

TO: Planning Commission
HEARING DATE: 9/12/2023
FROM: Bryan Snodgrass, Community Development Department Principal Planner
SUBJECT: Burnt Bridge Creek West Zoning Map Change



Report Date: 9/1/2023

Proposal: Change zoning map designation from Office Commercial Industrial OCI to Light Industrial IL on 33-acre property

Location: 6103 NE 152nd Avenue, parcel 159112000

Proponent/Applicant: Panattoni Development Corporation, represented by Peter Condyles of Toyer Strategic Advisors

City Staff: Bryan Snodgrass, Principal Planner

Recommendation: Forward denial recommendation to City Council

I. PRIOR REVIEW (IF APPLICABLE):

A Site Plan Review application for a 278,000 square foot warehouse on the northern third of the property was submitted by the rezone applicant in September 2022. See Attachment A. A pre-application conference was held on September 22, at which it was determined that the proposed warehouse would not be allowed on the current OCI zoning on the site.

II. BACKGROUND AND REVIEW PROCESS:

Following determination that a zone change was needed, the applicant had correspondence and discussions with City staff regarding the substance and processing of the rezone application, which was then received on November 11, 2022. Pursuant to the State Environment Policy Act (SEPA), the City issued a Determination of Non-Significance (DNS) and circulated a checklist also published in the Columbian newspaper on March 24, 2023. One SEPA comment was received, from the Washington Department Fish and Wildlife (WDFW), included as Attachment C, describing the environmentally critical lands on the site and suggesting placing the lower portion of the property in a conservation covenant. The Planning Commission reviewed the proposal at workshops on the [March 14](#), [June 13](#), and [July 25](#), 2023. The July workshop focused on critical areas and included discussion and informal questions with Amaia Smith of WDFW, Keith Jones of the City of Vancouver, and Peter Condyles representing the applicant.

During this general timeframe, the Vancouver City Council adopted a temporary moratorium on construction of new warehouse facilities on December 12, 2022, based on concerns about significant increases in local as well as national warehouse development consuming limited industrial land supplies with potentially lower employment yields, and traffic and climate impacts. Follow up hearings established the scope of Vancouver moratorium to apply to warehouse facilities of 250,000 square feet or more, with exceptions for Port of Vancouver properties on Port-owned land, and any proposals limited to traded sector goods. More information is available [here](#). The rezone proposal is not subject to the moratorium, but proposed development applications meeting the scope would be prohibited while the moratorium is in place. It is set to expire on December 5, 2023, and anticipated to be replaced with updated permanent zoning standards. These standards are now anticipated by staff to prohibit warehouse facilities larger than 250,000 square feet in all areas outside of the Heavy Industrial IH zones, with limitations on truck traffic in those areas, lower minimum parking and maximum lot coverage requirements, and various climate-related provisions. These will be discussed separately as Planning Commission workshop item on September 12.

III. SUMMARY OF ISSUE/APPLICANT PROPOSAL:

The proposal is to change the zoning designation on a 33-acre property at 6103 NE 152nd Avenue, parcel 159112000, from OCI (Office Commercial Industrial) to IL (Light Industrial). The applicant is Panattoni Development Corporation, represented by Peter Condyles of Toyer Strategic Advisors. Hudlicky Limited Partnership is the listed owner. The rezone application indicates future development of a warehouse is envisioned, and as noted a site plan application for a 278,000 square foot warehouse on the northern third of the site was submitted by the applicant for City Site Plan Review in 2022 before the rezone process was initiated.

The site lies in the upper Burnt Bridge Creek area in northeast Vancouver, approximately 1400 feet south of Fourth Plain Blvd, 1300 feet west of 162nd Avenue, and 800 feet north of Burnt Bridge Creek. There are several small lot homesites abutting to the north and southwest, also zoned OCI. The site and the abutting small lot OCI properties are surrounded on all sides by larger, mostly undeveloped areas zoned IL. The site is not within a recognized Neighborhood Association.

Application materials are attached to this memorandum as Attachment B. The application argues that the existing zoning is intended for industrial economic development, and the proposed zoning provides more flexible opportunities for meeting this goal in a manner consistent with surrounding area zoning, while providing approximately 200-300 jobs, and providing warehousing to meet current consumer demands. The application also includes a preliminary economic impact analysis projecting the fiscal benefits from anticipated development.

The application estimates development of a warehouse under the proposed IL zoning would result in 1,112 new weekday daily trips with approximately 35% of the total daily traffic being trucks, and that future development would propose construction of half street improvements for the future NE 59th Street extension, which is planned to be extended across the proposed project's northern property line. Future development would also propose installing a new traffic signal at the NE 162nd Avenue/NE 59th Street intersection according to the rezone application.

As noted, the site is extensively forested. WDFW estimates through aerial imaging that approximately 27 of the 33 acres of the site consist of Oregon White Oak habitat (oak canopy plus associated native vegetation), including six acres that would likely be removed under the proposed site plan. Wetlands are also present. City critical areas protection standards under [VMC 20.740](#) will be applied during the development review process with the same criteria under any zone, and a demonstration of no net loss of habitat function and values would be required. WDFW guidance to achieve no net loss of function and values for Oregon White Oak habitat is currently being updated. Based on WDFW's draft guidance and the preliminary site plan, this proposal may involve need for potential off-site planting of 12 new acres, and off-site enhancement of 48 acres. The applicant's environmental consultant has begun discussion with WDFW, which indicates that off-site mitigation for enhancement will likely be pursued at a site in the Ridgefield area known as the Wapato Mitigation Bank. This area is undergoing certification for mitigation but

envisioned to be ready by the time of potential development if the rezone is approved. City Development Review and WDFW staff will be available at the September 12 hearing to answer technical questions.

