FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

for the

VANCOUVER CITY CENTER VISION SUBAREA PLAN





November 2006

PREFACE

The primary purpose of an Environmental Impact Statement is to ensure that the State Environmental Policy Act (SEPA) goals are an integral part of the ongoing projects and actions of state and local government. This Final Supplemental Environmental Impact Statement (FSEIS) addresses the issues raised in the comments received in response to the Draft Supplemental Environmental impact Statement (DSEIS) for the Vancouver City Center Vision Subarea Plan.

The DSEIS was issued by the City of Vancouver on September 1, 2006, with a comment deadline of October 16, 2006. Twenty seven comments were received. All comments submitted are addressed in the FSEIS.

The FSEIS is published to include the updated Fact Sheet, the revised DSEIS which, includes revised text based on the comments and the Comment and Response section located at the end of the document and revised Appendices of the DSEIS.

FACT SHEET

Project Title

Vancouver City Center Vision Subarea Plan (VCCV)

Proposed Action/Alternative

The Proposed Action by the City of Vancouver includes the following elements:

- 1) adoption of a subarea plan for the City Center to guide development;
- adoption of amendments to the Vancouver Land Use and Development Code, 2) including, uses within zoning categories, development regulations, and boundary expansions for overlay districts;
- 3) adoption of zoning map amendments, including property rezones; and
- 4) adoption of an ordinance designating the VCCV sub-area plan as a planned action for purposes of future permit review and SEPA compliance.

The VCCV sub-area is identified in the Vancouver Comprehensive Plan as an urban center. The subarea is considered appropriate for high density and mixed-use development supporting increased population and employment growth. The DSEIS considered two alternatives, the Proposed Plan and the No Action. The FSEIS responds to comments

received during the public comment period of the FSEIS.

Location of Proposal

Vancouver's City Center encompasses an area of approximately 472 acres and is generally defined by the Columbia River on the south, the North/South main line of the BNSF railroad on the west, 15th Street on the north (the north boundary includes a northern finger from 15th Street to Fourth Plain and south to 19th Street along Main and Broadway), and Interstate 5 on the east.

Proponent The City of Vancouver

Lead Agency City of Vancouver Long Range Planning Department

Responsible Official & EIS Contact Person

City of Vancouver Long Range Planning Contact: Laura Hudson or Sandra Towne P.O. Box 1995 Vancouver, WA 98668-1995 360-619-4103 or 619-1289

Required Approvals

City of Vancouver Sub-area plan adoption, amendment of the Comprehensive Plan Revised development regulations and Planned Action Ordinance

SEIS Authors & Principal Contributors

City of Vancouver – Document preparation; Summary; Proposed Alternatives Description; Water Resources; Land Use; Parks and Recreation; Public Utilities and Services; Transportation DKS Associates – Transportation; Parking

Archaeological Investigations Northwest, Inc – Cultural Resources TW Environmental, Inc. – Air Quality and Noise Brent Davis, Clark County Wetland Biologist – Natural Environment Vancouver School District - Schools Leland Consulting Group – Market analysis

Location of Background Information

City of Vancouver

Prior Environmental Documents; Use of Existing Documents

This document supplements the Draft and Final EIS prepared for the City of Vancouver Comprehensive Plan (2004). The following existing environmental documents are incorporated by reference for purposes of SEPA compliance:

- Vancouver Comprehensive Plan 2003-2023. May 2004
- Vancouver Comprehensive Plan Draft (DEIS) and Final Environmental Impact Statements (FEIS). 2004
- Esther Short Subarea and Redevelopment Plan. 1998
- Esther Short Subarea and Redevelopment Plan FEIS. 1997
- Historic and Cultural Resources: Addendum to Environmental Impact Statement (EIS) Esther Short Subarea and Redevelopment Plan
- City of Vancouver Esther Short Neighborhood Historic Building Survey and Inventory

Draft SEIS Issue Date

September 1, 2006

Final SEIS Issue Date

November 6, 2006

Availability of Final SEIS

Compact disks and hard copies may be purchased from the City of Vancouver Cashier at the Citizens Service Center, 1st Floor, 1313 Main St., Vancouver. Copies are also available for review at the Vancouver Long Range Planning Department, Fort Vancouver City Library and on the City of Vancouver's Web site <u>www.cityofvancouver.us</u>.

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INTRODUCTION

Based on the success of the 1998 Esther Short Subarea and Redevelopment Plan, the City of Vancouver in 2003 selected a consulting team to prepare a Subarea Plan to foster and guide continued growth of the approximate 130-block City Center area of Vancouver, which incorporates the 30-block Esther Short area. A Community Resource Team (CRT), including residents, business owners, and developers working with the City of Vancouver created a vision for the area called the Vancouver City Center Vision Subarea Plan (VCCV). The VCCV identifies guiding principles and goals that encourage: residential development, a key to City Center vitality; creation and support of "messy vitality", a dynamic and rich mix of residential, cultural, civic, retail and entertainment places that will attract growth, jobs and round-the-clock activity; focused waterfront redevelopment supported by significant public access, recreation, cultural, hospitality, and entertainment uses and limited commercial uses; protection of key historic buildings and established residential neighborhoods; and revitalization of the Main Street Corridor as a central spine of diverse and complementary uses that establish downtown as a regional center for commerce, culture and urban living.

The VCCV establishes districts within the Planning Area and estimates the potential for each district to contribute to the realization of the vision's development goals. A vicinity map, Figure 1-1 shows the location of the Subarea Plan in relationship to the City of Vancouver Municipal boundary and the City's Urban Growth Area. Figure 1-2 shows the boundaries and districts of the VCCV.

The City of Vancouver, the non-project action lead agent, has determined that the adoption of the VCCV and subsequent development in compliance with the Subarea Plan is a potentially significant action.

PROPOSED ACTION AND NO ACTION ALTERNATIVES

Alternatives addressed in this Draft Supplemental Environmental Impact Statement (DSEIS) include the No Action Alternative and the Proposed Plan Alternative. Under the No Action Alternative, the City would not adopt a Subarea Plan or new and revised implementation tools for the City Center. The No Action Plan is the continuation of the City's current GMA Comprehensive Plan and Esther Short Redevelopment Plan. Under the Proposed Action Alternative, the City would adopt the VCCV Subarea Plan, which identifies a vision, guiding principles, plan policies, development goals, and implementation measures to foster continued growth within the Vancouver City Center. In addition, under the Proposed Action Alternative the City would adopt a Planned Action Ordinance.

LOCATION

The VCCV encompasses an area of approximately 472 acres and is generally defined by the Columbia River on the south, the North/South railroad on the west, 15th Street on the north (the north boundary includes a northern finger from 15th Street to Fourth Plain and south to 19th Street), and Interstate 5 on the east (Figure 1-1).

PHASING

This is not a phased project, however, development and redevelopment of the VCCV is anticipated to occur continually over the 20-year plan period to 2023. The Vancouver Comprehensive Growth Management Plan anticipates a certain level of intensity of development, and the VCCV articulates a clear vision to foster and guide the more intensive development of the approximately 130-block City Center area.

PLANNING PROCESS AND ENVIRONMENTAL REVIEW

In 2004, the City of Vancouver adopted a Comprehensive Plan in accordance with the requirements of the Growth Management Act (GMA). The Draft and Final EIS documents for the Comprehensive Plan were also published at this time. The Comprehensive Plan was prepared in the context of urban centers and the corridors that connect them planning to direct and concentrate portions of future population and employment growth to the City Center and other identified activity centers. The urban center concept (which includes the VCCV) was designed to encourage economic and redevelopment opportunities by promoting a mixture of employment, housing and cultural opportunities. The Draft and Final EIS documents for the City's Comprehensive Plan anticipated the intensity of growth in its identified urban centers including the VCCV.

SUPPLEMENTAL EIS AND SCOPE

This Draft Supplemental EIS is being prepared as a supplement to the City's Comprehensive Plan EIS. It focuses on two alternatives and identifies new probable, significant adverse environmental impacts that have not been addressed in prior State Environmental Policy Act (SEPA) documents (WAC 197-11-405(4)). It builds on plans, studies and environmental documents that have been prepared for proposals in and around the City Center. It does not repeat analysis of alternatives or impacts that were addressed in the EIS being supplemented (WAC 197-11-620).

- Vancouver Comprehensive Plan 2003-2023. May 2004
- Vancouver Comprehensive Plan Draft (DEIS) and Final Environmental Impact Statements (FEIS). 2004
- Esther Short Subarea and Redevelopment Plan. 1998
- Esther Short Subarea and Redevelopment Plan FEIS. 1997
- Historic and Cultural Resources: Addendum to Environmental Impact Statement (EIS) Esther Short Subarea and Redevelopment Plan
- City of Vancouver Esther Short Neighborhood Historic Building Survey and Inventory

This document supplements the EIS prepared for the City's Comprehensive Plan. For purposes of SEPA compliance, the City is adopting the above referenced Vancouver Comprehensive Plan FEIS. Information in the other documents referenced above is incorporated by reference as appropriate and where indicated.

The scope of review is based on an assessment of probable significant adverse impacts that may result from the proposal, to the extent they have not been addressed in prior SEPA documents. The City followed the procedures for determining the scope of an EIS set forth in WAC 197-11-360, -408, and -443. The City determined the scope of the DSEIS based on comments submitted by interested agencies, tribes and citizens, its own estimation of potential impacts and consideration of existing environmental documents. A determination of significance/scoping notice was published on October 18, 2005. Environmental issues addressed in the DSEIS include land use, transportation, parking, shoreline functions of water quality, quantity and habitat, air quality, noise, historic and cultural resources, parks and recreation, and public services and utilities. The DSEIS for the Plan Area includes analysis of the impact of uses and intensity of development with respect to the environmental elements scoped and listed above.

PLANNED ACTION

The City of Vancouver proposes to designate the VCCV as a "Planned Action" through an adopted ordinance pursuant to the SEPA and implementing rules RCW 43.21.C. The Planned Action Ordinance will be adopted following the FSEIS and at the time of the VCCV adoption.

In 1995, the state authorized the integration of GMA and SEPA through the Planned Action process. This process was successfully used for the Esther Short Subarea and Redevelopment Plan and resulted in reduced risk and cost for potential development and an expedited permit system, since one layer of regulation SEPA had been removed. The City will follow applicable procedures to review proposed projects within the VCCV, to determine their consistency with the approved Planned Action, and to impose any appropriate development conditions.

Planned Actions are a type of site-specific project action located within an Urban Growth Area. Qualifying projects are those that are consistent with and implement a Comprehensive Plan or Subarea Plan, and whose significant environmental impacts have been adequately addressed in an EIS prepared for the subarea.

When an implementing project is proposed, the City must first verify that the proposal is the type of project contemplated in the Planned Action Ordinance and that it is consistent with the applicable Subarea Plan. It must also determine that the probable significant adverse environmental impacts of the Planned Action project have been adequately addressed in the Planned Action DSEIS and all adopted environmental documents within the DSEIS (Comprehensive Plan FEIS). If the proposal meets this test and qualifies as a Planned Action, no SEPA threshold determination or further environmental review is required. The City may, however, require additional environmental review and mitigation if significant adverse environmental impacts were not adequately addressed in the Planned Action DSEIS or if the proposed project does not qualify as a Planned Action.

PURPOSE AND NEED FOR THE PROPOSED ACTION

In 2004, the City of Vancouver adopted the Vancouver Comprehensive Plan 2003-2023, an update of Vancouver's 1994 Comprehensive Plan. As part of the Plan, specific land use issues were addressed in compliance with the GMA. These issues included the focus of growth in urban centers and the corridors that connect them recognizing the interrelationship between land use and transportation, reduction of sprawl, direction of development to areas served by public services and facilities, encouragement of a variety of development types, provision of open space, development of a separate identity from Portland, and continuation of neighborhood stability. Despite rapid growth in Clark County, there continues to be vacant and underutilized land, services and facilities, including streets, water, sewer, and parks in the Vancouver City Center.

The VCCV encourages retail, office and institutional development and emphasizes residential development as the key to City Center vitality. The *Leland Consulting Group in an October report* states that, "across the nation, urban housing is driving the revitalization of downtowns. Urban housing can support retail stores to a much greater degree than offices or civic uses; thus, Vancouver's downtown retail revival depends on more housing. However, over the past ten years, Vancouver's City Center saw little population or income growth until the recent regionally weak office market, this new housing has driven the success of new restaurants and retail around Esther Short Park."

Implementation of the 20-year Esther Short Subarea and Redevelopment Plan was so successful projects reached development capacity within 7 years. With the success of the Esther Short plan, the desire to continue attracting redevelopment opportunities to downtown, and Vancouver Comprehensive Plan policy direction, the City determined that a new and expanded subarea plan should be developed for downtown Vancouver. The new Vancouver City Center Vision and Subarea Plan incorporates130 blocks (approximately 475 acres) including the 30 block Esther Short area, encourages continued redevelopment opportunities in the expanded downtown vicinity and consistent with the Growth Management Plan, creates a vision and direction for future redevelopment and connections of the City Center, (Table 2-3).

RELATED PROJECTS

Port of Vancouver -Columbia Gateway Site Project

The Port owns approximately 1,059 acres comprising Parcels 3, 4, and 5, known as Columbia Gateway, which are located south of SR 501 (Lower River Road) in the City. The Port originally proposed the development of Parcel 3 of Columbia Gateway to include a rail and road component. In April 2006, the Port and lead federal agencies made a collective decision to change from a Habitat Conservation Plan approach to an ESA Section 7 consultation through the Clean Water Act 404 permitting process. As a result, an agreement was reached that the US Army Corps of Engineers (Corps) is the lead federal agency for the project.

The Port is proposing to develop its Columbia Gateway (Parcel 3) for marine and light industrial uses. Mitigation and habitat creation for impacts on Parcel 3 would be developed on Parcels 4 and 5. The proposed project would also include constructing a turning basin

adjacent to the Columbia River navigation channel and constructing two to three marine terminals in the river. The Port is currently preparing a NEPA EIS for Columbia Gateway. The Corps is the lead agency for the NEPA EIS. A scoping meeting has been held, and the EIS is being prepared. The NEPA EIS is also intended for use during SEPA compliance for state and local permitting. Please refer to Appendix D and/or the Port's website at: http://www.portvanusa.com/property/columbiagateway.html

Port of Vancouver Rail Access Project

Presently, the existing Port rail facilities extend from the Burlington Northern Santa Fe Railway (BNSF) mainline to the Hill Track on Port property and terminate at Gateway Avenue at the Port's Terminal 4. The Port is proposing to construct a rail access project to allow for industrial and economic development. Rail access improvements to the Port have several project elements.

Schedule 1 begins in the vicinity of the BNSF Mainline near Esther Street to the west of the Boise property. This project will require SEPA compliance. The remaining Schedules 2 through 4 include a rail access line between the Port's existing facilities and the BNSF mainline, and extend the tracks to Old Lower River Road to create better rail access for the Port's existing clients and redevelopment within the existing Port facilities.

The rail improvements within the existing Port facilities are a separate project under a separate NEPA process, with FHWA performing as the funding and lead federal agency with the Port as the applicant. NEPA compliance is beginning for this project. Separate SEPA compliance will also be completed as required. Please refer to Appendix D and/or the Port's website at: <u>http://www.portvanusa.com/property/columbiagateway.html</u>

The Columbia River Crossing

Interstate 5 and the existing I-5 bridge are the eastern boundary of the VCCV. The I-5 Bridge is stretched far beyond capacity. The Columbia River Crossing Project will evaluate possible solutions. An EIS under NEPA for the Columbia River Crossing Project is in the early development stage. The estimated completion for the NEPA EIS is in 2008. The EIS will identify alternatives and analyze each alternative. The analysis will include consideration of the short- and long-term effects of the project, from construction through operation. It will also detail the effects of alternatives on people who live or work in the Plan Area, users of the facilities, and the broader community. The eastern portion of the VCCV will ultimately be affected by the Columbia River Crossing preferred alternative. The size of the crossing, touch down location and number of on/off ramps are a few of the major issues that will impact the VCCV in the future. The Columbia River Crossing Project http://www.columbiarivercrossing.com/

SUMMARY OF SIGNIFICANT IMPACTS

Table 1-1 summarizes the potential environmental impacts and mitigation measures evaluated in the DSEIS. Significant unavoidable adverse impacts are also identified. The following elements of the environment are evaluated in this document:

• Air Quality

- Historic and Cultural Resources
- Water
- Transportation
- Noise
- Land Use
- Parks and Recreation
- Public Services and Utilities
- Parking

CHAPTER 1 FIGURES AND TABLES

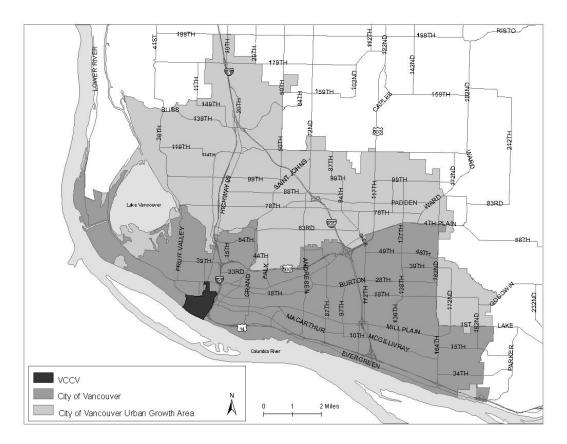


Figure 1-1. Vicinity Map

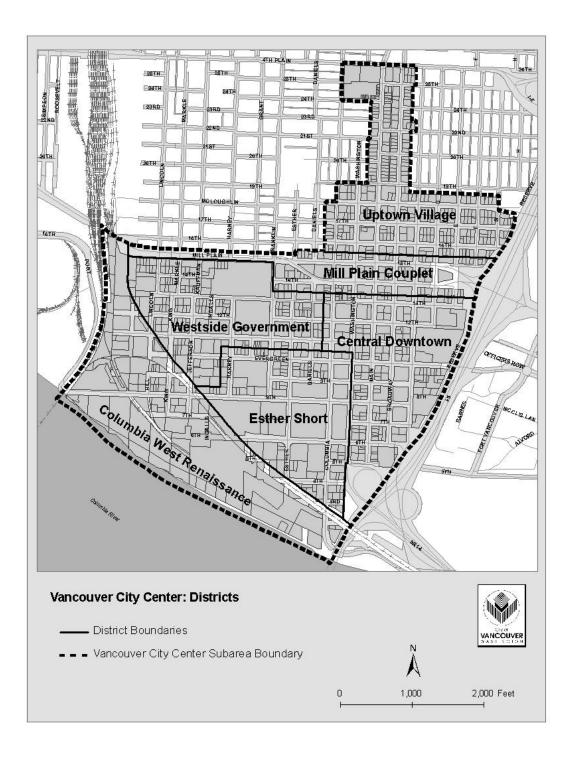


Figure 1-2. EIS Districts

Table 1-1. Summary of Potential Impacts, Mitigation Measures and Unavoidable Adverse Impacts

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Chapter 3: Air Quality			
Proposed Alternative	None.	None.	None.
No Action Alternative	None.	None.	None.
Chapter 4: Water			·
Runoff Surface / Abs	orption		
Proposed Alternative	 Increased runoff from new impervious surface, and increased pollutant quantities. 	 Comply with the BMPs of the Vancouver Municipal Code Chapters 14.24, 14.25 and 14.26. Centralize parking areas and water quality treatment facilities. 	 There are no unavoidable significant adverse impacts anticipated as a result of the Preferred Alternative.
No Action Alternative	Same as Preferred Alternative, Runoff Surface / Absorption.	 Comply with the BMPs of the Vancouver Municipal Code Chapters 14.24, 14.25 and 14.26. Encourage under building parking. 	Same as Preferred Alternative, Runoff Surface / Absorption.
Floods			·
Proposed Alternative	 Occasional flooding in basements or underground parking located below flood plain elevation. 	Use waterproof construction methods, and install safeguards such as sump pumps.	There are no unavoidable significant adverse impacts anticipated as a result of the Preferred Alternative.
No Action Alternative	• Same as Preferred Alternative, <i>Floods</i> .	• Same as Preferred Alternative, <i>Floods</i> .	• Same as Preferred Alternative, <i>Floods</i> .
Groundwater Movem	ent / Quantity / Quality		
Proposed Alternative	 Increase the amount of interflow and groundwater base flow (favorable impact), and possibly pollute groundwater (detrimental impact). 	• Comply with the water quality BMPs of VMC 14.25 and 14.26 prior to infiltrating of stormwater.	 There are no unavoidable significant adverse impacts anticipated as a result of the Preferred Alternative.
No Action Alternative	Same as Preferred Alternative, Groundwater Movement / Quantity / Quality.	Same as Preferred Alternative, Groundwater Movement / Quantity / Quality.	Same as Preferred Alternative, Groundwater Movement / Quantity / Quality.
Public Water Supplies		·	· · · · ·
Proposed Alternative	Greater demand on public water supply.	None	There are no unavoidable significant adverse impacts anticipated as a result of the Proposed Plan.
No Action Alternative	• Same as Preferred Alternative, <i>Public Water Supplies</i> .	• Same as Preferred Alternative, <i>Public Water Supplies</i> .	Same as Preferred Alternative, Public Water Supplies.
Chapter 5: Noise		1	1
Proposed Alternative	 The northwest portion of the ColumbiaWest Renaissance District may have sound levels too high for residential development. Development may result in noise sensitive uses 	• The mitigation measures listed are not exhaustive or preclusive of alternative mitigation strategies provided that they address the same issues and achieve the same end.	• There are no unavoidable significant adverse impacts anticipated as a result of the Proposed Plan.

Alternatives	Potential Impacts	Mitigation Measures		Unavoidable Adverse Impacts
	being established in an incompatible noise environment. • Train horn noise creates high level of ambient noise. Some allowable uses in a CX zone would be incompatable.	 A thorough noise evaluation interastices A thorough noise evaluation and mitible developed for the waterfront area West Renaissance District. Balconies and outdoor use areas sho developed facing the railroad tracks of Train Horn mitigation It may be possible to close the at at 8th Street and Jefferson once crossing on 6th Street and Grant reconstructed. If this crossing is in the future, noise levels would reduced. Establish a train horn quiet zone rail crossings. A quiet zone can installing supplemental safety im (quad-gates for example). A downtown train horn study shi to narrow down the list of supple improvements that best meet th downtown, develop a cost of the zone and identify funding option Since rail access is a primary feat operations, the Port shall be not with any future train horn quiet-proposed mitigation or improver Expand the Noise Impact Overlay Disto include the southern and western Prior to residential development in the portion of the waterfront the above r be completed. 	igation plan should of the Columbia uld not be or busy streets. at grade crossing the rail under Street is s closed sometime be substantially of for areas around be established by provements ould be prepared emental safety e needs of the e downtown quiet s. ature of the Port's ified and involved zone study or nents. strict boundaries VCCV boundaries. ne northwest	
No Action Alternative	None	None	•	None
Chapter 6: Natural Env				
Proposed Alternative	 Redevelopment of the site would most likely accelerate site clean up of the debris from previous industrial use and area landscaping and shoreline restoration. Potential impacts include: Increased impervious surfaces; Increased storm water run-off; Additional non-point source pollutants; Landscaped areas and shoreline restoration; Clean up of debris from previous industrial use of the site; Reduction of large woody debris recruitment 	The mitigation measures listed are n preclusive of alternative mitigation si that they address the same issues ar same end. <u>Riparian Restoration Mitigation Meas</u> <i>Riparian Buffer</i> Limit impervious surfaces Soil restoration Reestablish native vegetation Protect and enhance areas with	trategies provided nd achieve the <u>ures</u>	There are no unavoidable significant adverse impacts anticipated as a result of the Proposed Alternative.

