June 3, 2026

City of Lacey
Department of Community & Economic Development
420 College Street SE
Lacey, WA 98503

McClanahan Village and Neil Commons Planned Residential Development (PRD)
Code Review

The project proposes to develop 60 units (20 two-story townhome-style cottages, 4 one-story accessible townhome-style cottages, and 36 one-story cottages) in a Planned Residential Development (PRD) on two parcels crated through a subdivision within the City of Lacey's OS-I Open Space – Institutional Residential) zone.

The purpose of this Zoning Code review is to provide a written narrative of how McClanahan Village and Neil Commons aligns with the intent of the City of Lacey PRD code (LMC 11.10)

LMC 11.10.050 Design criteria

A. Applicants must demonstrate that the design of the proposed development will be superior to that which would result without a planned residential development. Such a design may include enhanced open space, recreational facilities, landscaping, circulation, building or site design beyond standard code requirements.

Response:
The OS-I zone is intended to provide opportunities and facilities for the various activities and needs of a diverse and dynamic population (LMC 16.48.010(D)), and a development of low-income housing with accessible units, it meets the housing needs of the City of Lacey residents.
The proposed Planned Residential Development (PRD) directly advances this purpose by creating high-quality, affordable, and accessible housing that meets critical community needs within the City of Lacey. The project includes a mix of two-story townhome-style cottages and single-story cottages, including accessible units, which expands housing choice beyond what conventional zoning would typically support.

Use of the PRD process allows the project to incorporate superior site planning, including enhanced open space, integrated pedestrian circulation, and coordinated building placement that creates a cohesive residential community. The PRD also enables the project to cluster units efficiently, preserve functional open space, and provide amenities and design features that would not be feasible under standard lot-by-lot development.

B. Applicants must demonstrate that the proposed development will provide specifically identified public benefits that clearly outweigh any adverse impacts or undesirable effects of the proposed planned residential development, particularly those adverse and undesirable impacts to the surrounding properties. Public benefits resulting from the planned residential development may include, but are not limited to:

1. Protection of critical areas that would not be protected otherwise to the same degree as without a planned residential development.
2. Preservations, enhancement, or rehabilitation of natural features of the subject property, such as significant woodlands, native vegetation, topography, or noncritical area wildlife habitats, not otherwise required by other city regulations; or
3. Provision of public facilities that could not be required by the city for development of the subject property without a planned residential development.
4. Designation of substantial proportion of the total units within the development as affordable housing.

HQ: 20210 142nd Avenue NE, Woodinville, WA 98072 • Kent: 1851 Central Place South, Suite 101, Kent, WA 98030

Response:
The proposed PRD provides clear public benefits that outweigh any potential adverse impacts. The project delivers low-income senior affordable housing, directly supporting a critical community need and exceeding what could be required under standard zoning. The development also incorporates enhanced site planning, including improved open space, coordinated circulation, and on-site stormwater facilities that reduce impacts to the public system. These elements collectively provide public benefits that justify use of the PRD and align with the intent of the OS-I zone.

C. The design of a planned residential development shall take into account the relationship of the site to the surrounding areas. The perimeter of the planned residential development shall be so designed as to minimize undesirable impact of the planned residential development on adjacent properties and, conversely, to minimize undesirable impact of adjacent land use and development characteristics on the planned resident development

Response:
The PRD has been designed to ensure compatibility with surrounding development and to minimize potential impacts on adjacent properties. The project maintains a minimum 20-foot building setback along all interior property lines and along Mullen Rd. SE, with landscaping preserved or added throughout these setback areas to provide buffering and visual screening.
Lower-intensity single-story cottage units are located along the southern boundary, creating an appropriate transition to the existing detached single-family homes in the adjacent neighborhood. This placement reduces massing impacts and supports neighborhood compatibility.
Overall, the site layout, setbacks, landscaping, and building transitions demonstrate that the PRD has been thoughtfully designed to minimize undesirable impacts on surrounding properties while also protecting the development from external impacts.