IV. REVIEW CRITERIA AND FINDINGS:

20.285.060 Approval Criteria – Standalone Zoning Map Amendments.

A. Zoning map amendments not involving associated comprehensive plan map amendments shall demonstrate the following:

1. How the proposal is more consistent with applicable policies of the Vancouver strategic plan and comprehensive plan than the existing designation; and
2. That a change in circumstances has occurred since the existing designation was established.

Applicable Vancouver Strategic Plan Focus Areas

Economic Opportunity - Vancouver is a place where a wide variety of businesses of all sizes, from young startups to established enterprises, grow and thrive. A host of education and training opportunities bring prosperity to those who live here and provide a skilled workforce for companies.

Climate and Natural Systems Strategic Outcomes - Environmental stewardship and efforts to address climate change ensure that everyone has a sustainable future. We recognize the intrinsic value of the land beyond the economic benefits it provides. Vancouver protects, restores, and cares for the natural environment upon which all living things depend. The health of our natural systems supports the health of all who live, work, and play in our community.

Applicable Comprehensive Plan Policies

CD-1 Citywide land supplies

Establish land supplies and density allowances that are sufficient to accommodate adopted long-term City of Vancouver population and employment forecast allocations.

CD-9 Compatible uses

Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.

CD-16 Sustainability

Facilitate sustainable land use development through measures including but not limited to the following: (a) Develop integrated land use patterns and transportation networks that foster reduced vehicle miles traveled and associated greenhouse gas emissions (b) Develop individual buildings that minimize energy and resource consumption. Encourage home based efficiencies such as insulation retrofits, efficient water and air heating systems, and use of solar panels or other forms of energy capture. (c) Implement recommendations of the Vancouver-Clark County Sustainable Affordable Residential Development Report.

CD-10 Complementary uses.

Locate complementary land uses near one another to maximize opportunities for people to work or shop near where they live.

EC-1 Jobs-housing balance

Increase the ratio of jobs to residents in the City of Vancouver and the region.

EC-2 Family-wage employment

Promote the formation, recruitment, retention and growth of businesses that provide a wide range of employment opportunities, particularly family-wage employment. Prioritize family-wage employment in land use policies and practices.

EC-3 Public revenue enhancement

Promote development that enhances revenue generation for public services.

EC-4 Industrial and business park sanctuaries

Provide an adequate supply of industrial and/ or business park areas with opportunities for family-wage employment and revenue generation.

EC-5 No net loss of employment capacity

Restrict zone changes or legislative land use approvals that would lessen long-term capacity for high-wage employment unless accompanied by other changes within the same review cycle that would compensate for the lost capacity or unless the proposed change would promote the long-term economic health of the city.

EC-6 Efficient use of employment land

Maximize utilization of land designated for employment through more intensive new building construction and redevelopment and intensification of existing sites.

Existing Vancouver Municipal Code [Title 20, Comprehensive Plan](#) and [Strategic Plan](#)

Staff Findings:

Standards for the existing OCI zone applying to the site and proposed IL zone are available [here](#). Both are envisioned as primarily for industrial employment and allow generally similar uses. The OCI zone, as its full Office Commercial Industrial title implies, also allows residential uses. Both zones have very similar allowances for commercial uses. The IL zone has some greater allowances for various industrial and related uses that are typically larger, such as fuel storage, detention facilities, airports, wholesale sales, and warehouses.

Rezone approval criteria are broad and involve consideration of a range of policy issues, and this proposal can reasonably be found consistent or inconsistent with the balance of those standards.

Supporting a finding of consistency are the zoning designations surrounding the proposal site, which are largely IL on all sides. There are thin strips of OCI zoning immediately north

and south of the proposal site, but these contain older, large lot residences and could be converted to IL as part of the 2025 Comprehensive Plan update if the rezone is approved.

Although they are not typically determinative in considering zoning changes, the [VMC 20.440.025](#) descriptions of the typical location and function of the OCI and IL zoning codes also support a finding of consistency. The OCI zone is described as potentially serving technology or research users in a mixed campus setting located along major roadways, while the IL zone is described as more focused on industry.

Staff finds that the established parameters of the ongoing warehouse moratorium are neutral to the proposal. The City Council has effectively determined that larger warehouses are envisioned to have a place in Vancouver in the future, and by choosing a moratorium threshold of 250,000 square feet, has indicated that warehouses almost as big as the one proposed by the applicant in this case are appropriate for more limited regulation. Information developed as part of the citywide moratorium, as well as part of the economic information submitted by the rezone applicant for this proposal, also suggest that warehousing can have positive economic benefits, although average wages may be lower than some other industries.

Staff nonetheless finds that the proposal at this time is inconsistent with the balance of applicable criteria, as it is premature given the particular site, timing, and likely future development involved. The rezone is not proposed in the abstract, but with stated intent of allowing a warehouse use. The site plan for a 278,000 square foot warehouse, although non-binding, is more than a conceptual plan provided with the rezone to illustrate what could be developed. It is what the applicant formally submitted for City review in 2022 before applying for a rezone, and in staff's view is what likely would be proposed in the near term if the rezone is approved.

