It states:

1. *Amendments to the Urban Growth Area Boundary may be requested at any time but shall only be reviewed during Woodland's Comprehensive Plan amendment process.*

Staff analysis: The requests being reviewed were done while the City is engaged in a formal amendment process. The timing of the process has been adjusted for the reasons noted above.

and,

2. *The applicant shall present factual information in support of the amendment.*

Staff analysis: In most cases, the information that is requested in the resolution is information that the City would provide the applicant. As a result, in lieu of asking the applicant to ask the city for information so it could be re-submitted back to the city, amendment applicants were asked to complete the relevant submittal items to apply. As a result, various application packets include varying amounts of detail for each specific request and the amount of design effort that has been invested in the effort.

No formal applications for annexation, zoning, or subdivision have been submitted. Given that these applications would represent a significant speculative expenditure without much assurance that the investment wouldn't be wasted, staff agreed that concurrent application was not warranted for amendment of the comp plan map. However, as noted below, staff is recommending that all requests for UGA expansion be considered only upon the attachment of certain conditions. (See below)

Resolution 02-078 - Five Year Comprehensive Plan Update Statements

Finding 6: On Page 13 of the resolution (Page 14 of 29 according to the recording stamp) Section B states: "The overall Woodland Urban Growth Management Plan policies, procedures and boundary shall be comprehensively reviewed every five (5) years as part of the City's Growth Management Act required Comprehensive Plan review process. The City of Woodland and Clark and Cowlitz counties shall:

Finding 6a:

- 1) *Establish the effectiveness of the overall program in fulfilling the purpose and intent of urban growth management.*

Staff analysis: As discussed above, the City of Woodland did a review of the buildable land within the City's limits. Based upon this, the city can monitor how it is achieving its progress towards implementation of its plan and the resolution.

To date, the city has not attempted to perform an analysis of the county's comp plan success. However, once the city has completed its process, the city will be applying for an amendment of the Cowlitz Comp Plan as part of the county's comp plan amendment process. At that time, the city will work with the county to perform some of this analysis so that the city's request can be reviewed in accordance with the resolution.

But until the city completes this process and reviews the pending applications, the analysis of how compatible the city's request will be with the county's comp plan cannot be effectively calculated.

At this point, staff points out that under RCW 36.70A.110(2) adopting counties are required to provide adequate growth areas capable of accommodating the growth projected for the succeeding 20-year period. In the case of the City of Woodland, the projected population as adopted in the 2016 plan is 9,274 by the year 2036.

Finding 6b:

- 2) *Review, evaluation local and regional trends and policies, urban service plans, service facilities and economic and environmental factors as they may be affected by the program.*

Staff analysis: As noted above, the major comp plan update required under GMA was completed in 2016. As part of that effort, the city made planning assumptions and adopted growth targets as shown in Table 3-1 of the comp plan. No effort is being made at this time to amend the numbers reached in that final decision. Staff is instead trying to reconcile those adopted assumptions with a map that cannot allow the city to meet GMA.

Staff is however, reviewing local development trends and comparing them to the policies expressed in the plan. Given that the City is three full years into the 20-year planning window, staff was able to evaluate those trends and make some conclusions. Based upon the City's analysis (Document 32) it was concluded that the City has adequate commercial and industrial land to meet its desired goals, but that the residential land supply is inadequate to meet the stated policies and targets if past trends hold.

Specifically, there is a shortage of net developable residential land within the city limits and its current UGA. In fact, calculations show that of the 1,292 units projected by 2036, the shortage could be between 810 and 1,155 units.

In addition, the city's desire for a 60/40 low and high-density split as outlined in the land use policies of the 2016 comp plan further makes the situation problematic. To achieve this policy goal, using the 1,933 existing residential units and the 1,292 units projected over the next 20 years, the city would need to have 1,290 high-density units.

The number of multi-family units in the city at the time the comp plan was adopted appears to be 464 (taken from Section 4.2 of the Housing Element). A total of eight additional units were built between 2016 and 2018 and staff expects 16 units to be built in 2019 (four fourplexes in Sequoia Park). This means that the city will have a total of 488 multi-family units by the end of 2019.

This is problematic because the comprehensive plan is already internally inconsistent.

- Existing housing stock = 1,933 dwellings (of which 464 are multi-family units)
- Adopted housing projection = 1,292 units by 2036
- Total housing projections = 3,125 units by 2036

Adopted housing allocation 60% Single-Family / 40% Multi-Family

- 40% of 3,125 units in 2036
- 1,290 high-density multi-family units by 2036

This means that with 488 existing multi-family units the city will need to build 802 additional multi-family units to achieve its stated goal ($1,290 - 488 = 802$). And given the data collected in the buildable lands document, the staff's best estimate is that the City will be able to build only 345 total housing units on its given land supply.

The only way to achieve the 60/40 policy would be for the City to approve only high-density (multi-family) housing developments within the City limits for the next 17 years. And even then, the city may not be able to achieve its adopted target.

This is problematic because a conclusion that the City desires only multi-family dwellings be built for what amounts to an entire generation does not appear to be supported anywhere else in the City's plan (except for possibly within the policies promoting the efficient provision of services and utilities). ([See Finding #29 for PC discussion of the 60/40 policy.](#))

At a minimum, these conclusions lead staff to believe that review of the comprehensive plan map for expansion of the UGA is warranted at this time. Upon completion of this task, the city will then work with the County to determine whether the trend (need) is representative of the county and warrants the county's plan be amended as well.

Note: Under GMA, counties are required to designate UGAs based upon projected growth allocations.

However, since Cowlitz County does not fully plan under GMA, the county has not allocated population growth figures to its cities as typical fully-planning GMA counties do. Therefore, the County may, at its discretion, determine that growth in Woodland is not where growth should occur and decline to make changes to the UGA because Woodland has no GMA allocated growth projection.

This puts the city in the position that while it is required to fully plan, the partially-planning county, which makes the final decision in a case like this, is not required to comply with GMA.

Finding 6c:

- 3) Propose and implement changes, if needed, to improve the programs policies, procedures, and boundary as a result of the above evaluation.

Staff analysis: The city has engaged in a significant public participation effort at the local level. The results of that effort will go forth as changes to the adopted comp plan. As the process continues, the city will participate in an additional public process at the county level when it goes before the Cowlitz County Planning Commission for review and before the Cowlitz County Commission which will consider the changes to the county's comprehensive plan. Any changes that result from that process could likewise be considered efforts to improve the comp plan.

Should the effort to amend the plan fail, the city will effectively have two choices: 1) to continue to develop under the currently adopted comp plan, or 2) to engage in a complete update of the 2016 comp plan.

Either option is viable, and both can be compliant with GMA given that the current comp plan appears to have been found consistent with GMA when it was adopted.

Finding 6d:

- 4) Propose changes in the City and County Comprehensive Plans, urban service plans, ordinances and other planning procedures as a result of the above evaluation.

Staff analysis: The City is in the process of evaluating requests for such changes. When the City Council has decided how they would like to change the Comp Plan Map, staff will prepare an application package for final decision by the County. In both cases, the requests will be evaluated based upon consistency with GMA, using local and regional trend data, and designed to improve the program, policies, and procedures of the plans.

Commercial Development

Finding 7: Table 3-1 of the 2016 comp plan states that there were 124 acres of developable land for the 20-year planning horizon. As noted previously, a significant amount of commercial land (27.8%) has been developed since the adoption of the comp plan in 2016. There is an additional 14.8% that is expected to be developed within the next year.

This means that approximately 42% of the commercial land supply will be developed within the first four years of the 20-year planning horizon.

Finding 8: The proposed comp plan map amendments will substantially change the amount of commercial land available for the remaining 16 years of the comp plan planning horizon. The table below shows the total acres of commercial land available for development and how it was affected by development. It also shows how the 2018-19 comp plan amendment requests, as recommended by the Planning Commission, could affect the overall commercial land supply.

	Developed	Re-designated	Added to UGA	Total Acres	
2016 Comp Plan Assumption				124	100%
2016-2018 development	33.68			90.32	72.8%
2019 estimated development	18.38			71.94	58.0%
Saxony Pacific - Franklin Loop		-19.05		52.89	42.7%
BYRV Inc.		-6.37		46.52	37.5%
Woodland Commerce Center		-5.51		41.01	33.1%
Aho - UGA PC recommendation*			+40.14	81.15	65.4%
Loomis - Empress Estates**			+26.36	107.51	86.7%
	52.06	-30.93	+66.5		

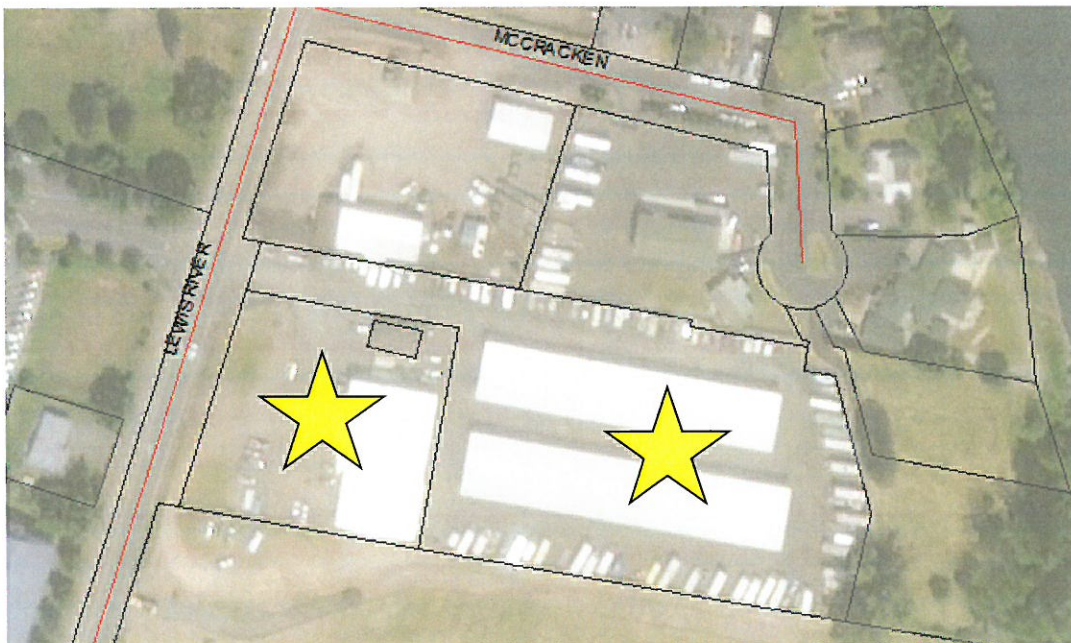
*Includes Double J trailers, Put It In Storage and Woodland Pallet.
 **Assumes PC Recommendation for the entire parcel.

The table shows that of the original 124 acres of land available, the land supply is expected to be 71.94 acres by the time all the permitted commercial projects are built.

The supply is further reduced by the three "internal" recommended comp plan map amendments. The effect of these re-designations will be to reduce the commercial land supply to 41.01 acres.

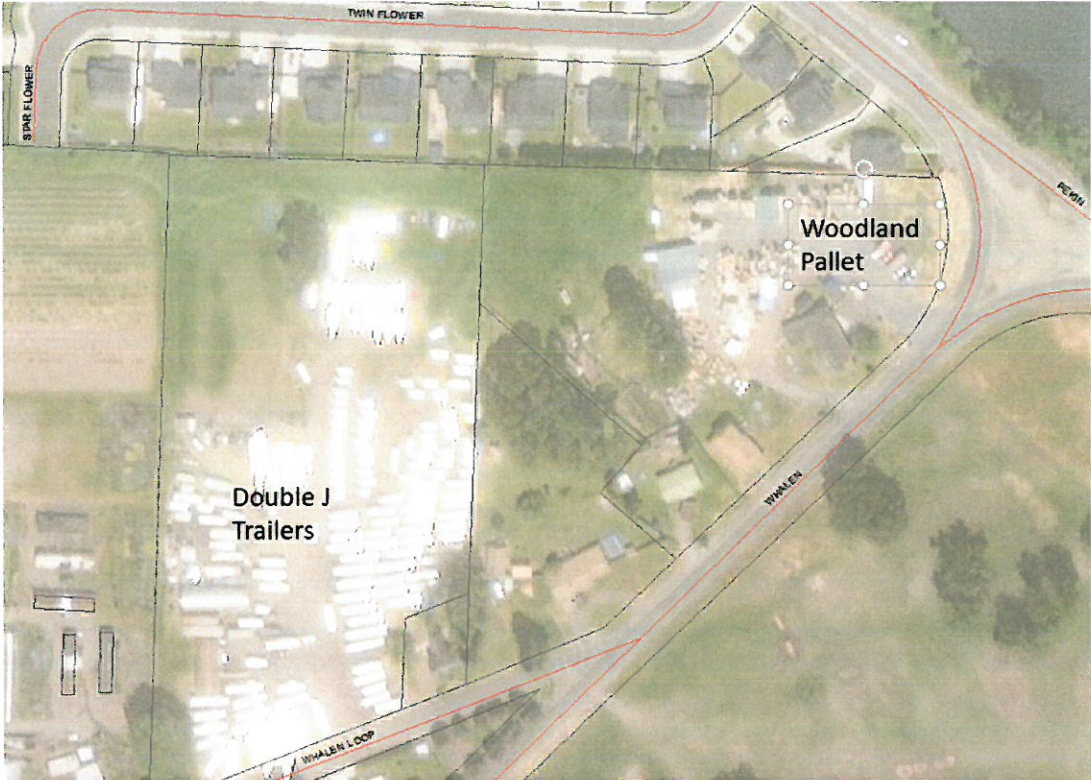
The comp plan map amendments which are recommended to expand the UGA could add as much as 66.5 acres to the 20-year commercial land supply for a potential total of 107.51 acres.

Finding 9: Staff also notes that this amount of acreage is affected by development that already exists on land within the UGA that is designated as Commercial. Those properties are shown in the aerial photos below.