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts
		 plant community <i>Riparian Management Area</i> Reduction of impervious surfaces Soil restoration Reestablish native vegetation Protect and/or enhance areas with an existing native plant community Regrade steep banks to reduce slope using appropriate bio-engineering or bio-technical engineering. <u>Near Shore Habitat Restoration</u> If there are impacts to near shore fish habitat the following mitigation measures may be appropriate. Improve substrate to suit the needs of fish species that utilize the near shore area for rearing or spawning. Creation of structural habitat by placement of large woody debris in the near shore area. <u>Heritage Buffer Areas</u> Consult with the Department of Fish and Wildlife for appropriate mitigation measures. 	
No Action Alternative	 Would not ensure consistent approach to riparian area protection and design within the Columbia River Shoreline area (Columbia West Renaissance District). Site redevelopment in the shoreline area would be reviewed case by case, resulting in a piecemeal approach to mitigation as well as design. Future applicants would comply with the Critical Area Permit Ordinance and SEPA for each individual project and mitigation would occur project-by-project. 		There are no unavoidable significant adverse impacts anticipated as a result of the No Action Alternative
Chapter 7: Land Use			
Proposed Alternative	 Intensive redevelopment would be concentrated where urban services already exist, resulting in some reduction in pressures to urbanize outlying areas. A mixed land use pattern with a balance of residential and job producing land uses, supporting commercial and retail uses, public spaces, and new streets and infrastructure resulting in a pedestrian friendly, round-the-clock active downtown. Implementation of the VCCV, in conjunction with cumulative development would contribute to an 	 Extend the Downtown Plan District design standards (20.630) of building lines, blank walls, rain protection, parking control and maximum building heights to include the larger VCCV boundary. The city should develop and follow a Main street design and retail strategy to enhance the vitality and preserve the character of Main Street. Legal nonconforming structures created by the Proposed Plan would comply with the City of Vancouver Land Use and Development Code 20.930. Applicable surveys and testing will be completed and submitted to the City of Vancouver for determination 	There are no unavoidable significant adverse impacts anticipated as a result of the Proposed Alternative.

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts
	 commercial uses within the Plan Area and may alter the existing character. The potential exists that contaminated soils from existing and previous uses may be present within areas of the VCCV. These will likely be affected during development of individual projects. 	 the plan area to limit potential significant adverse impacts from hazardous materials. The City of Vancouver should consider a requirement to consolidate existing news racks and boxes with a consistent color and style. <u>(Area 1 - Rezone)</u> The change to one cohesive zone 	
	 A few existing buildings would become legal nonconforming structures under the Proposed Plan's maximum building heights. At full development, the Proposed Plan would provide 4,551 residential units housing approximately 7,281 additional residents and provide opportunities for approximately 9,405 new jobs. The Plan calls for more family-wage 	 (CX) and the 35 foot maximum building heights would promote compatible scale redevelopment near existing neighborhoods. Include a transition zone of Community Commercial (CC) between the proposed zone CX and the north residential area. <u>(Area 2- Rezone)</u> Extend the Downtown Design Guidelines to include the 	
	 jobs, less retail jobs, and more households than the No Action. This shift from retail to professional jobs and the increase of downtown residents should encourage walking and public transport and result in a lively "24-hour" City Center. Development in accordance with the Proposed 	 Columbia West Renaissance District. To assure cohesive development, design and connectivity require a master plan for waterfront redevelopment. Establish design standards for the city center waterfront including; the principles of the Downtown Plan District design standards, and the creation of 	
	Plan (VCCV) will enhance long term connectivity to the City's waterfront.	 Plan District design standards, and the creation of public spaces and connections between the city center and the waterfront. Extend the Columbia Renaissance Trail west ward 	
	 <u>Rezone (Area 1)</u> - Changing (R-22) and (MX) parcels to (CX) zone would allow the potential for more of one use. Some existing single family housing may be 	 through the redeveloped City Center Waterfront. The proposed CX zone mitigates any job loss from the rezone of IH properties along the waterfront. CX zone increases the total employment capacity and wage 	
	 removed. The (CX) zone may provide many more new housing units than what is existing. <u>Rezone (Area 2)</u> - changing Heavy Industrial 	 capacity of the waterfront property. The City of Vancouver will work with the Port of Vancouver on any projects affecting rail access. 	
	(IH) waterfront parcels to City Center (CX) zone, would allow new commercial and urban density residential development along the waterfront where none presently exists.	 (Area 3 Rezone) Changing to Office-Commercial- Industrial (OCI) zone will reduce use incompatibility impacts between the adjacent (CX) Rezone (Area 2). Legal non-conforming uses comply with the City of Verseure lead the and Development of the City of 	
	 Would result in the loss of Heavy Industrial job lands. Permit urban residential densities and commercial mixed use development, foster infrastructure investment and the development 	 Vancouver Land Use and Development Code 20.930. A master plan should be required for any redevelopment of the Columbia West Renaissance District waterfront. Tree species selection and spacing shall be coordinated 	
	of a public trail and public spaces along the Columbia River waterfront now an area burdened with old vacant and underutilized industrial buildings and a deteriorated shoreline.	with the City's Parks and Forestry Divisions to ensure appropriate relationship to the Columbia River shoreline and Columbia River Renaissance Trail, connectivity to the City Center, and desired character	

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts			
	 Rezone (Area 3) - A few legal non-conforming uses may result from the rezone of the western portion of the Columbia West Renaissance District (Area 3) from Heavy Industrial (IH) to Office-Commercial-Industrial (OCI). Rezone (Area 4) - The removal of the Light Industrial (IL) Overlay would allow the underlying (CX) zoned parcels to develop with mixed uses. The zone change would create 2 legal nonconforming uses within the Area 4. 	 of specific streets. The City of Vancouver should consider expanding the Esther Short Subarea and Redevelopment Street Lighting Framework Plan to include the boundaries of the Proposed Plan Alternative (the VCCV boundaries). The principles of the Downtown Lighting District and Promenade Lighting District within the City of Vancouver's Street Light Policy and Columbia River Renaissance Trail development standards shall apply to all Columbia West Renaissance District waterfront development. The juxtaposition between the Columbia River Renaissance Trail development standards and Downtown Design Guidelines and Street Lighting Policy should be reconciled and details of light fixture type, location etc. should be determined within the process of the required waterfront master plan. The City of Vancouver will work with the Port of Vancouver on any projects affecting rail access. (Area 4 Rezone) Legal nonconforming use created by the Proposed Plan would comply with the City of Vancouver Land Use and Development Code 20.930. 				
No Action Alternative	 Development may occur without a focused Subarea Plan, the redevelopment of the Columbia River waterfront may not occur or at best be delayed for many years. Connectivity between the City Center and its waterfront may be confined to the very limited connection of today. Additionally, any redevelopment that occurs under the No Action Alternative will be completed in a "piece-meal" approach without the benefit of a cohesive Subarea Plan concept. 		 Development would occur in a piecemeal approach without the benefit of a focused subarea plan concept and policies. 			
	Chapter 8: Cultural and Historic Resources					
Proposed Alternative	 Lots vacant and or serving as parking lots, both paved and unpaved, could contain subsurface cultural resources that could be affected by proposed developments See Figure 8-8 for identified inventoried or eligible structures Columbia West Renaissance District 	 The archaeological predictability model should be revised to include all identified archaeological sites. As an interim measure until the predictabitility model is completed, the City should include in the City of Vancouver Development Code Figure 20-710-1 an interim map that identifies the City Center south of Mill Plain as Level A. The Archaeological Resource Protection Chapter 	 There are no unavoidable significant adverse impacts if the above mitigation is followed. 			

Alternatives	Potential Impacts		Mitigation Measures	Unavoidable Adverse Impacts
	Boise Complex - Archaeological Predetermination		20.710.070 outlines that a study is required as part of	
	Report (Roulette and Finley 2005) – No prehistoric or historic cultural materials or sites		the development review step when any part of the land is in probability Level A, or when the development	
	were identified during the predetermination		is five acres or more in size, or when it is within one-	
	survey, but further study was recommended		fourth mile of a recorded archaeological site.	
	given the likelihood of a resource being present.	•	Several of the archaeological sites recorded in the	
	• The northwestern portion of this district may		VCCV, including the significant sites, were under or	
	have intact deposits from both the historic		associated with buildings or former buildings.	
	period and from Native American use. Prior		Mechanical probing should be encouraged as a method	
	disturbance from recent industrial use, may		for site discovery in these situations.	
	have compromised the depositional integrity.	•	Ground disturbing activities that uncover	
	• The Boise Complex has not been investigated for		archaeological sites (including unanticipated) should	
	historic buildings since access was denied.		be halted and the DAHP should be contacted in order	
	 The 1908 railroad viaduct may be impacted by 		to address the State's management of significant	
	new development, but it also has not been		archaeological sites.	
	inventoried or assessed.	•	Historic buildings impacted by direct or indirect	
	Esther Short District		actions, procedures under VMC Chapter 17.39, Historic	
	Impacts could likely occur to subsurface cultural		Preservation, are applicable. The code encourages the	
	resources on all blocks within the Esther Short District.		protection and restoration or rehabilitation of historic	
		_	buildings. Impacts to historic buildings should be avoided or	
	 Construction plans to strengthen primary street connections along Columbia and Esther Streets 	•	minimized through project redesign as a form of	
	to the waterfront, with a secondary connection		mitigation, such as incorporating new development in	
	on Daniels Street, could affect subsurface		a sensitive and compatible manner with the historic	
	archaeological resources, especially in places		fabric of a neighborhood.	
	where cisterns had been placed within the	•	For individual historic buildings that may be impacted	
	streets.		in some way, especially those listed in or eligible for	
	New development may impact existing historic		listing in the NRHP, approaches to treatments should	
	structures		follow the Secretary of the Interior's Standards and	
	Westside Government District		Guidelines for the Treatment of Historic Properties	
	 Impacts could likely occur to subsurface 		(National Park Service 2006).	
	archaeological resources on almost every block	•	If impacts to historic buildings are unavoidable, the	
	within this area		harm can be minimized through the implementation of	
	New development may impact existing historic		measures including, but not limited to the following:	
	buildings		recordation of significant buildings to meet HABS level,	
	Central Downtown		research historic buildings and make recommendations	
	The entire Central Downtown District, except for		for NRHP eligibility, conduct detailed surveys and	
	a small area near the Mill Plain Couplet, should		inventories of historic buildings and districts, public	
	be considered a high probability area.Existing historic buildings could be impacted by		education displays and interpretation, and funding for culture and arts.	
	 Existing historic buildings could be impacted by new improvements and development 	•	During restoration or rehabilitation use design	
	Mill Plain Couplet	•	materials consistent with the historic materials.	
	Impacts could likely occur to subsurface	•	New building facades planned for integration into an	
	archaeological resources on every block within	-	existing historic neighborhood should be compatible	
	this district.		with the scale and character of adjacent buildings.	
	• Existing historic buildings could be impacted by	•	Historic storefronts in original condition should be	
L			the state of the s	

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts
	street improvements and new development Uptown Village District • Impacts could likely occur to subsurface archaeological resources in this district. • New development or renovations to buildings could impact existing historic buildings.	 retained. Building detailing should be identified, retained and preserved. The City of Vancouver should work with the Clark County Historic Preservation Commission for any future expansions of existing or creation of new Historic Overlay Districts. The city should encourage the restoration and rehabilitation of historic buildings by actively promoting current historic preservation tax incentives available through the existing Special Valuation and Current Use programs. Central Downtown District Extend the existing local Historic Preservation Overlay District #2 from 8th street to 12th Street, bounded by Washington Street and Broadway. Columbia West Renaissance District The predetermination report recommended that an archaeological survey be conducted and an archaeological survey be complex would be appropriate A HABS-level recordation of the significant buildings and structures within the Boise complex would be researched and assessed. A HABS-level historic documentation, should apply if it is a significant resource and any alterations are planned. 	
No Action Alternative	Redevelopment under the No Action Alternative will also result in potential impacts similar to those identified under the Proposed Alternative	The same as Proposed Alternative	 There are no unavoidable significant adverse impacts if the above mitigation is followed.
Chapter 9: Parks and			
Proposed Alternative Recreation: Proposed Alternative, continued	 With the Proposed Plan's anticipated increase in residential growth, additional park and open space land will need to be acquired and developed to serve future residents of the area as well as the many visitors that downtown redevelopment is attracting to the downtown and riverfront core. Future redevelopment of the Columbia River Waterfront will allow an opportunity to enhance the existing severely degraded shoreline, extend the existing Columbia River Renaissance Trail westward and provide public open spaces. 	 City of Vancouver to develop a City Center green spaces program City of Vancouver to secure additional land for parks, trails, recreation facilities and open space through the development review process by identifying important opportunities and negotiating with land owners and developers to acquire fee simple ownership in land sufficient to meet adopted park and open space standards for the service areas within the park district. 	• None

Alternatives	Potential Impacts		Mitigation Measures	Unavoidable Adverse Impacts
		•	City of Vancouver to secure additional land for parks, trails, recreation facilities and open space through the development review process by requiring the dedication of land for parks, trails, recreation facilities and open space sufficient to serve residents of the proposed new residential development. The program could be funded through the issuance of Park Impact Fees Credits, but would likely have to rely on some modified formula of credits based on the high cost of land in the plan area and the significant amount of park acres required for acquisition and development based on adopted park standards. Parks Department should review the acquisition component of the park impact fee and assure the fee reflects increases in land and redevelopment construction costs within a more densely populated urban area.	
		•	In planning for and accommodating additional growth and re-development in the VCCV area, the City of Vancouver should consider promoting a variety of special recreation and open space facilities, as indicated in the adopted Vancouver Urban Parks, Recreation and Open Space Plan. This should include consideration of water access facilities along the Columbia Riverfront, Off-Leash Dog Facilities to serve residents of the proposed mixed-use high-density multifamily housing units, skate parks to accommodate youth activities and draw enthusiasts away from unlawful street skating, environmental education opportunities along the Columbia River waterfront, historic interpretation throughout the planning area, and development of facilities and systems to promote bicycle and pedestrian commuting and healthy lifestyle choices.	
		•	Parks Dept. update the Parks, Recreation and Open Space Plan to include additional acquisitions, and facility development, to serve the VCCV Plan's development capacity.	
		•	Parks Dept. continue to manage and maintain Esther Short Park in such a way as to support the heavy use – especially during the summer months. Events should continue to be scheduled and managed to avoid conflicting uses and minimize excessive wear and tear	

Alternatives	Potential Impacts		Mitigation Measures	Unavoidable Adverse Impacts
		•	on the park, including the turf areas. The Parks Department should continue to work closely	
			with the City Transportation Department to plan and create user-friendly pedestrian and bicycle systems, increase connectivity, improve the overall streetscape, enhance visual attractions to the downtown area, ensure public safety, and provide attractive greenways leading to the Waterfront Trail and Park, as well as the Fort Vancouver National Historic Reserve and other existing recreation and open space amenities located on the east side of I-5.	
		•	The City of Vancouver should consider new innovative "City Center" park service and design standards more relevant to high density urban development.	
		•	The City of Vancouver should adjust the park impact fees to reflect the cost of land acquisition and park development within the high density and intense urban environment of the city center through special impact fees.	
		•	Mitigation for short term impacts:	
		•	The City of Vancouver will continue to collect park impact fees for all new residential housing units constructed in Park District #1. These funds, along with supplemental funding such as Real Estate Excise Tax revenue and grant funds, will be utilized to acquire park property and develop new neighborhood parks	
		•	To the extent practical, the Parks Department will continue to utilize the development review process to identify potential opportunities for land acquisition and/or developer-generated improvements.	
		•	The City of Vancouver should consider new innovative "City Center" park service and design standards more relevant to high density urban development.	
		•	The City of Vancouver should adjust the park impact fees to reflect the cost of land acquisition and park development within the high density and intense urban environment of the city center through special impact	

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts
		fees.	
Recreation: No Action Alternative	Esther Short Park will not be able to accommodate park, recreation and open space needs of the entire plan area at build-out.	The City of Vancouver will continue to collect park impact fees for all new residential housing units constructed in Park District #1. These funds, along with supplemental funding such as Real Estate Excise Tax revenue and grant funds, will be utilized to acquire park property and develop new neighborhood parks. The acquisition and development efforts will continue to be guided by adopted standards and policies included in the Urban Comprehensive Park, Recreation and Open Space Plan. However, the acquisition and development efforts may not directly serve the subject area due to quantified park needs in other areas of the service district. Additionally, the ability to acquire land in the subject planning area is also highly dependent on the availability and affordability of suitable land, and the presence of a willing seller. Vancouver-Clark Parks & Recreation Department should continue to manage and maintain Esther Short Park in such a way as to support the heavy use – especially during the summer months. Events should continue to be scheduled and managed to avoid conflicting uses and minimize excessive wear and tear on the park, including the turf areas.	• None
Chapter 10: Transpo			
Proposed Alternative	 For future needs and action strategies see Transportation Chapter page 172. 	 For future needs and action strategies see Transportation Chapter page 188. The identified mitigation measures and strategies are not meant as an exhaustive list, or to preclude other mitigation measures that address the identified issues and are acceptable to the city. 	•
No Action Alternative	•	•	•
Chapter 11: Parking			
Proposed Alternative	 Projected growth and the current City code parking minimum would increase the downtown area parking supply by approximately 14,070 new parking spaces, which is an unrealistic expectation of approximately 144% increase. 	 Make the downtown accessible through multiple modes of travel and to consider a policy shift to replace parking minimums and adopt parking maximums The VCCV parking policy to eliminate parking minimums for commercial development, reduce parking minimums for residential development, implement maximum parking caps on both residential 	• None

Alternatives	Potential Impacts		Mitigation Measures	Unavoidable Adverse Impacts
		•	and commercial development, limit the development of new surface parking facilities, and provide incentives to encourage structural parking should be implemented. Revise City ordinances to: encourage the use of shared parking facilities in the new development where shared parking can be utilized. Eliminate the requirement of developers to lese off- street parking to meet parking minimums Reconsider parking fee-in lieu's paid to the City for developments that do not provide basic minimum parking. Funds could be used to enhance the overall transportation network for the area Restrict the use of reserved parking spaces to promote efficient use of parking facilites Require a plan to provide informational signage to guide drivers to public garages near retail and short- term parking and integrate this plan into the	
		•	downtown area plan. Require the non-conforming surface parking lots located within the proposed Parking Control district (Figure 7-7) to meet VMC standards for the following purpose to prevent disruption of pedestrian circulation; to provide for smooth traffic flow; to ensure the most efficient provision of parking facilities; and to protect the public health, safety, and welfare by controlling erosion and dust and bypreventing bodily injury and crime.	
		•	City establish parking management zones that provide more "district specific" parking management strategies and controls consistent with the economic development and land use plan for downtown.	
		•	The city should adopt the proposed Parking Control shown in Chapter 7 (Figure 7-7) and the following purpose language, <i>This district is intended to prevent</i> <i>disruption of pedestrian circulation; to provide for</i> <i>smooth traffic flow; to prevent excessive use of</i> <i>downtown land for parking; to ensure the most</i> <i>efficient provision of parking facilities; to preserve the</i> <i>continuity of retail use and building frontage in the</i> <i>downtown shopping area; and to protect the public</i> <i>health, safety, and welfare by controlling erosion and</i> <i>dust and by preventing bodily injury and crime.</i>	

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts
No Action Alternative	 May result in similar impacts on parking as the Proposed Alternative. 	The same mitigation measures as the Proposed Alternative, however, they would not be as effective given that the mix of uses would not likely be as great as the Proposed Alternative	None
Chapter 12: Public Se	rvices and Utilities		•
Fire			
Proposed Alternative	 Expected to increase the population in the project area, which is likely to increase emergency calls. It also will result in increased revenues from the sub area, which can be used to pay for increased demands on the Fire Department's services. The Proposed Alternative will also require the Fire Department to acquire additional staff. 	 Development within the project area will be required to comply with all uniform building, fire and mechanical codes and standards. When the population increases by 29,153 and 1,218 businesses are added, the Fire Marshal's Office will need an additional Deputy Fire Marshal to maintain current service levels. One firefighter would be required for every 1,311 population increase (6 total). An incremental planning approach will be used to meet increasing demands, when hiring new staff. Access to the waterfront Columbia West Renaissance area should inclue consideration of emergency response, particularly in the event of a major disaster. 	• None
Fire: No Action Alternative	 As the City grows, it is expected to increase demand for emergency services and fire prevention services. Additional staffing will be needed. 	 When the population increases by 29,153 and 1,218 businesses are added, the Fire Marshal's Office will need an additional Deputy Fire Marshal to maintain current service levels One firefighter would be required for every 1,311 population increase (3 total) An incremental planning approach will be used to meet increasing demands, when hiring new staff. 	• None
Police			
Proposed Alternative	 Current service levels indicate that approximately 10 additional officers will be needed to serve this area at buildout. Four civilian positions will also be needed. The increase in population will result in increased tax revenue from the subarea, which would be applied to the city's General Fund and may be used for additional police services. 	 Building designs that include well-designed lighting will be required to provide additional site security in the plan area and improve public safety. The Community Policing Specialists will work with Development Review Services on design review. There will be a Crime Prevention Through Environmental Design review of site plans and building plans. Based on current staffing and local needs, it is anticipated that 1.3 officers and .47 citizens per 1,000 new residents be hired. 	• None
No Action Alternative	 Current service levels indicate that approximately 7 additional officers will be needed to serve this area at buildout. Three civilian positions will also be needed. The increase in population will result in 	Same as Proposed Alternative, <i>Police</i> .	• None

	increased tax revenue from the subarea, which				
	would be applied to the city's General Fund and may be used for additional police services.				
Schools					
•	Application of the student generation rates to the increased number of multi-family residential units in the plan area results in an additional 377 elementay students, 153 middle school students, and 172 high school students. Discovery Middle School would be able to accommodate the increase in middle school students. The number of new elementary students added to the current enrollment would significantly exceed the capacity of Hough Elementary Schol Hudson's Bay High School is already over capacity.	•	Accommodate additional students in existing classroom space, portable classrooms, adjusting school attendance boundaries, or building additional school capacity. The City of Vancouver will work with the Vancouver School District to consider new innovative school standards for building and site design more relevant to high density urban development. The City of Vancouver should work with the Vancouver School District to adjust the school impact fees to reflect the cost of schools within the high density and intense urban environment of the city center. The City of Vancouver should work with the Vancouver School District and other public/private parties to provide new school sites, as needed, within the VCCV.	•	None
City	No Action Alternative represents the existing of Vancouver Comprehensive plan, which udes the Vancouver School District's Six Year bital Facilities plan.	•	The District can accommodate additional students within the Plan Area in existing classroom space, through the use of portable classrooms, adjusting school attendance boundaries, or building additional school capacity.	•	None
Potable Water			• •		
	Any new street construction near the old water distribution lines may cause the older water pipes to rupture. Many lines are also undersized for the redevelopment of the area. The VCCV Subarea Plan anticipates buildings up to 200 feet in height; water pressure at the street elevation would not be adequate to serve the upper floors of these buildings.	•	When a portion of the subarea and redevelopment plan is constructed and includes street construction, where necessary, the city will replace all adjacent substandard water pipe with engineered ductile iron pipe, and replace all substandard fire hydrants with new hydrants that meet city standards. Any development proposal that requires fire flow in excess of 3,000 gpm will require additional review by the City of Vancouver and potential additional facilities may be required to be installed by the developer. Fire flow values are for street elevation; multi-story proposals will require additional developer installed fire protection systems in compliance with city requirements (e.g., automatic sprinkler systems) to provide the necessary fire protection and water pressure increase to supply the upper floors of the buildings.	•	None

Alternatives	Potential Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Proposed Alternative	 The City has indicated a fire flow of 3,000 gpm and adequate water supply for the Proposed Alternative 	• None	None
No Action Alternative	 The City has indicated a fire flow of 3,000 gpm and adequate water supply for the No Action Alternative 	• None	None
Sewer / Solid Waste			
Proposed Alternative	 It is possible that street activity could crush existing sewer mains. 	• The City of Vancouver will evaluate all sanitary sewer mains adjacent to development and replace those that have significant deficiencies and those that may be shallow enough to be adversely affected by the street construction.	• None
No Action Alternative	• Same as Proposed Alternative, <i>Sewer</i> .	Same as Proposed Alternative, Sewer	None

PROPOSED ALTERNATIVE

The City of Vancouver proposes to adopt a Subarea Plan for the City Center, along with an initial package of implementation tools. Vancouver's City Center is an approximate 472 acre or 130-block area generally defined by the Columbia River on the south, the North/South Burlington Northern Santa Fe (BNSF) Railroad on the west, Mill Plain on the north (the north boundary includes a northern finger from 15th Street to Fourth Plain and south to 19th Street), and Interstate 5 on the east.