The current citywide moratorium on large warehouses remains in place. Ongoing development of permanent standards to replace the moratorium, while clearly anticipating allowances for warehouses under various circumstances, has not been drafted in final form or presented for public hearing review. A Planning Commission workshop discussion on potential permanent warehouse standards is also scheduled for September 12. City staff envision a simplified approach whereby warehouses larger than 250,000 square feet are allowed in the IH zone only and subject to various provisions. Warehouses of any size would also be subject to the City Green Building Policy. Adoption of a Green Building Policy was identified as an Action step under the [City of Vancouver Climate Action Framework](#) adopted in December 2022, which was centered on an ambitious goal of reaching carbon neutrality in Vancouver by 2040. Work towards adoption of the Green Building Policy is anticipated to begin in 2024.

Also pending in the near term is the adoption of a full update to the Vancouver Comprehensive Plan itself, required by state law to be completed by June 2025. The update is the first since 2011 and is envisioned as the most ambitious in Vancouver's history under the Growth Management Act, with new emphases on core City values of safety, equity, and climate recently established by the Vancouver City Council, as well as new direction from the recently updated [Vancouver Strategic Plan](#) adopted in June 2023. From an economic development standpoint it will be the first Vancouver Comprehensive Plan in

the post-recession, post-pandemic and E-commerce era. It will likely chart new directions in several aspects.

The extensive critical lands on the site and complicated regulatory measure required at the time of development review also introduces some uncertainty, although the option for off-site mitigation allows an opportunity to meet mitigation requirements.

Because of the pendency of the development of permanent warehouse standards and the Green Building Policy, of other potential implementation actions of the Climate Action Framework, and of the 2025 Comprehensive Plan, approval of a rezone at this time and a likely follow up application and development of an approximately 278,000 square foot warehouse in the near term thereafter may preclude other options in how the site is developed, or what regulatory standards are applied. Because of the importance of these policy initiatives, and the potential relationship of large warehouses to these initiatives – no other single use has been subject in recent years to a Vancouver citywide moratorium as opposed to in a particular subarea or class of roadway – staff finds that the proposal is premature, and at this time does not comply with the balance of applicable rezone approval criteria. More specifically, the proposal at this time does not comply with Strategic Plan Focus Area of Climate and Natural Systems and potentially does not comply with the Focus Area of Economic Opportunity. At this time staff finds it also does not comply with Comprehensive Plan policies CD-16, Sustainability; EC-2, Family Wage Employment; and EC-6, Efficient use of Employment Land. As with almost all rezones, staff does find that the proposal can comply with the VMC 20.285.060.A.2 requirement to show a change in circumstances since the designation was originally applied, in this case most likely through the rise of E-commerce and large scale warehousing.

As noted, staff acknowledges that a case can also be made that the proposed rezone complies with the balance of applicable criteria, as has been reflected in the process to date. Staff informed the applicant in fall 2022 correspondence and the Planning Commission at the March 2023 workshop that a staff recommendation of denial was generally anticipated, but due to the evolving status of the warehouse moratorium and other city initiatives in spring 2023, indicated at the June 13 Commission workshop a possible approval recommendation. However, based on the status of those issues and the proposal information at this time, staff finds that the balance favors denial. The June 2025 Comprehensive Plan update provides an appropriate remedy to apply an IL designation if those City initiatives are resolved in support of approval.

V. RECOMMENDED ACTION:

Staff recommends denial of the proposed zone change, with the following sample motion language offered:

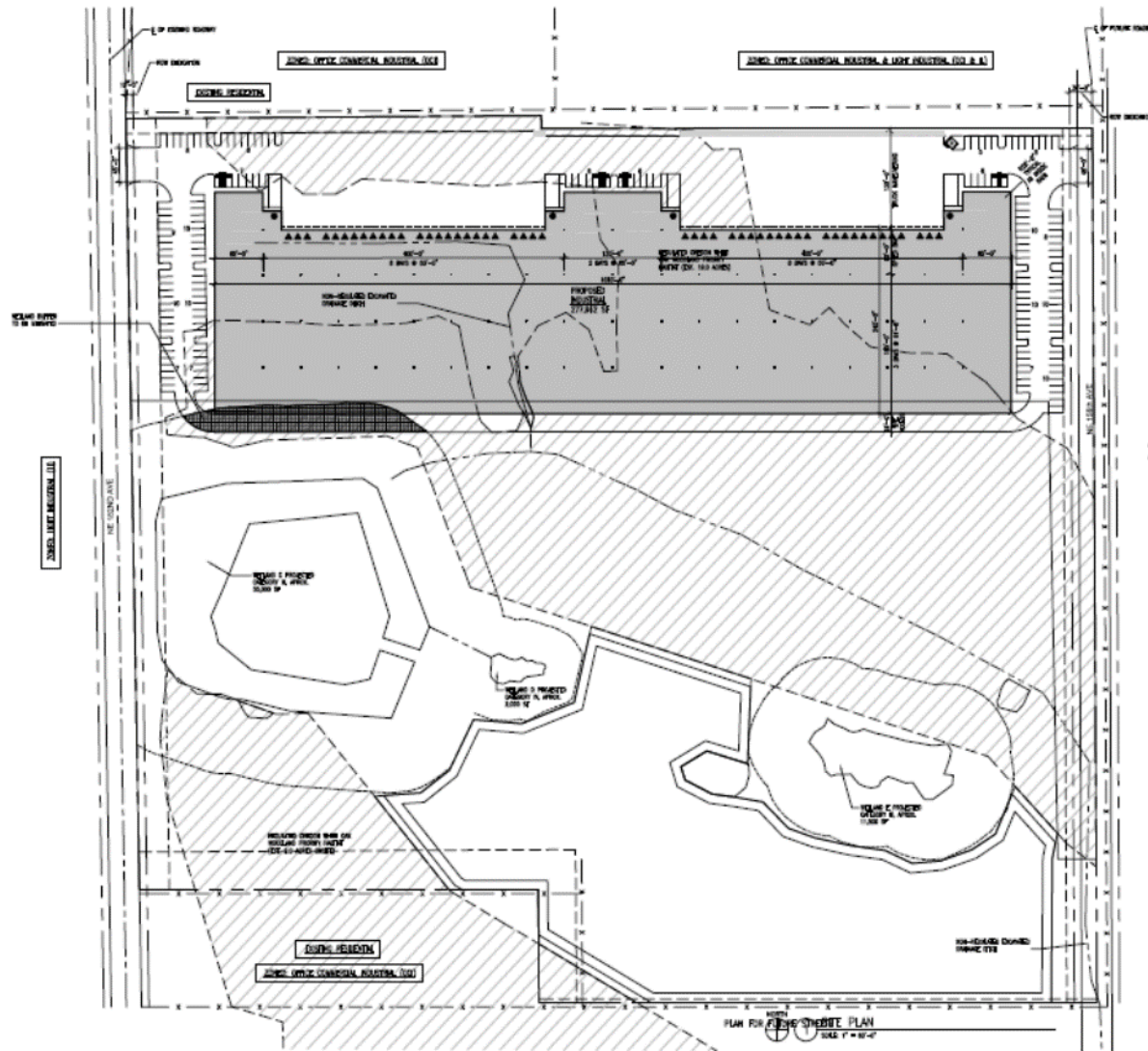
The Planning Commission recommends denial of the proposed Burnt Bridge Creek rezone proposal from OCI to IL at 6103 NE 152nd Avenue, based on the staff report and discussion at the September 12, 2023 public hearing.