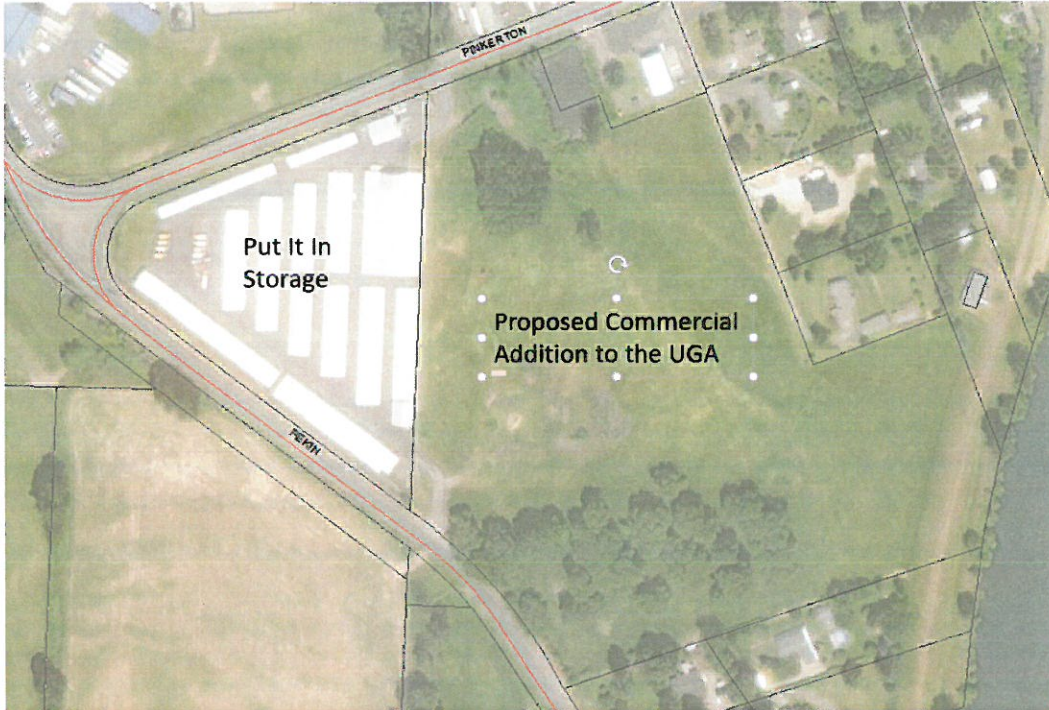
These two properties are in the UGA at the northeast corner of the city. They are 4.18 acres in size and have been fully developed with commercial activity.

Finding 10: The current recommendations by the Planning Commission also include land that is currently developed. The aerial photos below show those parcels.



These two parcels are about 8.2 acres in size and occupied by currently operating commercial businesses. They are within the area added to the docket map as part of the CPA-18-005 (Aho Construction I LLC) PC recommendation.

Rest of page intentionally left blank.



These two parcels are also within the area recommended for the docket map as part of the CPA-18-005 (Aho Construction I LLC) PC recommendation. The storage site is approximately 6.65 acres and appears to be fully developed.

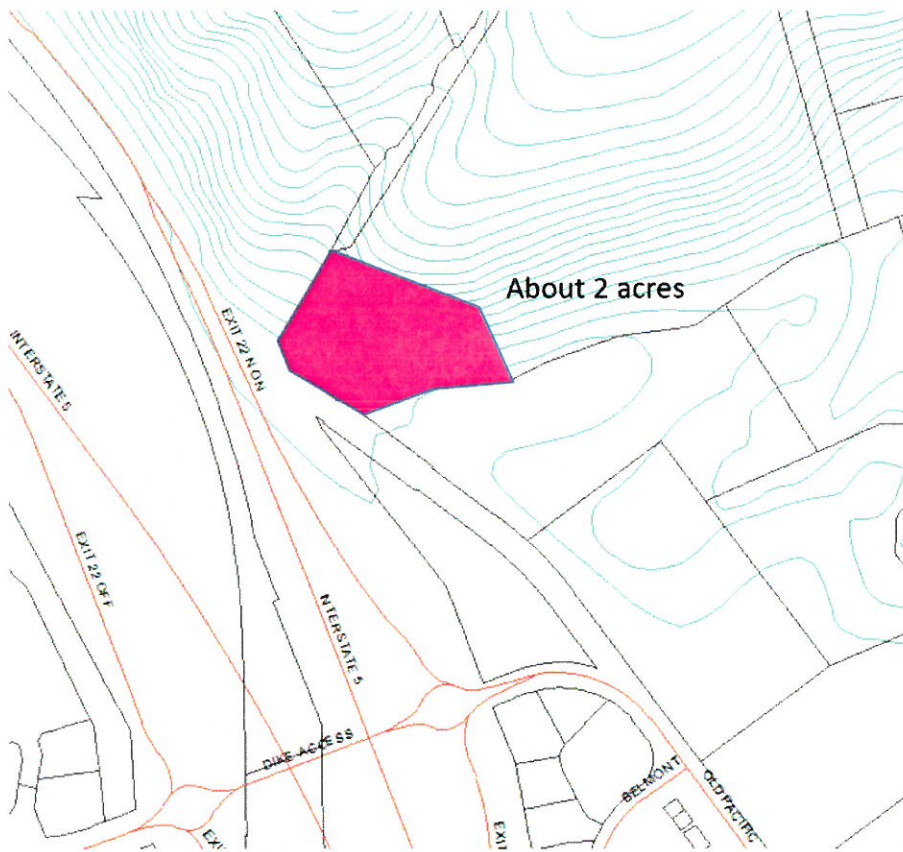
Finding 11: The three commercial uses within the potential UGA expansion area are all uses that would be permitted under the commercial zoning codes as the code exists today. Storage is a permitted use per WMC 17.36.020(28). Double J Trailers would be considered a permitted retail use per WMC 17.36.020(25). Likewise, Woodland Pallet would also be considered a permitted use under WMC 17.36.020(25). Inclusion of these existing commercial uses would not be problematic if/when they annex into the city. The lack of landscaping and compliance with the city’s commercial design standards would be addressed upon further development of the lots but the establishment of existing non-conforming rights would be an issue negotiated at the time of annexation to ensure that property rights are protected.

Finding 12: No zoning needs to be assigned to the commercial land being considered for inclusion into the UGA at this time. Zoning will be assigned as part of the annexation process when a request is made.

Conclusion: Based on the above analysis, with four years (20%) of the 20-year planning horizon gone, the consumption of commercial land by development, the loss of some commercial land to re-designation, and the addition of commercial land to the UGA, the recommendations resulting from this process will generally leave the city with 86.7% of its projected commercial land needs for the remaining 80% of the adopted comp plan planning horizon.

Finding 13: The Loomis request for a commercial designation presents a difficult problem. The applicant's request included 5-acres of commercial at the bottom of the hill, at the end of Old Pacific Highway. Staff's recommendation at the hearing for CPA2018-006 was to not split the property with two designations, commercial for the south five acres and residential for the rest of the property. The reason for this is that upon annexation, the property would be split-zoned, and the city's municipal code has instructions for split zoning property that will make it very hard for the city to facilitate development of the property. Therefore, staff's recommendation was that the entire 26.36-acre parcel (Parcel #WB1203001) be included in the UGA and designated as commercial.

However, upon further consideration, staff recommends that only a portion of the property be included in the UGA and designated as Commercial. As shown in the aerial photo below, the actual developable property is more like two-acres.



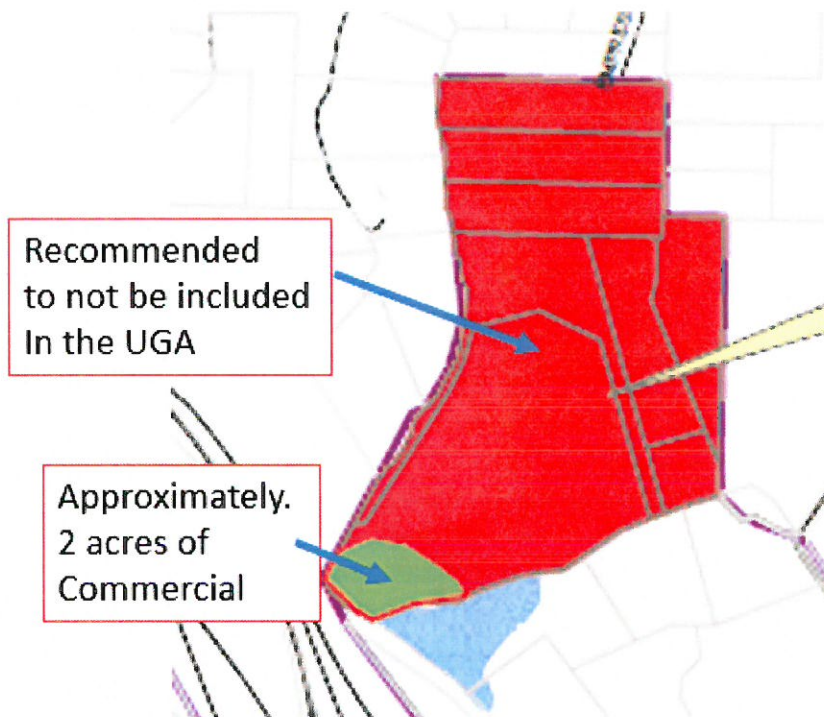
As was discussed at the March 28th PC Hearing, state law does allow the city to provide services to land outside of the UGA under certain circumstances. Staff did not support the extension of services to these properties without extension of the UGA and the possibility for future annexation. However, upon hearing public testimony and further consideration, staff revises its recommendation to extending the UGA to include the 2-acres identified above for commercial designation.

Should the PC and City Council find that extension of water to the residential properties to the north is in the public's interest, a condition of that service would be an agreement to

accept UGA extension and annexation (should the city choose to include those properties). Therefore, extension of the UGA currently is not necessary if the city chooses to extend services to the properties in question. This will allow Mr. Loomis and his neighbor to construct private water lines to serve the requested properties.

Should the City consider expansion to the north, the most likely route for utilities would be up the Green Mountain Road corridor. No real opportunity will be lost by not expanding the UGA at this time. However, it should also be noted that the city would expect easement for future utility corridors as a condition for utility services.

Staff Recommendation #1: Staff submits a revised recommendation that only the two acres as identified below be included in the UGA. (Additional information can be found in Finding # 52 below)



Rest of page intentionally left blank.

Finding 14: Should the above recommendation be adopted, the effects to the commercial land supply would look like:

	Developed	Re-designated	Added to UGA	Total Acres	
2016 Comp Plan Assumption				124	100%
2016-2018 development	33.68			90.32	72.8%
2019 estimated development	18.38			71.94	58.0%
Saxony Pacific - Franklin Loop		-19.05		52.89	42.7%
BYRV Inc.		-6.37		46.52	37.5%
Woodland Commerce Center		-5.51		41.01	33.1%
Aho - UGA PC recommendation*			+40.14	81.15	65.4%
Loomis - Empress Estates**			+2.0	83.15	67%
	52.06	-30.93	+42.14		

*Includes Double J trailers, Put It In Storage and Woodland Pallet.

**Assumes only partial UGA expansion.

Opting to make this change would not affect the implementation of the comp plan. However, a condition of approval has been added which would require the property owner to perform a boundary lot adjustment or land division prior to annexation of the property within the UGA into the City. This will ensure that there are no split jurisdiction permitting issues when the property is annexed and developed. (See Conditions)

	Developed	Re-designated	Added to UGA	Total Acres	
2016 Comp Plan Assumption				548	100%
2016-2018 development	84.08			463.92	84.7%
2019 estimated development	65.27			398.65	72.7%
Saxony Pacific - Franklin Loop		-2.56		396.09	72.3%
Trevor Beatty		+0.5		396.59	72.4%
Aho - UGA PC recommendation*			+36.31	432.9	79.0%
	149.35	-2.06	+36.31		

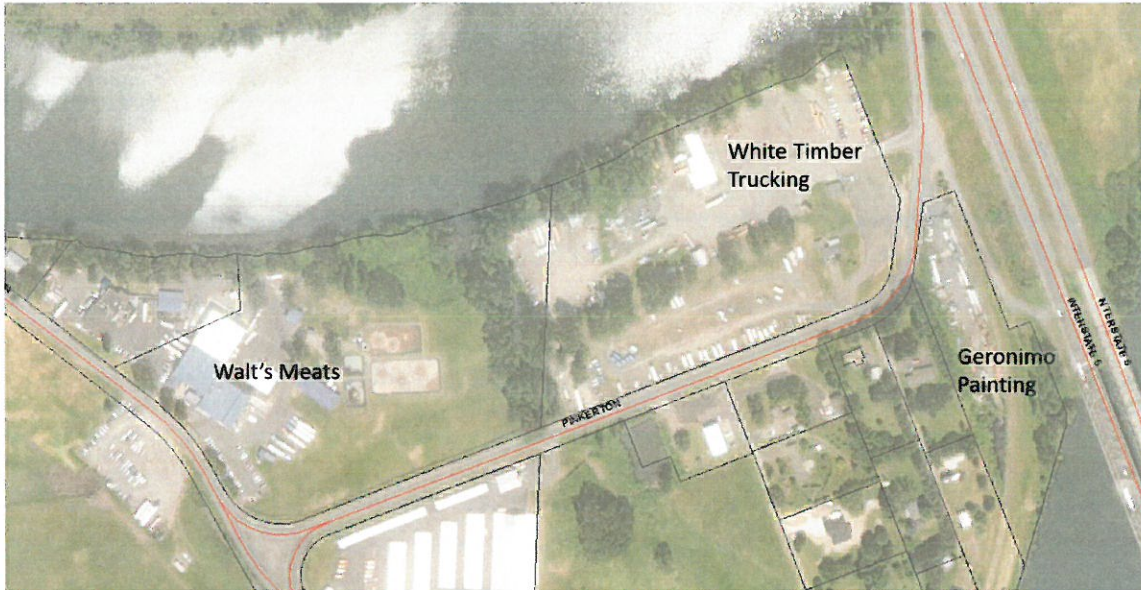
*Includes Walt's Meats, White Timber Trucking, and Geronimo Painting.