The VCCV (Vancouver City Center Vision Subarea Plan) represents the "Downtown" urban center identified in the City's Comprehensive Plan. The Subarea Plan increases development and diversification of uses, including office, housing, commercial, industrial, and mixed use. The increased development was anticipated in the Comprehensive Plan Final Environmental Impact Statement (FEIS). The VCCV more specifically allocates this anticipated development analyzed in the FEIS through identifying districts and establishing each district's specific contribution to the subarea's development goals. Through the more detailed analysis of the VCCV, land uses shifted to increase residential and jobs other than retail.

Vancouver's City Center saw modest total population growth in the 1990's, but actually saw its household population decline. Nevertheless, it is largely characterized by a low-income elderly population base. With the influx of new residents to affordable and market-rate projects around Esther Short Park and in Uptown Village, the income base is diversifying. Such diversification is key to the revitalization of downtowns and the attraction of a wider range of retail and services, (*Leland Consulting Group, Oct. 2004*).

Comprehensive Plan designations are proposed to change in two areas (Figure 2-1) and zoning is proposed to change in four areas of the Subarea (Figure 2-2).

- Area 1 Approximately 4 full blocks and 6 half blocks (approximately 11 acres) located within the Uptown Village District;
- Area 2 The Boise owned parcels of approximately 30 acres located within the Columbia West Renaissance District located on the Columbia River waterfront;
- Area 3 Approximately 15 acres located between 7th Street Evergreen Street in the western portion of the Columbia West Renaissance District; and
- Area 4 The 8 blocks or approximately 12 acres of Light Industrial Overlay located between 12th Street and Mill Plain and west of Harney Street is proposed to be removed.

Area 1 in the Uptown Village District is proposed to change from Comprehensive Plan designation Urban Medium and Residential (R-22) zone to Comprehensive Plan designation Commercial and Mixed Use and City Center (CX) zone. In addition, the current Mixed-Use (MX) zone is proposed to change to City Center (CX) zone to promote cohesive mixed-use redevelopment of urban-density residential, commercial, and office uses under a consistent set of mixed use (CX) regulations. Area 2 includes the Boise Cascade property located within the Columbia West Renaissance District and is currently for sale. The Boise Cascade property is proposed to change from a Heavy Industrial zone (IH) to a City Center zone (CX) to promote redevelopment for urban residential densities and increase in family-wage jobs. Area 3 in the western portion of the Columbia West Renaissance District is to change from IH to Office, Commercial, Industrial zone (OCI) to recognize many of the existing uses and potentially increase the number of family-wage jobs. In Area 4 the Light Industrial Overlay is proposed to be removed to allow redevelop of permitted uses within the existing underlying CX zone. The change to OCI will allow new clean light industrial uses, the existing clean light industrial uses to remain and if desired to expand according to VMC 20.440.030. The existing heavy industrial uses as identified in Table 7-1 will become legal non-conforming uses and new heavy industrial uses would not be allowed. The lifting of the Light Industrial overlay in Area 4 will reduce the likelihood of this area redeveloping into an industrial area; however, the City Center Mixed Use zone does allow limited light industrial uses. Table 7-1 identifies two existing industrial uses that would become legal nonconforming uses after the overlay is removed. The other uses in the proposed Area 4 rezone may continue under the City Center Mixed Use zone.

The Columbia West Renaissance District assumes the highest number of residential units and population and the second highest number in jobs because of the expected redevelopment of the old Boise Cascade Complex to a residential/MX development and the redevelopment and expansion of the Red Lion Hotel. The Proposed Alternative different from the Comprehensive Plan or No Action Alternative emphasizes increased residential units and jobs, other than retail, in all the proposed districts but especially in the redevelopment of the Columbia West Renaissance waterfront district.

The VCCV development goals propose to include approximately 4,551 new residential units, 7,281 new residents, 1,108 specialty retail jobs, and 8,298 other jobs (total new jobs 9,406) for the total planned area (Table 2-1). Market and planning capacity evaluations were made to estimate the potential for each district to contribute to realization of the Vision. The timing and extent of development will depend on market factors that are not predictable. The goals for each district are meant to guide future development rather than act as fixed district goal totals (Table 2-3).

Working with a Citizen Resource Team that represents local businesses, residents, and other interests, five principles were identified to guide the Plan's vision, goals, and concepts.

Plan Principles:

- Build on the successes and experience of the Esther Short Plan
- Promote residential development as key to a vital and attractive City Center

- Create and support "messy vitality", a dynamic and rich mix of residential, cultural, civic, retail and entertainment places that will attract growth, jobs, and round-the-clock activity in the VCCV
- Improve the Main Street Corridor (between Broadway and Washington Streets) as a central spine of diverse and complementary uses that establish downtown as a regional center for commerce, culture and urban living
- Support the Vision with strategic investments in public infrastructure especially transportation

The Plan includes general, land use, parking and transportation policies the general and land use policies are listed below. The Transportation and parking policies are found in the pertinent Transportation and Parking Chapters.

General and Land Use Plan Policies:

- Encourage residential development as the key to City Center vitality
- Revitalize downtown uses along the Main Street Corridor (between Broadway and Washington Streets) from 8th Street to Fourth Plain Boulevard and its connectors
- Focus waterfront redevelopment on residential uses supported by significant public access, recreation, cultural, hospitality, entertainment and limited commercial uses
- Protect key historic buildings and established residential neighborhoods
- Encourage key support services, such as a full service grocery store and lifestyle retail center
- Encourage development within the west subarea of the VCCV primarily for government services complemented by residential, entertainment and cultural uses
- Recognize and encourage arts, cultural and institutional uses as critical to economic development in the City Center
- Strengthen the primary street connections to the waterfront
- Support a secondary connection to the waterfront
- Overcome the barrier like feeling of the BNSF railroad berm between downtown and the waterfront
- Support the redesign and improvement of the Main Street Corridor as a priority project
- Ensure that expansion of I-5 and Columbia River crossing improvements improve access to the City Center and minimize potentially negative effects
- Provide improved access into the southern and western areas of the City Center
- Connect downtown with the Vancouver National Historic Reserve via a 7th Street pedestrian bridge

New and revised implementation tools will be adopted at the same time of the adoption of the VCCV. Ordinances proposed for amendments are as follows:

• Amend the Downtown Plan District (20.630) including the following sections:

Building Lines (20.630.020) Rain Protection (20.630.030) Blank Walls (20.630.040) Maximum Building Heights (20.630.050) Parking Control (20.630.060); and, Light Industrial Overlay (20.630.070)

- Rezone Area 1 the Blocks zoned R-22 and MX in the southern portion of the Uptown Village District to CX zone (see Figure 2-2)
- Rezone Area 2 the Boise Cascade property from IH to CX (see Figure 2-2) Rezone Areas 1 and 2 require comprehensive plan designation amendments.
- Rezone Area 3 Northwest blocks zoned IH to OCI located south of Evergreen Street and west of Harney Street and north of 7th Street (see Figure 2-2)
- Rezone Area 4– Remove the Light Industrial Overlay north of 12th Street, south of Mill Plain and between Lincoln and Harney (see Figure 2-2)
- Amend Design Review Boundary, Design Guidelines, Figure 20.265-1
- Amend the Vision and Airport Height Overlay District maps and text (20.560)
- Amend the Noise Impact Overlay District (20.520)
- To allow limited artisan and specialty goods production uses in the CX zone, amend 20.160.020, Listing of Use Classifications; 20.430.030, Commercial Uses; and 20.430.050, Special Limitations on Uses
- Amend Section 20.430.020D, List of Zoning Districts, to allow housing at ground floor in the CX zone except for properties fronting Main Street between 6th Street and Mill Plain
- Amend Section 20.430.020B, Community Commercial (CC) zone, to allow housing at ground floor on properties fronting Broadway Street only
- Establish waterfront design guidelines for the redevelopment of the Columbia West Renaissance District

Through a series of workshops a 15-member Community Resource Team (CRT) comprised of members from the community with a wide variety of interests ranging from neighborhood representation, local business, and transportation providers gave input on vision, community, business, and agency issues. A 6-member developer/real estate panel gave input on development potential. Consultants and CRT members invited public comment at each workshop. Identity Clark County, the Port of Vancouver, USA and City staff presented the Subarea Plan to numerous organizations including the following: Vancouver Downtown Association, Columbia River Economic Development Council, Greater Vancouver Rotary, Hough Neighborhood Association, Identity Clark County Board, Clark County Public Utility Board, Regional Transportation Council, Uptown Village Association, Northwest Neighborhood Association, Heritage Place Owners Association, and to the City of Vancouver Planning Commission and City Council in workshop and regular meeting sessions.

NO ACTION ALTERNATIVE

In the context of the City Center Vision planning effort, the SEPA "no action" alternative does not mean literally "no development". The City would need to take some action to implement the Comprehensive Plan's urban center concept to maintain consistency with its Comprehensive Plan; however, these efforts would be less focused and less coordinated.

Under the No Action Alternative, the City would not adopt a Subarea Plan or new and revised implementation tools (zoning, design standards, building heights) for the City Center. The existing Comprehensive Plan Land Use Map designations and zoning would remain unchanged. Redevelopment of the City's waterfront and connections

to the waterfront and redevelopment of the R-22 - MX Uptown Village cluster are less probable to happen. If the City's waterfront and its connections redeveloped, it would occur incrementally rather than guided under a cohesive land use concept. The existing design standards would continue to guide only a small portion of the downtown. The City cannot achieve existing allowed building heights because they exceed FAA height restrictions. Individual property owners would propose to redevelop according to land use and zoning designations, perceived market opportunities, and their individual goals and situations. Individual decisions would determine how and where various uses are concentrated. Land uses would not be focused or organized into districts with a distinct character.

Capital improvements would also occur incrementally. The street grid would not be improved or expanded, connections to the waterfront would not be developed, and parks and trails would not be developed pursuant to a plan. Improvements would occur in the context of project-by-project development.

The No Action Alternative would retain the existing Comprehensive Plan growth totals for the downtown area. These totals include a higher number of retail jobs (2,169), a lower number of other sector jobs (5,536), and a substantially lower number of residential units (1,930) than the Proposed Action. Tables 2-1 and 2-2 show the difference between the No Action and Proposed Action growth totals.

Since there would not be a Subarea Plan, the No Action Alternative could not be designated as a Planned Action. Future applicants would comply with SEPA for each individual project. Mitigation would also occur, project-by-project.

CHAPTER 2 FIGURES AND TABLES

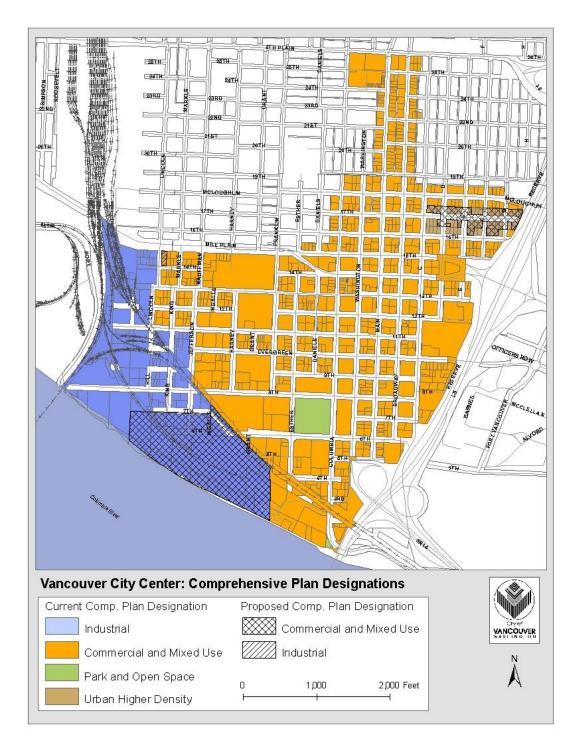


Figure 2-1. Vancouver City Center: Comprehensive Plan Designations

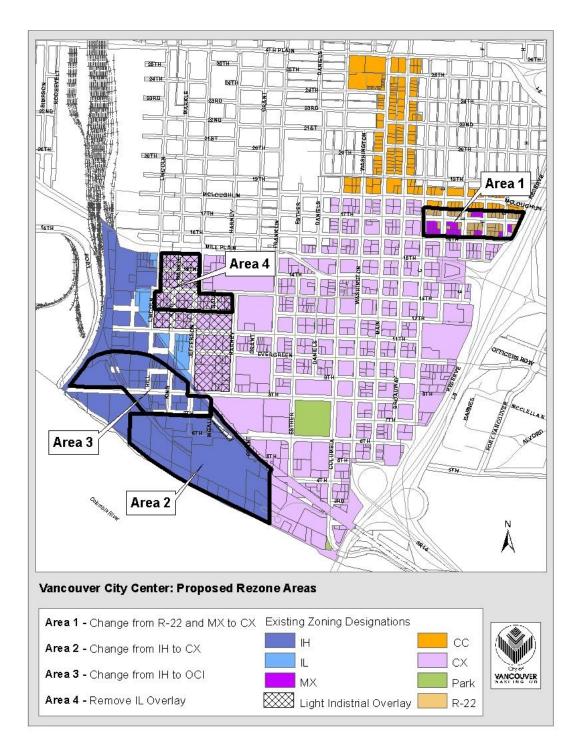


Figure 2-2. Vancouver City Center: Proposed Rezone Areas

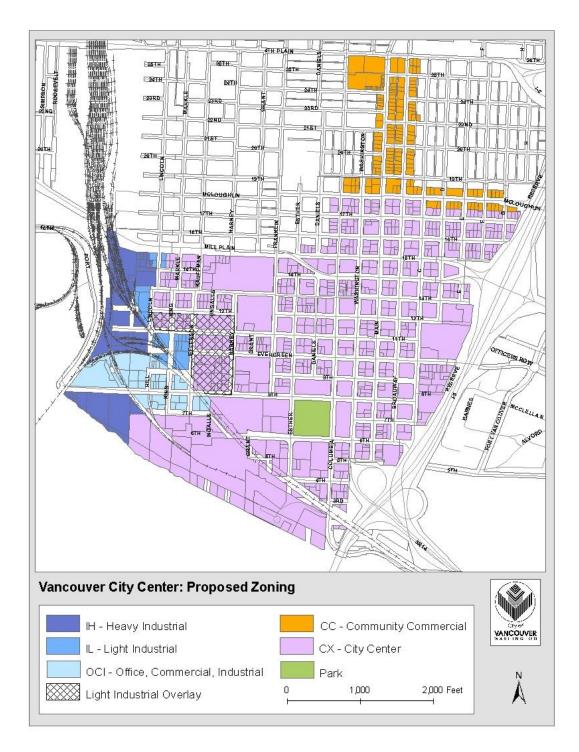


Figure 2-3. Vancouver City Center: Proposed Zoning

Tables 2-1 and 2-2 show approximate land use growth totals for the Proposed Plan (Vancouver City Center Vision Subarea Plan) and the No Action Plan (adopted City of Vancouver Comprehensive Plan).

Table 2-1.	Approximate Land Use Growth Totals – Proposed Plan
(VCCV)	

4,551
7,281
1,108
8,298
9,406

Table 2-2. Approximate Land Use Growth Totals – No Action(Comprehensive Plan)

Households	1,930
Persons	3,274
Retail Jobs	2,169
Other Jobs	5,536
TOTAL JOBS	7,705

Table 2-3 shows the Vancouver City Center Vision Plan total growth summary per District.

Table 2-3	

DISTRICT			USE CAT	EGORY		
	Retail Sq. Ft.	Office Sq. Ft.	Residential Units	Institut. Sq. Ft.	Hotel Rooms	Light Indust. Sq. Ft.
Uptown Village	20,000	20,000	254			
Mill Plain Couplet	108,000	200,000	171			
Central Downtown	80,000	560,000	495		60	
West Government	12,000	360,000	267	500,000		
Esther Short	56,000	835,000	350	81,500		
Columbia W. Renaissance	125,000	450,000	3,014	10,000	200	100,000
TOTAL	401,000	2,425,000	4,551	591,000	260	100,000

CHAPTER 3: AIR QUALITY

INTRODUCTION

The purpose of this section is to discuss air quality including the existing conditions, the No Build Alternative (the continuation of the Vancouver Comprehensive Plan and Esther Short Redevelopment Plan), and the conditions resulting from implementation of the Proposed Alternative (the Vancouver City Center Vision (VCCV) Subarea Plan), which encompasses a geographical area that has the potential to impact air quality on both a regional scale and a local scale. Because area development is expected to occur independently from the VCCV Subarea Plan, air quality impacts are not expected to be alternative-specific impacts.

EXISTING CONDITIONS

Air quality has improved in Southwest Washington since the early 1980s. Historically, the area has violated federal standards for carbon monoxide (CO) concentrations and ground level ozone (smog) concentrations and was designated as a nonattainment area. The area is now in compliance with air quality standards. Plans are in place to maintain these healthier air quality levels.

Summary of Applicable Federal, State, and Local Regulations

National ambient air quality standards (NAAQS) were established to protect public health and welfare. Primary air quality standards were established to protect public health. More stringent secondary air quality standards have been set to protect public welfare. The Southwest Clean Air Agency (SWCAA) uses the more stringent secondary standards to manage air quality in the project area. Washington has State Ambient Air Quality Standards (SAAQS) that are at least as stringent as the federal standards. NAAQS and SAAQS applicable to the project area are shown in Table 3-1.

Geographic areas in which concentrations of a pollutant exceed the NAAQS are classified as nonattainment areas. Federal regulations require states to prepare state implementation plans (SIPs) establishing methods to bring air quality into compliance with the NAAQS and to maintain the compliance. Nonattainment areas that return to compliance are called maintenance areas. The Portland/Vancouver metropolitan area is designated as a maintenance area for CO and an attainment area for all other pollutants.

Pollutant	Averaging Time	Federal	Washington
Carbon Monoxide	8-hour ¹ 1-hour ¹	9 ppm 35 ppm	9 ppm 35 ppm
Lead	Calendar Quarter	1.5 μg/m ³	1.5 μg/m ³
Ozone	8-hour ²	0.08 ppm	
Nitrogen Dioxide	Annual Arithmetic Mean	0.05 ppm	0.05 ppm

 Table 3-1. Ambient Air Quality Standards

Sulfur Dioxide	Annual Arithmetic Mean	0.03 ppm	0.02 ppm
	24-hour	0.14 ppm	0.10 ppm
	3-hour	0.50 ppm	
	1-hour		0.40 ppm
PM ₁₀	Annual Arithmetic Mean	50 μg/m³	50 μg/m ³
10	24-hour Average	150 μg/m ³	150 µg/m ³
PM _{2.5}	Annual Arithmetic Mean	15 μg/m ³	
	24-hour Average	65 μg/m ³	

ppm = parts per million

 $\mu g/m^3$ = micrograms per cubic meter

¹Not to be exceeded more than once per year

²The 3-year average of the 4th-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.08 ppm. The 1-hour ozone standard was revoked on June 15, 2005. *Source: Southwest Clean Air Agency*

The SIP incorporates air quality regulations used by SWCAA to maintain healthful air quality levels in Southwest Washington. These regulations include controls on industrial and commercial sources of air pollution, as well as regulations to control regional development of the transportation system to maintain healthy air quality.

POTENTIAL IMPACTS

The City of Vancouver's implementation of the VCCV Subarea Plan (Proposed Alternative) would increase the density of development over the No Action Alternative. Table 3-2 summarizes the differences in growth assumptions in the future for the Proposed and No Action Alternatives.

	Proposed Alternative (VCCV Subarea Plan)	No Action Alternative (Vancouver Comprehensive Plan)
New Residential Units	4,551	1,930
New Residents	7,281	3,088
New Jobs	9,405	7,705

 Table 3-2. Growth Assumptions for Proposed and No Action Alternatives

Data Source: Chapter 7, Draft SEIS for the VCCV Subarea Plan, July 6, 2006.

The Proposed Alternative is designed to encourage a mix of residential, cultural, civic, retail, recreation, and entertainment development to revitalize the Subarea and establish downtown Vancouver as a regional center for commerce, culture and urban living.

SWCAA has control measures for regional air pollution control incorporated into the general air quality regulations. In particular, commercial and industrial emission sources are required to register or obtain an operating permit. Transportation system improvements are reviewed to ensure that they do not contribute to or worsen air quality impacts. These regulations will apply to individual developments or transportation projects that result from the implementation of the VCCV Subarea Plan.

Traffic analyses performed for the VCCV Subarea indicate that overall traffic volumes within the downtown area will not change significantly with the Proposed Alternative from the planned future changes in traffic patterns and improvements to roadway segments. The traffic analysis for this project included optimizing traffic signal timing to decrease wait times and improve traffic flow at poorly performing intersections in the VCCV Subarea. Signalized intersections operating at LOS C or better and unsignalized intersections do not generally have high enough traffic volumes or sufficient congestion levels to cause CO levels exceeding the NAAQS. All mitigated intersections within the VCCV Subarea improved to a level of service (LOS) of C or better with the exception of Fourth Plain Boulevard and Main Street which remained at LOS D.¹

Proposed Alternative

The Proposed Alternative promotes a mixed-use land use pattern with a broader mix of uses than the No Action plan. The Proposed Alternative, at full development would provide approximately 4,551 new dwelling units, 7,281 more people, and 9,405 new jobs in the Subarea.

