

DATE: June 5, 2023

TO: Chair Ledell and Planning Commission members

FROM: Bryan Snodgrass, Principal Planner, Community Development Department

RE: June 13 workshop review of Burnt Bridge Creek West standalone rezone proposal – OCI to IL at 6103 NE 152nd Avenue



This memorandum describes this proposal and issues identified by staff in advance of the June 13 workshop discussion. The proposal would change only the zoning map designation on the property, with no changes to the Comprehensive Plan designation, and so can be reviewed at any time during the year. A Planning Commission public hearing is scheduled for July 11. City Council review is not yet scheduled.

The rezone proposal was originally reviewed by the Commission at a March 14 workshop, at which time staff indicated that a denial recommendation was anticipated because of the ongoing citywide moratorium on large scale warehouse facilities, and the upcoming Comprehensive Plan update process that is underway. Following subsequent moratorium revisions by the City Council, preliminary discussions with consultants assisting City staff on moratorium issues, and further consideration of the critical lands status of rezone site, staff anticipates recommending approval of the rezone.

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 single building 278,000 square foot warehouse is envisioned. The applicant originally submitted a site plan proposal in September 2022 showing warehouse development at the northern end of the site. See Attachment A herein.

The rezone site contains a single-family home and outbuildings, and is otherwise heavily forested. The central and southern portion of the site contains mapping indicators for Oregon White Oak habitat requiring protection under VMC 20.740, Critical Areas Protection, and for wetlands. The originally proposed site plan locates the warehouse at the northern end of the site, with likely lesser impacts, although compliance with City critical area standards, and a detailed State Environmental Policy Act review would need to be conducted following formal submittal of a site plan. The Washington Department of Fish and Wildlife submitted a comment with concerns about impacts from future development on the Oregon White Oak habitat, and a recommendation to place the southern portion of the site into a conservation easement. See Attachment C on page 15 of this report.

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.

Preliminary Staff Analysis

[VMC 20.285.060](#) requires proposed standalone rezones to demonstrate the proposed zoning designation is more consistent with applicable criteria of the Vancouver Strategic Plan and Comprehensive Plan than the existing designation, and that there has been a change in circumstances since the existing designation was originally adopted.

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 Vancouver City Council adopted a temporary moratorium on construction of new warehouse facilities on December 12, 2022, with an affirming resolution on February 6, 2023. Concerns were expressed about significant increases in local as well as national large warehouse development that is consuming limited industrial land supplies with potentially lower employment yields, and traffic and climate impacts. City of Vancouver analysis at that time found there were eight large scale warehouse applications under review citywide encompassing 3.3 million square feet in total, accounting for approximately 14% of Vancouver's available industrial land. A Columbian [article](#) summarized the situation countywide.