The table shows that of the original 548 acres of land available, the land supply is expected to be 398.65 acres (548 - 84.08 - 65.27 = 398.65) by the time all the permitted projects are built.

The supply will be further reduced by the Saxony Pacific Franklin Loop "internal" comp plan map amendment recommendation. The effect of that re-designation will be to reduce the industrial land supply by 2.56 acres. At the same time, the Trevor Beatty request will add half an acre (.5) to the supply.

The comp plan map amendments which are recommended to expand the UGA could add as much as 36.31 acres of industrial land to the 20-year industrial land supply.

Finding 15: Staff notes that the 36.31 acres of land that is recommended for inclusion in the UGA and designated as industrial is all developed. Those properties are shown in the aerial photo below.



These three properties are in the recommended UGA expansion south of the city. They are 36.31 acres in size and have been developed.

Finding 16: The City's discussion on expanding the growth area has also included Parcel #60179 owned by the George F. Thoeny Exemption Trust III Etal.



This 30.93-acre property was identified as being left outside the city limits in error when the rest of the "Thoeny Farm" was included in the UGA and annexed into the City. The city was asked to correct this oversight when the UGA was reviewed.

Finding 17: This parcel appears to be one of only two contiguous Theory parcels that are not within the city limits. Parcel #604390200 (shown below) is under separate ownership from the parcel in discussion.



Finding 18: The Thoeny Trust parcel represents an additional 30.93 acres of industrial land which would make the industrial land supply 462.83 acres or 84.5% of the 2016 comp plan land supply. This property was not reviewed for critical area encumbrances.

The property is problematic because it does not front on a public road and currently access is provided through the adjacent lots owned by the same owner, but that is within the City of Woodland. Therefore, there is some logic to including this property in the city's UGA. Once within the UGA, the owner would be responsible for requesting annexation.

Rest of page intentionally left blank.



Finding 19: The Treavor Beatty property, which is within the city limits, has residential zoning under its current residential designation. If it is re-designated to Industrial, it will need to be given an industrial zone for its zoning. The industrial property across the street from the Beatty property is Light Industrial (I-1). Staff recommends that the Beatty parcel be given a Light Industrial (I-1) zoning upon implementation of the amended map. (See Conditions)

Conclusion: Based on the above analysis, with four years (20%) of the 20-year planning horizon gone, the consumption of industrial land by development, the loss of some industrial land to re-designation, and the addition of industrial land to the UGA, the recommendations resulting from this process will generally leave the city with 78% of its projected industrial land needs for the remaining 80% of the adopted comp plan planning horizon.

Residential Development

Finding 20: Since 2016 when the plan was adopted, 129 residential units have been built. That is 9.9% of the projected number of residential units to be added over the 20-year horizon of the comp plan.

The vacant lands analysis completed in conjunction with the comp plan map update shows that of the 174 acres of residential land that was expected to accommodate that growth, only 141 acres were available at the end of 2018. That means that three years, or 15% of the way into the planning horizon, 19% of the residential land had been developed.

In other words, 19% of the land has been developed to accommodate 9.9% of the expected housing units. This means that residential development has occurred at half the density expected.

Finding 21: Additional analysis on the amount of residentially designated land within the city and the current UGA shows that there is a significant shortfall of the land necessary to accommodate the adopted growth at the densities adopted in the plan.

Analysis in the vacant land document (Document #32) shows further constraints on residentially designated land, making the 141 acres of available land more like 63.79 acres of developable land. That is 36.6% of the land thought available in 2016 when the comp plan was adopted.

Residential Development (174 acres per 2016 Comp Plan)

	City Limits	Cowlitz UGA	Clark UGA	Total
Gross land available	141.44	47.66	82.12	271.22
Net land available	63.79	26.07	33.55	123.41
Gross units	1397	138-689	0	1535
Net units	601	73-367	0	674
Practical units	314	31	0	345
Predicted Units	314	31	0	345

Using the Comp Plan’s adopted density ratios of four low-density (single-family) units per acre and 20 high-density (multi-family) units per acre, the analysis show the current residential land supply capable of sustaining an additional 314 units in the city and 31 units in the UGA. This unit capacity number is 70.1% less than what the comp plan projected for the City’s 20-year growth needs.

PLEASE NOTE: Staff assumes that “high density” is planner terminology for multi-family residential but acknowledges that it is not necessarily prohibitive of single-family units. But mathematically, an acre of land having 20 units per acre would result in 2,178 sq. ft. lots without any road right-of-way dedication, and about 1,750 per lot with dedications. Since there is no zoning to support single-family units on lots within that size range, 20 units per acre means multi-family residential.

Finding 22: To date, only eight units of multi-family residential have been built since the 2016 comp plan update. Those units, built in 2018, plus permits for another eight units to be built in 2019, represent 2.58% of the total multi-family residential units projected under the 2016 comp plan.

Finding 23: To date, 129 units of single-family residential have been built since the 2016 comp plan update. Those units represent 9.3% of the total residential units projected under the 2016 comp plan.

Finding 24: Unlike in the previous sections for commercial and industrial land, staff had difficulty fully understanding how the figure of 174 acres was reached. Doing the analysis of vacant buildable land, staff concluded that the measurement of land acreage wouldn’t provide the units outlined in the comp plan assumptions. After completing a survey to evaluate residential development potential staff generated the following potential development calculations.

Residential Development (174 acres per 2016 Comp Plan)

	City Limits	Cowlitz UGA	Clark UGA	Total
Gross land available	141.44	47.66	82.12	271.22
Net land available	63.79	26.07	33.55	123.41
Gross units	1397	138-689	0	1535
Net units	601	73-367	0	674
Practical units	314	31	0	345
Predicted Units	314	31	0	345

Finding 25: The proposed comp plan map amendments will significantly change the amount of residential land available for the remaining 16 years of the comp plan planning horizon. The table below shows the total acres of residential land available for development and how they were affected by development. It also shows how the 2018-19 comp plan amendment requests, as recommended by the Planning Commission, could affect the overall residential land supply.

	Total Acres	Net Available
2016 Comp Plan Assumption	174	
Vacant Land Assumptions		
City Limits	141.44	63.79
Cowlitz UGA	47.66	26.07
Clark UGA	82.12	33.55
	271.22	123.41
Comp Plan Amendment cases (reflecting the PC recommendations)		
Saxony Pacific - Franklin Loop		21.61
Saxony Pacific - Dike Access		16.22
Loomis - Empress Estates		30.35
Aho - Request		142.73
UGA (SOUTH) expanded PC recommendation		83.36
BYRV Inc.		6.37
Woodland Commerce Center		5.52
		306.16
Total	577.38	429.57

Finding 26: The current supply will be reduced acres because of the Trevor Beatty "internal" comp plan map amendment recommendation. The effect of that re-designation will be to reduce the residential land supply by half an acre (.5).

Finding 27: There were three internal comp plan map amendments which are recommended to re-designate land to residential as noted in the table above. They include the Saxony Pacific – Franklin Loop site, the BYRV Inc. site, and the Woodland Commerce site. The recommendations for those requests are discussed below.

Finding 28: There were three comp plan map amendments which are recommended to expand the UGA. They include the Saxony Pacific – Dike Access site, the Gary Loomis – Empress Estates site, and the Aho Construction I, LLC site. The recommendations for those requests are discussed below.

General Observations (COMP PLAN TEXT RELATED)

Finding 29: During the discussion for several of the comp plan requests, the PC raised the issue of the 60/40 Low/High-density policy.

During the discussion of CPA-18-005 for the Aho request. A motion was passed that called for the modification of the 60/40 rule to reflect a 75/25 low-density to high-density ratio so that the City’s plan better reflects existing conditions and those of our neighboring jurisdictions.

Unfortunately, when this discussion occurred, the motion could have been interpreted to imply that the PC motion only applied to the property associated with case CPA-18-005.

Staff believes that it was the intent of the PC for the motion to apply to the city and that it was a defacto motion recommending a change to comp plan policy.

NOTE: Staff requests that the PC confirm for the applicant of CPA-18-005 (Aho Construction I LLC.) that the motion was not meant to be a case specific condition of approval but was in fact a comp plan policy recommendation to applied to the entire community. Thanks.

Rest of page intentionally left blank.

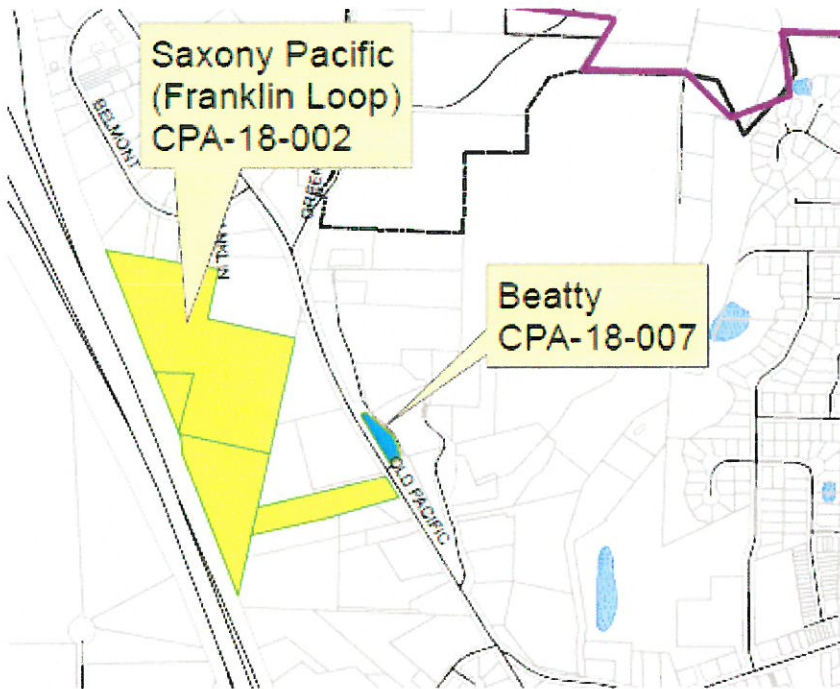
Comp Plan Map Amendment Docket Analysis

INTERNAL CASES

Saxony Pacific Franklin Loop Request (CPA 18-002) 16.22 acres from Commercial to Residential and 2.56 acres from Industrial to Residential



Rest of page intentionally left blank.



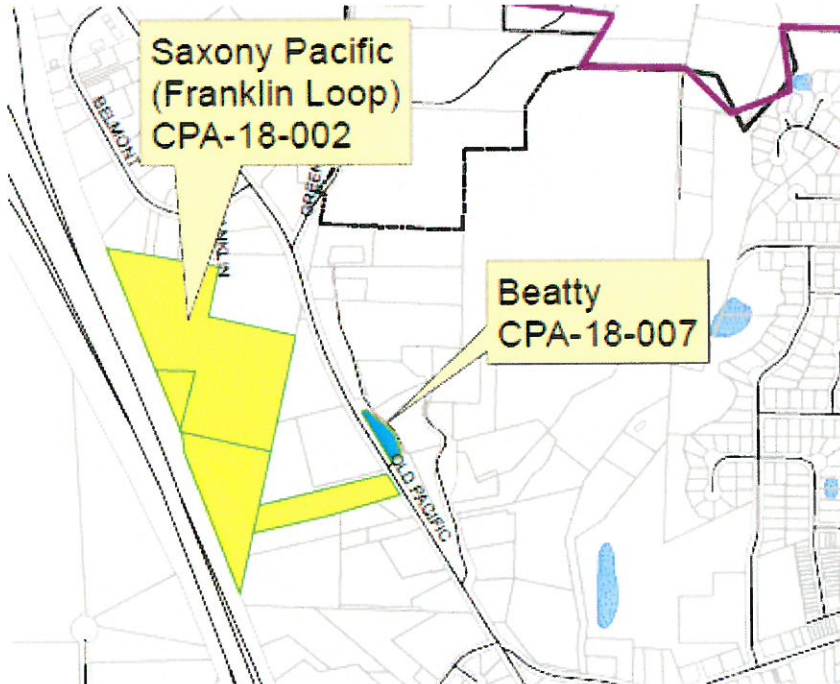
Finding 30: The Franklin Loop request was heard at the February 21st public hearing and continued to the March 21st hearing. The PC recommended approval of the request to re-designate the site to Residential.

Finding 31: The recommendation included conditions that require the site be developed as a high-density development and that the developer enter into a developer's agreement as outlined in the conditions below. (See Conditions)

Finding 32: Zoning – The PC recommended that this site be re-designated Residential and expressed a desire for high-density development on the site at the 20 units per acre rate established by the comp plan. Staff therefore recommends that the site be assigned Medium Density Residential (MDR) zoning. (See Conditions)

Rest of page intentionally left blank.

Beatty Request (CPA 18-007) .5 acres from Residential to Industrial



Finding 33: The Beatty request was heard at the February 21st public hearing. The PC recommended approval of the request to re-designate the site to Industrial.