LMC 11.10.060 Site acreage
The minimum site for a planned residential development shall be a full block or a portion of a block if it was a numbered block in the original plat of the city, or a numbered block of a subdivision recorded prior to the adoption of the ordinance codified in this title. For all previously unplatted areas, the minimum site shall be two acres.

Response:
The combined McClanahan Village and Neil Commons site is currently 5.3-acres that will be subdivided into two lots; the northern lot will be 2.01 acres and the southern lot will be 3.31 acres, both of which exceeds the minimum two-acre site requirement for a Planned Residential Development in previously unplatted areas. Therefore, the project meets the PRD minimum site-area standard.

LMC 11.10.070 Access to public right-of-way
The major internal street serving the planned residential development shall be connected to at least one major arterial, secondary arterial or collector street.

Response:
The McClanahan Village and Neil Commons site is served by Mullen Rd. SE which is classified as a collector road in the current City of Lacey Transportation Plan.

LMC 11.10.080 Lot size
The minimum lot size provisions of other chapters of the zoning title are waived in a planned residential development.p

Response:
The McClanahan Village and Neil Commons consist of an approximately 5.3-acre site, that is proposed to be subdivided into two lots. Per the underlying OS-I zone the site must be appropriately

sized for the proposed use (LMC 16.48.060). The proposed PRD has been designed to fit the site appropriately and efficiently, consistent with the purpose and flexibility provided by the PRD regulations.

LMC 11.10.090 Setback and side yard requirements

A. Setbacks from the exterior boundary line of the planned residential development area shall be comparable to or compatible with those of the existing development of adjacent properties, or, if adjacent properties are undeveloped, the type of development which may reasonably be expected on such properties given the existing zoning of such properties or the projections of the Comprehensive plan. In no event shall such setback be less than twenty feet.

Response:
A 20' building setback will be maintained around the entire boundary of McClanahan Village and Neil Commons PRD. See response to LMC 11.10.050(C) above for more specific information about compatibility with uses.

B. Setbacks or side yards between buildings: The standard setbacks and yard requirements between buildings may be waived in a planned residential development. Buildings may have common walls and, therefore, built to the property line as in townhouse construction.
Wherever buildings are separated, a minimum distance of ten feet shall be maintained between such buildings.

Response:
The applicant is not requesting any deviation from required building separation setbacks. All buildings within the McClanahan Village and Neil Commons PRD will maintain a minimum of 10 feet of separation, consistent with LMC 11.10.090(B).

LMC 11.10.100 Off-street parking

Off-street parking shall be provided in a planned residential development in the same ratios for types of buildings and uses as required for the underlying zoning district, and as described in Chapter 16.72 LMC.

Response:
Off-street parking for the McClanahan Village and Neil Commons PRD has been provided consistent with the ratios required under the OS-I zone and LMC Chapter 16.72.

McClanahan Village includes 20 two-story, two-bedroom townhome-style cottages and 4 accessible one-story, two-bedroom townhome-style cottages. Per LMC Table 16T-13, these units require 1.5 stalls per dwelling unit, resulting in a minimum of 36 stalls. A total of 36 stalls, of which 4 ADA-accessible stalls are provided.

Neil Commons includes 36 one-story, one-bedroom cottages, which also require 1.5 stalls per unit under LMC Table 16T-13 resulting in a minimum of 54 stalls. A total of 54 stalls, of which 7 ADA-accessible stalls are provided.

The project will provide a total of 90 parking stalls; 79 standard stalls and 11 ADA accessible stalls.

LMC 11.10.110 Secondary use limitations

A. Commercial uses are subject to full administrative review procedures contained in LMC 11.04.040 and shall be provided for in the original, finally approved version of the planned residential development application for the development within which the commercial use is to be integrated. "Original as is used in this subsection, refers to the planned residential development application as it existed at the time of its final approval by the city council.
B. The gross floor area of the commercial use shall not exceed the product shall not exceed the product of thirty square feet multiplied by the number of dwelling units within the development.

The purpose of restricting commercial development is to prevent the planned residential development process from being used as a vehicle for rezoning to commercial, which may not at all related to the commercial needs of the area. Once a relatively large number of dwelling units have been completed or occupied, the need for such commercial development may be justified.