Bryan Snodgrass, Community Development Department Principal Planner,
bryan.snodgrass@cityofvancouver.us, 360 487-7946

Attachments:

- A. Previously proposed site plan
- B. Application and related materials
- C. SEPA comment

Attachment A: Previously Proposed Site Plan



12503 Redmond Road, Suite 101
Bellevue, WA 98005
206-848-1810 206-848-4141



1821 DOCK ST, SUITE 100
TACOMA, WA 98402

PROJECT DATA

SITE AREA	1,411,200 SF
BUILDING AREA	277,942 SF
CANOPY	15,776 SF
PARKING REQUIRED	156.9
15'x30' SF OFFICE @ 21000	36.0
20'x30' SF OFFICE @ 10000	131.9
PARKING PROVIDED	162
▼ 15'x7' DOCK DOOR	00
■ 14'x14' DRIVE ACCESS DOOR	4



BURNT CREEK WEST
NE 152ND AVENUE
VANCOUVER, WA

HIC 02 08 11 2023
LD1



Attachment B: Application and related materials

Applicant is seeking a standalone rezone from Office Commercial Industrial to Light Industrial. The underlying comprehensive plan land use designation on the site is Industrial, and applicant will not be seeking a change. Below is this project consistency with The Vancouver Comprehensive Plan, and the approval criteria laid out in Vancouver Municipal Code 20.285.060.

1. How the proposal is more consistent with applicable policies of the Vancouver strategic plan and comprehensive plan than the existing designation

City of Vancouver Community Development Policies:

CD-1: Establish land supplies and density allowances that are sufficient to accommodate adopted long-term City of Vancouver population and employment forecast allocations.

This zone was originally designed to spur economic development and job creation in this part of Vancouver. While the underlying industrial comprehensive plan designation allows for certain uses, the ones that are in demand that are most likely to locate to this site are restricted by the OCI zone. With the market cooling for certain types of development, a rezone will allow flexibility in the uses that can use the site.

CD-3: Where compatible with surrounding uses, efficiently use urban land by facilitating infill of undeveloped properties, and redevelopment of underutilized and developed properties. Allow for conversion of single to multi-family housing where designed to be compatible with surrounding uses.

This site is currently underdeveloped, and with industrial development already taking place in the area this rezone would not be incompatible, and neither would any development that would take place as a result of it.

CD-9: Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.

Given other development on neighboring properties that are zoned light industrial, this would not be incompatible.

CD-12: Promote cohesive, integrated planning of areas and sites through use of subarea planning, master planning, and planned developments, or other methods.

This area was zoned and planned for industrial development, which has already taken place at various levels in this neighborhood. A rezone that will allow for flexibility in industrial development will help this area continue its already existing development patterns that are cohesive.

City of Vancouver Economic Development Policies:

EC-1: Increase the ratio of jobs to residents in the City of Vancouver and the region.

A rezone of the property would allow for a flexibility of industrial uses on this site, most if not all would bring jobs to Vancouver and help increase the ratio of jobs to residents. According to the economic analysis done on this site, there is the potential for 185 to 302 jobs that could be created on this property.

EC-2: Promote the formation, recruitment, retention and growth of businesses that provide a wide range of employment opportunities, particularly family-wage employment. Prioritize family-wage employment in land use policies and practices.

Oftentimes jobs that are created in industrial zones fill a gap in employment for those that are looking for jobs outside retail and office. These jobs pay family-wages in some cases, depending on the end user of the site once rezoned.