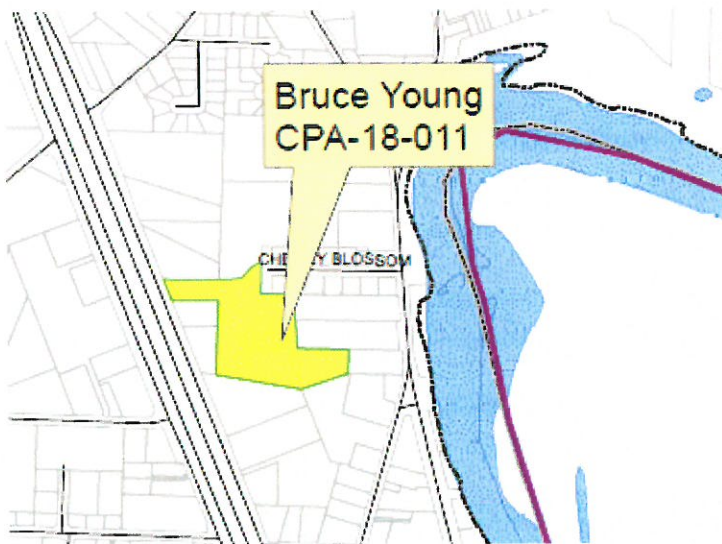
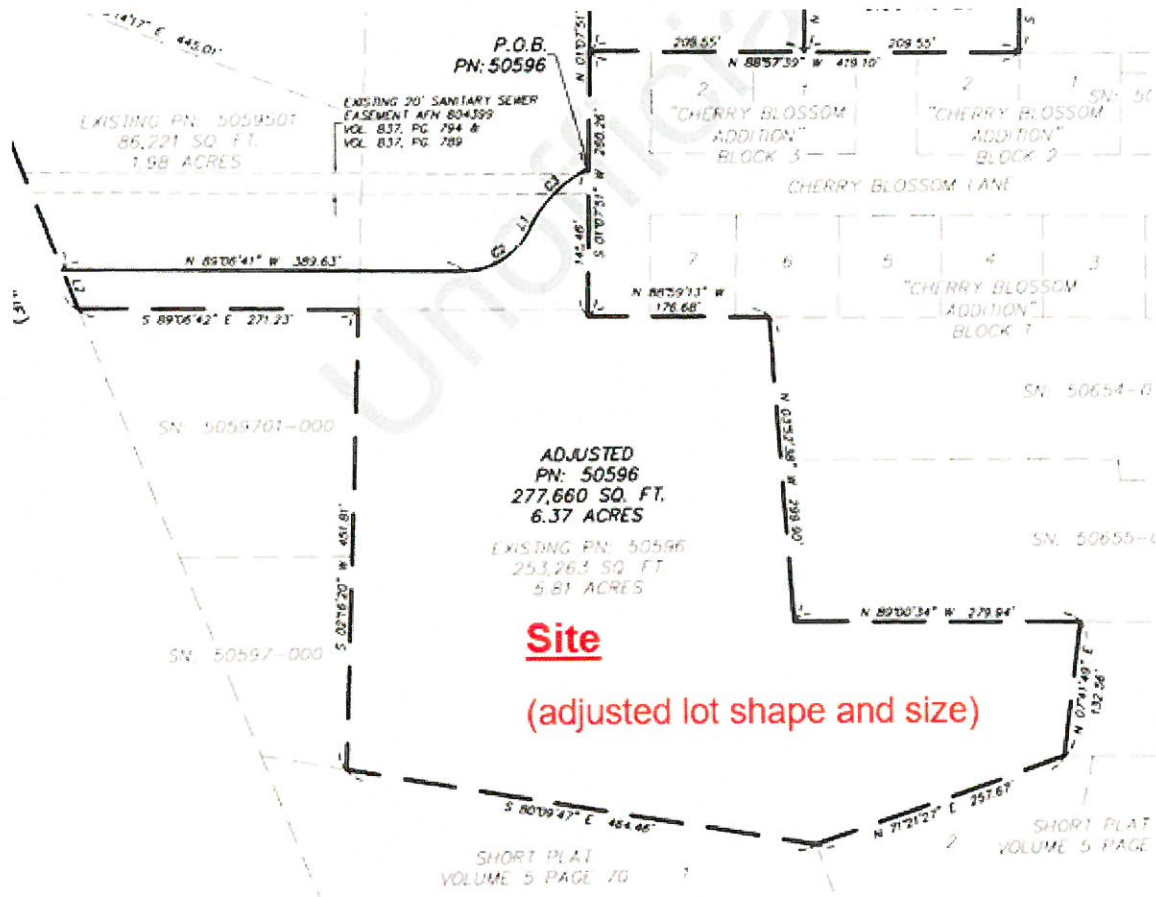
Finding 34: The recommendation included conditions that require the owner enter into a developer's agreement as outlined in the conditions below. (See Conditions)

Finding 35: Zoning – The PC recommended that this site be re-designated Industrial. Given that it is across the street from industrial property that is zoned Light Industrial (I-1) staff recommends that the site be assigned Light Industrial (I-1) zoning. (See Conditions)

BYRV Inc. Request (CPA 18-0011) 6.37 acres from Commercial to Residential



Rest of page intentionally left blank.



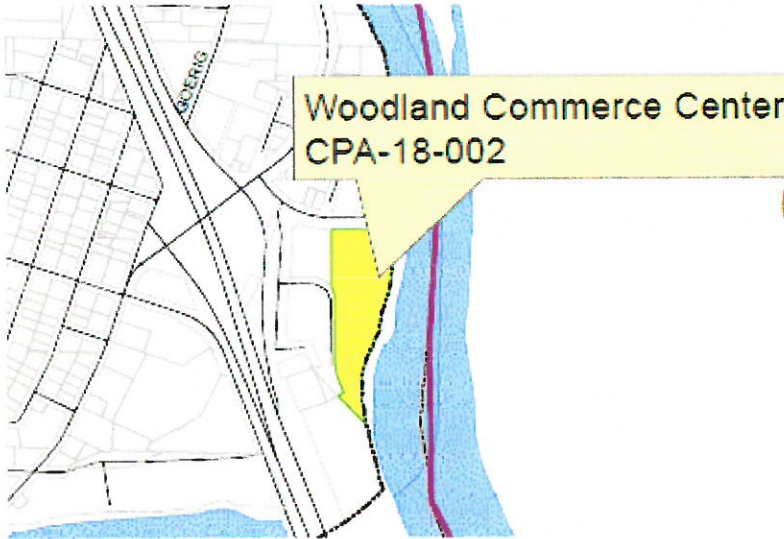
Finding 36: The B Young RV request was heard at the February 21st public hearing. The PC recommended approval of the request to re-designate the site to Residential.

Finding 37: The recommendation included conditions that require the site be developed as a high-density development and that the developer enter into a developer's agreement as outlined in the conditions below. (See Conditions)

Finding 38: Zoning – The PC recommended that this site be re-designated Residential and expressed a desire for high-density development on the site at the 20 units per acre rate established by the comp plan. Staff therefore recommends that the site be assigned Medium Density Residential (MDR) zoning. (See Conditions)

Woodland Commerce Center Request (CPA 18-012) 5.52 acres from Commercial to Residential





Finding 39: The Woodland Commerce Center request was heard at the February 21st public hearing. The PC recommended approval of the request to re-designate the site to Residential.

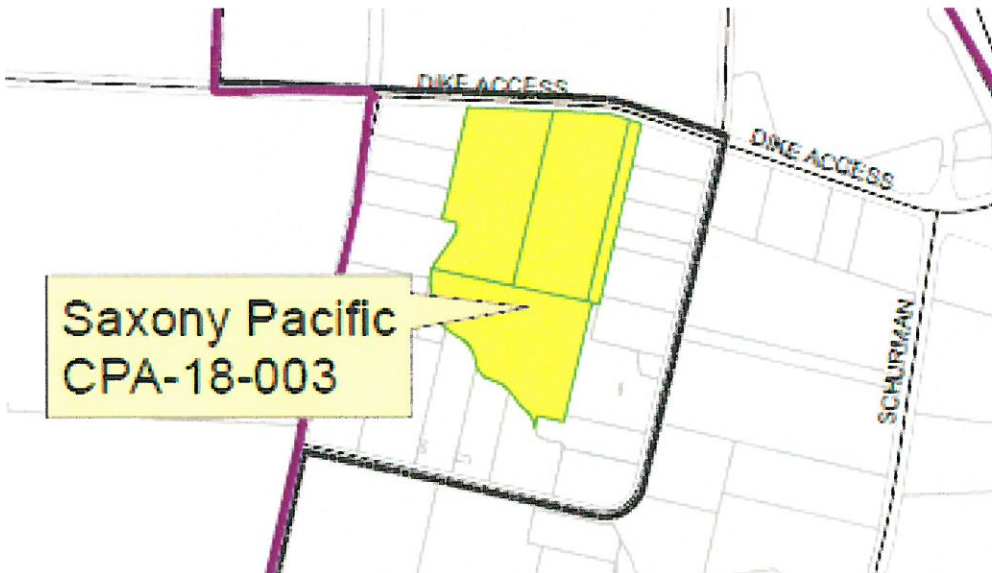
Finding 40: The recommendation included conditions that require the developer enter into a developer's agreement as outlined in the conditions below. (See Conditions)

Finding 41: Zoning – The PC recommended that this site be re-designated Residential but did not opine as to whether the development should be high-density or low-density. The applicant submitted a preliminary plan that showed a density of approximately eight units per acre. To allow for development at the density proposed with the type of housing unit envisioned by the property owner, staff therefore recommends that the site be assigned Medium Density Residential (MDR) zoning. (See Conditions)

Rest of page intentionally left blank.

EXTERNAL CASES

Saxony Pacific Dike Access Request (CPA 18-003) a 16.22 acres expansion of the UGA and designation as Residential



Finding 42: The Dike Access Road request was heard at the March 21st Public Hearing. The PC recommended approval of including the property in the UGA with a Residential designation.

Finding 43: The recommendation included conditions that require the site be developed as a High-density development and that the developer enter into a developer's agreement as outlined in the conditions below. However, discussion at the hearing concluded that the PC would like the site designated as low-density housing. Staff believes there was a disconnect between the PC's conversation and the conditions that were attached to the recommendation. (See Conditions)

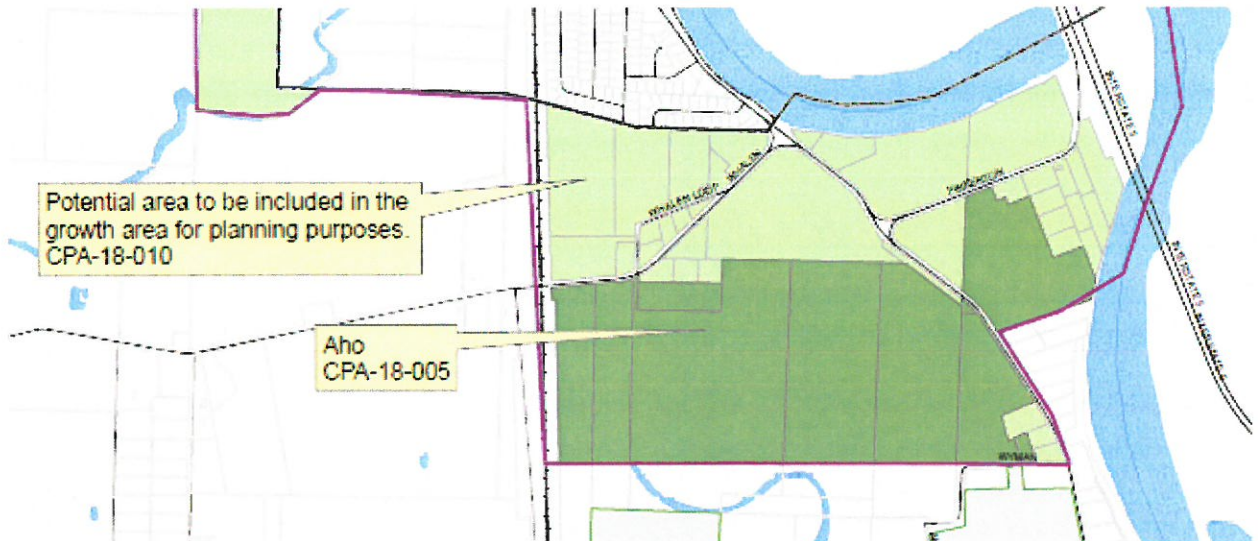
Finding 44: Zoning – As noted in the finding above, the PC recommended that this site be re-designated Residential and expressed a desire for Low-density development on the site at the 4 units per acre rate established by the comp plan. If that is a correct interpretation, Staff recommends that the site be assigned Low-Density Residential 8.5 (LDR-8.5) zoning. If staff misinterpreted what the PC wanted, and the desire was for high-density development on the site at the 20 units per acre rate established by the comp plan. Staff recommends that the site be assigned Medium Density Residential (MDR) zoning. (See Conditions)

Staff Recommendation #2: Staff notes that the inclusion of only the property subject to the Dike Access Road request will lead to inefficiencies in the provision of services. Staff recommends that the UGA be moved to the east side of Burk Road and include the properties identified below.

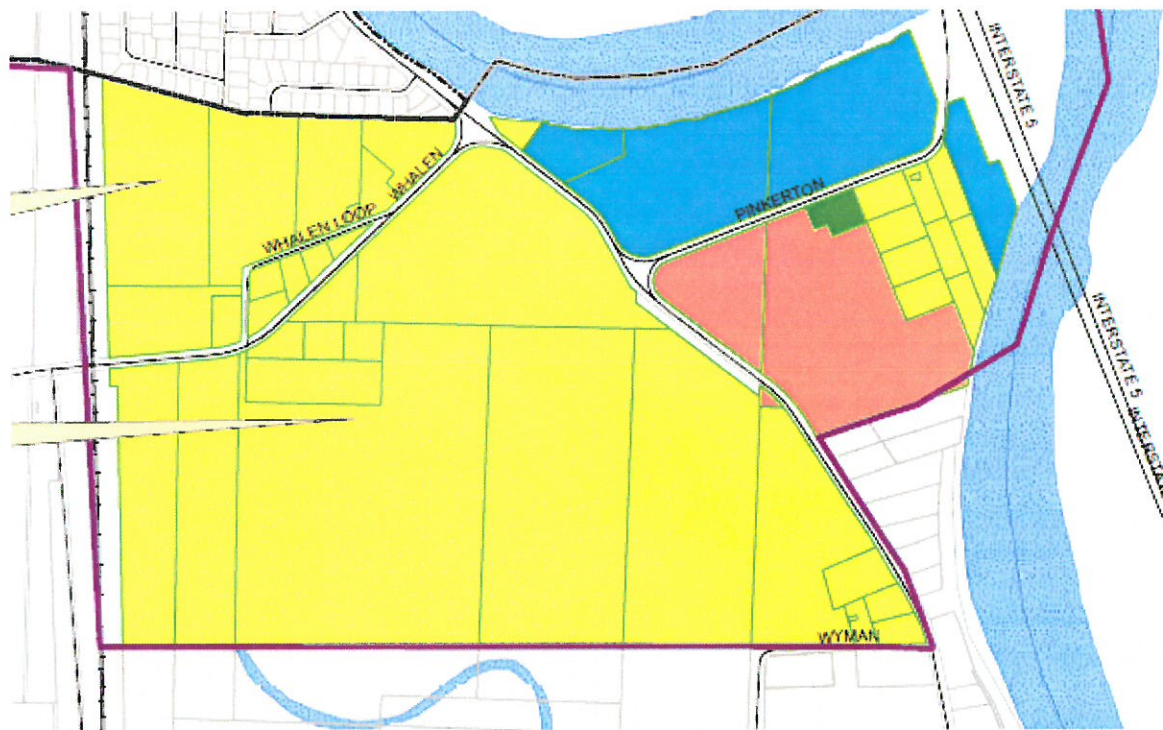


This area is approximately 27 acres in size and characterized by parcels between one-half and three acres in size. These properties are all zoned Ag-38 and have county comp plan designation of Economic Resource Land – Agriculture. The sites are characterized by single-family residential development.