Although the Proposed Alternative is expected to result in an increase in residents living and working in the city center, the increase is expected to have less of an air quality impact than the No Action Plan. The VCCV plan aims to promote people living and working in the City Center. The development of public spaces, plazas, trails, and bike paths are expected to improve connectivity to the City Center, the Columbia River waterfront and the Historic Reserve areas. The combination of living, working and shopping in the VCCV Subarea will encourage walking and the use of public transportation and will help reduce vehicle trips.

The Proposed Alternative includes rezoning of four of the subareas within the VCCV (defined in Chapter 2 of this document), much of it to be redesignated as City Center (CX). Typical uses within the CX zone might include but are not limited to: retail sales; hotels and motels; restaurants; professional offices; educational, cultural and civic institutions; public buildings; commercial parking; and above-grade housing. The zoning in the south waterfront will change from Industrial to City Center (CX) zoning, allowing for residential and commercial development. At the present, in the south waterfront industrial zone (in the VCCV Subarea Plan - Area 2 – the Columbia West Renaissance), Boise White Paper is permitted to emit 83 tons per year (TPY) of volatile organic compounds (VOC), 13.5 TPY of nitrogen oxides (NOx), and 11.05 TPY of CO along with other criteria pollutants and hazardous air pollutants.2 With the zone change, industrial use will not be permitted.

The traffic analysis for the Proposed Alternative included adjustments to the signal timing at intersections to improve traffic flow and decrease wait times. Adjustments to signal timing are exempt from conformity regulations and hot spot analyses for CO impacts at specific intersections would not be required.

¹ DKS Associates. July 2006

²McClelland, Vannessa, Southwest Clean Air Agency (SWCAA). "Boise White Paper Potential to Emit (PTE)." Electronic mail to Carole Newvine, TW Environmental, Inc. February 28, 2006.

No Action Alternative

With the No Action Alternative, the City of Vancouver would not adopt the Subarea Plan and the zoning designations would remain unchanged. Vancouver Comprehensive Plan growth assumptions for the downtown area would be retained.

Without primary street connections to the waterfront and improved access to the southern and western areas of the City Center, vehicle trips to these particular areas of the VCCV Subarea are expected to be less than that of the Proposed Alternative. However, since the number of retail jobs is expected to increase and the number of residential units is expected to be lower than with the Proposed Alternative, there would be fewer opportunities for living close to work, thus increasing vehicle trips into the City Center. Depending on the individual projects proposed, non vehicle modes of transportation may not be built, which would likely result in increased vehicle trips to and within the VCCV Subarea.

Under the No Action alternative, with no zoning changes, industrial development could still occur. Air emissions resulting from new sources or existing sources that modified operations would be subject to SWCAA review.

MITIGATION MEASURES

Proposed Alternative

No significant adverse air quality impacts are predicted as a result of the Proposed Alternative and no mitigation is proposed.

No Action Alternative

No significant adverse air quality impacts are predicted as a result of the No Action Alternative.

Unavoidable Significant Adverse Impacts

Proposed Alternative

No significant adverse air quality impacts are predicted as a result of the Proposed Alternative.

No Action Alternative

No significant adverse air quality impacts are predicted as a result of the No Action Alternative.

CHAPTER 4: WATER

INTRODUCTION

This chapter discusses the relative impacts of rainfall and the associated run-off on the Plan Area and focuses on both the quantity and quality of run-off. Runoff, exclusive of evaporation, follows three flow routes to a body of water (e.g., stream, river, lake, or ocean). The portion that travels overland to the nearest channel (including flow in storm sewers) is referred to as surface run-off. Typically, surface run-off travels as sheet flow on streets, sidewalks, and landscaping (no definable channel), and as channel flow in street gutters, ditches, water quality swales, and storm sewers (channel has a definable shape, and flow can be easily quantified). A second form of run-off is referred to as interflow. This is water that infiltrates into the soils and flows laterally near the surface to a stream channel or other body of water. A third component of the water may infiltrate downward through the soil until it reaches a groundwater aquifer (this is frequently referred to as base flow).

Stormwater quality impacts are created when pollutant sources are introduced to stormwater run-off, or when lack of quantity control increases erosion of native soils which increases sediments in run-off. Pollution from roads and parking facilities typically includes oil, grease, lead, and cadmium. Industrial and commercial users can contribute PCBs, heavy metals, high pH concrete dust, and other toxic chemicals depending on the use. Residential areas can contribute herbicides, pesticides, fertilizers, and animal waste to run-off. The key element to mitigating these water quality impacts is isolating the sources and either preventing the mixing of pollution with run-off, or treating the run-off from specific areas for the specific pollutants.

Summary of Applicable Federal, State and Local Regulations and Ordinances

Pollution of groundwater and surface water is ultimately controlled by the federal Clean Water Act, established in 1972, and amended in 1977 and 1987. The Clean Water Act is enforced at the federal level by the U.S. Environmental Protection Agency (EPA) and administered at the state level by the State of Washington.

The State Water Pollution Control Act of 1971 gives the Washington Department of Ecology (Ecology) the authority to implement the federal Clean Water Act. Ecology regulates water pollution by establishing water quality standards and issuing water discharge permits. In 1987, an amendment to the federal Clean Water Act created the National Pollution Discharge Elimination System (NPDES) permit program. This program addresses non-point source pollution and major stormwater discharges, and is administered in Washington by Ecology. An NPDES permit is required for certain commercial, industrial, and municipal discharges of stormwater depending on activity size and character of run-off control.

In order to provide the necessary legal control, the City of Vancouver has adopted an Erosion Control Ordinance, and a Stormwater Ordinance, Vancouver Municipal Code (VMC) 14.24, 14.25, and Water Resources Protection Ordinance VMC 14.26 respectively.

Generally, for erosion and sediment control, property owners who conduct land disturbing activities must comply with the Best Management Practices (BMPs) established for Western Washington in the Stormwater Management Manual. The greater the land disturbing activity, the more stringent the requirements. Property owners who develop or redevelop must comply with the BMPs of the Stormwater Management Manual for stormwater quantity and quality control. VMC 14.25 requires a stormwater plan for any activity creating 2,500 square feet of impervious surface, or adding 1,000 square feet of impervious surface to an existing facility, or replacing existing structures exceeding 5,000 s.f.

In summary, development is governed by the VMC and development standards (including the Puget Sound Manual), and is reviewed for conformance by the City of Vancouver through the Development Review process. This is the standard of care for protecting the quality of life with respect to stormwater run-off impacts.

SURFACE RUNOFF/ABSORPTION

Existing Conditions

A considerable amount of the Plan Area is impervious. Many vacant or unused areas are still covered with compacted gravel or pavement, creating a high quantity of runoff that flows into the storm sewer and is discharged to the Columbia River. At present, streets in the Plan Area are constructed to full development width and runoff is discharged to the storm sewer system without water quality treatment or water quantity control.

The existing storm sewer system is functioning at an acceptable level of service, with a few exceptions. Currently, the City is conducting an internal T.V. inspection of all storm pipes and structures. It is also likely that some storm systems are connected to the sanitary sewer that needs to be disconnected.

Site soils are Lauren gravelly loam (Figure 4-1). These soils consist of deep, excessively drained, gravelly soils that formed in mixed Columbia River alluvium containing some volcanic ash. The Lauren series are in the Hydrologic Soil Group (HSG) "B", and are allowed an infiltration design rate of 20 inches per hour without testing.

Potential Impacts

Either alternative will increase stormwater run-off, and increase pollutant quantities. There is very little difference between the two alternatives. The CX zoning allows 100% building coverage, or 85% coverage for combined building and parking. This coverage would be possible under either alternative. Stormwater quantity impacts for a given area are the same if a two-story building covers 100% of the area, or if a ten-story building covers 100% of the area; run-off is prevented from infiltrating in either case.

Stormwater impacts for the proposed areas of development will be divided into two general categories: areas with water quality impacts, and areas without water quality impacts; all areas will have water quantity impacts. Generally, roads and parking areas that are exposed to rainfall events will increase the amount of oil, grease, lead, and cadmium in stormwater run-off. Landscaping areas will increase

the amount of pesticides, herbicides, and animal waste in run-off. Areas where pollution potential is low (e.g., sidewalks, roof areas) do not generally impact pollutant loads in run-off. Determination of what constitutes a pollutant, and how it is mitigated depends on the current standard of care, and the technology available for treatment.

Proposed Alternative

Impacts include increased run-off from additional impervious surface, and increased pollutants from roads, parking areas, and landscaping. This alternative will contribute less oil, grease, cadmium, and lead to the run-off than the No Action Alternative. With the additional restrictions proposed for the Parking Control District, less exposed area would be utilized for parking and storage of vehicles. This alternative provides for parking structures, and under building parking which shields the vehicular storage areas from rainfall events, and prevents the mixing of pollutants with stormwater. The pollutants still exist in the parking structure; however, they are removed by mechanical means (street sweeper / vacuum truck) and disposed of in a legal manner (i.e., in a sanitary landfill, or in toxic waste disposal site). This prevents the mixing of stormwater and pollution that would require a water quality BMP to remove the pollutants prior to discharge.

No Action Alternative

Impacts include increased run-off from additional impervious surface, and increased pollutants from roads, parking areas, and landscaping. This alternative would not benefit from the vision of the VCCV (Vancouver City Center Vision Subarea Plan), and individual proposals in the Plan Area would likely provide parking as allowed in the Downtown Conditional Parking Control Plan District, Chapter 20.630.060. This would fragment the parking areas because the cost of a parking structure is not economically feasible for an individual proposal. This creates the need for many small water quality treatment facilities (e.g., biofilter swales, compost filters) used to separate run-off and pollutants prior to discharge, utilizing a greater amount of development area, or increasing the cost of treatment. Numerous small facilities, while they have the same capacity as a single larger facility, occupy more space, and require more hours to maintain at an acceptable level of service.

MITIGATION MEASURES

For both alternatives, existing stormwater systems located outside of public right-ofway will be abandoned and new systems will be constructed to ensure an adequate design life. Storm sewers will be checked to see if cross-connections with the sanitary sewer exist, and will be disconnected when found in order to decrease the amount of inflow to the sanitary sewer. Potential pollution areas will be treated through the use of BMPs as outlined in VMC 14.25.210, and run-off will be controlled through the quantity control practices as outlined in VMC 14.25.220, in order to protect the waters of the State. Areas where the pollution potential is low, and areas which receive treatment prior to discharge, can be directly infiltrated to the ground through the use of infiltration BMPs, to minimize the flows into the stormwater treatment facilities and decrease the surface water flows.

Proposed Alternative

Wherever possible, centralize the parking of vehicles, making water quality treatment possible in fewer facilities, and encourage covered parking garages in order to minimize the potential for mixing of stormwater and pollutants that do not

require extensive land area for adequate treatment to maximize the Plan Area development. Wherever possible, use alternate treatment methods. Alternative treatment methods must have City of Vancouver approval. Alternative methods must meet or exceed standards established in VMC 14.25. Treatment and disposal will be in accordance with the VMC 14.25. Infiltration will be the proposed disposal BMP to reduce surface water impacts, and increase interflow and base flow. To ensure an effective storm sewer conveyance system throughout the Plan Area, the City of Vancouver will repair or replace any defective parts of the system in the public right-of-way as improvements are constructed. Due to the intensity of development proposed in the Plan, this alternative would likely result in more rapid replacement of any defective parts of the system.

No Action Alternative

Encourage under building parking that would be feasible for smaller development, and covered parking garages as economically feasible in order to minimize the potential for mixing of stormwater and pollutants. Multi-level parking structures are fairly expensive; however, "at grade," under building parking, where only one level of parking is provided, can be accommodated at almost every level of construction. In both cases, covered parking minimizes the potential for mixing of stormwater and pollutants. Wherever possible, use alternate treatment methods that do not require extensive land area for adequate treatment in order to maximize the useable development area. Treatment and disposal will be in accordance with the VMC 14.25. Infiltration will be the proposed disposal method for run-off quantity to reduce surface water impacts. To ensure an effective storm sewer conveyance system throughout the Plan Area, the City of Vancouver will repair or replace any defective parts of the system in public right-of-way as improvements are constructed.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the Proposed Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the No Action Alternative.

FLOODS

Existing Conditions

The Plan Area is located outside of the flood plain (Figure 4-2). This area is designated as having minimal flooding. The surface elevation of the Plan Area is above the 100-year flood zone.

The 100-year base flood elevation is less than 28 feet (NGVD 1929). The lowest surface elevation in the Plan Area is approximately 30 feet (Figure 4-3). Basements in areas south of 6th Street may be subject to occasional flooding or water seepage. As the water level in the Columbia River rises, run-off in the form of interflow reaches equilibrium with the level of the river. This places hydrostatic pressure on

walls constructed below the elevation of the equalized interflow. This pressure, unless certain precautionary measures are taken, will cause the water to seep through the walls and fill the structures. This is a historical occurrence and will happen regardless of Plan Area development.

Potential Impacts

Proposed Alternative

This alternative encourages the use of parking garages and underground parking. Occasional flooding may occur in basements or underground parking located south of 6th Street. This flooding would be occasional, and depending on the uses, could be only a minor inconvenience.

No Action Alternative

There may be occasional flooding in basements or underground parking located south of 6th Street. This flooding would be occasional, and depending on the uses, could be only a minor inconvenience.

Mitigation Measures

Proposed Alternative

As necessary for basements or underground parking below the flood plain elevation, the developer will be required to use waterproof construction methods and install sump pump systems discharging to a sanitary sewer. Hydrostatic pressures must be considered in the design of these facilities. Facilities that are not either constructed below flood plain elevation, or adversely affected by occasional flooding, do not require waterproofing and/or dewatering mitigation measures as long as the impact of flooding is considered.

No Action Alternative

As necessary for basements or underground parking below the flood plain elevation, the developer will be required to use waterproof construction methods and install sump pump systems discharging to a storm sewer. Hydrostatic pressures must be considered in the design of these facilities. Facilities that are not either constructed below flood plain elevation, or adversely affected by occasional flooding, do not require waterproofing and/or dewatering mitigation measures as long as the impact of flooding is considered.

Unavoidable Significant Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the Proposed Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the No Action Alternative.

GROUNDWATER MOVEMENT/QUANTITY/QUALITY

Existing Conditions

It is likely that groundwater is not near the surface in the Plan Area. The Pliocene Age Troutdale Formation is likely to be 100 feet below surface elevation, and groundwater would likely be present at this depth. The level of interflow may occur and be influenced by the level of the Columbia River. This would be approximately 15 to 55 feet below surface elevation.

This area is not in a zone of contribution for public drinking water wells. The closest high-capacity well is located at the Boise Cascade site to the west. The VCCV does not propose any wells for the Plan Area. All drinking water will be provided by the City of Vancouver potable water system.

Potential Impacts

Proposed Alternative

Stormwater infiltration from development of the Plan Area could increase interflow and groundwater base flows, and has the potential to pollute groundwater.

No Action Alternative

Stormwater infiltration from development of the Plan Area could increase interflow and groundwater base flows, and has the potential to pollute groundwater.

Mitigation Measures

Proposed Alternative

All new development in the Plan Area will be required to comply with the water quality standards of VMC 14.25 and 14.26 when discharging run-off to the ground.

No Action Alternative

All new development will be required to comply with the water quality standards of VMC 14.25 and 14.26 when discharging run-off to the ground.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the Proposed Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the No Action Alternative.

CHAPTER 4 FIGURES AND TABLES

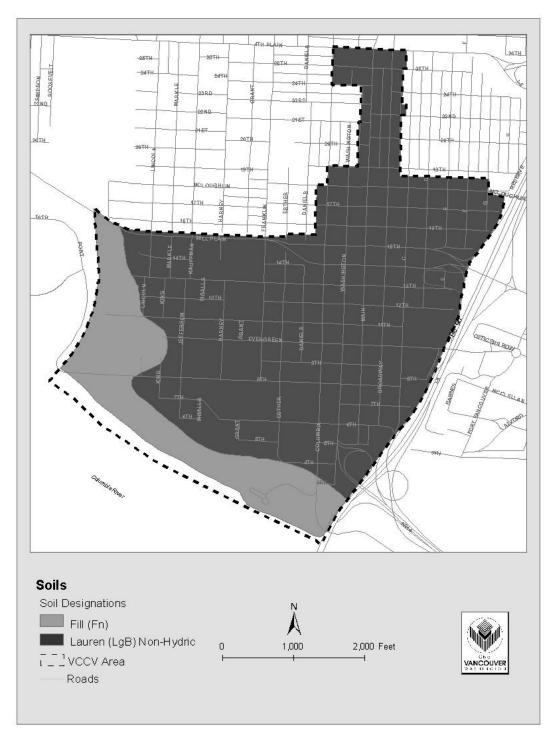


Figure 4-1. Soils

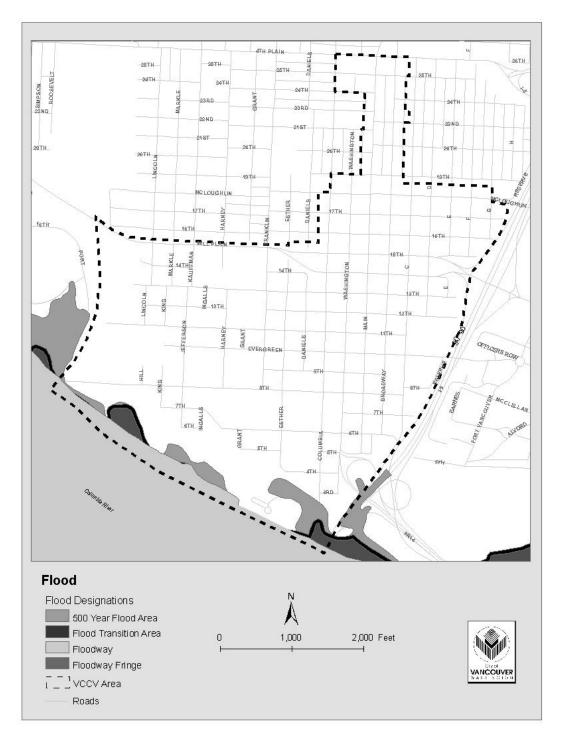


Figure 4-2. Flood

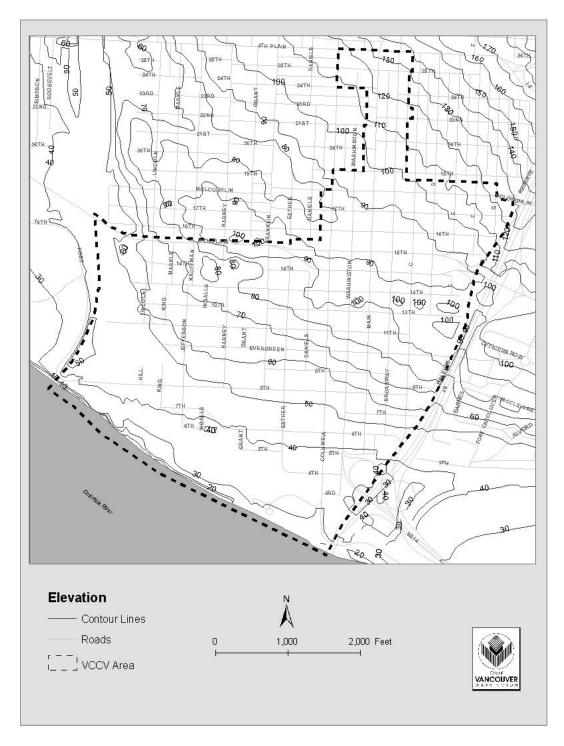


Figure 4-3. Elevation

CHAPTER 5: NOISE

INTRODUCTION

There will be two potential noise issues for the Vancouver City Center Vision (VCCV) Subarea Plan. One issue is the potential noise increase that development of the area may cause. The other is the acceptability of the existing noise environment as a compatible location for the proposed development.

All noise measurements or standards used in this document are sound pressure levels stated in terms of decibels (dB) using an A-weighting (dBA). Noise levels stated in terms of dBA approximate the response of the human ear by filtering out some of the noise in the low and high frequency ranges that the ear does not detect well. The dBA weighting is used in most environmental ordinances and standards. The minimum change in sound level that can be detected by most people is about 3 dBA. An increase of 10 dBA is usually perceived as a doubling of loudness. Sound levels produced by common noises are listed in Table 5-1.

Thresholds/Noise Sources	Sound	Subjective	Possible
	Level	Evaluations	Effects on
	(dBA)		Humans
Human threshold of pain	140	Deafening	Continuous
Carrier jet takeoff (50 ft)		_	exposure can
Siren (100 ft)	130		cause hearing
Jackhammer, power drill			damage
Loud rock band	120		
Auto horn (3 ft)			
Busy video arcade	110		
Baby crying			
Lawn mower (3 ft)	100	Very	
Noisy motorcycle (50 ft)		loud	
Heavy truck at 40 mph (50 ft)	90		
Shouted conversation			
Kitchen garbage disposal (3 ft)	80	Loud	
Busy urban street, daytime			
Normal automobile at 65 mph (25 ft)	70		Speech
Vacuum cleaner (3 ft)			interference
Large air conditioning unit (20 ft)	60	Moderate	
Normal conversation (3 ft)			
Quiet residential area	50		Sleep
Light auto traffic (100 ft)			interference
Library	40	Faint	
Quiet home			
Soft whisper (15 ft)	30		
Broadcasting studio	20	Very faint	
Threshold of human hearing	0-10		

Table 5-1.	Sound Levels	of Common	Sources and	Noise Environments*
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* Note that both subjective evaluations and physiological responses are continuous without true threshold boundaries. Consequently, there are overlaps among categories of response that depend on the sensitivity of the noise receivers.

Sound levels vary over time. There are several methods used to describe noise characteristics over a given time period. Energy average sound levels (L_{eq}) are commonly used on an hourly basis to show how levels vary with time. L_{eq} sound levels are also commonly averaged over longer time periods. Statistical descriptors indicate the percentage of time that a sound level is equaled or exceeded. For example, an L_{25} of 60 dBA means that the 60 dBA level is equaled or exceeded 25 percent of the time, or 15 minutes in any one hour.

Most environmental impact assessments in the United States use L_{dn} (also referred to as DNL) to describe the community noise environment. L_{dn} is a 24-hour L_{eq} with a 10-dB penalty added to noise events occurring at night (defined as 10:00 p.m. to 7:00 a.m.). The effect of this penalty is that any event during the nighttime hours is equivalent to ten events during the daytime hours. This strongly weights L_{dn} toward nighttime noise to reflect most people being more easily annoyed by noise during the nighttime hours when both background noise is lower and most people are sleeping. Figure 5-1 illustrates typical community noise levels in terms of L_{dn} .