EC-3: Promote development that enhances revenue generation for public services.

Any business that develops this site, or moves to a finished building on this site will be contributing to the City of Vancouver's tax rolls in one way or another.

EC-4: Provide an adequate supply of industrial and/or business park areas with opportunities for family-wage employment and revenue generation.

The industrial land available in Vancouver is quickly being developed, or purchased, leaving very little left for the growing community. Given the city's position near Portland, many employers are looking to locate facilities here to serve both markets. By rezone this property and bringing it into the fold for potential light industrial development, the city is opening this site to potential family wage jobs and assured tax revenue.

EC-5: Restrict zone changes or legislative land use approvals that would lessen long-term capacity for high-wage employment unless accompanied by other changes within the same review cycle that would compensate for the lost capacity or unless the proposed change would promote the long-term economic health of the city.

A rezone of this property would not lessen long-term capacity for high-wage employment.

EC-6: Maximize utilization of land designated for employment through more intensive new building construction and redevelopment and intensification of existing sites.

One of the best ways to maximize land is to rezone it for more intensive and better uses. Given that this rezone would not change the ultimate type of use, a rezone on this property would

Clark County Land Use Planning Policies

1.2.1 The UGAs shall be consistent with the following general goals:

- reduce the inappropriate conversion of undeveloped land into sprawling, low density development

A rezone of this property would allow flexibility of use, and allow for the parcel to be developed as its highest and best use.

- maintain densities which support a multi-modal transportation system

This property is within walking distance to transit, which will allow future employees on this site to utilize transportation options other than single occupancy vehicles.

- support variety, choice and balance in living and working environments

In order to create a parity between job development and housing affordability, there must be adequate land for that job development. This rezone would help make this property for flexibility for potential job creators.

Clark County Economic Development Policies

9.1.1 The county and cities will demonstrate their commitment to long-term economic growth by promoting a diverse economic base, providing opportunity for all residents, including unemployed and disadvantaged persons. Growth which helps to measurably raise the average annual wage rate of community residents and preserves the environmental quality and livability of our community, is viable growth and will improve the lifestyle of Clark County residents.

Jobs that are created within industrial zones help create a diversity of jobs types, and in many cases pay wages that can support a family. This type of job development helps keep residents within their existing communities and can help spur economic development in other ways with their buying power. This rezone will create flexibility in what jobs can be located here, with a recent economic analysis estimating that between 185 and 302 jobs could be created on the property.

9.1.3 The county and cities will encourage long-term growth of businesses of all sizes, because economic diversification and stratification are important factors in overall job growth for the county and cities.

Industrial type jobs are very important to the economic diversity and economic health of a community. They are outnumbered greatly by retail and commercial jobs, meaning any opportunity to expand industrial uses in a community will help reach this goal overall.

9.1.4 The county and cities will promote productivity and quality among its businesses to meet world and market standards for their products and services.

Even as we see the economy begin to slow down from the boom years we saw previously, the reality is that people are now purchasing products online now more than ever. This requires distribution centers and warehousing to ensure these goods make it to the consumers safely, and in a timely manner. This is what the market is currently demanding and will be for the foreseeable future. The city and county can meet this demand by allowing these types of uses on this property, where is it already allowed on all neighboring parcels.

9.1.8 The county and cities will provide for orderly long-term commercial and industrial growth and an adequate supply of land suitable for compatible commercial and industrial development.

A large portion of the land designed and zoned for industrial uses in Vancouver have already been developed as such or have been purchased with that intention. A rezone of this property would help increase the "adequate" supply for land for industrial development, which leads to job growth and economic development overall.

9.1.9 The county and cities will encourage the recruitment of new business employers to absorb the increasing labor force and to supply long-term employment opportunities for county's residents who are currently employed outside of the State.

The land in this part of Vancouver designated as industrial was meant to house jobs for residents allowing them to work within the same community they live. By allowing additional uses such as warehousing and freight on this property there is a higher likelihood of job creation.

1.2.3 Ensure coordination of environmental protection, preservation and enhancement programs and regulations.

There will be no adverse effects environmentally to this site if a rezone is approved.

1.2.6 Concentrate development in areas already served by public facilities and services. Use the provision or planned provision of public services and facilities as a means of directing development into desirable areas.

This part of Vancouver has already seen substantial investment by both public and private entities with respect to transit, roads improvements, commercial development, and job creation. Any future development would stand to further this growth.

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

This area has already seen industrial development at a level greater than or equal to the development that would be expected on this property if a rezone is approved. Given the site is near developed roads and transit opportunities, this site would be compatible to neighboring ones.

1.4.1 Interrelated uses should generally be encouraged to locate in close proximity of each other:

- Commercial, industrial or other employers and the residential areas they serve should be allowed and encouraged to locate near to one another, as long as negative impacts from non-residential uses on the residential areas are mitigated.

This neighborhood has already been designated and developed for industrial uses. A rezone would serve as a continuation of this and help realize a goal of the city to create jobs for residents.

1.4.7 Higher intensity uses should be located on or near streets served by transit.

Transit is located less than a mile away from this site.

Clark County Housing Policies

2.1.2 Link economic development and housing strategies to achieve parity between job development and housing affordability.

According to a recent economic analysis of this property, there is the potential to create between 185 and 302 jobs on this site. Much of this is dependent on a rezone.