Aho Construction I LLC Request (CPA 18-005) Expansion of the UGA and designation as Residential



Approximately 350 acres as recommended by the commission. (Not the applicant.)



Finding 45: The Aho request was heard at the March 28th public hearing. The PC recommended approval of the request with conditions that as outlined in the conditions below. (See Conditions)

Finding 46: The recommendation was expanded beyond the parcels of the request to include all the property north of Wyman Road between S Pekin Road and the railroad tracks. This property was recommended to be designated as Residential except for the

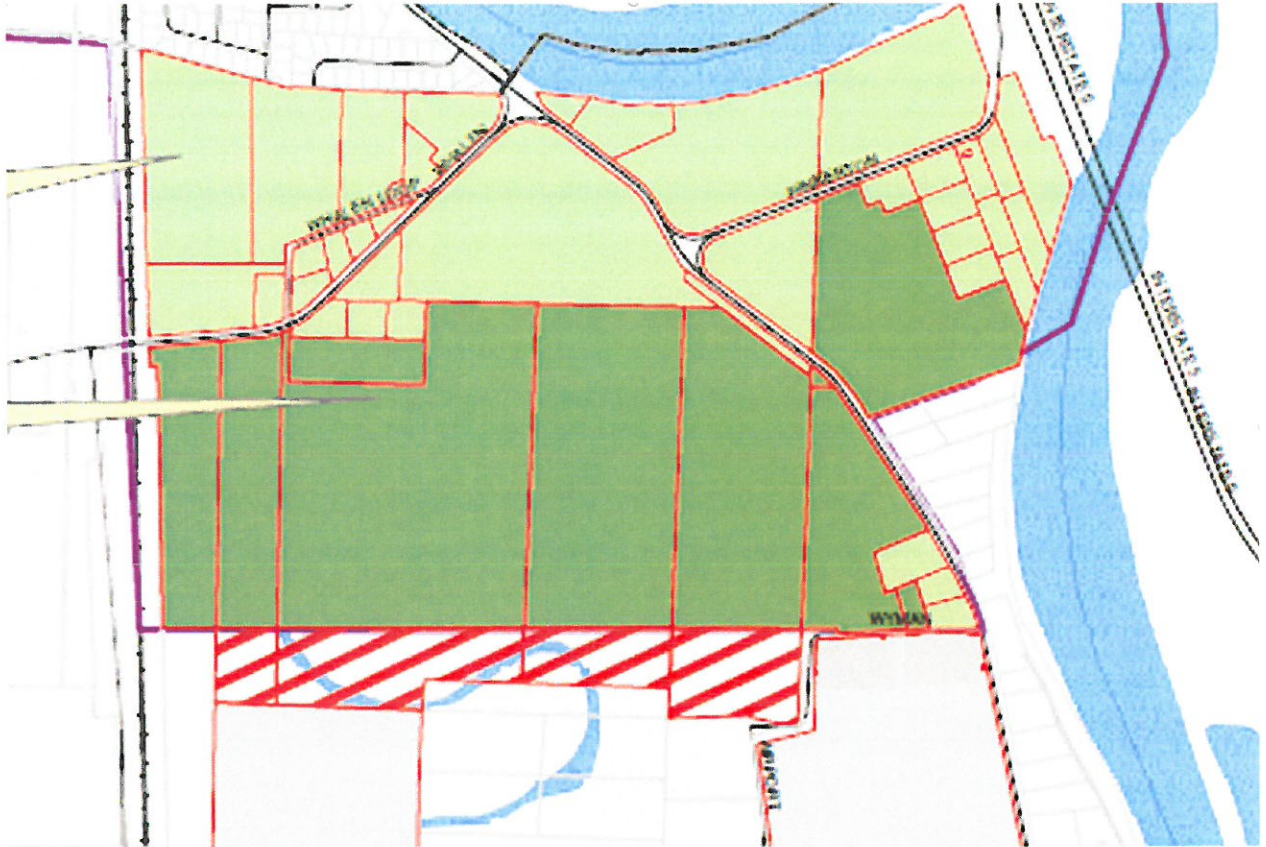
Double J Trailer site and the Woodland Pallet site which were recommended to be designated as Commercial. (See the Commercial section above).

Finding 47: The recommendation also included the land east of S Pekin between the current city limits and the south line of Parcel #EA3009001 as shown above. This area includes several parcels that were not part of the Aho request. The PC requested that the property be given a Commercial designation unless the current use was reflected by a more fitting designation.

In reviewing the parcels, it was determined that several of the parcels had industrial users (Walt's Meats, White Timber Trucking, and Geronimo Painting), one parcel had a fire station, and one parcel had a commercial use (Put It In Storage). Therefore, the proposed docket map includes Industrial, Public Institutional, and Commercial designations accordingly. The balance of the parcels contain residential development so they were given a Residential designation on the proposed docket map.

Staff Recommendation #3: Staff notes that the PC recommended UGA line would create several split-jurisdiction parcels. This practice is problematic because development of those parcels will result in remainder parcels outside of the City's jurisdiction. These parcels will be landlocked and have no access to public streets except through future city roads built at the time of development. In the short-term after development it means that agricultural activities on the remainder parcels would have to be accessed through the city streets. There is also a concern that development on these remainder lots while they are in the county, would inevitably create impact to the city because there would be no other means for county development to access county roads and services.

Rest of page intentionally left blank.

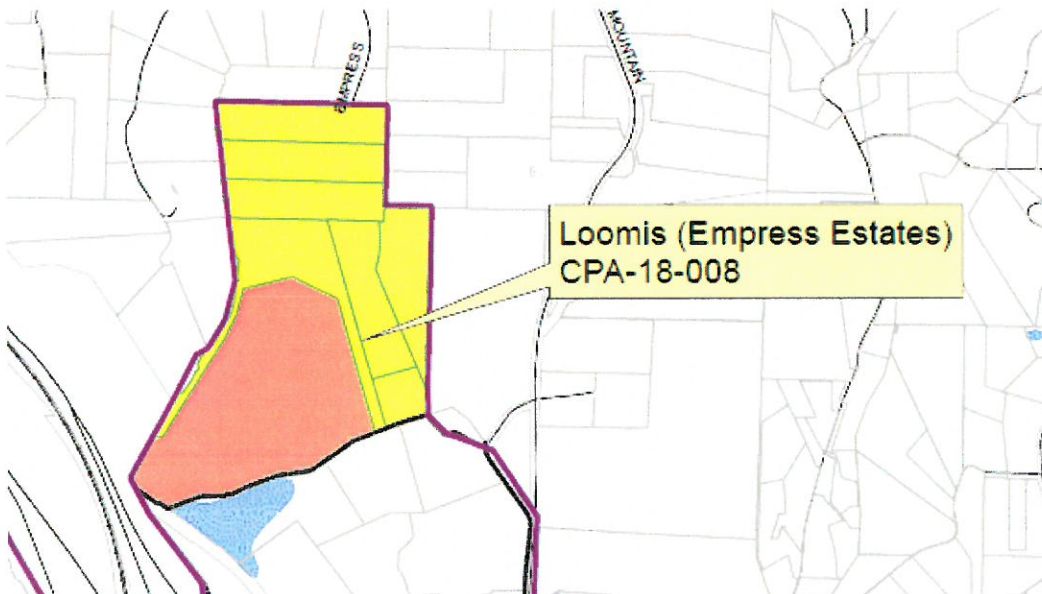
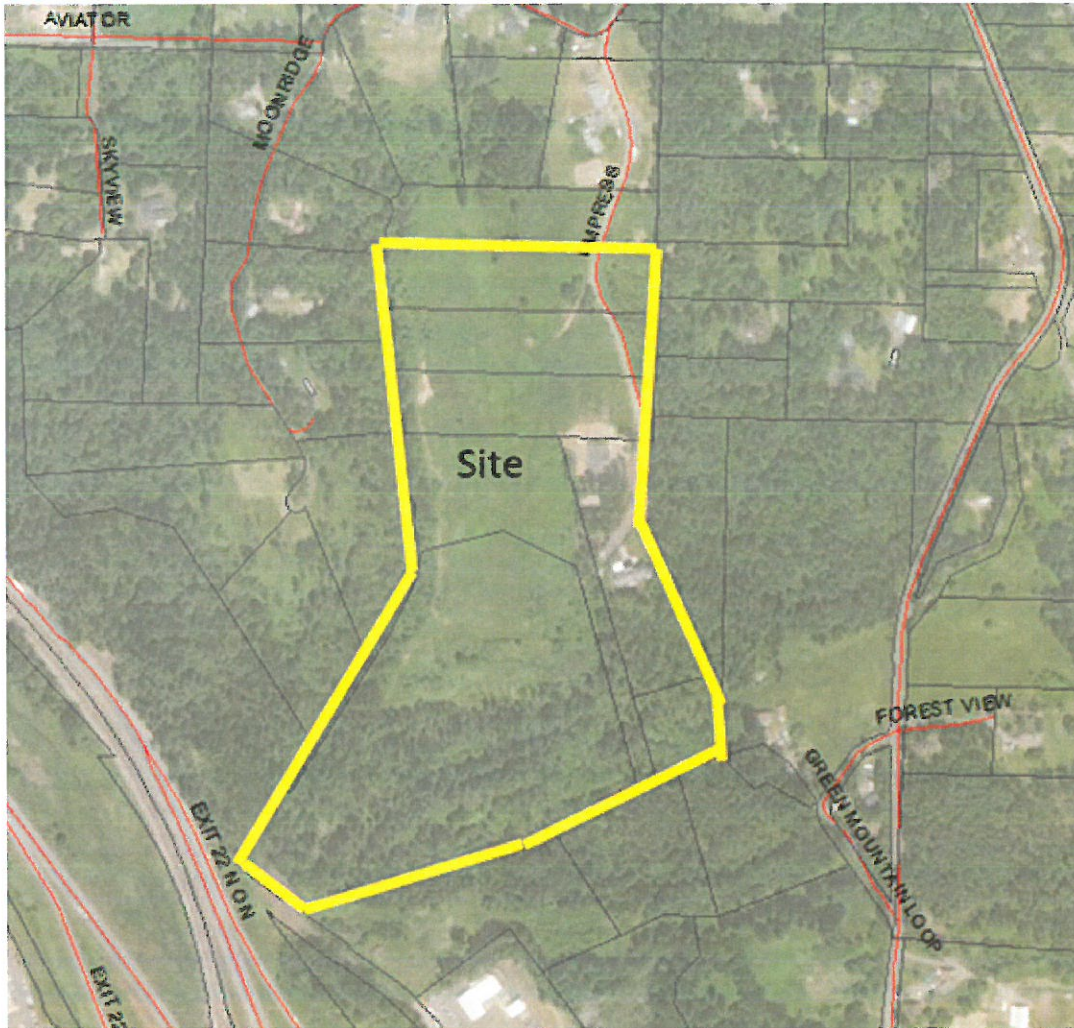


Staff recommends that the line me modified to eliminate the "remainder" lots by including whole parcels into the UGA at this location.

Please note: This situation also exists with the Gary Loomis – Empress Estates recommendation but in that case, the parcel in question does have access to a city street so partial inclusion can be addressed by a land division of boundary line adjustment. (See below)

Rest of page intentionally left blank.

Gary Loomis/Empress Estates Request (CPA 18-008) a 56.71 acres expansion of the UGA with 26.36 acres as Commercial and 30.35 as Residential



Finding 48: The Gary Loomis – Empress Estates request was heard at the March 21st public hearing. The PC recommended approval for including the property in the UGA with a designation of Residential except for Parcel #WB1203001 which was recommended to be in the UGA with a Commercial designation.

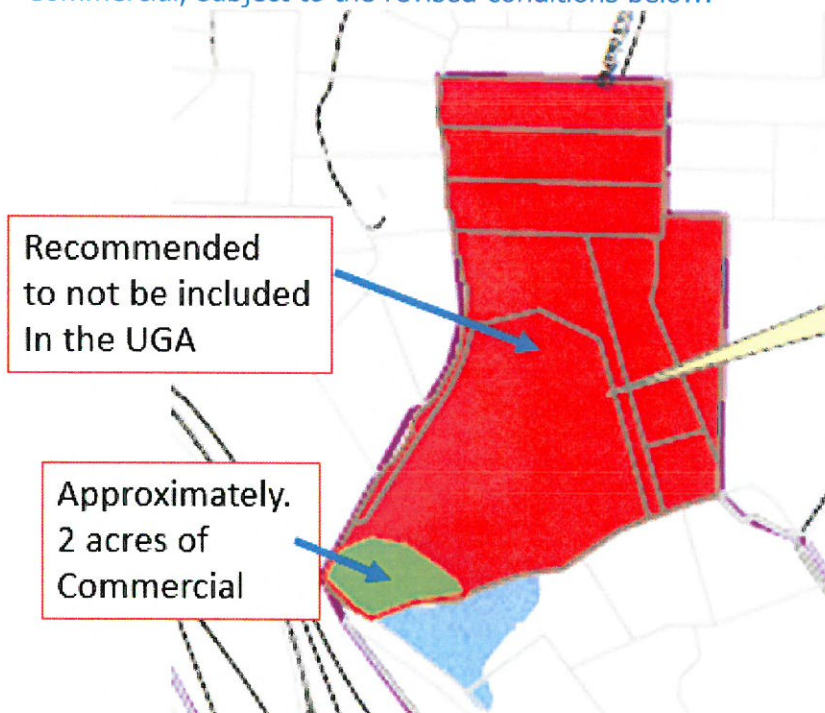
Finding 49: The recommendation included conditions that require the site be developed as outlined in the conditions below.

