



December 28, 2022

Anita G. Palacios
Clerk, City of Grandview
207 West Second Street
Grandview, WA 98930

Project: Elite Development, AHBL No. 2220774
Subject: Comprehensive Plan Amendment Application

Civil Engineers

Structural Engineers

Landscape Architects

Community Planners

Land Surveyors

Neighbors

Dear Anita:

Enclosed are the following items which comprise an application for a text amendment to the City's Comprehensive Plan:

- Comprehensive Plan Amendment Application
- SEPA Non-Project Environmental Checklist

In addition, this letter contains an important narrative explanation of our request.

Introduction

We are requesting a text amendment to the Grandview Comprehensive Plan, Land Use Element - *Section V: Future Land Use*. Our focus is on the language in the Plan pertaining to the R-3 zoning district. In this letter we outline the following:

- The Plan is far too restrictive on development in areas intended for high-density development
- The Plan goes into greater detail than what is typically found in Comprehensive Plan documents and should be modified; some statements contained in the Comprehensive Plan are simply too detailed and prescriptive
- The city's zoning code is the best location for regulating minimum lot sizes and other restrictions relating to building bulk and dimensional aspects as well as limits on density

The R-3 zoning district is one of the zoning districts in the city that implements the "Residential" land use designation (as assigned on the City's Future Land Use Map, Figure 2-6). As indicated by its name, the R-3 district is the location where high-density housing is intended to be located in the city, and structures with multiple units such as tri-plexes, four-plexes, apartment buildings and so forth could be constructed in such locations. In contrast, the R-1 and R-2 districts are zoning districts for residential uses at a lower planned density.

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The plan sets out a good and very helpful introduction to the purposes of the R-3 zoning district:

The R-3 district is established to provide a high density residential environment. Lands within this district generally contain multiple-unit residential structures...

However, a portion of the following phrase (underlined portion) is problematic as it seems to suggest that development, as regulated in the R-3 district, should be more or less the same in terms of density as compared to lower density districts:

"Lands within this district generally contain multiple-unit residential structures of a scale compatible with the structures in low density districts and with useful yard spaces"

Further, the same section sets out a minimum lot size requirement for multifamily housing in the R-3 zoning districts of the city:

"[The] minimum area of lot for multifamily dwellings is 3,000 square feet per dwelling unit for the first four dwelling units and 6,000 square feet per each additional dwelling unit."

This language limits the allowed density in the R-3 zoning district, resulting in an extreme limitation on how apartment buildings can be developed and situated on lots within the city. We contend that this restriction actually conflicts with the City's goals and policies to allow a variety of housing types throughout the city to increase options for affordable housing.

Request

Based on the explanation above, we respectfully request the council approve our proposal to strikeout certain portions of the text, as follows:

"... The R-3 district is established to provide a high density residential environment. Lands within this district generally contain multiple-unit residential structures ~~of a scale compatible with the structures in low density districts and with useful yard spaces~~. The R-3 district is intended to allow for a gradual increase in density from lower density residential districts and, where compatible, can provide a transition between different use areas. Minimum area of lot for single-family dwelling is 7,500 square feet; for two-family dwelling attached, minimum lot area is 8,000 square feet, and governed by the standards in R-1 and R-2 districts. ~~Minimum area of lot for multifamily dwellings is 3,000 square feet per dwelling unit for the first four dwelling units and 6,000 square feet per each additional dwelling unit.~~"



Discussion

On the topic of what the Comprehensive Plan should and should not include, we fully recognize and support the City's prerogative and responsibility to include language in the Comprehensive Plan that is appropriately detailed, easy to understand, and which sets forth a vision for development. We highly value the local preferences, choices, and guidance that the Council (as presently formed and in previous time) has made. However, we request that Council re-evaluate the language contained in the plan to determine if it is still useful and the right approach for the city.