Response:
There are no commercial uses proposed within the McClanahan Village and Neil Commons project site.

LMC 11.10.120 Design standards

A. Open space requirements shall be as follows:
1. Each planned residential development shall provide not less than thirty percent of the gross land area for common open space, which shall be either:
   a. Held in single ownership where such ownership assumes full responsibility for maintenance and operation; or
   b. Held in common ownership by all of the owners in the development area; or
   c. Dedicated for public use, if acceptable to the city.

Response:
All required common open space within the McClanahan Village and Neil Commons PRD will be held under single ownership, which will assume full responsibility for the ongoing maintenance and operation of these areas. This approach is consistent with LMC 11.10.120(A)(1)(a) and ensures long-term stewardship of the site's open-space amenities.

2. Common open space may contain such complementary structures and improvements as are necessary and appropriate for the benefit and enjoyment of residents of the planned residential development; provided, that the building coverage of such building or structure combined with the building coverage of the residential structures shall not exceed the maximum permitted by the underlying zone.

Response:
The project will comply with LMC 11.10.120(A)(2). Any complementary structures or improvements located within the common open-space areas will be limited to those necessary for the use and enjoyment of residents, and the combined building coverage of these structures and the residential buildings will remain within the maximum coverage allowed by the underlying OS-I zone.

3. Areas containing critical area habitat and associated buffers that would otherwise be required to be protected shall not be counted toward the gross and area for common open space.

Response:
There are no critical area habitats or associated buffers within the project area.

4. Common open space must meet the following design criteria:
   a. Must be useable and accessible. All common open spaces intended for public use shall be physically and visually accessible from the adjacent street or major internal pedestrian route. Open spaces shall be in locations accessible to intended users – rather than simply left-over or undevelopable space in locations where very little pedestrian traffic is anticipated. Locations integrated with transit stops, for instance, would be encouraged, as there is likely to be pedestrian traffic in the area.

Response:
All open spaces are located between or adjacent to residential buildings, ensuring they are physically and visually accessible to residents. These spaces are intentionally integrated into the site layout—rather than being leftover or undevelopable areas—so that residents can easily access and enjoy them as part of the overall community design.

b. Must be inviting. Inviting open spaces feature amenities and activities that encourage pedestrians to use and explore the space. On a large scale, it could be a combination of active and passive recreational uses. It could include a fountain, sculpture, children's play area, special landscaping element, or even a comfortable place to sit and watch the world go by. In order for people to linger in an open space, it must be comfortable. For instance, a plaza should receive ample sunlight, particularly at noon, and have design elements that lend the space a "human scale," including landscaping elements, benches and other seating areas, and pedestrian-scaled lighting. No use shall be allowed within the open space that adversely affects the aesthetic appeal or usability of the open space. (See Table 16T-83.)

Response:
The development includes pedestrian walking paths, landscaped open lawn areas, picket fences, and site landscaping intended to create an inviting, human-scaled environment for residents. These spaces are designed to support activities for both senior and family residents, including walking, gathering, gardening, outdoor play, and informal recreation, while maintaining the flexibility and ease of maintenance appropriate for the residential character of the Project.
Open spaces between cottage clusters are oriented to create inviting shared gathering areas, with private porches, patios, planting areas, and pedestrian connections contributing to a neighborhood "front lawn" character. Additional open space areas are intended to provide opportunities to enjoy the natural setting of the site, including preserved trees within the tree tract and landscaped planting buffers.

c. Must be safe. Safe open spaces incorporate Crime Prevention through Environmental Design (CPTED) principles:
(1) Natural surveillance – which occurs when parks or plazas are open to view by the public and neighbors. For example, a plaza that features residential units with windows looking down on space means that the space has good "eyes" on the park or plaza.
(2) Lighting that reflects the intended hours of operation.
(3) *Landscaping and Fencing.* Avoid configurations that create dangerous hiding spaces and minimize views.
(4) Entrances should be prominent, well lit, and highly visible from inside and outside of the space.
(5) *Maintenance.* Open spaces shall utilize commercial grade materials that will last and require minimal maintenance costs. Walls, where necessary, shall be designed and treated to deter graffiti. Use and maintain landscape materials that reduce maintenance cost and maintain visibility, where desired.