Finding 50: During review of this request, significant public testimony expressed concern about the potential for further development using county roads and services should public water become available. The applicant himself has expressed a desire for city water but noted that there were no additional plans for development.

Finding 51: The area north of the city limits is characterized by steep slopes and low-density suburban sprawl that will make further development inefficient and costly.

Finding 52: As noted in public testimony, there is a mechanism for allowing the city to extend water to these parcels without being included in the UGA. Such connection would be accompanied by an agreement to not fight expansion of the UGA or annexation to the City. Therefore, should the decision be made to not include this entire area, water could still be provided AND, the city could still re-visit the UGA issue at a future time.

Staff Recommendation #4: Staff recommends that the PC recommended UGA line be amended to include only the area that fronts on Old Pacific Highway and that it be limited to approximately the two-acres of developable property identified by the map below (subject to review and agreement by the owner/applicant) and that those acres be designated Commercial, subject to the revised conditions below.



Recommended to not be included in the UGA

Approximately 2 acres of Commercial

General Observations (APPLICATION SPECIFIC ANALYSIS)

Finding 53: The City is engaging in a review of Exit 21 and the area traffic circulation that affects it. Development of any property in the area south of the city will have a direct impact on that study because a clear majority of the trips generated by such development will affect Exit 21 (unless the residents work in the industrial district on the west side of Interstate-5).

Finding 54: Public comments received during the public participation process for the comp plan update resulted in significant input that the City should not be pursuing residential growth. This desire is in direct conflict with the City's adopted Comp Plan (that likewise involved public participation).

Finding 55: More nuanced comments noted that residential development within the City limits should be the preferred method for accommodating the City's adopted growth projections. This application is consistent with the City's adopted Comp Plan in that higher densities are projected within the City's limits.

Finding 56: Neighbors of properties south of the city have specifically expressed opposition to including these properties in the UGA. Reasons include preservation of environmental resources, privacy, property values, and the desire to preserve the rural character of the area. Preservation of agricultural resources was also cited.

Finding 57: RCW 36.70A.110(3) provides that *"urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately 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, and third in the remaining portions of the urban growth areas."*

As discussed for each case, the parcels being considered by the pending requests and recommended map amendment includes the properties that are accessed by city and county roads and are a short distance from an interstate interchange. In fact, the properties all get access from city streets or an interstate. So, urban transportation system services are already available and being used.

The city's comp plan indicates that water and sewer services are available to accommodate the adopted growth targets. As planning progresses, the water and sewer plans and their accompanying capital facilities plans will be updated to reflect UGA decisions.

All the area being considered for re-designation and UGA expansion is within the Woodland School District boundary and has fire and police service either through the city or Cowlitz County (which in turn has mutual aid agreements with the City of Woodland). So, these services are already available.

It should also be noted that the area being considered includes properties that are developed as residential, commercial and industrial uses. Whether the properties are

"urban" or "rural" residential densities is open to debate. Adjacent lot sizes range from .54 acres to 2.65 acres. But the commercial and industrial users are considered urban.

Under the County's Comprehensive Plan designations include Rural, Smallhold, remote, and Economic Resource Land – Industrial. There may also be a request to re-designation part of the area south of town to be suburban. So, there are varying levels of development in the area. However, if developed as part of the City's UGA, impact fees will offset the impacts of urban development.

Staff concludes that expansion of the UGA into this area would be consistent with RCW 36.70A.110(3).

Finding 58: RCW 36.70A.110(4) provides that "*cities are the units of local government most appropriate to provide urban governmental services. In general, it is not appropriate that urban governmental services be extended to or expanded in rural areas except in those limited circumstances shown to be necessary to protect basic public health and safety and the environment and when such services are financially supportable at rural densities and do not permit urban development.*"

In this case, the City would be the provider of urban governmental services and extension of those services onto the property would only occur if it were in the UGA and/or annexed into the City.

Finding 59: RCW 36.70A.110(7) provides that "*an urban growth area designated in accordance with this section may include within its boundaries urban service areas or potential annexation areas designated for specific cities or towns within the county.*"

The City of Woodland is planning for the expansion of its UGA. Such an expansion would constitute its urban service boundary when, and if, Cowlitz County chooses to adopt the City's expanded UGA in the future.

Finding 60: RCW 36.70A.110(8) prohibits expansion of a UGA into the 100-year floodplain of any river or river segment except in certain circumstances:

"(b) Subsection (8)(a) of this section does not apply to:

(i) Urban growth areas that are fully contained within a floodplain and lack adjacent buildable areas outside the floodplain;

(ii) Urban growth areas where expansions are precluded outside floodplains because:

(A) Urban governmental services cannot be physically provided to serve areas outside the floodplain; or

(B) Expansions outside the floodplain would require a river or estuary crossing to access the expansion; or

(iii) Urban growth area expansions where:

(A) Public facilities already exist within the floodplain and the expansion of an existing public facility is only possible on the land to be included in the urban growth area and located within the floodplain; or

(B) Urban development already exists within a floodplain as of July 26, 2009, and is adjacent to, but outside of, the urban growth area, and the expansion of the urban

growth area is necessary to include such urban development within the urban growth area; or

(C) The land is owned by a jurisdiction planning under this chapter or the rights to the development of the land have been permanently extinguished, and the following criteria are met:

(I) The permissible use of the land is limited to one of the following: Outdoor recreation; environmentally beneficial projects, including but not limited to habitat enhancement or environmental restoration; stormwater facilities; flood control facilities; or underground conveyances; and

(II) The development and use of such facilities or projects will not decrease flood storage, increase stormwater runoff, discharge pollutants to fresh or salt waters during normal operations or floods, or increase hazards to people and property."

Ultimately the City of Woodland will have to evaluate its ability to geographically grow given the fact that it is largely within the floodplain of both the Lewis and Columbia Rivers and the question of whether growth into the hills north of town is feasible. The presence of the Cowlitz County Dike Improvement District (#2) will also factor into whether the City is "within the floodplain" of a river for the purposes of designating UGAs. This issue will have to be explored as part of the Cowlitz County comp plan update application process for expanding the UGA if the City determines that it wishes to expand the UGA.

However, upon cursory review (and based upon the fact that the City already has a designated UGA), staff concludes that an expansion of the UGA would continue to be consistent with this RCW.

Finding 61: RCW 36.70A.110(9) states:

"(9) If a county, city, or utility has adopted a capital facility plan or utilities element to provide sewer service within the urban growth areas during the twenty-year planning period, nothing in this chapter obligates counties, cities, or utilities to install sanitary sewer systems to properties within urban growth areas designated under subsection (2) of this section by the end of the twenty-year planning period when those properties:

(a)(i) Have existing, functioning, nonpolluting on-site sewage systems;

(ii) Have a periodic inspection program by a public agency to verify the on-site sewage systems function properly and do not pollute surface or groundwater; and
(iii) Have no redevelopment capacity; or

(b) Do not require sewer service because development densities are limited due to wetlands, flood plains, fish and wildlife habitats, or geological hazards."

The city has adopted plans and utility elements that indicate there is adequate capacity to serve the projected growth targets. The service area for the utilities and capital facilities are defined by the comprehensive plan map. For long-range planning purposes expansion of the UGA will require the City to update its capital facilities plan.

For current planning purposes, should the UGA be expanded, the city recognizes that it will not be obligated to expand the systems in question. Instead staff recognizes that the City's development regulations require that infrastructure be installed and dedicated as part of the development process.

Staff therefore concludes that if this property is included in the request for a UGA expansion, the proposal should meet this RCW.

Finding 62: Staff recognizes that there has been significant resistance to UGA expansion into the bottoms. This manifested itself clearly during the discussions regarding CPA-18-010 when the city held open houses and public hearings to discuss several scenarios for how the city should plan for growth.

Particularly significant is the number of comments that the city should accommodate its growth within the city's boundary as illustrated by a petition signed by more than 600 citizens. The petition also notes that 80% of those contacted to sign the petition did in fact sign the petition. This implies that 80% of the citizenry are against the city selecting any growth scenario that involves expansion of the UGA to accommodate the adopted growth targets.

Finding 63: The petition specifically states the signers oppose any scenario that involves expansion of the growth area into the bottoms. The petition is silent on whether expansion of the city to the north into the hills would be an acceptable alternative.

Finding 64: The petition is silent on whether there is support for growth of the City north along Lewis River Road or into Clark County.

Finding 65: The petition states that the majority of signatories are woodland residents. Though not all of them dwell within the City, 600 signatures represent approximately 10% of the city's population which is a significant number. However, a cursory look at the addresses of the signatories shows that a significant number of the addresses given include county addresses including some on Haberman Road, Caples Road, Dike Road, Forest Park Road, Airport Road, Rose Valley Road, Whalen, as well as addresses in Ariel, Cougar, Kalama and Clark County.

Staff raises this issue because it raises the question of what defines "Woodland" can be subjective. While staff defines it by the City limits because that is the extent of the city's regulatory and planning authority. Others might define it as the school district boundary or the Woodland postal code, while other might define it as a state of mind that includes anyone who lives, works, recreates, or passes through "Woodland". The actual number of city residents that have signed the petition could be between 30% and 50% of the 600 which can still be considered a significant number.

Finding 66: As noted in the Residential Development section above, the city is falling short on meeting its adopted housing goals and targets. The City has three requests to convert commercial land to residential. The petition is silent as to whether the signers support this conversion but the only scenarios it does not oppose include making no changes to the map, and in making changes within the city's boundaries. So, the conversion of these commercial lands is not opposed by the petitioners.

If the city were to make no changes to the comp plan map, the unmet growth target of 1,155 residential units could only be met by accommodating high density residential growth at an estimated density 18 units per acre (2,400 sq. ft. lots).

Internal only changes would require the City to sacrifice 22.5% of its commercial land supply. With the residential acreage conversion from those changes, densities would have to be 12.9 units per acre (3,375 sq. ft. lots). This would be a density consistent with all future residential growth occurring at a Medium Density Residential (MDR) zoning density.

Finding 67: Concentrating development as desired by the petition will reduce the cost for water and sewer service provision. Transportation infrastructure is also in place to serve the properties. However, increased concentration of the traffic from growth will cause a significant impact on the level of service for the existing transportation infrastructure.

Finding 68: Other services could see a disproportional increase in demand because generally, high density development has a higher demand for services. Anecdotally, the police chief noted that multi-family residential created a significantly higher rate of public safety calls. Another example is from testimony by the Woodlands School District superintendent who noted that student generation rates for multi-family units is twice as high for elementary and middle schools and about 50% higher for high schools.

This matters because public input, like that in the petition, would appear to be guiding the city towards a future where growth impacts are higher AND, concentrated within the city therefore those costs would be largely borne by existing city tax payers (and not by developers or county residents in the school district).

Finding 69: The Woodland School District has expressed a desire for growth to provide funding for its capital programs. For context, the City of Woodland collects school impact fees whereas Cowlitz County does not. The logical conclusion is that the district would prefer growth to occur within the City because the city collects capital funds. This would be true whether the UGA were to expand or not.

Finding 70: School impact fees vary depending on the type of residential unit constructed. Single-family residences pay \$5,000. Duplex's pay \$2,500. Three/Fourplexes pay \$5,000. Apartments pay per unit depending upon the size of the unit. So, if the city chooses to not expand the UGA and concentrate its growth within the current boundaries, it is possible that the city could collect less school impact fee money...while building units that generate two to eight times as many students.

Finding 71: The Washington State Department of Fish and Wildlife supports the city's efforts to improve its long-range planning efforts.

Finding 72: The Washington State Department of Transportation expressed concern that the city's growth will impact the state and interstate transportation system. The city acknowledges this concern and notes that coordination is ongoing and that there are several studies being engaged which will both affect and be affected by the comp plan discussion. This includes a study of Exit 21. Staff supports those efforts and the department is coordinating a larger discussion effort. However, staff also must draw attention to the fact that the city is not responsible for fixing regional transportation problems. A proportional solution involving Clark County, Cowlitz County, the City of Woodland, and both state and federal highway monies will be required to address the problem. Asking the city

to not plan for growth is not a viable solution to the problem. Staff feels that good planning is instead a solution for finding better transportation solutions. DOT staff occur that better planning is needed.

This issue is especially critical for case CPA08-005 because growth south of town will have direct impacts on Exit 21 unlike development that occurs anywhere else in town. The March 21st withdrawal of case CPA18-006 is already an example of how difficult Exit 21 planning is. The city now has no sense of whether it will remain partially undeveloped, whether it will develop in the county as industrial, or whether the owners still intends to develop as commercial. These three options are so widely diverse, and the fact that there is no zoning to help predict the impacts from the site, the city will have to assume that development of the site will contribute traffic to the city's street system but cannot be counted to contribute to any fix the city will have to fund.

The sooner a decision is made on whether the city will expand its UGA southward, the better the Exit 21 study will be able to analyze impacts and design a solution.

Using the intersection at Goerig, Buckeye, and Lakeshore as an example, if there is going to be residential development south of the city, the city will have to consider how to prioritize traffic on Lakeshore. If additional traffic is not going to occur south of the City, priority should be given to the truck route which serves the City's industrial district.