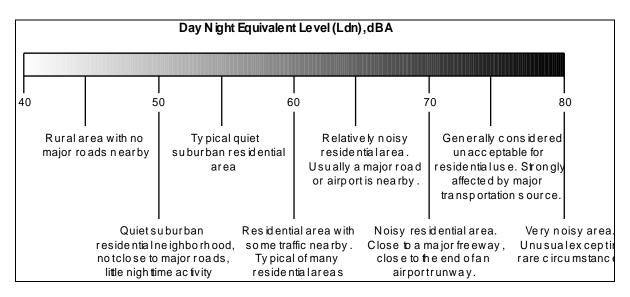


Figure 5-1. Day Night Equivalent Level (Ldn), dBA Source: FTA 1995

EXISTING CONDITIONS

A review of previous studies and information relating to existing noise levels in the VCCV Subarea was conducted. Studies investigated were the Port of Portland's ongoing community noise monitoring and the Portland International Airport (PDX) Noise Compatibility Study Part 150 update, the Port of Vancouver's Columbia Gateway Environmental Impact Statement (EIS), and the Esther Short Subarea Redevelopment Plan. In addition, noise measurements were performed within the Subarea and in other locations with potential traffic noise impacts. Existing noise sources affecting downtown Vancouver and the Subarea are aircraft operating from the Portland International Airport and Pearson Airpark, traffic on Interstate 5 (I-5) and the local street system, rail traffic on the Burlington Northern Santa Fe (BNSF) lines, industrial sources, and general urban noise sources such as building utilities and voices. Two of the major contributors to the VCCV existing noise environment - aircraft and train horns - are discussed here, as well as measured noise levels in the downtown area.

Aircraft Noise

The project area is affected by both the Portland International Airport and Pearson Airpark. The Port of Portland maintains permanent community noise monitoring locations throughout the Portland/Vancouver metropolitan areas to monitor aircraft noise. Hough School, located on W 12th Street in the VCCV Subarea is one of the Port's permanent sites. Ambient noise data from the school showed a range of 64 to 70 DNL values for the site from 6/19/2002 to 7/9/2002.

For the Federal Aviation Regulation (FAR) Part 150 Noise Compatibility Study Update (June 2005), noise exposure maps were generated indicating the 55, 65, 70, and 75 DNL contours. The existing (2001) noise exposure map shows the 65 DNL contour touching the eastern edge of the VCCV Subarea at the Columbia River's edge. Part 150 document, which considers a short-term time frame (generally 5 years), does not show an expansion of the 65DNL contour in 2008. However, the Portland International Airport Future Year Noise Analysis1 report shows that the 65 DNL contour for Alternative 3 does expand in approximately 2030 when compared to the 2008 noise contours in the Part 150 document. The 65 DNL contour in the future will expand in size to include the VCCV Subarea south of Esther Short Park. The contours, existing year and future were generated without implementing advancements in aircraft technology, navigation, and air traffic control that would likely reduce the noise impacts from aircraft. The future year contour assumed that there would be an additional taxiway and an extended runway.

Smaller, privately-owned aircraft, taking off and landing from Pearson Airpark, located in the Vancouver National Historic Reserve, also contribute to the high ambient noise levels found in the VCCV Subarea. The noise contours developed for the 2001 *Pearson Field Airport Master Plan*² show the 1999 65 DNL contour extending approximately 110 feet from the west end of the runway, which is well east of the Subarea boundary. For 2020, with a slight growth (9.1 percent) in aircraft operations, the Master Plan states that the difference in the size of the noise contour is predicted to be negligible. The 65 DNL boundary on the west side will remain the same in the future: approximately 110 feet from the runway. This will be outside the Subarea boundary. Although the 65 DNL noise contours for 1999 and 2020 are outside the VCCV Subarea, the proximity of the airfield to the Subarea means that smaller privately-owned aircraft would use the VCCV Subarea airspace for approaching and departing.

¹BridgeNet International, November, 2005 ²City of Vancouver, October 2001

<u> Train Horns</u>

The Federal Railroad Administration (FRA) requires that trains blow their horn at all public crossings as well as at private crossings with vehicles present. Train horns are very loud and are sounded for an extended period of time (15 to 20 seconds). Train horn noise has a long history of generating complaints in the City of Vancouver and nation wide particularly in relation to residential land use.

The project area is affected by noise generated from the BNSF train lines, particularly at crossings. A May 2005 train horn study, Railroad Horn Quiet Zone Sound Study Benefit Zone, indicated that maximum noise levels from locomotive warning horns generally range from 104 to 108 dBA L_{max} at 100 feet. This report studied sound levels from train horns in the Evergreen corridor which runs parallel to SR-14, east of the VCCV. Monitoring data from the study indicates that the average sound levels from train horns ranged from 84 to106 dBA measured from sites ranging from 95 to 740 feet from the rail tracks. We would expect to see similar sound levels from train horns in the VCCV Subarea. Monitoring performed for this study showed L_{dn} levels of 81 to 83 dBA at a location approximately 200 feet from the BNSF Crossing at 8th Street and Jefferson.

Downtown residents have made requests to the City of Vancouver to eliminate horn use for the W 8th Street, Jefferson and W 11th Street public railroad crossing. The complaints typically are related to disturbances to sleep and outdoor entertainment. Complaints related to train horns are likely to increase as the downtown resident population increases and as train traffic increases, as is projected.

The high noise levels in the VCCV Subarea can be attributed to aircraft noise generated from PDX and Pearson Airpark, along with noise from train horns and traffic. The locations that are impacted by these high noise levels helped define the boundaries of the City of Vancouver's noise impact overlay district (for discussion on the Noise Overlay District, see Summary of Federal, State, and Local Regulations section).

Measured Noise Levels

Measurements of noise levels were performed as part of this study including four 24hour (long-term) measurements and ten short-term measurements. The results of the field monitoring are summarized below.

Long-term Monitoring

Areas where the proposed zoning will change to CX (City Center) were candidates for long-term monitoring, particularly those proposed CX areas that are close to the BNSF line. The purpose of the long-term monitoring was to evaluate the existing L_{dn} levels in the area for compatibility for development of noise sensitive uses. Figure 5-2 shows the long-term monitoring sites and Table 5-2 shows the results of the monitoring.

Table 5-2. Long-Term Ambient Noise Monitoring Results						
Monitoring Site ID	Location	Date	L _{dn}			
А	6th Street & Grant Street	1/23/06 - 1/24/06	68			
В	Columbia River Bank (Boise	1/24/06 -1/25/06	68			

Table 5-2. Long-Term Ambient Noise Monitoring Results

	Cascade property - bottom of Jefferson Street)		
С	Jefferson Street & Evergreen Boulevard (Creative Tile)	2/7/06 - 2/8/06 7/25/06 - 7/26/06	81 83
D	6th Street and Esther Street (Columbian Newspaper Vacant Lot)	2/8/06 -2/9/06	69

Data Source: TW Environmental, Inc. July 2006.

The results of the measurements support the conclusion that overall noise levels in the area are uniformly high and are typical of urban commercial/industrial areas and urban residential areas near airports. All monitored sites have L_{dn} greater than 65 dBA, which is the abatement threshold for the Noise Impact Overlay District. In addition, except for one site strongly affected by train horn noise, measured levels were similar throughout the area and are representative of noise levels for areas proposed for rezoning to allow mixed use. Any residential units built in these areas would be subject to the requirements of the Chapter 20.520 of the City of Vancouver Development Code (see following section, Summary of Federal, State, and Local Regulations for discussion).

The L_{dn} of 81 and 83 dBA at Site C (Evergreen Boulevard and Jefferson Street) is higher than the other sites and these sound levels are not appropriate for the development of certain outdoor activities. In addition, these noise levels would need be unacceptable for residential development without mitigation. Train horns are the dominant contributor of high sound levels at this site. Site C is located approximately 200 feet from the at-grade rail crossing at 8th Street and Jefferson. During the 7/25/06 – 7/26/06 monitoring period, at least 12 trains passed through the crossing during the hours of 8 a.m. to 4 p.m. Measurements at this site are representative of levels that would be expected near the other at-grade rail crossings in downtown Vancouver and indicate that sound levels on portions of the riverfront area proposed for rezoning (Columbia West Renaissance District) may not be acceptable for residential development without mitigation.

Short-Term Noise Monitoring

Short-term monitoring, primarily to evaluate traffic noise impacts in areas potentially affected by traffic volume changes resulting from the Proposed Alternative, was conducted in July, 2006. Ten sites where increases in traffic volumes were predicted to be greater than 50 percent from the No Action to the Proposed Alternative were selected for monitoring. Figure 5-2 shows the locations of the short-term monitoring sites.

As of 2005, truck traffic in the downtown area has been restricted to local deliveries only. Traffic counts and vehicle class breakouts were logged during short-term monitoring and used as inputs for noise prediction modeling for screening noise impacts from VCCV Subarea roadways. Table 5-3 shows the location and monitoring results for the 10 short-term monitoring sites.

Site ID	Location	Date	Duration	L _{eq} (dBA)	
1	Washington Street between 4th & 5th Streets	7/26/2006	15 Mins	66	
2	5th Street between Washington Street & Columbia Street	7/26/2006	15 Mins	63	
3	5th Street between Washington Street & Main Street	7/26/2006	15 Mins	67	
4	Broadway Street Between 7th & 8th Streets	7/26/2006	15 Mins	64	
5	Columbia Way, East of I-5 Bridge	7/26/2006	15 Mins	68	
6	13th Street between C Street & D Street	7/27/2006	15 Mins	61	
7	Broadway Between 13th & 14th Streets	7/27/2006	15 Mins	63	
8	9th Street between Main Street & Broadway Street	7/27/2006	15 Mins	75**	
9	Franklin Street between 11th & 12th Streets	7/27/2006	15 Mins	60	
10	13th Street between Washington Street & Main Street	7/27/2006	15 Mins	63	
*Noise measurements were recorded at mid-block, at the back of the sidewalk. **Military aircraft (6 fighter jets departing from PDX) were noted on field log.					

Table 5-3. Short-Term Ambient Noise Monitoring Results*

Data Source: TW Environmental, Inc. July 2006.

Existing noise levels at most locations are below levels that would be considered noise impacted. Site 8 was dominated by the sound contribution from military aircraft during the monitoring interval. Sound measurements at Sites 3 and 5 were dominated by ramp and I-5 freeway noise.

SUMMARY OF FEDERAL, STATE, AND LOCAL REGULATIONS

There are several sets of noise regulations and guidelines that will apply to various activities in the VCCV Subarea. Federal traffic noise impact guidelines apply to noise resulting from traffic. Washington has a state regulation governing maximum environmental noise levels that is incorporated into the City of Vancouver's municipal code. The City of Vancouver has a zoning ordinance that governs additional noise mitigation required for residential uses constructed in the Noise Impact Overlay District.

Traffic Noise

Traffic noise impact guidelines used by the Federal Highway Administration (FHWA) to assess if traffic noise impacts are severe enough to warrant abatement are shown in Table 5-4. Impacts are considered to occur when the exterior noise level approaches or exceeds the abatement criteria. Washington State Department of

Transportation (WSDOT) considers a noise level 1 dBA below the FHWA abatement criteria to be the impact level. Noise studies and mitigation analysis are performed for new roads or significant modifications of existing roads.

Table 5-4. Traffic Noise Impact Guidenne	(L _{eq} - UDA)	
Land Use - Primary Activity	Abatement	Impact
	Criteria	Criteria
Residential, Recreation, Churches, Schools	67	66
Commercial, Industrial	72	71

Table 5-4. Traffic Noise Impact Guidelines by Land Use (Leg - dBA)

Stationary Source Noise

Where local development and planning agencies in Washington have not established noise ordinances specifying noise standards for various land uses, WAC Chapter 173-60 governs noise regulation. WAC 173-60-030 defines allowable noise impacts by land use. The basic designations are:

- Class A properties Residential
- Class B properties Commercial
- Class C properties Industrial

Table 5-5 is taken from WAC 173-60-040 and defines noise limits for sounds originating from and impacting different classes of property.

Table 5-5. Acceptable Noise Limits from WAC 173-60 (dBA)

Noise Source	Receiving Property					
	Class A	Class B	Class C			
Class A	55	57	60			
Class B	57	60	65			
Class C	60	65	70			
Between the hours of 10 p.m. and 7 a.m. the noise limitations of the table shall be reduced by 10 dBA for Class A receiving properties. At any hour of the day or night the noise limits in the table or footnote 1 may be exceeded for any receiving property by no more than: 5 dBA for a total of 15 minutes in any 1-hour (L_{25}) 10 dBA for a total of 5 minutes in any 1-hour (L_{25})						
10 dBA for a total of 5 minutes in any 1-hour $(L_{8.3})$						

15 dBA for a total of 1.5 minutes in any 1-hour $(L_{2.5})$

The City of Vancouver has incorporated the Washington State Noise Regulations shown in Table 5-5 into the Vancouver Municipal Code (VMC), except the residential to residential maximum allowable sound level is omitted. In addition, the VMC includes prohibitions against off-site vibration impacts that are discernible without instruments at the property line and construction activity between 8 p.m. and 7 a.m. The regulations do not apply to public streets and sidewalks, rail maintenance yards, or essential public facilities such as the interstate highway system or intercity passenger rail (VMC 20.935.030).

The City of Vancouver has a Noise Impact Overlay District zoning ordinance. The purpose of the ordinance is to require noise to be considered in the development of residential properties within the area of the City where the combined effect of aircraft, railroad, and traffic noise levels exceed normally acceptable levels for residential uses. Some of the project area falls within the boundaries of the Noise Impact Overlay District. The Columbia West Renaissance District (Boise property), which will be rezoned from heavy industrial (HI) to city center (CX) is not included within the boundary (see discussion under Mitigation).

Within the district, the City requires the submission of a Noise Impact Reduction Plan that documents the noise levels on the property, the methods proposed to reduce unacceptable sound levels, information on consultation with noise generating source owners, a schedule showing that noise impacts will be mitigated prior to residential occupancy, and a statement acknowledging the existence of the measured noise levels. Where exterior noise levels exceed L_{dn} of 65 dBA, mitigation of interior sound levels to 45 dBA L_{dn} or less is required (City of Vancouver Development Code, Chapter 20.520).

POTENTIAL IMPACTS

Existing noise levels in the Subarea are high; and are dominated by aircraft, freeway, and railroad noise. A noise contour screening analysis was performed for traffic noise impacts caused by the proposed action using the 66 (residential) and 71 dBA (commercial) noise contours. The goal of the analysis was to identify areas where traffic increases associated with the proposed action would have the potential to affect noise levels.

Screening level estimates of sound levels resulting from increases in traffic were made using the FHWA Traffic Noise Model (TNM), a computer-based model used for predicting sound levels. Thirty-two roadways in the VCCV Subarea with predicted increases in traffic volumes of 50 percent or greater change from the No Action to the Proposed Alternative were selected for analysis. At a change less than 50 percent, the noise level difference would generally be inaudible. Medium and heavy truck percentages of the total traffic volumes were based on assumptions derived from traffic volume and vehicle class counts during the short-term noise monitoring. Distances from roadway centerlines to residential and commercial noise impact contours were estimated. For the No Action condition, the impact criteria contours for both the residential (66 dBA) and commercial impact criteria (71 dBA) were less than 30 feet from the roadway segment centerlines (this is generally within the roadway and sidewalk area) for all roads analyzed. For the Proposed Alternative, distances from the roadway centerlines to the 66 dBA and 71 dBA contours were all less than 30 feet with the exception of two segments of the 3rd Street/SR 14 Connector. Between 3rd Street and Main the 66 dBA contour is between 30 and 40 feet from the centerline in the road and from Main to SR14, the 66 dBA contour is approximately between 40 and 50 feet from the centerline of 3rd Street. In general, the proposed action is not expected to have a substantial affect on noise levels adjacent to roads in the VCCV Subarea except along a portion of the 3rd Street and SR14 Connector. Under either of the alternatives, zoning in the 3rd Street and SR-14 area will remain CX (City Center) which allows for a mix of retail, office and housing uses.

Overall traffic volumes within the VCCV Subarea (the Proposed Alternative) are not expected to increase substantially from those forecast in the No Action Alternative; however with some of the one-way roadways being modified to accommodate twoway traffic, the traffic patterns will change.

The more probable noise impact resulting from either the Proposed Alternative or the No Action Alternative will be the development of noise impacted land for noise

sensitive uses such as residential housing, recreation areas, hotels, professional offices, educational facilities, and cultural and civic institutions in downtown Vancouver. The long-term monitoring data indicate that the northwest portion of the Columbia West Renaissance District may have sound levels too high for residential development without mitigation. Prior to development of this area for residential uses, a thorough noise evaluation and mitigation plan should be developed.

Proposed Alternative

The impact screening analysis performed for VCCV local roadways indicates that noise impacts from traffic will be located less than 30 feet from the centerline along most of the roads in the downtown area. In these cases impacts from traffic noise are not expected.

The Noise Impact Overlay District zoning ordinance, VMC 20.935.030, and the WAC Maximum Environmental Noise Regulations must be complied with in the VCCV Subarea and should prevent most incompatible land uses. However, noise compatible land use planning should be implemented to enhance the quality-of-life in the VCCV Subarea.

No Action Alternative

The No Action Alternative does not include the active development and rezoning of the VCCV Subarea. Therefore, this alternative would reduce the possibility of the existing noise environment being incompatible with newly developed uses.

The Noise Impact Overlay District zoning ordinance and the WAC Maximum Environmental Noise Regulations must be complied with and should prevent most incompatible uses.

MITIGATION MEASURES

Proposed Alternative

No significant adverse noise impacts are expected to result from the Proposed Alternative. Development of the Proposed Alternative in the VCCV Subarea may result in noise sensitive uses being established in an incompatible noise environment. To mitigate for possible conflicts with the development of noise sensitive uses such as residential units in an area with high noise levels, it is recommended that effective planning be implemented to create more livable communities. For example, balconies and outdoor use areas should not be developed facing the railroad tracks or busy streets. Instead, noise sensitive uses should be developed in quieter areas of the Subarea or shielded by buildings to create quiet oases. Special construction standards that would mitigate interior sound levels to 45 L_{dn} are required for all new, expanded, or reconstructed residential structures inside the Noise Impact Overlay District.¹

Train Horns

In the case of the area around the 8th Street/Jefferson rail crossing, some allowable uses in a CX zone would be incompatable with the high levels of ambient noise. It may be possible to close the at grade crossing at 8th Street and Jefferson once the

rail under crossing on 6th Street and Grant Street is reconstructed. If this crossing is closed sometime in the future, noise levels would be substantially reduced.

Another option would be to establish a train horn quiet zone for areas around rail crossings. A quiet zone can be established by installing supplemental safe improvements (quad-gates for example) that are as safe as or safer than rail/public crossings that rely on train horns.³

To mitigate the conflict between train horn noise and residential land use, a downtown train horn study should be prepared to narrow down the list of supplemental safety improvements that best meet the needs of the downtown, develop a cost for the downtown quiet zone and identify funding options.

Since rail access is a primary feature of the Port's operations, the Port shall be notified and involved with any future train horn quiet-zone study or proposed mitigation or improvements.

If train horn noise is not mitigated, portions of the Columbia West Renaissance District proposed for rezoning may not be acceptable for residential development.

Expansion of the Noise Impact Overlay District

With the zoning change proposed for the vacant Boise property on the river, the Noise Impact Overlay District boundaries would need to be expanded. The L_{dn} contour for PDX for the future year indicates that the 65 DNL contour will expand in size. The expansion of the PDX 65 DNL contour will include the southern portion of the VCCV Subarea, from Esther Short Park to the north and west to the rail line crossing the Columbia River. The City of Vancouver must plan for and examine long-term uses in the Subarea plan. Therefore, it is appropriate to anticipate the future boundary of the 65 DNL contour as presented in the *Portland International Airport Future year Noise* Analysis¹.

Currently the Noise Impact Overlay District does not include the western lower portion of the VCCV Subarea (Columbia West Renaissance District). The current boundary is based on the 1988 65 DNL contour that was developed for the 1983 Portland International Airport Noise Abatement Plan.³ Long-term monitoring performed for this project at Site B (the Boise location at the edge of the Columbia River), with an L_{dn} of 68, indicates that an expansion of the Noise Impact Overlay District is appropriate. The proposed new boundary for the overlay district, shown in Figure 7-14 (see Chapter 7, Land Use), would include most of the Columbia West Renaissance District. The expansion of the Noise Impact Overlay District boundaries will reduce the potential for inappropriate uses for this area which will be rezoned to CX from IH.

The mitigation measures listed are not exhaustive or preclusive of alternative mitigation strategies provided that they address the same issues and achieve the same end.

¹ City of Vancouver Development Code, Chapter 25.520, Noise Impact Overlay District.

² 49 CFR Parts 222 and 229. Use of Locomotive Horns at Highway-Rail Grade Crossings; Final Rule.

No Action Alternative

No significant adverse noise impacts are expected as a result of the No Action Alternative and no mitigation is required.

Unavoidable Significant Adverse Impacts

Action Alternative

There are no unavoidable significant adverse noise impacts that will result from the Action Alternative.

No Action Alternative

There are no unavoidable significant adverse noise impacts that will result from the No Action Alternative.

¹BridgeNet International, November, 2005

CHAPTER 5 FIGURES

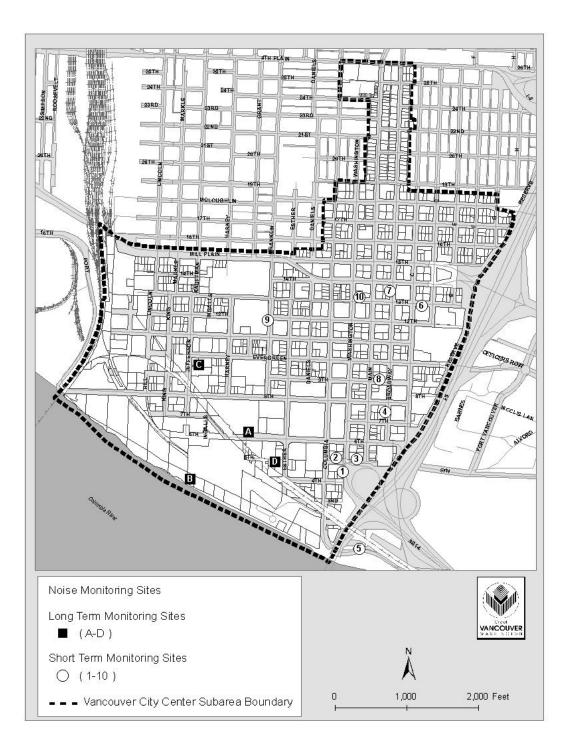


Figure 5-1. Noise Monitoring Sites

CHAPTER 6: NATURAL ENVIRONMENT

INTRODUCTION

The Columbia River and its shoreline between the Interstate 5 Bridge and the Railroad Bridge is the only environmentally sensitive area in the vicinity of the VCCV (Vancouver City Center Vision Subarea Plan). This chapter summarizes the existing fish and wildlife habitat characteristics, existing regulations that apply to habitat conservation and protection along the Columbia River within the VCCV and potential impacts and mitigation measures for each alternative. This analysis does not provide a detailed assessment of specific habitat functions or species presence or absence and does not discuss specific conservation and protection measures for redevelopment of the Study Area.

EXISTING CONDITIONS

A preliminary site survey of existing Fish and Wildlife Habitat conditions within the Columbia River shoreline area located between the I-5 Bridge and the Railroad Bridge in the City of Vancouver was completed on October 14, 2005 (See Figure 6-1). This survey included direct observation of accessible portions of the bank area and shoreline area below the ordinary high water mark.