Response:
The proposed open spaces incorporate CPTED principles through the overall site layout, visibility, and residential character of the development. Cottage units are oriented toward shared open spaces and pedestrian pathways, allowing for natural surveillance from front porches, windows, patios, and pedestrian activities throughout the site. The small-scale layout and orientation of the clusters are intended to create pedestrian pathways, entrances, and shared open spaces that remain visible and accessible. Landscaping, fencing, and planting areas are intended to provide visual character and definition without creating concealed or isolated spaces that limit visibility. The Project emphasizes simple, durable, and low-maintenance site improvements appropriate for a residential cottage community.

d. Provides for uses/activities that appropriately serve the anticipated residents and users of the development. For example, common space that serves a variety of functions will attract greater usage. When designing open spaces, project applicants should consider a broad range of age groups, from small children to teens, parents, and seniors.

Response:

The design emphasizes flexible, informal open space areas rather than highly programmed recreational facilities, allowing the spaces to support a variety of day-to-day activities and patterns of use.

Shared lawn areas, pedestrian walking paths, porches, patios, and landscaped gathering spaces are intended to accommodate walking, passive recreation, outdoor play, gardening, social interaction, and opportunities for residents to spend time outdoors within a comfortable neighborhood setting. The small-scale cottage layout and interconnected pedestrian environment are intended to encourage casual interaction between residents while also providing quieter areas for relaxation and enjoyment of the site's natural features.

e. Must be designed and placed in consideration of existing and potential open space on adjacent parcels to provide consolidation or opportunities for future consolidation of neighborhood open space areas.

Response:
The proposed open space layout has been organized to create a cohesive internal network of shared residential open spaces while maintaining appropriate transitions to adjacent properties. Cottage clusters are oriented around shared courtyard and lawn areas that provide common gathering space and reinforce the pedestrian-oriented character of the development.

Perimeter planting buffers and landscaped edge conditions are incorporated to provide visual screening, soften transitions to neighboring parcels, and preserve the residential character of the site. While the Project is not specifically intended to create consolidated neighborhood-scale open space areas across adjacent properties, the site design maintains open space along internal and perimeter areas in a manner that is compatible with surrounding development patterns and potential future neighborhood connectivity.

f. Additional criteria:
(1) Consolidation of open space is encouraged to provide maximum access, visibility, usability, minimization of impacts to residential uses, and ease of maintenance.
(2) Existing and significant vegetation shall be retained in open space unless an alternative park/landscaping plan consistent with the criteria herein is approved by the site plan review committee.

Response:
The proposed open space areas are consolidated within central courtyard and common lawn areas between cottage clusters in order to promote accessibility, visibility, usability, and ease of maintenance.

Existing significant vegetation is proposed to be retained where feasible, including preservation areas associated with the tree tract and perimeter landscape buffers. The site design and landscaping approach seek to incorporate existing natural features into the overall character of the development while providing functional and maintainable open space areas for residents.

5. Cash or like value of land area and improvements may be donated to the city for open space purposes to fulfill up to fifty percent of open space requirements within that specific parks planning area. Acceptance will be at the discretion of the city.

Response:
The applicant is not proposing a cash contribution or land donation to the City to satisfy any portion of the open-space requirement. All required open space will be provided on-site within the McClanahan Village and Neil Commons PRD.

6. Developments are encouraged to conform to usable open space provisions of the applicable zone. However, at a minimum, three hundred square feet of private, usable open space having a minimum of fifteen feet in depth and width shall be provided for each ground level dwelling unit planned residential development. Such private open space should be visible and accessible from the dwelling unit. When adjacent to common open space, such private open space is to serve as a buffer between dwelling units and common open space.