9.1.11 Conversion of industrial or employment center lands to non-industrial or nonemployment center districts may occur within the following parameters:

- a. Protect and preserve lands zoned heavy industrial for heavy industrial uses.

This rezone would not change any land zoned for heavy industrial use.

- b. Protect employment center lands from conversion to residential.

This rezone would not change any land from industrial to residential.

2. That a change in circumstances has occurred since the existing designation was established.

In the time since this zone was established much of the land designated as industrial in this part of Vancouver has been purchased with the intention of industrial development or been developed. The zoning of this property makes it an island of OCI zoning among the neighboring LI zoning on all sides. It is not an accident that a large majority of these properties around this site have been developed, while this one has remained vacant. Even at the height of the real estate market during the last few years this site did not see much activity. Now as the real estate market begins to cool and companies limit expansions due to economic uncertainty, circumstances have changed enough to warrant a rezone of this property. This will allow greater flexibility in uses, such as allowing warehousing, distribution, and freight movement, all uses that are still in demand. While the economy has slowed, the demand for items ordered online has not. This demand will only increase in the coming years, and to assure these items get to the consumer in a safe and timely manner, distribution centers, and other freight facilities are going to need to locate in and around metro areas such as Vancouver-Portland. This site is a good location for this type of development that is needed within this part of the region, and a rezone will help accomplish that.



TOYER STRATEGIC ADVISORS, INC.
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November 4, 2022

Bjorn Brynestad
Panattoni Development
1821 Dock St. , Suite 100
Tacoma, WA 98402

PRELIMINARY ECONOMIC IMPACT ANALYSIS FOR BURNT CREEK WEST

Dear Mr. Brynestad:

You have asked our firm to provide a preliminary analysis of three development scenarios based on construction of a 278,000 speculative industrial building designed to accommodate one or more users. This is close to the maximum likely footprint. The intent of this analysis is to support public agency and private citizen engagement during a rezone process, recognizing that the building's ultimate use may be a single tenant or multiple tenants that range from office and R&D tenants to warehousing and from light manufacturing and kitting to breweries or wineries.

Although the scenarios that could be studied are many, we have attempted to narrow our analysis to three potential scenarios. The following highlights the process for how we model the likely impacts based on the conceptual site plan and summarizes our preliminary findings:

STEP ONE: DETERMINING A BASE EMPLOYMENT FIGURE

- A. Where feasible our model utilizes the specific employment figure provided by the project's end user (i.e. tenant). However, this is not possible in the case of a speculative buildings.
- B. Absent specific end-user data, we evaluate local and regional information, including but not limited to:
 1. Employment densities from similar projects completed by the developer
 2. Local employment density data from sources such as local reports (e.g. buildable lands reports; economic development plans; etc.), as well as proprietary data sources and our company's own database
- C. Our model anticipates this project is likely to have a mix of future tenants engaged in light manufacturing, wholesale trade, technology, and warehousing/distribution. For the single tenant, distribution facility scenario we assumed 1 job to 1,500 square feet. For the mixed tenant scenarios the average employment density was 1 job per 919 and 954 square feet.

STEP TWO: APPLYING MULTIPLIERS

- A. Multipliers for the model are pulled from the Bureau of Economic Analysis (BEA) RIMS II Multipliers which are based on the 2012 benchmark input-output (I/O) national table with updated 2020 regional data. This model reflects multiplier data specific to the Vancouver-Portland-Hillsboro, OR-WA Metropolitan Statistical Area.

STEP THREE: MODELING IMPACTS

- A. Direct and indirect jobs are those related to/tied to the new activity. Induced jobs are those jobs that are created because of the overall increase in activity. This type of analysis does not distinguish between full and part time jobs.

- B. Using the base job estimates we apply output, earnings, and value-add multipliers for each industry segment to determine the projected final demand change in economic output and projected earnings (wages, salaries and proprietor’s income) as a result of the project. These figures are shown in 2020 dollars unless otherwise noted.

MODELED IMPACT (PRELIMINARY)

The following table highlights three scenarios modeled for future occupancy of a conceptual 278,000 square foot industrial building that could accommodate up to four tenants. Scenario 1 assumes the building is fully occupied by a warehouse and distribution user. Scenario 2 assumes two tenants include warehousing and distribution, as well as manufacturing. Scenario 3 assumes four tenants including warehousing and distribution, manufacturing, and technology related uses.

	Scenario 1	Scenario 2	Scenario 3
Employment	185	291	302
Related Jobs [^]	189	279	305
Total Jobs Impact	374	570	607
Direct Output (in millions)	\$ 29	\$ 57	\$ 54
Local GDP (in millions)	\$ 24	\$ 44	\$ 44
Earnings* (in millions)	\$ 7.71	\$ 14.14	\$ 17.81

[^]This includes indirect and induced jobs attributable to the estimated employment created by this project

*Earnings as defined by the model include wages, salaries, and proprietor’s net income, plus employer contributions to health insurance

PROJECTED SALES TAXES FROM CONSTRUCTION

The construction of the building will generate approximately \$25.57 million in one-time sales tax revenues that benefit the City of Vancouver, Clark County, and the State of Washington. The following estimates the breakdown by tax authority:

Estimated Sales Tax from Construction		
Building SF (Approx)		277,942
Construction Cost per SF		\$92
Total Construction Cost		\$25,570,664
State	6.50%	\$1,662,093.16
City of Vancouver	0.85%	\$217,350.64
C-Tran	0.70%	\$178,994.65
Clark County	0.15%	\$38,356.00
E911	0.10%	\$25,570.66
Mental Health	0.10%	\$25,570.66
Affordable Housing	0.10%	\$25,570.66
	8.50%	\$2,173,506.44

REAL PROPERTY TAXES

The proposed development could generate over \$303,000 annually in property at full buildout, including approximately \$55,000 to the City of Vancouver. The example below is based on an estimated total valuation and the 2022 current tax levy broken down by taxing district and shown on the next page. This is roughly \$300,000 more in total annual property taxes than are being generated on the existing vacant parcel.