The Study Area has been a site for industrial activities and urban development for more than a century. The shoreline has been highly modified by fill and industrial debris and habitat function is substantially degraded. However, there are areas with limited riparian vegetation and non-impervious surface.

Riparian Habitat

In the City of Vancouver, a Riparian Management Area that extends 100 horizontal feet of the ordinary high water mark and a Riparian Buffer that extends an additional 75 feet define the Riparian Area along the Columbia River. Existing impervious surface is excluded from the Riparian Area (Figure 6-1).

In addition to the Columbia River, there is a drainage swale located between the LeFarge and Boise Cascade sites. This swale is a drainage way for a stormwater outfall located on the south side of 8th Street and does not meet the definition of a stream. The swale supports a linear stand of medium height cottonwoods along a portion of its length. Some of these trees are located within the Riparian Area along the Columbia River.

Riparian Management Area

The Riparian Management Area is intact over about 50% of the Study Area. There is limited vegetation that mainly consists of a fringe of shrubby locust and mixed willow near the ordinary high water and himalayan blackberry further up the banks. At the tops of the banks there are sporadic young cottonwoods ranging to approximately 30 feet in height and pockets of mixed willows. Steeper banks generally only support

blackberries. There are a few non-impervious areas that are primarily bare soil with a low density of weed cover. There are piles of masonry and metallic debris in several locations. A portion of the cottonwood stand associated with the drainage swale between LeFarge and Boise Cascade is within the Riparian Management Area.

Riparian Buffer Area

The Riparian Buffer Area is mostly covered with pavement. There are a few nonimpervious areas that are grass, formal landscaping or bare soil with a low density of weed cover. A portion of the cottonwood stand associated with the drainage swale between LeFarge and Boise Cascade is within the Riparian Buffer Area.

Non-Riparian Habitat

Priority Species Buffer

There is a mapped Peregrine Falcon nesting site located on the I-5 Bridge. The onefourth mile Heritage Buffer for this site extends into the eastern portion of the Study Area (refer to the Habitat Conservation Areas Map). The Washington Department of Fish and Wildlife (WDFW) should be consulted for specific management recommendations for this area.

In-stream Fish Habitat

The near shore area consists primarily of cobble substrate devoid of natural woody debris with periodic decaying wood pilings and metallic debris. The substrate is generally a mix of course angular rock, fragments of masonry, and broken concrete that is fouled with a thin film of algal growth.

Two existing piers extend into the river; the LeFarge pier at the western end of the Study Area is the only one in active use. At the eastern end of the Study Area, a large structure supported by pilings extends approximately 100 feet from the bank over the near shore area. This structure includes a hotel, (Inn at the Quay) observation deck, and recreational moorage (Terminal 1).

<u>Permitting Requirements for Development or Restoration</u> Detailed Habitat Analysis

In order to determine the specific fish and wildlife habitat impacts associated with future development, a detailed analysis of specific functions and species that are present as well as the specific impacts of the proposed development or restoration activities will be needed to prepare applications for the required permits.

City of Vancouver Permits

Specific development and restoration activities proposed within the Habitat Conservation Areas identified on the attached map will be subject to environmental review under the Vancouver Municipal Code (VMC). Depending on the location and scope of the proposed activities the following City reviews will be required.

- Critical Areas Permit
- Shorelines
- SEPA

State and Federal Permits

There are numerous state and federally listed fish species in the Lower Columbia River. Any development or restoration activities that involve work below the ordinary high water mark will require consultation with and permits from the Washington Departments of Ecology (DOE) and WDFW, National Marine Fisheries Services (NOAA), the U.S. Fish and Wildlife Service (USFWS), and the U.S. Army Corps of Engineers (USACE). These consultations will be facilitated through the Shoreline and SEPA process as well as the following state and federal permits.

- Hydraulics Project Approval (WDFW)
- Section 10/404 (USACE)
- National Pollution Discharge Elimination System (NPDES) Construction Permit (DOE)

POTENTIAL IMPACTS

Proposed Alternative

As described in the existing conditions section the habitat functions of the Columbia River shoreline located within the Columbia West Renaissance District are substantially degraded. Redevelopment of the Boise property within the Columbia West Renaissance District under the Proposed Alternative would allow uses included in the City Center (CX) zone and excludes heavy industrial uses. Redevelopment of the site would most likely accelerate site clean up of the debris from previous industrial use and area landscaping and shoreline restoration. Potential impacts include:

- Increased impervious surfaces
- Increased storm water run-off
- Additional non-point source pollutants
- Landscaped areas and shoreline restoration
- Clean up of debris from previous industrial use of the site
- Reduction of large woody debris recruitment
- Improved public access to the riverfront along the extended Renaissance Trail

A related project the Gateway Project could potentially impact the environment and shoreline in the western portion of the Columbia West Renaissance District area of the Plan. Identified impacts and mitigation measures from the Gateway Project will be discussed within the NEPA EIS prepared for the Gateway Project.

No Action Alternative

As described in the existing conditions section the habitat functions of the Columbia River shoreline located within the Columbia West Renaissance District are substantially degraded. Redevelopment of the Boise Cascade property within the Columbia West Renaissance District under the Proposed Alternative would allow uses included in the CX zone and excludes heavy industrial uses. Under the No Action Alternative the Heavy Industrial (IH) zone for the Boise Cascade site would remain and no redevelopment would occur unless it were with uses permitted in the IH zone. Potential impacts include:

- Increased impervious surfaces
- Increased storm water run-off

- Additional non-point source pollutants
- Point source pollutants
- Little to no riparian vegetation
- Continuation of near shore fish habitat degradation
- Little to no large woody debris recruitment

MITIGATION MEASURES

The following mitigation opportunities are general concepts to restore or provide habitat function within the Study Area. A detailed analysis of the specific benefits of these measures will be required in order to design an effective mitigation or restoration project. The analysis will occur as a part of obtaining a City Critical Areas Permit or state or federal permits.

Proposed Alternative

With the adoption of the VCCV and a Planned Action Ordinance, the Proposed Alternative enables a planned approach for site redevelopment ensuring that the mitigation actions are consistent throughout the affected area and the goals of protecting riparian and aquatic area functions are met. (Storm water run-off and water quality impacts are mitigated in accordance to Chapter 4 – Water).

Riparian Restoration Mitigation Measures

Riparian Buffer

- Limit impervious surfaces
- Soil restoration
- Reestablish native vegetation
- Protect and enhance areas with an existing native plant community *Riparian Management Area*
 - Reduction of impervious surfaces
 - Soil restoration
 - Reestablish native vegetation
 - Protect and/or enhance areas with an existing native plant community
 - Regrade steep banks to reduce slope using appropriate bio-engineering or bio-technical engineering.

Near Shore Habitat Restoration

If there are impacts to near shore fish habitat the following mitigation measures may be appropriate.

- Improve substrate to suit the needs of fish species that utilize the near shore area for rearing or spawning.
- Creation of structural habitat by placement of large woody debris in the near shore area.

Heritage Buffer Areas

Consult with the Department of Fish and Wildlife for appropriate mitigation measures.

No Action Alternative

The No Action Alternative would not ensure consistent approach to riparian area protection and design within the Columbia River Shoreline area (Columbia West Renaissance District). Site redevelopment in the shoreline area would be reviewed case by case, resulting in a piecemeal approach to mitigation as well as design. Future applicants would comply with the Critical Area Permit Ordinance and SEPA for each individual project and mitigation would occur project-by-project. (Storm water run-off and water quality impacts are mitigated in accordance to Chapter 4 - Water).

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts to habitat function that are likely to occur as a result of implementing the Proposed Alternative

No Action Alternative

There are no unavoidable significant adverse impacts to habitat function that are likely to occur as a result of implementing the No Action Alternative.

CHAPTER 6 FIGURES AND TABLES

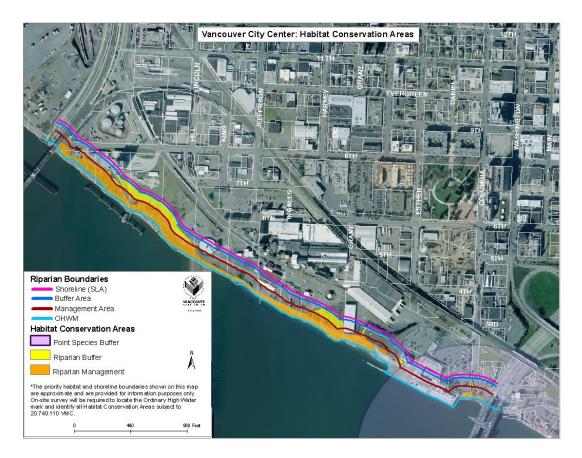


Figure 6-1. Habitat Conservation Areas

CHAPTER 7: LAND USE

INTRODUCTION

This chapter describes existing conditions and addresses the potential significant adverse impacts of the Proposed Alternative, the VCCV (Vancouver City Center Vision Subarea Plan) and the No Action Alternative, which is the continuation of the Vancouver Comprehensive Plan and Esther Short Redevelopment Plan. For each alternative, impacts on land use, population and employment, the City of Vancouver Growth Management Plan, Zoning and Ordinances, and relevant development standards are evaluated.

EXISTING CONDITIONS

Vancouver City Center

The approximate 472-acre Plan Area contains a variety of uses, including residential, commercial, office, governmental-institutional, and light and heavy industrial. Older buildings predominate, including some historic structures. However, several notable new projects have been developed in the past several years. The Esther Short Subarea Redevelopment Plan (adopted 1998) laid the ground work for the redevelopment of the Esther Short Park Subarea. The redevelopment includes the Heritage Place Condominiums, the Vancouver Center Towers, and the Esther Short Commons around the park with a mix of apartments and condominiums with office and ground floor retail. At the southeast corner from the park is the newly constructed Vancouver Conference Center and Hotel.

Other new buildings include the West Coast Bank Building at the south end of Broadway Street, which is predominately office with condominiums; the County Public Service Building on Franklin Street, which is governmental offices; the Cinema 12 Complex at the south end of 'C' Street, which is entertainment/restaurant retail; the Lewis and Clark Plaza at the south end of Broadway, which is residential; and the Anthem Park condominiums and apartment buildings at the north end of Main Street, which is predominately residential with ground floor retail and work/live units.

Existing Land Uses

Although there are a mix of land uses throughout the City Center, three areas can be identified by land use: the central business/commercial district to the north and east; the government/office district to the northwest; and the industrial district, which includes the waterfront properties (Red Lion Hotel, Boise Plant and others) to the south and west.

Business/Commercial District

The business/commercial district is generally located from Fourth Plain Boulevard south along Main and Broadway Streets at McLoughlin Boulevard the area expands east to the I -5 freeway and west to Esther Street and continues south to 3rd Street. A majority of the businesses in this district are pedestrian oriented with most of the

buildings built to the sidewalk, on-street parking is available, and the number of drive-through businesses are minimal. Two gas stations are located in the Plan Area.

There are two distinct areas within the larger City Center business/commercial district. The northern portion located north of Mill Plain fronting Main and Broadway Streets has an old "Main Street" downtown environment. The area consists of mostly older one story buildings with distinct characteristics. Anthem Park, a new mixed-use development on Main Street provides apartments, attached townhouses, retail and a small courtyard public park. Most of the buildings front the streets, however there are a few blocks with surface parking lots in front and to the side of existing businesses. A lively mix of commercial/office uses are found including, restaurants, coffee shops, antique stores, other specialty retail, dance studio, auto repair shops, banks and professional offices. Older, single-family residential neighborhoods surround Main and Broadway Streets. On-street parking and some surface parking lots are available. The scale of the buildings, the existing retail/office uses, the on-street parking, and the surrounding single-family residential neighborhoods all contribute to the general pedestrian feel of the area.

The southern portion of the business/commercial district displays the most compact and dense urban form found in the City. The south leg of Main Street is historically Vancouver's financial and commercial guarter. Older, two to eight-story buildings dominate with a few buildings reaching heights of 10 to 15 stories. The City government buildings are located in this southern district. Parking is accommodated with structure, surface and on-street parking. The newer portion of this urban core includes the redeveloped Esther Short Park , the newly built Mixed-Use (MX) buildings surrounding the park, and the Conference Center Hotel, as well as the new West Coast office/residential building located at the south end of Broadway and the Cinema 12 Complex at the south end of 'C' Street. A wide range of office and commercial uses are located in this district. Service businesses include banks and other financial services, a hotel, a couple economy motels, dry cleaning, funeral homes, athletic clubs, spas, and a variety of other businesses and professional offices. The retail uses include restaurants, coffee shops, taverns, furniture stores, pawn shops, gift shops, specialty clothing and shoe stores and other specialty retail. A year-round outdoor farmer's market is located on Esther Street adjacent to Esther Short Park. The Spring-Summer market is open Saturday and Sunday and offers a multitude of choices in food vendors, fresh vegetables and fruits, specialty foods, flowers, and arts and crafts. The Fall-Winter indoor farmer's market is much smaller and at this time includes food vendors, vegetable, fruit and flower stalls, specialty foods and arts and crafts.

While housing is a minority land use in the City Center, three new residential structures are located adjacent to Esther Short Park. Two of these new buildings, the Vancouver Center Towers and the Esther Short Commons offer a mix of condominiums and apartments and the Heritage Place building offers condominiums. The Smith Tower, Evergreen Hotel and Fontina Apartment building provide senior and low-income housing. The owner of the Historic Academy Apartments renovated the building into condominiums. The Lewis and Clark Plaza is a new residential apartment building located on the south end of Broadway. Penthouses are located on the tops of several of the office buildings.

Government/Office District

The government/office district is generally located west of Esther Street, south of Mill Plain, north of the railroad track and berm, and west of Kauffman Street. This area contains many government buildings including the Clark County Public Service Building and parking structure, the Clark County Court House, the Clark County Sheriff and new crime lab buildings, the Clark County Juvenile Center, and numerous other County government buildings. Other government buildings include the Federal Building, Post Office, and the City Esther Short Building. *The Columbian* Newspaper offices and printing presses are located on the corner of 6th and Esther Streets. The Vancouver Plaza for senior housing and the old brick Beverly Court Apartments are located in this area. And several owners converted old and historic two story houses to professional offices, and bed and breakfasts.

Industrial District

The industrial district is generally located in an area bounded by Kauffman Street to the east, Mill Plain to the north, the Columbia River to the south and the railroad yard to the west. There are two distinct industrial areas within this larger district. The light industrial area is mostly located in the eastern portion and the heavy industrial area is mostly located in the west and south of the larger area. The land uses in the light industrial area are either zoned Light Industrial (IL) or have a City Center zone and a Light Industrial Overlay. The Light Industrial Overlay area is made up of a hodgepodge of uses including, new affordable housing developments, old apartments, many single-family residents, retail shops, restaurants, warehousing, storage, distribution, manufacturing, vacant parcels, large underutilized parking lots, and vacant buildings. Heavy industrial uses include the railroad yards, the Albina tank farm, Vericast, and the old Boise Cascade plant located on the Columbia River waterfront.

Vacant and Underutilized Land

The Vancouver City Center is almost fully developed, with little vacant land. The existing vacant parcels are mostly located in three areas: a northeast cluster, a south central cluster, and a western cluster.

- The northeast cluster is predominately single-family residential dwellings with a mix of residential and small business uses. Vacant lots are scattered with no apparent pattern amongst the existing built lots. This northeast cluster is zoned MX and Medium-Density Residential (R-22).
- The south central cluster is south and southwest of Esther Short Park. The area is predominately old one- and two-story commercial/office buildings with a newly built eight-story conference center hotel and a proposed ten-story office building. Most lots available in this area are underutilized surface parking lots. This south central cluster is zoned City Center (CX).
- The western cluster lies within the heavy and light industrial area of the City Center. The Burlington Northern Santa Fe (BNSF) Railroad yard lies within the industrial area and there is a mix of heavy industrial uses, and light industrial uses such as warehousing, storage and distribution, as well as some residential and commercial uses. There are many underutilized lots and several vacant lots scattered throughout the area. The old Boise Cascade Plant, which is for sale and slated for redevelopment is located within this

area. The area is zoned with a mix of IH (Heavy Industrial), IL and CX with a Light Industrial Overlay.

Most of the development potential in the VCCV is in redevelopment on underutilized parcels (land parcels with a land value greater than the improvement or building value). Much of the underutilized parcels are existing surface parking lots. The Boise Cascade Complex located on the Columbia River waterfront is the largest underutilized parcel (approximately 30 acres) in the VCCV. Approximately 100 acres of underutilized and vacant land is available for redevelopment in the VCCV.

Connections to the Vancouver City Center and the Waterfront

The BNSF railroad berm separates the majority of the City Center from the Columbia River waterfront. Pedestrians and motorists may access the Columbia River waterfront on Columbia Street. Only the existing Red Lion Hotel/Restaurant and Terminal One/Vancouver Landing, just west of the Red Lion, provide close-up, visual access to the Columbia River's waterfront. The remaining and major portion of the City Center waterfront is devoted to heavy industrial land uses. Three major landowners own the property along the City Center waterfront, the Port of Vancouver owns the eastern portion with the Red Lion Hotel and Terminal One/Vancouver Landing; Boise owns the large central portion, which has older plant buildings that are no longer in use and a few office and storage buildings used only for goods distribution; the La Farge (located at the western boundary) is an active cement storage and distribution enterprise. The railroad berm, heavy industrial uses, and vacant industrial buildings continue to separate the Vancouver City Center from its waterfront.

Maximum Building Heights and Significant View Corridors

The existing maximum building heights and protection of view corridors to significant buildings and areas were initially set in 1985 with the adoption of the Downtown Comprehensive Plan. It contained provisions for setting different maximum building heights in each area of the downtown commercial zone. The provisions set for maximum building heights included protection of the scale of development adjacent to and preservation of view corridors to identified significant buildings and areas (the Academy, St. James Church, Esther Short Park and the Court House); to maintain the old town nature of the south downtown between 11th and 5th Streets; to take a step back approach surrounding Esther Short Park; and to include buffer areas adjacent to residentially zoned areas on the northern border of the downtown. These provisions remain today except for one significant additional provision, the building height limitations set forth by the Federal Aviation Administration (FAA).

Since 1985, the City, to allow for additional development, adopted amendments to increase the maximum building heights in certain areas of the downtown. However, the City's existing maximum building height map showing these increased building heights is mostly unattainable. The heights shown on the existing map (Figure 7-9) are unachievable because of existing Federal Aviation Administration height restrictions based on the nearby Pearson Airpark.

Surrounding Land Uses

Surrounding the Plan Area are three major land uses (Figure 7-1). To the north are the older, historic single-family residential neighborhoods of Hough, Carter Park,

Arnada, and Shumway. The nearest grocery store to the Planning Area is a Safeway located approximately ³/₄ of a mile north of the most northerly boundary of the Plan Area. To the east of Interstate 5 is the publicly owned Vancouver Historic Reserve with Officers Row, the Fort Vancouver National Historic Site and Pearson Airpark. To the west and south are BNSF Railroad yards and heavy industrial land uses in the Port of Vancouver.

Population, Housing and Employment

Within the boundaries of the Plan Area, approximately 353 dwelling units are owner occupied and approximately 647 dwelling units are rentals, which house approximately 1800 persons. Nearly all the existing housing in the VCCV is multidwelling units. Washington Employment Security Department estimates that 5,660 employees work within the City Center. Based on the existing zoning the City of Vancouver's Growth Management Comprehensive Plan assumed approximately 1,930 new residential units housing approximately 3,088 new residents, and approximately 7,705 new jobs of which nearly half are retail jobs. The preponderance of jobs in the Vancouver City Center directly contributes to the area's "lively" atmosphere during working hours and "dead downtown" atmosphere at night and on weekends.

Comprehensive Plan Land Use and Zoning Designations

Vancouver City Center Vision

Implementation of a Subarea Plan for the Vancouver City Center is part of the urban center concept defined in the Community Development Chapter of the Comprehensive Plan. The objective of this concept is to promote full development of the identified "centers" with jobs, housing, retail and a range of services and recreation. Comprehensive Plan policies provide the means to develop a City Center that combines the best aspects of a traditional central business district with current and future trends in transportation, shopping, employment and living. Residents and employees in the Center would have access to employment, shopping, transportation systems and City services. At the same time, it would allow the City to accommodate new residents who are expected to move to Vancouver City Center in the coming years while maintaining the single-family character of existing neighborhoods. Realizing the "urban center" concept is one of the major elements of implementing the Vancouver Comprehensive Plan.

Land Use and Zoning Codes

The majority of the Plan Area is designated and zoned as CX and has been since adoption of the Esther Short Redevelopment Plan in 1998. The western and southern part of the Plan Area is designated and zoned IH, which is the second largest area of zoning. The third largest is Community Commercial (CC) located from McLoughlin Street north along Main and Broadway. Other designations and zones found in small pockets in the Plan Area are IL, MX, and R-22. Refer to (Figure 7-1) for current zoning.

The intent of these designations as described in the Vancouver Land Use & Development Code are listed below.

• CX zone - Specific to Downtown Vancouver the CX zone is designed to provide for a concentrated mix of retail, office, civic and housing uses in downtown Vancouver. The broad range of allowed uses is intended to promote

Vancouver as the commercial, cultural, financial and municipal center of Clark County. Typical uses include, but are not limited to retail sales; hotels/motels; restaurants, professional offices; educational, cultural and civic institutions; public buildings, commercial parking; and housing.

- CC zone The CC zone is designed to provide for retail goods and services purchased regularly by residents of several nearby neighborhoods. The zone also accommodates offices, institutions and housing located above the ground floor.
- IL zone The IL zone provides appropriate locations for combining light, clean industries including, industrial service, manufacturing, research/development, warehousing activities, general office and limited retail. These activities do not require rail or marine access and have limited outdoor storage.
- IH zone The IH zone provides appropriate locations for intensive industrial uses including industrial service, manufacturing and production, research and development, warehousing and freight movement, railroad yards, waste-related and wholesale sales activities.
- R-22 zone The R-22 zone is designed to accommodate row houses, gardentype apartments, and lower-density multi-dwelling structures at a minimum lot size of 1,500 square feet per unit. Professional office uses are permitted under certain circumstances. Some retail, civic and institutional uses are allowed conditionally.
- MX zone The Mixed-Use zone is intended to provide the community with a mix of mutually supporting retail, service, office, light industrial and residential uses.

Other Vancouver Development Codes

Downtown Plan District (Chapter 20.630)

The Downtown Plan District includes regulations governing six different issues identified as important to maintain and enhance a quality urban form, an economic vitality and the pedestrian environment of the downtown (Figures 7-3 through 7-10). The regulations include:

- Building Lines (20.630.020): The goal of this district is to maintain and enhance urban quality, by preventing the sense of loss of enclosure or continuity of display windows, and to afford protection from weather by creating mandatory build to lines of zero feet along key area streets in the downtown area.
- Rain Protection (20.630.030): The goal of this district is intended to provide weather protection for pedestrians circulating the area by requiring ground floor facilities to place sidewalk protection along store frontages.
- Blank Walls (20.630.040): This district is intended to protect the public health, safety, and welfare, and encourage pedestrian traffic in the downtown area by discouraging blank walls at the pedestrian level.
- Maximum Building Heights (20.630.050): The goal of this district is to comply with Federal Aviation Administration regulations, to meet historic preservation goals including preservation of architectural character, to protect adjacent residential neighborhoods, and the preservation of view corridors.
- Parking Control (20.630.060): This district is intended to prevent disruption
 of pedestrian circulation; to provide for smooth traffic flow; to prevent
 excessive use of downtown land for parking; to incur the most efficient
 provision of parking facilities; to preserve the continuity of retail use and
 building frontage in the downtown shopping area; and to protect the public
 health and safety.