Finding 73: Futurewise submitted comments that included concern about liquefaction, preservation of county ag resource land, and smallholding areas. Staff acknowledges that the entire City of Woodland is mapped as high susceptibility, as is the entire bottoms and Interstate-5. Staff notes that the city requires that all construction be consistent with the applicable international building standards including those for seismic standards. (Pilings are a regular part of the construction process for substantial buildings within the city limits. Proof that the city can and does address this issue in the course of normal business.)

The City is considering expansion of the UGA but only one application is into an area mapped as Economic Resource Land – AG, this application, CPA-18-003 is on Dike Access Road and involves a property that has been in industrial use since at least the year 2000. Should the city include this parcel in the UGA, no agricultural conversion would occur.

The city is also considering expansion into areas designated as Small Holding. The extent of that UGA inclusion is yet to be determined and will be subject to review and adoption by Cowlitz County when the City applies for UGA expansion. Additional analysis will be completed at that time. However, staff notes that the area in question is characterized by not only agricultural uses but also industrial uses, commercial uses, and a proliferation of urban style lots in addition to the 5-acre lots desired by the small-holding designation. This includes a newly proposed 76 lot subdivision with lots between .5 and 2.5 acres in size. This subdivision alone will add approximately 150% of the number of houses that currently exist in the area. From city staff's point of view, this project could be said to exemplify the exact opposite of self-sustaining growth desired by the County because the impacts of this development will be borne almost solely by the City of Woodland. The city will continue to work with Futurewise as it tries to plan growth at urban densities to reduce sprawl and achieve the goals of good planning and the Growth Management Act.

V. STAFF RECOMMENDATION:

Per WAC 365-196-640(3) and Section 11.2 of the City of Woodland 2016 Comprehensive Plan limits amendments to the plan to once per year.

In accordance with WMC 19.08.030, the Commission is tasked with making a recommendation to the City Council which has the decision-making authority for the City. Given that Comp Plan map amendments are a legislative action governed by the standards stated above, the role of the Planning Commission is to consider all the amendment requests in the docket and to incorporate those recommendations into one cumulative proposal. That singular proposal is known as City of Woodland Docket Map Comp Plan Map Amendment case CPA-18-010.

Based upon the analysis herein and the case records for the cases listed, staff hereby recommends that the Planning Commission recommend **APPROVAL of the docket map amendments with conditions** as listed below.

VI. CONDITIONS OF APPROVAL FOR INCLUSION IN THE AMENDED MAP

Each recommendation included conditions applicable to the properties involved in the requests. Those conditions area as follows: (Staff recommended changes in red)

Franklin Loop (CPA 18-002)

1. In return for being part of the docketed comp plan map amendment, prior to application for any development or building permit, the property owner shall enter into a Developer's Agreement with the City that includes the following:
 - a. Acknowledgement that there could be noise, vibration, and odors from public facilities that will impact developments on this site and that such development is embarked upon with full knowledge that these impacts exist; and,
 - b. Agreement that the site will be developed as a Planned Unit Residential Development.
2. The amended map shall include a "High Density" overlay for this site with a legend label of "High Density Residential to be developed at a density of 20 units per acre."
3. The adopting ordinance for amending the Comp Plan map shall include language which requires the site to develop at the density required by policy H 5.5 (20 units per acre).
4. Upon implementation of the amended Comprehensive Plan Map, the following zoning shall be implemented for re-designated properties:
 - a. Medium Density Residential (MDR) zoning

Dike Access Road (CPA 18-003)

1. In return for being part of the docketed comp plan map amendment, prior to application for any development or building permit, the property owner shall enter into a Developer's Agreement with the City that includes the following:
 - a. Agreement to annex into the City of Woodland prior to connection to the City's water and/or sewer utility;
 - b. Agreement that residential developments on the site will be developed as Planned Unit Residential Developments; and
 - c. Agreement that division of the property will occur at densities of 4 units per acre for single-family residences and 20 units per acre for multi-family residences.

(Was the preferred scenario low-density or high density?)

2. Upon implementation of the amended Comprehensive Plan Map, the following zoning shall be implemented for re-designated properties:
 - a. (if High-Density) Medium Density Residential (MDR) zoning

Aho (CPA 18-005)

1. In return for being part of the docketed comp plan map amendment, prior to application for any development or building permit, the property owner shall enter into a Developer's Agreement with the City that includes the following:
 - a. Agreement to annex into the City of Woodland prior to connection to the City's water and/or sewer utility;
 - b. Agreement that residential developments on the site will be developed as Planned Unit Residential Developments; and,
 - c. Agreement that division of the property will occur at densities of 4 units per acre for single-family residences and 20 units per acre for multi-family residences. ~~with at least 40 percent of the units in each development be at a density of 20 units per acre.~~
 - d. Any property included within the UGA which as a portion of the parcel that extends beyond the UGA line, shall be divided or adjusted prior to annexation to ensure that annexation requests only include whole parcels, lots, or tracts.

Beatty (CPA 18-007)

1. In return for being part of the docketed comp plan map amendment, prior to application for any development or building permit, the property owner shall enter into a Developer's Agreement with the City that includes the following:
 - a. Agreement to bring the site up to current development standards prior to operating a business out of the site.
2. Upon implementation of the amended Comprehensive Plan Map, the following zoning shall be implemented for re-designated properties:
 - a. Light Industrial (I-1) zoning

Loomis (CPA 18-008)

1. In return for being part of the docketed comp plan map amendment, prior to application for any development or building permit, the property owner shall enter into a Developer's Agreement with the City that includes the following:
 - a. Agreement to annex into the City of Woodland prior to connection to the City's water and/or sewer utility;
 - b. Agreement that residential developments on the site will be developed as Planned Unit Residential Developments; and
 - c. Agreement that division of the property will occur at densities of 4 units per acre for single-family residences and 20 units per acre for multi-family residences.
 - d. Agreement to participate and support inclusion of served properties into the City of Woodland Urban Growth Area. (Staff recommendation if UGA not extended)
2. Any property included within the UGA which as a portion of the parcel that extends beyond the UGA line, shall be divided or adjusted prior to annexation to ensure that annexation requests only include whole parcels, lots, or tracts.

Woodland Commerce (CPA 18-012)

1. In return for being part of the docketed comp plan map amendment, prior to application for any development or building permit, the property owner shall enter into a Developer's Agreement with the City that includes the following:
 - a. Agreement that public access for recreation will be provided along the river (in a manner approved by a shoreline permit) as part of the development of the site;
 - b. Acknowledgement that there could be noise, vibration, and odors from public facilities that will impact developments on this site and that such development is embarked upon with full knowledge that these impacts exist; and,
 - c. Agreement that the site will be developed as a Planned Unit Residential Development.
2. Upon implementation of the amended Comprehensive Plan Map, the following zoning shall be implemented for re-designated properties:
 - a. Medium Density Residential (MDR) zoning

BYRV (CPA 18-011)

1. In return for being part of the docketed comp plan map amendment, prior to application for any development or building permit, the property owner shall enter into a Developer's Agreement with the City that includes the following:
 - a. Acknowledgement that there could be noise, vibration, and odors from public facilities that will impact developments on this site and that such development is embarked upon with full knowledge that these impacts exist; and,
 - b. Agreement that the site will be developed as a Planned Unit Residential Development.
2. Upon implementation of the amended Comprehensive Plan Map, the following zoning shall be implemented for re-designated properties:
 - a. Medium Density Residential (MDR) zoning

VII. SEPA DECISION:

As lead agency, City of Woodland staff acts as the SEPA Responsible Official (WMC 19.08.030) and a notice of a potential Determination of Non-Significance for this project was issued on November 29, 2018.

As lead agency for the Comprehensive Plan Map update process the City has tentatively determined that amending the map will not have a probable significant adverse impact on the environment and that an environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. The notice and the checklist are known as Document 19 and available at City Hall and on-line at the site listed in the Attachment section of this report. This information is available to the public on request.

As lead agency, City of Woodland staff acts as the SEPA Responsible Official (WMC 19.08.030). and a Determination of Non-Significance for this project was issued on November 29, 2018 and the determination is hereby final. There is no further comment period on the DNS.

APPEAL PROCEDURE:

Planning Commission recommendations on legislative actions to the City Council are not appealable. City Council decisions are appealable per WMC 17.84.100.

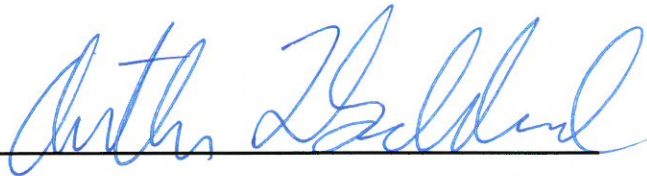
WMC 17.84.100 - Appeal—Council decision. - Enactment of an ordinance by the council approving an amendment shall constitute final action. When the action of the council is to deny a request for an amendment, the adoption of the motion shall constitute final action. Written notice of the action shall be forwarded to the commission to be attached to the permanent file of the case, and the city shall notify the applicant of the final action of the council.

Note: In accordance with Cowlitz County Resolution 02-078 Section E a decision by the City Council to change its UGA will be sent to the Cowlitz County Planning Commission for review whereupon the Commission will make a recommendation to the Cowlitz County Board of Commissioners. This review will be initiated in the form of an application to amend the Cowlitz County Comprehensive Plan. The Board of County Commissioners is then responsible for a complete review of the City process and adoption, as well as the County Planning Commission's recommendation on the amendment request. Per the resolution, the City amendment (if approved) would be adopted as an amendment to the County's Comprehensive Plan. (No County process would be required if the City chooses to only make changes that are internal to the City's existing limits.)

Responsible Official: Travis Goddard, Community Development Director
City of Woodland
PO Box 9
230 Davidson Ave
Woodland, WA 98661
goddardt@ci.woodland.wa.us

Date: 4/13/2019

Signature:



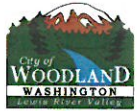
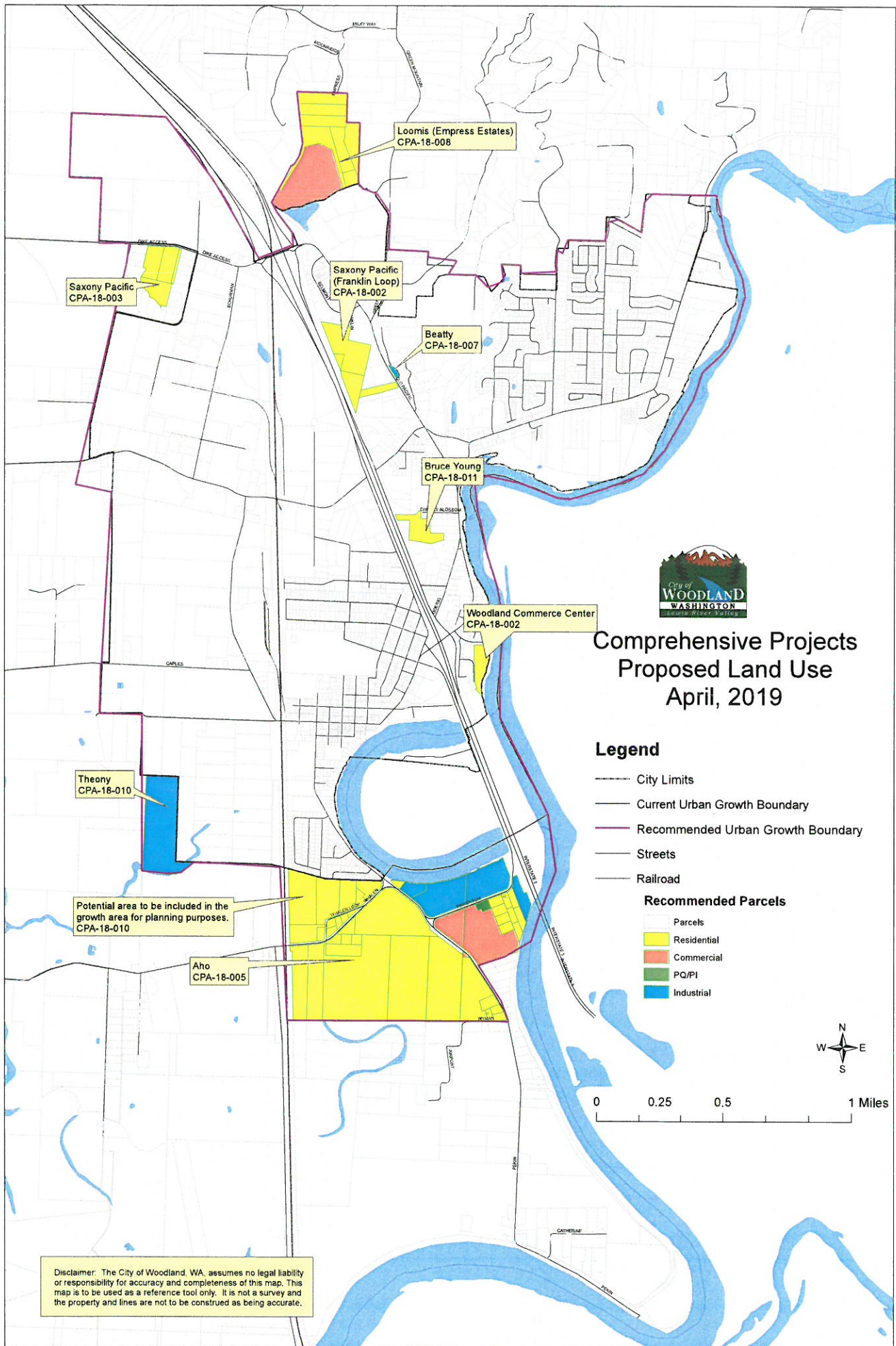
cc: Planning Commission
Applicant
File
Website

ATTACHMENTS

Documents listed and available at:

<http://www.ci.woodland.wa.us/departments/planning/comprehensive.php>

- A. All documents and records from CPA-18-010 by reference



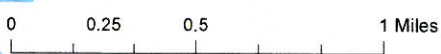
Comprehensive Projects Proposed Land Use April, 2019