		Potential Taxable Value
Property Tax Broken Down by Levy		\$28,000,000
COUNTY GENERAL	0.92759	\$ 25,972
COUNTY GENERAL ADREF	0.00166	\$ 47
DEV DISABILITY	0.01087	\$ 304
MENTAL HEALTH	0.01087	\$ 304
VETERANS ASST	0.00979	\$ 274
CONSERVATION FUTURES ADREF	0.00007	\$ 2
CONSERVATION FUTURES	0.03615	\$ 1,012
FT VANCOUVER REG LIBRARY	0.34275	\$ 9,597
METROPOLITAN PARK DIST	0.17147	\$ 4,801
METROPOLITAN PARK DIST ADREF	0.00041	\$ 12
PORT VANCOUVER BONDS	0.11449	\$ 3,206
PORT VANCOUVER GENERAL	0.15073	\$ 4,220
SD114 EVERGREEN DEBT SVC	1.76351	\$ 49,378
SD114 EVERGREEN ENRICHMENT	1.71968	\$ 48,151
SD114 EVERGREEN TECHNOLOGY LE	0.42022	\$ 11,766
STATE SCHOOLS - PART 1	1.91284	\$ 53,559
STATE SCHOOLS - PART 2	1.03016	\$ 28,845
CITY VANCOUVER AFFORDABLE HOUS	0.22586	\$ 6,324
CITY VANCOUVER GENERAL	1.97136	\$ 55,198
CITY VANCOUVER GENERAL ADREF	0.00595	\$ 167
Total All	10.82644	\$ 303,140

OCCUPATIONS & WAGES

The following graphic depicts the hourly wage distribution data of full-time equivalent employees in manufacturing (allowed use in the OCI zone) and transportation and warehouse (allow in the LI zone). This data indicates that wages in both industries are very similar with the percentage of workers in manufacturing making \$38/hour or greater accounting for 22% of the manufacturing total while the same wage ranges account for 23% of the total.

NAICS	Industry	FTE	<\$14.00	\$14.00 - \$19.99	\$20.00 - \$25.99	\$26.00 - \$31.99	\$32.00 - \$37.99	\$38.00 - \$43.99	\$44.00 - \$49.99	\$50.00 - \$55.99	\$56.00+
31-33	Manufacturing	12,506	385	2,991	2,884	2,192	1,301	805	491	351	1,106
	Percent Distribution		3.1%	23.9%	23.1%	17.5%	10.4%	6.4%	3.9%	2.8%	8.8%
48-49	Transportation and warehousing	2,937	106	614	708	580	257	189	154	98	230
	Percent Distribution		3.6%	20.9%	24.1%	19.7%	8.8%	6.4%	5.2%	3.3%	7.8%

Source: Washington Employment Security Department, County Data Tables, Clark County, WA

OTHER ECONOMIC IMPACTS

Although not modeled in this analysis, it is also important to point out that this project will generate additional local and state revenues, including:

- real estate excise taxes generated from the sale of the property from its current owner
- permit revenues generated from the project's application, review, and inspection fees which typically fund the community development department by reducing the amount of general fund dollars which might be required for the community to provide these services
- personal property taxes on the machinery, equipment, racking, office furniture, etc. that will be within these buildings
- water and sewer connection charges, which help fund improvements to the city's water and sewer infrastructure

- traffic impact fees, which help fund identified transportation improvement needs in the community
- utility taxes, business and occupation taxes, etc. the completed project will generate these other state and local recurring tax receipts

ABOUT PRELIMINARY MODELING

The impacts modeled at this stage are very preliminary and should not be construed as final. As specific tenants are confirmed, this analysis can be updated to reflect specific tenant information including the actual number of employees, final building square feet, construction value, etc.

Should you have any questions or require additional information, please do not hesitate to contact us.



DAVID K. TOYER
PRESIDENT



TOYER STRATEGIC ADVISORS, INC.
10519 20th ST SE, SUITE 3
LAKE STEVENS, WA 98258
toyerstrategic.com

June 14, 2023

Vancouver Planning Commission
415 W 6th Street
Vancouver WA, 98660

Dear Commissioners,

Our firm represents Panattoni Development, applicant for a rezone at 6103 NE 152nd Ave, Vancouver, WA, 98682, parcel number 159112000. We are happy to respond to questions raised by the Commission during its June 13 workshop.

Site Plan:

We submitted a conceptual site plan with the rezone application based on a request from staff. It's been our experience over 20+ years, that jurisdictions often want non-project rezones to submit conceptual site plans to allow for a general analysis of potential impacts. For example, we recently did a rezone in a city that corrected an inconsistency between the comprehensive plan's land use designation (mixed use) and zone (single family residential) where the jurisdiction wanted to see the maximum development potential (even if it wasn't the final site plan proposed) in order to understand potential traffic and other concerns.

The conceptual site plan you have for this proposal is just that, a concept. It is meant to show commissioners what the maximum development footprint could look like given the zone. Given the present uncertainty resulting from the warehousing moratorium, our client has not yet developed a formal site plan and any formal site plan will more specifically reflect site and market conditions.