• Light Industrial Overlay (20.630.070): This district is intended to accommodate and preserve existing uses in the southwest area of downtown Vancouver while promoting a harmonious transition from an industrial to a mixed-use area.

Overlay Districts

- Noise Impact Overlay District (20.520): This district allows those living and working in the area of the district to understand the levels of ambient aircraft, railroad, and traffic noise. All regulated structures within the district shall be constructed with sound insulation or other means, which are rated to provide a noise reduction sufficient to achieve a day/night average interior noise level of 45 Ldn.
- Transit Overlay District (20.550): This voluntary district is designed to improve mobility by creating pedestrian and transit-friendly development through appropriate land uses. The establishment of residential densities and development regulation associated with this district will help to encourage high density and more transit-friendly urban design .
- Vision and Airport Height Overlay District (20.560): This district restricts the height of structures that would obstruct the view from designated residential slopes or obstruct navigation of aircraft into or out of the Pearson Airpark
- Historic Preservation Overlay District (20.510): This district is intended to
 preserve the special architectural character and/or historic or cultural
 significance of certain areas within the City by ensuring that new development
 is compatible in scale, character, and design with existing buildings; by
 encouraging the restoration of existing older buildings; and by retaining
 unique historical, cultural, and architectural environments attractive to
 residents and to visitors.

Parking and Loading

The City of Vancouver Land Use & Development Code, Chapter 20.945, Parking and Loading regulate parking requirements in the Plan Area. These requirements specify the number of parking spaces per land use, e.g., residential uses require one space per dwelling unit, transient lodging accommodations require one space per living unit, congregate care facilities require one space per two living units, and all other uses require one space per 1,000 square feet of floor area.

Dimensional Standards

Chapter 20.430.040 defines the setback requirements for building in the CX zone and CC zone to be a zero setback.

Tree Conservation and Street Tree Ordinances

The City of Vancouver Tree Conservation Ordinance, Chapter 20.96 requires a tree planting plan when removal of existing trees occurs, or ground is disturbed. A list of prohibited street trees, as well as procedures for removal of street trees are referenced in Chapter 12.04, Street Trees and Chapter 20.83 requires that there will be a minimum of one street tree for every 30- feet of street frontage.

Archaeological Resource Protection

The City of Vancouver Archaeological Resource Protection, Chapter 20.710 requires a predetermination when the existence of an archaeological site within a disturbance

area is probable. An archaeological site is probable within the Predictive Model Probability Level A; or when a site is at least 5 acres in size and is within the Predictive Model Probability Level B; or when the disturbance area is proposed within ¼ mile of a known, recorded archaeological site; or when any item of archaeological interest is discovered during ground-disturbing action; or when the Planning Official determines that reliable and credible information indicates the probable existence of an archaeological site.

Shoreline Management Area

The City of Vancouver Shoreline Management Area, Chapter 20.760 purpose is to implement the policies and procedures set forth by the Shoreline Management Act of 1971, as amended, and all applicable provisions contained in the Washington Administrative Code. The City's Shoreline Management Master Program regulates property within 200-feet of the Ordinary High Water Mark or the 100-year floodplain of the Columbia River within the VCCV. Refer to the Natural Environment Chapter.

Site Plan Review

The City's Land Use & Development Code, Chapter 20.270 requires a site plan review prior to the issuance of building permits, establishment of any new uses, or commencement of any site work. Site plan review provides guidelines to insure that development is compatible with the surrounding environment.

Design Review

The City's Land Use & Development Code, Chapter 20.265 regulates the design review process for architectural and design review of new construction and exterior improvements to buildings and developments in the downtown by the City's Design Review Committee, composed of architects, landscape architects and other design professionals, prior to or in conjunction with a formal land use approval. Figure 20.265-1, Design Review Boundary shows the physical boundaries of the area Chapter 20.265, Design Review regulates.

Downtown Design Guidelines

The City of Vancouver downtown Design Guidelines Manual was adopted by the City council in December of 1995 to define the character of the downtown area. Although this document is used by the City of Vancouver Project Review Committee in reviewing the design of the Plan Area, the guidelines are applied as recommendations for design in the downtown area. Projects must comply with the objectives of the City of Vancouver Zoning Ordinances and the Growth Management Plan. The Downtown Design Guidelines provide recommendations on the following: site design, building forms and appearance, weather protection, pedestrian amenities, landscaping, parking, and signs.

POTENTIAL IMPACTS

PROPOSED ALTERNATIVE

The VCCV would be adopted under the Proposed Alternative. It provides direction for new business and housing developments in the identified districts of the Plan Area. At full development, the Proposed Alternative would provide approximately 4,551 new dwelling units, 7,281 more people, and 9,405 new jobs. Most of the assumed

new growth will occur through redevelopment of underutilized lands including the Boise property and many of the existing surface parking lots. Development assumptions are shown in Chapter 2, Table 2-1 and 2-3. The VCCV indicates the types of preferred uses that could be developed and allows for flexibility in type of development. The City Center zoning district designation, which would be retained and expanded, the IH, IL, and CC zoning district designations and the City's existing development regulations, will determine specific uses permitted.

The majority of the Plan Area is designated and zoned as CX and has been since adoption of the Esther Short Redevelopment Plan in 1998. The Proposed Alternative rezones four areas within the VCCV. As identified in Chapter 2, Figure 2-2, Area 1 and 2 changes to CX zone from R-22 and MX and IH. Area 3 changes to OCI from IH and in Area 4 the Light Industrial Overlay is removed to reveal the underlying CX zone. The change to OCI will allow new clean light industrial uses, the existing clean light industrial uses to remain and if desired to expand according to VMC 20.440.030. The existing heavy industrial uses as identified in Table 7-1 will become legal non-conforming uses and new heavy industrial uses would not be allowed. The lifting of the Light Industrial overlay in Area 4 will reduce the likelihood of this area redeveloping into an industrial area; however, the City Center Mixed Use zone does allow limited light industrial uses. Table 7-1 identifies two existing industrial uses that would become legal non-conforming uses after the overlay is removed. The other uses in the proposed Area 4 rezone may continue under the City Center Mixed Use zone.

The Proposed Alternative includes a mixed-use pattern with a balance of residential and job producing land uses, supporting commercial and retail, public spaces, and new streets and infrastructure. It contains a broader mix of uses than the No Action scenario, emphasizing residential development and jobs and providing tools to encourage and implement redevelopment as key to City Center vitality. The Plan calls for the redevelopment of the waterfront and the improvement of the Main Street Corridor and its connections as a central spine that will establish downtown as a regional center for commerce, culture and urban living. The Plan more specifically promotes the City Center and its corridors to cohesively develop under a unified vision and adopted implementation tools then does the No Action Alternative.

Proposed Land Uses

Implementation of the Proposed Alternative would result in the incremental displacement and redevelopment over time of underutilized properties within all the districts of the Plan Boundary.

The Proposed Alternative anticipates significant public investment in the Plan Area, which will, in turn, stimulate increased private development. The anticipated public and private physical improvements to the character of the Plan Area include:

- Redesign and improvements to Main and Broadway Streets
- Connect downtown with the Vancouver National Historic Reserve via a 7th Street (Heritage Way) pedestrian bridge
- Extend Esther Street south of the BNSF railroad berm to intersect with new connector street
- Consider Grant Street for improvement and extension to south waterfront
- Improve and preserve Franklin as an arterial street
- Relocate 4th Street to be adjacent to the BNSF railroad berm

- Evaluate options for relocating the 7th Street Transit Center
- Improve Columbia Street multi-modal capacity
- Improve and extend Jefferson/Kauffman south to waterfront

Implementation of the VCCV, in conjunction with cumulative development would contribute to an intensification of residential, office and commercial uses within the Plan Area and may alter the existing character. Extension of existing design standards and guidelines as well as the development of new waterfront design standards would mitigate growth impacts. In addition, a Main Street Rediscovery project now in development stage will articulate through street design and a retail strategy, specific measures to support a quality, active, pedestrian, urban retail environment.

In the near term, the adoption of the VCCV would result in the rezone of four identified areas; Area 1 is located in the Uptown Village District, Area 2 and Area 3 are located in the Columbia West Renaissance District and Area 4 is located in the West Government District. See Figure 2-2 for the location of the rezone areas. Each of the area rezones implement VCCV policies and the City of Vancouver Land Use & Development Code will provide the zoning guidance for land use redevelopment.

Area 1 - R-22 and MX Zones to City Center Zone

The Proposed Plan would rezone the R-22/MX cluster in the Uptown Village District to CX allowing redevelopment in an area now difficult to develop because of the hodgepodge zoning and small parcel pattern. Nearly seven acres of underutilized and vacant lands are located in this area, and the probability of lot consolidation to develop a cohesive project is minimal. The rezone to CX meets the intent of the existing zones (R-22 and MX) and provides the potential for a more cohesive, vibrant-urban development by creating a consistent zone that allows medium- to high-density residential, retail, commercial and office uses under one set of zone regulations. The rezone of the Residential (R-22) properties to City Center (CX) zone will require a Comprehensive Plan designation change from an Urban Medium designation to a Commercial/Mixed Use designation (Figures 2-1 and 2-2). Within the Uptown Village District, the proposed Maximum Building Heights Map limits building heights permitting redevelopment more in keeping with the existing Main Street, Broadway Street and Arnada Neighborhood character. Development in accordance with the VCCV proposed City Center (CX) zone, the step-away building height approach and height limit, and the existing Downtown Design Guidelines would allow this area to redevelop in a manor sensitive to the adjacent neighborhoods.

Area 2 - IH Zone to CX Zone (Waterfront redevelopment)

The Proposed Plan Alternative (VCCV) identifies Vancouver's waterfront as a key development opportunity. Boise (formerly Boise Cascade) is one of the largest property owners on the waterfront along with the Port of Vancouver. Boise recently initiated a bid process to sell its approximately 30 acres of property for redevelopment. On the Boise site, the heavy industrial lots and buildings lie vacant and underutilized separating the City Center from the Columbia River waterfront. The CX zone will allow urban-density residential and professional office, businesses, and clean light manufacturing industries that are family-wage employment generators. This diverse mix of uses and proposed connections along the Columbia River waterfront would allow the opportunity to create an attractive, active, vital City

riverfront with urban residential and employment densities. The redevelopment of the Boise property would enhance the River's shoreline, create active and passive public spaces and pedestrian and vehicle connections, and invigorate the City Center economy with the addition of City Center residences and jobs. To assure this intense, attractive, connected, quality urban form that the Proposed Plan (VCC) envisions for the waterfront redevelopment, a master plan process and waterfront development standards are needed.

The rezone from Heavy Industrial to City Center Mixed Use will require a Comprehensive Plan designation change from a Heavy Industrial designation to a Commercial/Mixed Use designation. A key requirement of the City's "no net loss" policy restricts 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 annual review cycle that would compensate for the lost capacity or unless the proposed change would promote the long-term economic health of the city." An analysis completed by the Leland Consulting Group, April 28, 2006 (Appendix A) shows that the employment capacity and wage impacts of a zone change from Heavy Industrial (IH) to City Center (CX) does not only represent a major new investment in downtown, but it will have significant positive impacts to the employment and wage capacity of Vancouver. The analysis summarizes that, "the total employment capacity of the site will increase by over 460 jobs, assuming a build out that is heavily focused on housing. If more offices were built instead of housing, the increase in jobs would be even higher. Those jobs pay well and are in the family-and high-wage categories that the City desires, increasing the total wage capacity of the site from \$16 million to over \$40 million per year. Thus, the proposed change supports the City's "no net loss" policy and other economic development goals" and no adverse impact is expected.

Because of the former use of Area 2 (Boise Plant), the potential for contaminated soils exist. This issue will be addressed during development of individual projects.

The City Center waterfront properties are near the BNSF Railroad, Columbia River Interstate-5 Bridge and the flight pattern of the Pearson Airport. Potential noise impacts and mitigation measures are addressed in Chapter 5, Noise.

The result of Area 2 zoned CX adjacent to Area 3 zoned OCI is not expected to create potential impacts, because OCI is restricted to less intensive industrial uses and prohibits outdoor storage and an existing drainage naturally buffers Area 2 from Area 3. However, the proposed rezones will present the opportunity for downtown uses to locate closer to an existing active industrial area, which is proposed to continue operations. Because the City Center Mixed Use allows a varied mix of uses including commercial and limited light industrial no potential impacts are predicted.

Area 3 - IH Zone to OCI Zone

Fewer heavy industrial uses are within this IH zoned area than non-heavy industrial uses. The area includes non-industrial uses such as a credit union, an old vacant restaurant building and vacant lots, light industrial uses of warehousing, distribution and business center, and heavy industrial uses such as Albina Fuel and small auto repair shops. These existing heavy industrial uses (3 properties) would become legal nonconforming uses under the Proposed Plan and would be regulated under VMC20.930, Nonconforming Situations (Table 7-1). The OCI zone would allow most of the current uses without creating non-conforming status, promote redevelopment

and businesses with higher job ratios, and act as a transitional zone between the proposed CX zone to the south and east and the railroad tracks and IH zone to the north and west. Development in accordance with the VCCV will enhance the long-term redevelopment of these parcels as well as connectivity to the waterfront. Because of the existing and former use of portions of the area, the potential for contaminated soils may exist. This issue will be addressed during development of individual projects.

Area 4 - Light Industrial Overlay

The Proposed Plan would remove the Light Industrial Overlay from 8 city blocks within the West Government District. The purpose of the Light Industrial Overlay (20.630.070) is to accommodate and preserve existing light industrial uses in the southwest area of downtown Vancouver while promoting a harmonious transition from an industrial to a mixed-use area. The transition is well underway with multifamily housing developments, a mixed use development of residential and commercial uses, and the renovation of an existing commercial building. The majority of uses in Area 4 are single-family residences, apartments, new multifamily housing and vacant lots. Two properties would acquire a legal non-conforming status due to the lifting of the Light Industrial Overlay (Table 7-1). The CX zone does not disallow industrial uses but rather limits it to cleaner industrial uses and requires a conditional use permit for certain industrial uses. Removing the IL Overlay would permit the CX zone outright and allow the underutilized parcels to redevelop under the urban densities and diverse mixed uses of the CX zone, while the few remaining industrial uses can continue under the legal non-conforming status. The removal of the IL Overlay would encourage the full transformation of Area 4 to an urban mixed-use area.

Population and Employment

Over a 20-year period, the Proposed Plan is expected to result in development of 4,551 residential units housing approximately 7,281 additional residents. The Proposed Plan is also expected to increase employment by providing opportunities for approximately 9,405 new jobs. Although development in accord with the VCCV will result in more residents living and working in the City Center than in the No Action Alternative, the increase should have less impact. The VCCV development goals call for more family-wage jobs, less retail jobs, and more households than the No Action (Table 2-2). This shift from retail jobs to other professional jobs and the increase of residents will reduce traffic trips, encourage walking and public transportation and should result in a lively "24 hour" City Center where people can walk to shopping, recreation and work.

Housing and Commercial Uses

The development goals for each of the six districts identified in the Proposed Plan include a mix of housing and commercial uses. As previously indicated, the Proposed Alternative is expected to provide approximately 4,551 new dwelling units in the Plan Area. In order to provide sites for the new housing, some existing residents may be removed as market conditions change and new developments occur. For example, some existing homes may be removed when Area 1, the cluster of existing R-22 and MX zoned parcels in the Uptown District is rezoned and redeveloped and the Light Industrial Overlay is removed from the 8 blocks located in the Westside Government District in accordance with the VCCV. However, the rezone to CX would permit many more housing units to develop, allow a mix of commercial, professional and public services to serve the increased urban density, and foster infrastructure investment. The rezone of the waterfront in the Columbia West Renaissance District will permit urban residential densities and commercial mixed use development, foster infrastructure investment and the development of a public trail and public spaces along the Columbia River waterfront now an area burdened with old vacant and underutilized industrial buildings and a deteriorated shoreline.

The entire Plan Area expects approximately 2,425,000 square feet of new commercial space with the bulk of the commercial space located in the Esther Short District where the new *Columbian* newspaper building will be located and the Central Downtown District where lifestyle retail and mid-rise office buildings are expected to develop. The Proposed Plan is designed to accommodate this additional urban development, and no adverse impact is expected.

Connectivity to the City Center and the Waterfront

Implementation of the Proposed Plan Alternative (VCCV) will reconnect the City Center to its waterfront. The guiding principles, goals and policies of the VCCV are consistent with the City endorsed (1992) Columbia River Renaissance Document vision, which aims to restore the connection between community and river through a vision for Vancouver's waterfront. The vision calls for three primary goals:

- Develop an attractive, vital and safe urban waterfront,
- Facilitate public access and enjoyment of the Columbia River; and,
- Preserve, promote and interpret the historical and environmental resources of the Columbia River.

Similarly, the VCCV focuses waterfront redevelopment on residential uses supported by significant public access, recreation, cultural, hospitality, entertainment and commercial uses. The VCCV includes a street grid pattern extending to the waterfront; improvements and extensions of several streets including Columbia, Esther, Grant, and Jefferson Streets penetrating the railroad berm and connecting the City Center with its waterfront; a trail as part of the Vancouver Historical Reserve, along Evergreen Street to Columbia Street, then south to the waterfront; waterfront development to include public open spaces and extension of the Columbia River trail west through the new City Center waterfront development; a series of proposed public spaces and plazas from Esther Short Park south along Esther Street acting as a strong pedestrian connection to the waterfront. These elements of the VCCV Subarea Plan (trails, streets, and public spaces) will improve connectivity to the City Center, Columbia River waterfront and Historic Reserve areas. Development in accordance with the VCCV will enhance long-term connectivity. To assure consistency with the Columbia River Renaissance Document and the Proposed Plan (VCCV) and to restore the connection between community and river, a master plan process and waterfront development standards should be established for the redevelopment of the waterfront.

Maximum Building Heights and view corridors

The proposed amendment to 20.630.050, Maximum Building Heights lowers building heights: to reflect the Federal Aviation Administration Regulations Part 77; to implement plan goals and policies for historic preservation, including preservation of architectural character; and to protect adjacent residential and commercial neighborhoods, including compatibility in scale and character. Furthermore, the proposed amendment expands the maximum building heights regulation boundary to include the full VCCV plan boundary. Development to the Proposed Alternative's

maximum allowable building heights will implement the above listed goals and continue to protect the scale of adjacent development and view corridors of earlier identified significant buildings and areas (the Academy, St. James Church, Esther Short Park and the Court House) and the existing limited views of the Columbia River from some building's upper floors. Existing views over now vacant development blocks may be interrupted by new development.

While the proposed amendment lowers building heights in nearly all circumstances, in a couple of locations building heights are increased. These increased areas include the waterfront area changing from 40 feet to 60 feet; the blocks south of Evergreen between 'C' Street and I-5 changing from 75 feet to 150 ft; and the 2 blocks bounded by McLoughlin, 16th Street, Washington and Columbia changing from 50 ft to 75 ft. These increased heights were determined when considering the purpose and goals of the Maximum Building Heights regulation; therefore, no potential impact is predicted. Some of the heights allowed in accordance with the existing map (Figure 7-9) exceed FAA standards. Although the proposed building heights map and airport overlay make a significant improvement in accurately depicting the airport surfaces consistent with Federal Regulation 49 CFR part 77, some heights on the existing map are already consistent with FAA standards.

The proposed building height limitations continue to provide for a "stepping away" approach as does the existing code, as well as protection of identified view corridors to significant buildings and areas. The proposed building height limitations, unlike the existing code, provide a more sensitive "stepping away" approach by lowering heights in several areas of identified significance such as the Main Street Corridor, Esther Short Park, adjacent residential neighborhoods, and significant historic buildings. In addition, unlike the existing maximum building heights map the proposed lower height limitations are attainable under FAA regulations. A few existing buildings would become legal nonconforming structures under the Proposed Plan's maximum building heights and would be regulated by VMC20.930, Nonconforming Situations.

Comprehensive Plan Land Use and Zoning Designations

City Center Vision

The VCCV policies aim to promote people living and working in the City Center. Based on the success of the 1998 Esther Short Subarea and Redevelopment Plan and through the participation of many stakeholders, the VCCV will foster and guide continued growth of the approximate 130-block City Center. Since vacant land is in short supply, the City expects that most of the new growth will occur from redevelopment. The vision is to cultivate a diversity of new uses that will complement those that exist and, at the same time, serve the resident, and working and visiting populations in and adjoining the City Center. The Proposed Plan promotes residential development and jobs as key to a vital and attractive City Center and focuses on connections to the waterfront and adjacent areas.

The Proposed Plan develops a land use pattern, which is supportive of a variety of transportation options, including transit, automobile, pedestrian, and bicycle facilities. This will help to fulfill one of the goals of the Growth Management Plan to reduce reliance on the motor vehicle and the single-occupancy vehicle in particular. The plan promotes redevelopment of underutilized parking lots and underutilized structures in the Plan Area to commercial, residential, or mixed-use facilities.

In May of 2004, the City adopted an update to the existing Visions for the Vancouver Comprehensive Growth Management Plan. The proposed VCCV policies consistent with the goals of the Comprehensive Plan enhance urban centers and corridors, establish connectivity within the center and other areas, and invest in public facilities.

Land Use and Zoning Codes

The Proposed Plan recommends amendments to the CX and CC zones to allow residential uses on the ground floor. This recommendation implements the Proposed Plan policies, in particular the policy to "encourage residential development as the key to City Center vitality. In the case of the CX zone, ground floor residential is allowed with one exception, properties fronting Main Street between Sixth Street and Mill Plain of which ground floor residential is prohibited to preserve and encourage Main Street retail activity. The CC zone would allow ground floor residential on properties fronting Broadway Street only, again preserving Main Street ground floor for retail activity. These amendments are tools to implement the goals and policies of the Proposed Plan and have no adverse impact.

Other Vancouver Development Codes

To implement the Proposed Plan's goals and policies the VMC for the Downtown Plan District, 20.630 would change to extend into all or portions of the VCCV plan area, the Building Lines (20.630.020), Rain Protection (20.630.030), Blank Walls (20.630.040), Maximum Building Heights (20.630.050) and Parking Control (20.630.060), refer to Figures 7-3 through 7-10. Each of these regulations are intended to maintain and enhance the urban guality, economic vitality and pedestrian environment of the City Center, including preventing the loss of the sense of enclosure, enhancing the continuity of display windows, and providing weather protection. For additional discussion on Maximum Building Heights and View Corridors see the above discussion under the heading Maximum Building Heights and *View Corridors*. The proposed amendment to 20.630.060, Parking Control not only extends the parking control boundary area (refer to Figure 7-7) but clarifies the existing regulations by clearly distinguishing the three areas of parking regulations within the Central Downtown and Esther Short Districts. For a complete discussion of existing conditions, potential impacts and mitigation measures for parking refer to Chapter 11, Parking.