   Response:
   The proposed development has been designed to provide a minimum of 200 square feet of private usable open space per dwelling unit, with a minimum dimension of 8 feet, consistent with direction provided in the City's pre-submittal review comments (Case Number #25-0385, January 14, 2026) The site plan has been organized around this standard in order to maintain the intended cottage layout, unit configuration, and overall site efficiency. Private open space is provided adjacent to each dwelling unit and is intended to be visible and directly accessible, consistent with the residential character of the project.

B. Open space, street area, etc., are computed as follows:

1. Streets in a planned residential development shall be computed at twenty percent of the gross land actually used for streets in the final design.

   Response:
   See plan sheet CG-01 for calculations of streets in the project design.

2. The density of the underlying zone governs unless a density increase is granted as provided in this chapter.

   Response:
   The underlying OS-I zone does not have a dwelling unit density limit. The PRD project is thoughtfully designed to be compatible with the surrounding uses.

3. The city may approve an increase in the dwelling unit density up to:
   a. In the low density district, fifteen percent.
   b. In a moderate density district, twenty percent.
   c. In the high density district, twenty five percent, rounded to the nearest whole number; provided, that the environmental and recreational amenities sought by this title are met.

   Response:
   The underlying OS-I zone does not have a dwelling density limit. Dwelling unit density limit is to be confirmed by the City based on interpretation of the OS-I zone. There is no request for an increase in dwelling unit density under the interpretation of the current OS-I zone.

4. The computation of the number of dwelling units permitted, and other space requirements, shall be as follows:

   DU = N/M x 1.2 (1.2 is the incentive factor).
   G Is gross land area in square feet.
   S Is street area (i.e., 20% of G) in square feet.
   DU Is number of dwelling units
   M Is minimum land area per dwelling unit.
   N Is net buildable site (G-S) in square feet

   Example: In a hypothetical five acre site in the moderate density residential district, thirty-two dwelling units are permitted under conventional development procedures, assuming a minimum lot area of five thousand four hundred forty-five square feet, no dedication for other public use, and twenty percent of the land area dedicated for public right-of-way. The calculations are as follows:

   G = 5 acres = 217,800 sq. ft., gross land area
   S = 20% of G = 43,560 sq. ft. of public R.O.W.

G-S = 174,240 sq. ft.
DU = 174,240/5,445 = 31.6 = 32 dwelling units.
On the same five-acre site, under planned residential development procedure, thirty-eight dwellings are permitted using the formula shown below:
DU = N/M * 1.2.
N = G-S = 217,800 - 43,560 = 174,240 sq. ft.
M = 5,445 sq. ft. minimum lot area.
DU = 174,240/5,445 * 1.2 = 38.4 = 38 dwelling units.

Response:
M (minimum land area per dwelling unit) is to be confirmed by the City based on interpretation of the underlying OS-I zoning district and its applicability within the PRD framework. The proposed density is being evaluated under the PRD provisions consistent with pre-submittal direction, and all final calculation inputs, including M, will be verified through the City's review of the PRD density methodology.

C. All landscaping requirements of LMC 16.80 shall be satisfied.

Response:
The applicant will comply with all applicable landscaping requirements outlined in LMC 16.80.

11.10.130 Environmental and recreational amenities
Four of the following five amenities must be provided as part of the planned residential development in order to receive the density bonus as provided in LMC 11.10.120.

A. Develop and equip significant recreational areas within the common open space with such features as, but not limited to, swimming pools, tennis courts, bike or pedestrian path systems, children's play areas;
B. Substantial retention of natural ground cover, bushes and trees;
C. Vegetated LID facilities are included in the design and serve as a visual amenity;
D. Provide significant access to a lake, river, stream or other natural water body;
E. Provide substantial and exceptional landscaping treatment either as an adjunct to or in lieu of natural landscaping beyond the minimum required.

Response:
As the underlying OS-I zone has no density limit, there is no incentive bonus requested or proposed. See response to LMC 11.10.120(B)(3) for more information.

Sincerely,
LDC, Inc.

Ross Jarvis

Ross Jarvis, PE, Assoc. DBIA
Principal Engineer