Our request is supported by many of the goals and policies of the City's Comprehensive Plan, including but not limited to the following Land Use Element Policies:

- Encourage urban infill where possible to avoid sprawl and the inefficient leapfrog pattern of development. (policy 1.3)
- Accommodate future population growth through infilling and utilization of undeveloped subdivision lots in order to avoid conversion of agricultural land to residential uses. (policy 1.4)
- Building where adequate public facilities and services exist (policy 3.1)
- Build in City limits prior to UGA development (policy 3.2)
- Provide residential areas with a variety of housing densities, types, sizes, costs and locations (policy 4.2)
- Attempt to assure that basic community values and aspirations are reflected in the City's planning program, while recognizing the rights of individuals to use and develop private property in a manner consistent with City regulations. (policy 4.6)

Additionally, the Comprehensive Plan details that Grandview's economy relies on productive farmlands and those lands must be preserved to ensure economic vitality for future generations. Through the Plan, the City also acknowledges that a certain amount of land is needed for housing and other economic activities and that certain conditions may determine the suitability of areas for various land uses. The Plan also says that land use planning must accommodate the protection of wetlands, wildlife habitats, and other environmentally critical areas. Removing restrictive minimum lot size requirements and increasing the number of housing units allowed in those areas designated for high-density will help to foster appropriate development in areas that are suitable and likewise direct development away from areas that should be protected.

Furthermore, the current **housing crisis** that is occurring in the region and throughout Washington bolsters our request. It is widely recognized that there are many factors that impact housing costs, supply constraints, and choices – including polices and regulations



at the state and local levels. We imagine that Council is mindful of these present-day challenges and considerations.

Our Request and Other Considerations Council may Consider

On a side note, while our application includes a request to only strikeout the minimum lot requirement for multi-family dwellings, we further suggest that the city may want to consider making further edits to the Comprehensive plan to remove all instances where minimum lot sizes are prescribed. Instead, the city may consider only setting out lot size and development standards in the zoning code. We suggest that the Comprehensive Plan should instead provide general policy statements such as average or typical density ranges that are intended (i.e., “While the R-2 Medium Density Residential district is expected to have *X to X* dwelling units per acre, development in the R-3 High Density Residential district would average *X to X* dwelling units per acre.”) Our suggested approach is to provide flexibility (because different development areas of the City may have unique circumstances that impact density such as transit access, proximity to commercial / services areas, proximity to schools, transportation limitations, etc.) while setting out general parameters to be implemented with the zoning / development regulations.

Our Next Steps

We want to be very clear and transparent as to our intended “next steps.” Following an amendment to the City’s Comprehensive Plan , we will next apply to modify GMC 17.35.050 (the development standards for the R-3 zoning district) to effectively increase the allowed density in the R-3 zoning district¹. In doing so, the R-3 zoning district will become more aligned with what neighboring municipalities typically allow for development in an R-3 district (*and additionally more closely align with the density of existing development that is located within Grandview in the areas zoned R-3 that were built prior to the ordinance which created the limitations that are the subject of our request*).

Once that is complete, Elite Investment Group will pursue the opportunity to develop a multi-family project at a 2.05-acre site off of Grandridge Road that is zoned R-3. The proposal would include the construction of attractive and high-quality market-rate housing plus related amenities. The plan is to develop the site with up to 63 units in up to 5 buildings and associated parking, landscaping, and social gathering areas. The development cannot occur without a change to the development regulations - which must *first* be accommodated through the Comprehensive Plan Amendment that we are

¹ We will apply to modify the minimum lot area for multifamily dwellings required by GMC 17.35.050(B) to 1,400 square feet per dwelling unit. Alternatively, the council could direct and approve the change to the municipal code using their legislative authority, if desired.



requesting. The benefits of the project to the community will be many, including creating new living opportunities at an “infill” site where services and infrastructure is already in place, having beautiful design and pleasing aesthetics, adding to the city’s tax base, and creating additional choices for people looking to rent a home in Grandview.

In closing, we are very grateful to you, the city staff, and your consultants for your assistance through this process. Please let me know if the city staff, YVCOG staff, or Council will require any additional items to process this request; we would welcome any opportunity to provide a presentation to staff, to Council or any other interested groups.

Sincerely,

Nicole Stickney, AICP
Senior Planning Project Manager

c: J. Trinidad Garibay, Elite Investment Grp LLC

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