Legend

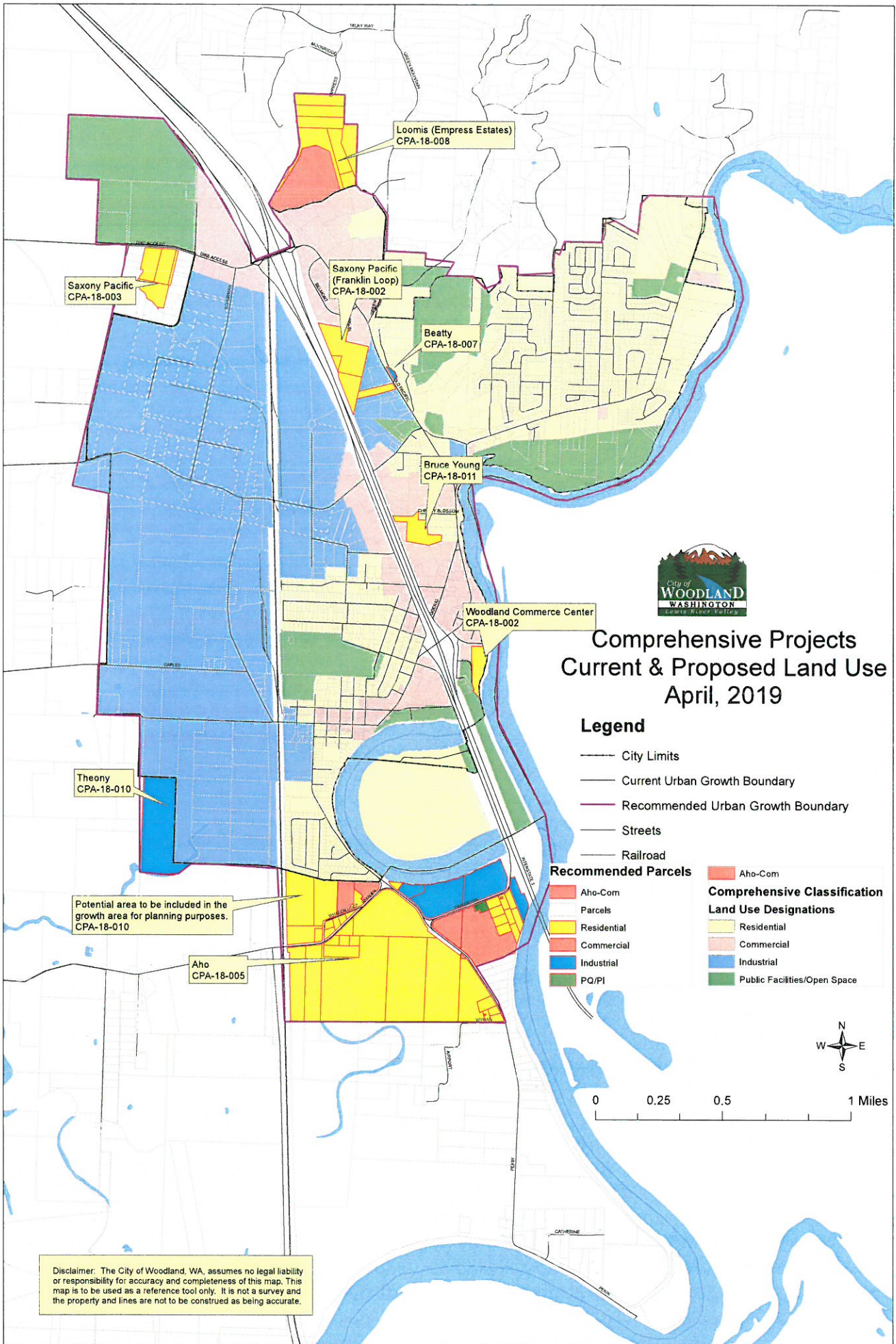
- City Limits
- Current Urban Growth Boundary
- Recommended Urban Growth Boundary
- Streets
- Railroad

Recommended Parcels

- Parcels
- Residential
- Commercial
- PQ/PI
- Industrial



Disclaimer: The City of Woodland, WA, assumes no legal liability or responsibility for accuracy and completeness of this map. This map is to be used as a reference tool only. It is not a survey and the property and lines are not to be construed as being accurate.



Comprehensive Projects Current & Proposed Land Use April, 2019

Legend

- City Limits
- Current Urban Growth Boundary
- Recommended Urban Growth Boundary
- Streets
- Railroad

Recommended Parcels

- Aho-Com
- Parcels
- Residential
- Commercial
- Industrial
- PQ/PI

Comprehensive Classification

- #### Land Use Designations
- Residential
 - Commercial
 - Industrial
 - Public Facilities/Open Space

Loomis (Empress Estates)
CPA-18-008

Saxony Pacific
CPA-18-003

Saxony Pacific
(Franklin Loop)
CPA-18-002

Beatty
CPA-18-007

Bruce Young
CPA-18-011

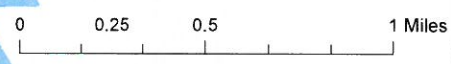
Woodland Commerce Center
CPA-18-002

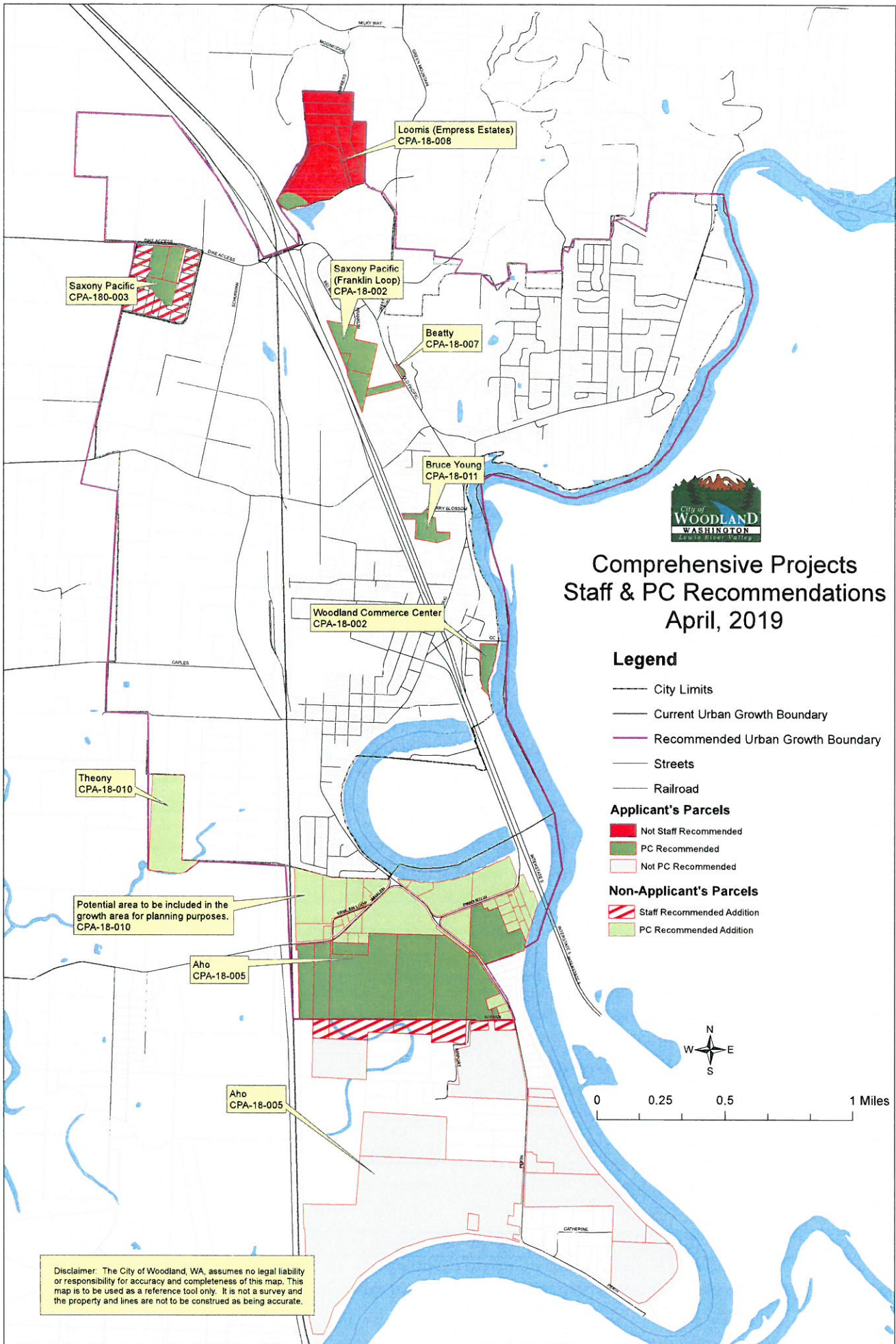
Theony
CPA-18-010

Potential area to be included in the
growth area for planning purposes.
CPA-18-010

Aho
CPA-18-005

Disclaimer: The City of Woodland, WA, assumes no legal liability or responsibility for accuracy and completeness of this map. This map is to be used as a reference tool only. It is not a survey and the property and lines are not to be construed as being accurate.





Comprehensive Projects Staff & PC Recommendations April, 2019

Legend

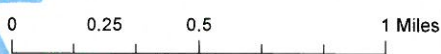
- City Limits
- Current Urban Growth Boundary
- Recommended Urban Growth Boundary
- Streets
- Railroad

Applicant's Parcels

- Not Staff Recommended
- PC Recommended
- Not PC Recommended

Non-Applicant's Parcels

- Staff Recommended Addition
- PC Recommended Addition



Disclaimer: The City of Woodland, WA, assumes no legal liability or responsibility for accuracy and completeness of this map. This map is to be used as a reference tool only. It is not a survey and the property and lines are not to be construed as being accurate.

Planning Commission Recommendation

Associated Case	Parcel #	Designation	Size		Excluded
CPA 18-002	50714	Residential	2.56		
CPA 18-002	50680023, 50729, 50730	Residential	19.05		
CPA 18-003	6535715, 6535716, 63235, 6325701	Residential	16.22		
Inclusion	6215902	Industrial	4.5		
Inclusion	62159	Industrial	14.23		
Inclusion	EA3008001	Industrial	13.98		
Inclusion	EA3009012	Industrial	3.6		
Inclusion	EA3009011	PUBLIC	1.16		
Inclusion	62160	PUBLIC	1.34		
005+	6215901	Commercial	6.65		
005+	6216501	Commercial	3.52		
005+	62166	Commercial	4.83		
CPA018-005	EA3009001	Commercial	25.14		Acres
CPA018-005	63521	Residential	16.37	minus	7.22
CPA018-005	62150	Residential	15.96	minus	1.3
CPA018-005	62151	Residential	56.28	minus	11.3
CPA018-005	62155	Residential	35.9	minus	5.64
CPA018-005	62158	Residential	35.35	minus	8.1
CPA018-005	6088002	Residential	0.56		
CPA018-005	60880	Residential	15.87		
CPA018-005	WB2515001	No		Denied	21.26
CPA018-005	60886	No		Denied	48.32
CPA018-005	6088104	No		Denied	34.94
CPA018-005	60882	No		Denied	182.96
CPA018-005	60884	No		Denied	1.48
Inclusion	6088001	Residential	2		
Inclusion	6088003	Residential	0.91		
Inclusion	608804	Residential	1.06		
Inclusion	EA3009003	Residential	1.25		
Inclusion	EA3009004	Residential	1.25		
Inclusion	EA3009005	Residential	1.25		
Inclusion	EA3009006	Residential	1.25		
Inclusion	EA3009008	Residential	1.1		
Inclusion	EA3009007	Residential	1		
Inclusion	EA3009010	Residential	1		

Planning Commission Recommendation (continued)

Associated Case	Parcel #	Designation	Size	Excluded
Inclusion	EA3009009	Residential	1.41	
Inclusion	EA3009002	Residential	1.2	
Inclusion	62157	Residential	0.81	
Inclusion	62165	Residential	1.48	
Inclusion	62167	Residential	0.17	
Inclusion	62168	Residential	9.41	
Inclusion	63520	Residential	14.07	
Inclusion	62148	Residential	4.98	
Inclusion	6215015	Residential	1	
Inclusion	62173	Residential	0.9	
Inclusion	62170	Residential	0.5	
Inclusion	27487	Residential	0.63	
Inclusion	62172	Residential	0.7	
Inclusion	62171	Residential	0.5	
Inclusion	62169	Residential	1.59	
Inclusion	6215101	Residential	1.02	
Inclusion	62156	Residential	24.88	
Inclusion	6215102	Residential	1.02	
Inclusion	6215103	Residential	1.02	
Inclusion	6215104	Residential	4	
CPA 18-007	508970100	Industrial	0.5	
CPA 18-008	WB1203001	Commercial	26.36	
CPA 18-008	WB1206005, WB1206002, WB1206003, WB1206006, WB1206007, WB1206008, WB1202005	Residential	30.35	
CPA 18-012	50492	Residential	5.52	
CPA 18-011	50596	Residential	6.37	

Staff Recommended UGA Inclusions

Associated Case	Parcel #	Designation	Size	Excluded
Thoeny Farm	60179	Industrial	30.93	
Burke Road	6325711	Residential		
Burke Road	6325713	Residential		
Burke Road	6325712	Residential		
Burke Road	6325714	Residential		
Burke Road	632361	Residential		
Burke Road	63236101	Residential		
Burke Road	6236103	Residential		
Burke Road	632362	Residential		
Burke Road	63236106	Residential		
Burke Road	63236105	Residential		
Burke Road	63236102	Residential		
Burke Road	63236002	Residential		
Burke Road	6323601	Residential		
Burke Road	6323602	Residential		
Burke Road	6323604	Residential		
Burke Road	6323603	Residential		
Burke Road	632570101	Residential		
Burke Road	632570103	Residential		
Burke Road	6325702	Residential		
Burke Road	6325703	Residential		
Burke Road	632570102	Residential		