Further, it should be noted that in the memo for the June 13 workshop, staff states that "a detailed State Environmental Policy Act review would need to be conducted following formal submittal of a site plan." Again, it is the formal site plan review process, not a conceptual site plan presented for a standalone rezone, that will be reviewed for compliance with city codes and standards, including the items that have been commented on by the Washington Department of Fish and Wildlife.

Dimensional Standards:

We fully understand and appreciate the Commission's interest in critical areas and how they may be protected. Regardless of which zone applies, any critical areas that may be on the site are required to be protected in the same manner under the city's code. Thus, a rezone does not change the requirements to identify and protect critical areas.

Comparing the dimensional standards for the current Office Commercial Industrial (OCI) zone to the proposed Light Industrial (LI) zone would result in a reduction in the maximum site coverage allowed according to Table 20.440.040-1, which establishes the maximum site coverage for OCI at 100% versus a limit of 75% in the LI zone.

Additionally, building height in the OCI zone can be as much as 75 feet, while buildings in the LI zone have a maximum height of 45 feet. In sum, the proposed rezone from OCI to LI actually results in greater restrictions on the future development of the site because it does not allow 100% of the site to be covered by development. This should lessen concerns about future environmental impacts including those expressed by the Department of Fish and Wildlife. The most appropriate time for addressing these comments is during the formal site plan review, which process has not been applied for yet. The fact of the matter is that the proposed rezone will allow for more of the site and trees present to be preserved than if it were developed under the current zoning designation.

Warehousing Moratorium:

As the city council and city staff continue to work on the warehousing moratorium, it is important to reiterate that this rezone stands independent from those deliberations. Our client does not have a formal or final development plan for this site. It is important to note that our client submitted an application for this rezone nearly a month before the warehousing moratorium was passed and their goal

Burnt Bridge Creek West rezone

9/12/2023

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has been to gain approval of the LI zone so that whatever their formal site plan proposes, it can be marketed to the greatest range of likely industrial tenants.

We look forward to the opportunity to present at the Planning Commission hearing in July and can further address any questions you may have at that time.

Thank you.

Sincerely

Peter Condyles
Senior Project Manager

Attachment C: SEPA Comment received



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
Telephone: (360) 696-6211 • Fax: (360) 906-6776

April 6, 2023

Bryan Snodgrass, Principal Planner
Vancouver Community and Economic Development
415 W 6th St
Vancouver, WA 98660

RE: Burnt Bridge Creek West Zone Change

Dear Mr. Snodgrass

Thank you for the opportunity to comment on the Burnt Bridge Creek West Zone Change. The Washington Department of Fish and Wildlife (WDFW) has reviewed the proposal and offers the following comments for your considerations.

WDFW is concerned that the proposed rezone and subsequent future development of the parcel will lead to unavoidable impacts on the priority Oregon white oak (OWO) woodland. WDFW recommends that the City of Vancouver explore other zoning options that reduces conflict between protecting the resource and reasonable use of property.

The *Proposed Burnt Bridge Creek West Zoning Map Designation Change* presentation presented by Bryan Snodgrass, Principal Planner for the City of Vancouver on March 14, 2023, indicates that a 275,000 square foot warehouse is proposed in the northern portion of this parcel tentative on zoning approval. We are concerned that changing the zoning to light industrial will not allow flexibility in avoiding impacts to the priority OWO woodland and the resulting development will degrade habitat. While we recognize the need for Light Industrial zoning and development, we do not believe this parcel is best suited to meet those needs. The OWO woodland within this parcel occupies approximately 27* of the 33 acres and is a part of a larger, contiguous OWO woodland that is approximately 41 acres*. Additionally, several acres of this contiguous oak stand are actively managed by the Terrace Oak Mitigation Bank. Stands this large are rare in Clark County and almost completely absent within the City of Vancouver. Because of the rare and valuable nature of the OWO woodland of this size, we recommend for the City of Vancouver to explore ways to keep this parcel as green space while encouraging industrial development on parcels that do not have significant conflict with priority habitats of this significance.

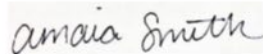
* Calculations are estimates based on WDFW PHS aerial imaging and have not been field verified.

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If this zoning is approved, however, we recommend placing the southern portion of this parcel, outside of the proposed development footprint, into a conservation easement. A significant portion of the stand is located outside the proposed footprint and protecting it in an easement would prevent future development impacts that would be difficult, if not impossible, to mitigate for. We also request being consulted for the review of the compensatory mitigation plans prior to the City approving any development on this site. We are currently updating our recommendations for mitigating for Oregon white oaks and the best available science indicates mitigation is needed to offset the temporal loss of habitat *in addition to* the physical loss of trees. Based on this information, compensatory mitigation requirements will likely be greater than what has been required in previous development proposals. Due to the significant acreage of OWO woodland on site, the compensatory mitigation required will likely be complex and we want to ensure that any mitigation achieves no net loss of function.

Thank you for considering our recommendations to protect this priority habitat. We hope that the City gives special consideration to this property due to the size and location of this priority OWO woodland. Furthermore, we encourage the City to have additional conversation to determine the best use of this property, given the valuable habitat on site.

Sincerely,



Amaia Smith
Habitat Biologist,
Washington Dept of Fish and Wildlife
5525 South 11th St.
Ridgefield, WA 98642