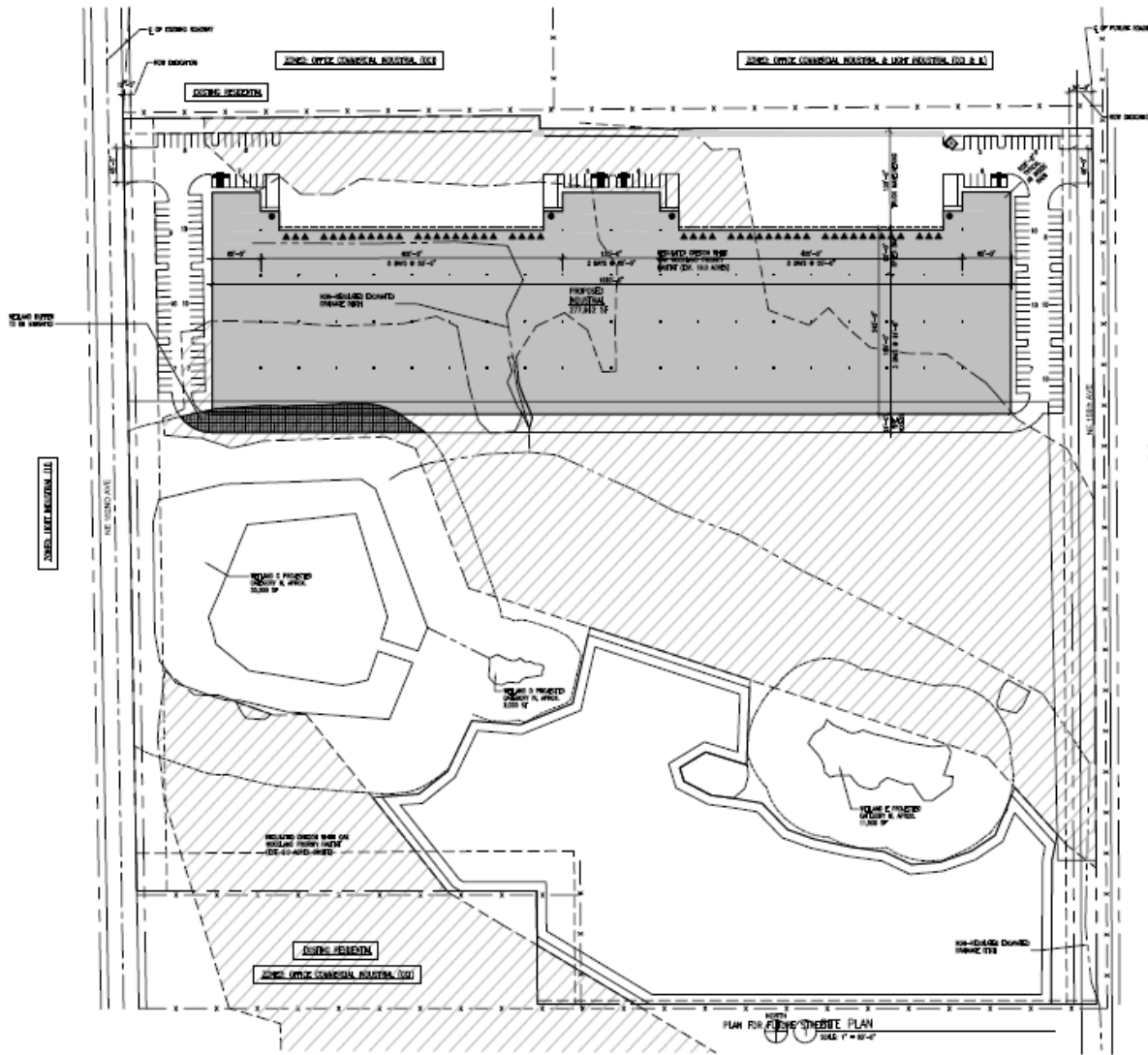
Moratorium discussions recognized that warehousing plays an important role in modern consumer shopping, and future permanent Vancouver regulations will likely not seek to prohibit these uses, but may add some provisions on appropriate locations, mitigation of impacts, requirements to better allow for future adaptive reuse, or other considerations that don't currently exist in City code. On March 6 the Council reduced the moratorium scope by increasing the threshold size of applicable facilities from 100,000 to 250,000 square feet, with exceptions for Port 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 while it remains in effect a development application for a warehouse as large as envisioned in this case would be prohibited. Future development applications submitted after expiration of the moratorium would be subject to any new zoning standards developed as part of the moratorium.

Standards for the industrial zones, including the existing OCI and proposed IL zones at this site, are available [here](#). Both zones accommodate most industrial uses, although the OCI district does not allow some larger or potentially more impactful industrial uses such as warehousing. The OCI district has additional allowances for office and commercial uses, envisioned in a well landscaped and pedestrian friendly setting. As noted, the rezone site contains extensive critical lands and much of the southern and central portions of the property are likely not able to be developed. In staff's view multiple user campus style development involving commercial and office uses as generally envisioned in the OCI district is a worse fit for the site than single industrial users which are more likely in the IL zone, and are proposed in this case.

Approving the rezone would leave thin strips of OCI-zoned lands abutting to the north and south, but these could be rezoned as part of the upcoming Comprehensive Plan update process. The larger surrounding area on all sides is zoned IL.

Attachment A: Future Development Envisioned



12503 Red-Road Road, Suite 101
 Bellevue, WA 98005
 P: 425-848-1810 F: 425-848-4141



1821 DOCK ST., SUITE 100
 TACOMA, WA 98402

PROJECT DATA

SITE AREA	1,413,250 SF
BUILDING AREA	277,312 SF
CONCRETE	18,736
PARKING REQUIRED:	
1500 SF OFFICE @ 2:1000	28.0
283,912 SF WARE @ 1:2000	131.9
PARKING PROVIDED	182
▼ 9'x19' DOCK DOOR	00
● 14'x14' STAIR ACCESS DOOR	4

PROGRESS
 PRINTING
 August 11, 2012

BURNT CREEK WEST
 NE 152ND AVENUE
 VANCOUVER, WA

DATE: 08/11/2012
 TIME: 10:11 AM
 USER: LD1



Attachment B: Application narrative

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

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 Polices

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

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.

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.
10519 20th ST SE, STE 3
LAKE STEVENS, WA 98258
toyerstrategic.com

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

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.

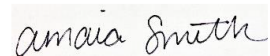
* Calculations are estimates based on WDFW PHS aerial imaging and have not been field verified.

Page 2

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