In addition, the Proposed Plan will amend the boundaries on the following regulatory maps to assure that the VCCV complies with existing regulations: the boundary maps for the Airport Height Overlay District (20.560), Noise Impact Overlay District (20.520), Design Review 20.265, and Downtown Design Guidelines Manual. The amendments to the Airport Height Overlay District (Figures 7-11 and 7-12) explain both in text and visually the surface zones and regulations of the Federal Aviation Administration, guiding allowed construction heights in the City Center. The amendment to extend the existing Noise Impact Overlay District is based on the noise studies completed and discussed in Chapter 5, Noise. The extension of the Downtown Design Guidelines and Design Review boundaries will assure the maintenance and enhancement of urban quality, economic vitality and pedestrian environments of the City Center. These amendments are tools to implement plan goals and policies and have no adverse impacts.

Related Projects

A related project the Gateway Project could potentially impact the waterfront redevelopment land use potential and the quality of urban environment in the western portion of the Columbia West Renaissance District area of the Plan. Identified impacts and mitigation measures from the Gateway Project will be discussed within the NEPA EIS prepared for the Gateway Project.

A related project the Columbia River Crossing could potentially impact the redevelopment of the waterfront, land use potential, and the quality of the City Center urban environment. Identified impacts and mitigation measures from the Columbia River Crossing Project will be discussed within the NEPA EIS prepared for the Columbia River Crossing.

NO ACTION ALTERNATIVE

Proposed Land Uses

Under the No Action, the City of Vancouver would not adopt a Subarea Plan or new implementing tools (zoning, code amendments) for the VCCV. The existing Comprehensive Plan Land Use and Zoning designations would remain unchanged. The type, form and amount of development would depend on market conditions and the situations and goals of individual property owners. Redevelopment would not be guided by a cohesive land use concept or plan, nor would it be focused or organized into districts with distinct character and focus.

Under the No Action the waterfront may eventually redevelop but not under the cohesive direction of a plan. The Boise Property would remain an underutilized 30 acres of IH zoned land located on the City Center waterfront. Without the adoption of the VCCV, pedestrian and vehicle circulation would occur incrementally and not as a cohesive plan to reconnect the City Center with its Columbia River waterfront.

A Comprehensive Subarea Plan with the following guiding policies would not occur.

- Residential development as the key to City Center vitality
- Focus waterfront redevelopment on residential uses supported by significant public access, recreation, cultural, hospitality, entertainment and limited commercial uses
- Encourage key support services, such as a full service grocery store and lifestyle retail center
- Encourage development within the west subarea of the VCCV primarily for government services complemented by residential, entertainment and cultural uses
- Recognize and encourage arts, cultural and institutional uses as critical to economic development in the City Center
- Strengthen the primary street connections to the waterfront
- Support a secondary connection to the waterfront
- Overcome the barrier like feeling of the BNSF railroad berm between downtown and the waterfront
- Provide improved access into the southern and western areas of the City Center
- Connect downtown with the Vancouver National Historic Reserve via a 7th Street pedestrian bridge

The planning framework for implementation of the VCCV would not occur.

- Blank walls to help protect the public health, safety, and welfare, and encourage pedestrian traffic
- Rain protection to provide weather protection for pedestrians circulating through the City Center core.
- Building lines to maintain and enhance urban quality, and prevent the sense of loss of enclosure or continuity of display windows
- Parking control to prevent the disruption of pedestrian circulation and the excessive use of downtown land for parking facilities by maintaining as much continuous building frontage as possible
- The Downtown Design guidelines would not cover much of the proposed VCCV
- The Maximum Building Heights would allow 200-foot buildings adjacent to existing established residential neighborhoods and many of the existing heights are noncompliant with the Federal Aviation Administration Part 77 regulations

Under the No Action Alternative, the existing VMC Maximum Building Heights code allows for heights unattainable based on FAA regulations and does not consider sensitivity toward historic preservation or protection of adjacent residential neighborhoods.

Capital improvement decisions would, in general, also occur incrementally, and it is not certain if or when park, street or pedestrian improvements would be made. In general, these facilities would likely respond to growth rather than trying to lead or frame it. Under the No Action, the City Center's visual and physical connectivity to the Columbia River waterfront would be limited. It is likely that the City Center would function and appear much as it does today, although some intensification of land use would occur.

Because of the former use of portions of the Plan Area for heavy industrial, the potential for contaminated soils may exist within the IH zoned lands of the Plan Area. This issue would be addressed during development of individual projects.

Population, Housing and Employment

Under the No Action Alternative, the existing Vancouver Comprehensive Plan growth totals for the downtown would be retained. These totals include a higher number of retail jobs (2,169), a lower number of other sector jobs (5,536), and a substantially lower number of residential units (1,930) than the Proposed Action. Impacts would occur incrementally, and no adverse impacts on population and employment are expected.

Vision for the Vancouver Urban Area

The No Action Alternative does not comply with the Vancouver Growth Management Comprehensive Plan Urban Center Vision. The Comprehensive Plan calls for the development of focused subarea plans for identified centers and corridors. Downtown Vancouver is one of those centers. A potential impact of the No Action Alternative is that a Downtown Subarea Plan is delayed or is never adopted. Without the focused Subarea Plan, the redevelopment of the Columbia River waterfront may not occur or at best be delayed for many years. Connectivity between the City Center and its waterfront may be confined to the very limited connection of today. Additionally, any redevelopment that occurs under the No Action Alternative will be completed in a "piece-meal" approach without the benefit of a cohesive Subarea Plan concept.

Compliance with Zoning Ordinances and Other Applicable Ordinances

Development in the Plan Area under the No Action Alternative is expected to comply with the City of Vancouver Land Use & Development Code. Therefore, no impacts or changes to the Code are expected.

MITIGATION MEASURES

PROPOSED ALTERNATIVE

With the adoption of the VCCV and a Planned Action Ordinance, the Proposed Alternative enables a planned approach for site redevelopment ensuring that the mitigation actions are consistent throughout the affected area and the policies of the Vancouver Comprehensive Plan and the VCCV are met.

Area 1 - Rezone

- The change to one cohesive mixed use zone City Center (CX) zone will allow an area of existing 'hodgepodge' zoning and small parcels to redevelop under one set of zoning regulations and provide for cohesive mixed use development, which meets the intent of the current varied zones of R-22 and MX.
- To reduce impacts to adjacent neighborhoods, expand and amend the Maximum Building Heights (20.630.050) to promote appropriate redevelopment compatible in scale to adjacent neighborhoods and include a transition zone of less intensity such as Community Commercial (CC) between the higher intensity City Center (CX) zone and the residential zone to the north.
- To assure the continuance of urban quality, economic vitality and pedestrian environments for new development in this area extend the Downtown Plan District design standards (20.630) of building lines and blank walls to include portions of Area 1
- Development applications will be subject to the Downtown Design Guidelines, the primary tool used by the Project Review Committee in reviewing the design of proposed projects
- Improvements to the public rights-of-way shall be required to comply with proposed Street Classification, Street Lighting Framework Plan, and appropriate street tree selection and spacing.
- Lighting improvements will be designed to limit glare
- Temporary construction impacts shall be limited by the following measures
 - Construction activity will be limited to between 7:00 a.m. and 7:00 p.m.
 - Noise impacts will not exceed the maximum permissible noise levels, as determined by WAC Chapter 173-60

Area 2 - Rezone

- The CX zone allows for much higher employment capacity and wage capacity than does the IH zone (Appendix A), *Leland Consulting Group Analysis*.
- To assure cohesive redevelopment, design and connectivity of the waterfront in the Columbia West Renaissance District require a master development plan, which incorporates a public access element, grid-street pattern, connections to the City Center and Renaissance trail, extends the principles of

the Downtown Plan District, and addresses the relationship between the east and west adjacent properties and uses.

- Establish design standards for the redevelopment of the City Center waterfront including the creation of public spaces and connections between the City Center and the waterfront.
- Extend the Columbia Renaissance Trail westward through the redeveloped City Center Waterfront.
- Applicable surveys and testing will be completed and submitted to the City of Vancouver for determination of action prior to construction of any development in the Plan Area to limit potential significant adverse impacts from hazardous materials
- Extend the Noise Impact Overlay District (20.520) to mitigate for noise impacts in this area. This district allows those living and working in the area of the district to understand the levels of ambient aircraft, railroad, and traffic noise. All regulated structures within the district shall be constructed with sound insulation or other means, which are rated to provide a noise reduction sufficient to achieve a day/night average interior noise level of 45 L_{dn} (refer to Figure 7-14).
- For a complete discussion of noise impacts and mitigation measures including train horn noise refer to Chapter 5, Noise.
- Enhance existing natural drainage with native landscaping to provide buffer and open space between Area 2 CX zone and Area 3 OCI zone.
- The City of Vancouver will work with the Port of Vancouver on any projects affecting rail access

Area 3 - Rezone

- This rezone from IH to OCI will reduce potential impacts of incompatibility with the adjacent CX Rezone (Area 2).
- Legal non-conforming uses created by this rezone are addressed by the City of Vancouver Land Use & Development Code 20.930, Non-conforming Situations.
- Applicable surveys and testing will be completed and submitted to the City of Vancouver for determination of action prior to construction of any development in the Plan Area to limit potential significant adverse impacts from hazardous materials.
- Extend the Noise Impact Overlay District (20.520) to mitigate for noise impacts in this area. This district allows those living and working in the area of the district to understand the levels of ambient aircraft, railroad, and traffic noise. All regulated structures within the district shall be constructed with sound insulation or other means, which are rated to provide a noise reduction sufficient to achieve a day/night average interior noise level of 45 L_{dn} (refer to Figure 7-14).
- For a complete discussion of noise impacts and mitigation measures including train horn noise refer to Chapter 5, Noise.
- The City of Vancouver will work with the Port of Vancouver on any projects affecting rail access.

Area 4 – Rezone

• Legal non-conforming uses created by this rezone are addressed by the City of Vancouver Land Use and Development Code 20.930, Non-conforming Situations.

To mitigate potential growth impacts based on the Proposed Plan policies of "messy vitality" and the revitalization of Main Street the city should develop and follow a Main Street Design and retail strategy to enhance the vitality and preserve the character of Main Street and its major connections. Additionally, as discussed in Chapter 8, Cultural Resources, the existing local Historic Preservation Overlay #2 should be extended as shown in (Figure 8-1).

The City of Vancouver should consider a requirement to consolidate existing news racks and boxes with a consistent color and style in the Central Downtown District.

To assure the continuance of urban quality, economic vitality and pedestrian environments for all development in the VCCV, extend the Downtown Plan District design standards (20.630) of building lines, rain protection, blank walls, parking control, and maximum building heights to include as shown on Figures 7-3 through 7-10.

The project review area of the Downtown Design Guidelines Manual for the City of Vancouver, adopted December 18, 1995 and the Design Review Boundary Figure 20.265-1 should be expanded to include the boundaries of the Vancouver City Center Vision Subarea Plan (refer to Figure 7-13).

The selection of tree species and the layout of trees on different streets is related to both the operation and desired character of a particular street. All redevelopment or new development within the Proposed Plan Alternative's boundaries should include street trees to emphasize neighborhood character and connectivity and desired character of a particular street. Species selection and tree spacing is to be coordinated with the city's Parks and Forestry Divisions.

The City of Vancouver should consider expanding the Esther Short Subarea and Redevelopment Street Lighting Framework Plan to include the boundaries of the Proposed Plan Alternative (the VCCV boundaries).

Waterfront

The Proposed Plan enables a planned approach for redevelopment within the Columbia West Renaissance District waterfront. To assure consistency with the Proposed Plan (VCCV) policies and the existing Columbia River Renaissance Document, to assure quality urban form, economic vitality, pedestrian environments, design continuity and connectivity to the existing City Center and all phased waterfront developments, a master plan should be required for any redevelopment of the Columbia West Renaissance District waterfront.

The principles of a street grid and the Downtown Plan District sub-sections 20.630.020, Building Lines; 20.630.030, Rain Protection; 20.630.040, Blank Walls; and Parking Control, 20.630.060 shall apply to any Columbia West Renaissance District waterfront development. The details of how and where to apply the street grid and above mentioned Downtown Plan District sub-sections shall be determined in the required waterfront master plan.

The selection of tree species and the layout of trees on different streets are related to both the operation and desired character of a particular street. Species selection and tree spacing shall be coordinated with the City's Parks and Forestry Divisions to ensure appropriate relationship to the Columbia River shoreline and Columbia River Renaissance Trail, connectivity to the City Center, and desired character of specific streets.

The principles of the Downtown Lighting District and Promenade Lighting District within the City of Vancouver's Street Light Policy and Columbia River Renaissance Trail development standards shall apply to all Columbia West Renaissance District waterfront development. The juxtaposition between the Columbia River Renaissance Trail development standards and Downtown Design Guidelines and Street Lighting Policy should be reconciled and details of light fixture type, location etc. should be determined within the process of the required waterfront master plan.

Maximum Building Heights

The Proposed Plan lowers maximum building heights. Unlike the existing adopted maximum building heights, the proposed heights are attainable under FAA regulations. The proposed maximum building heights would create a few legal nonconforming structures regulated by VMC20.930, Nonconforming Situations.

NO ACTION ALTERNATIVE

To reduce potential significant adverse impacts with respect to hazardous materials uncovered because of a project, applicable surveys and testing will be completed and submitted to the City of Vancouver for determination of action prior to construction on any project within the Plan Area.

CHAPTER 7 FIGURES AND TABLES

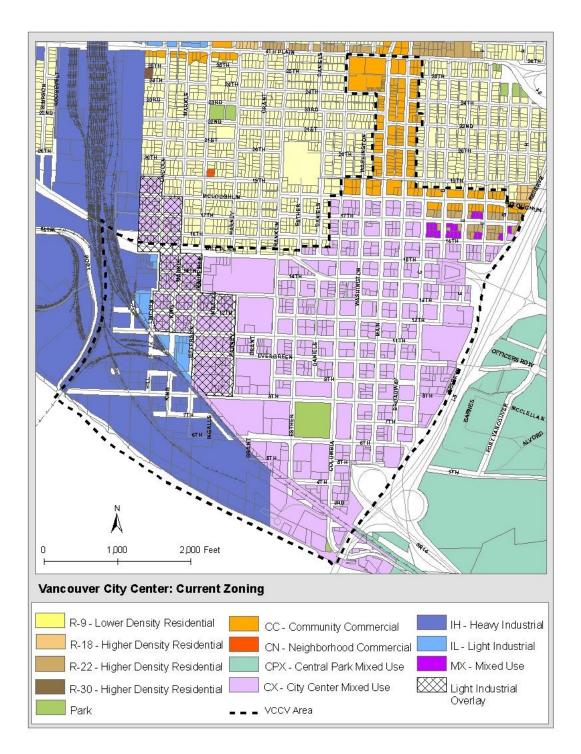


Figure 7-1. Vancouver City Center: Current Zoning

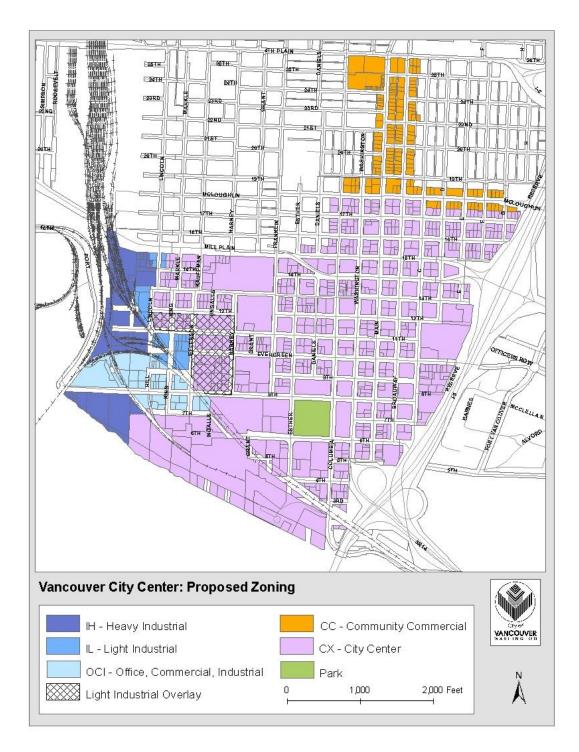


Figure 7-2. Vancouver City Center: Proposed Zoning

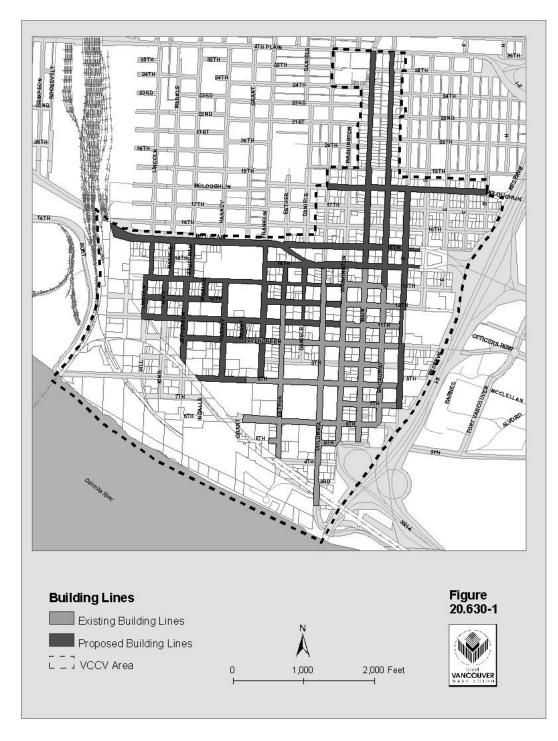


Figure 7-3. Building Lines

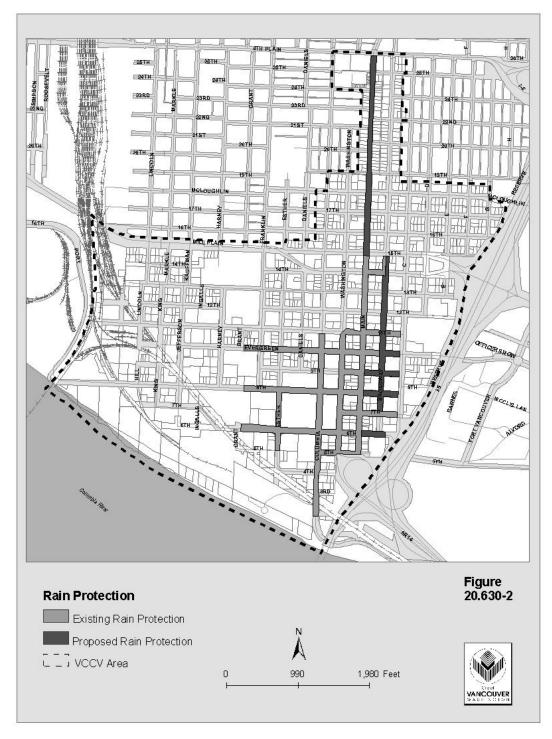


Figure 7-4. Rain Protection

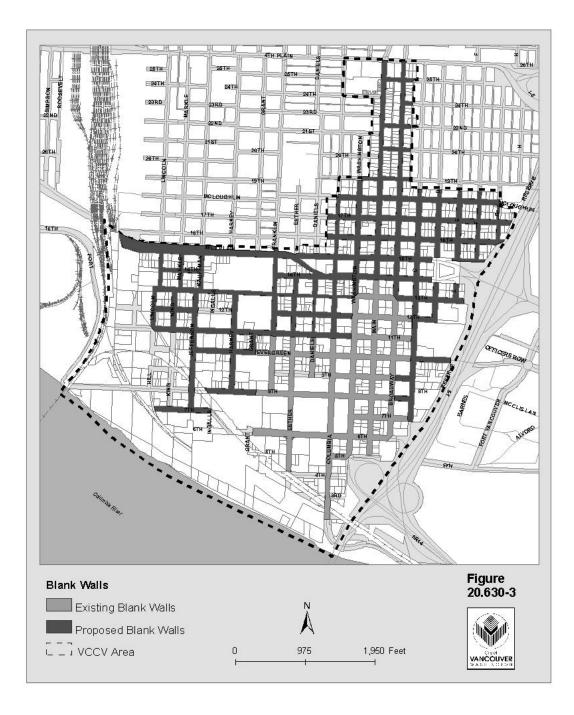


Figure 7-5. Blank Walls

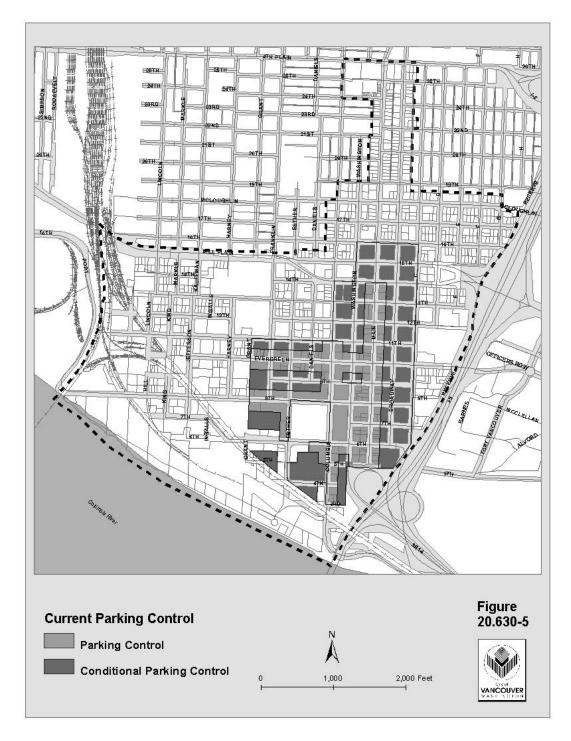


Figure 7-6. Current Parking Control

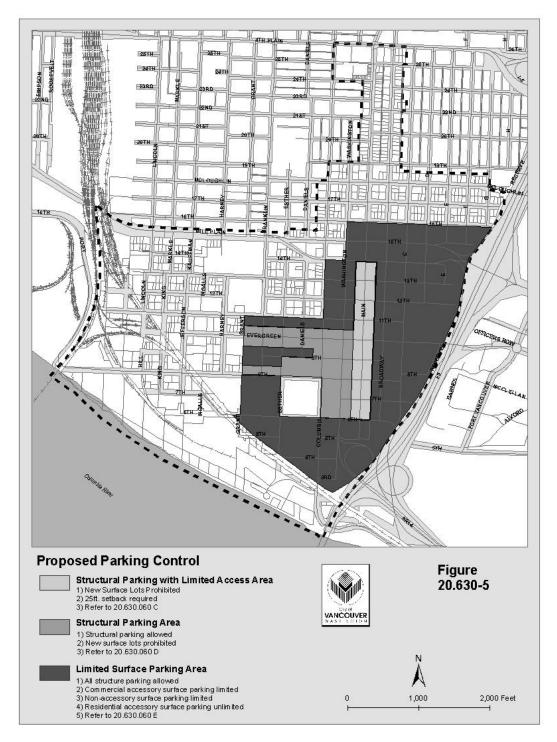


Figure 7-7. Proposed Parking Control

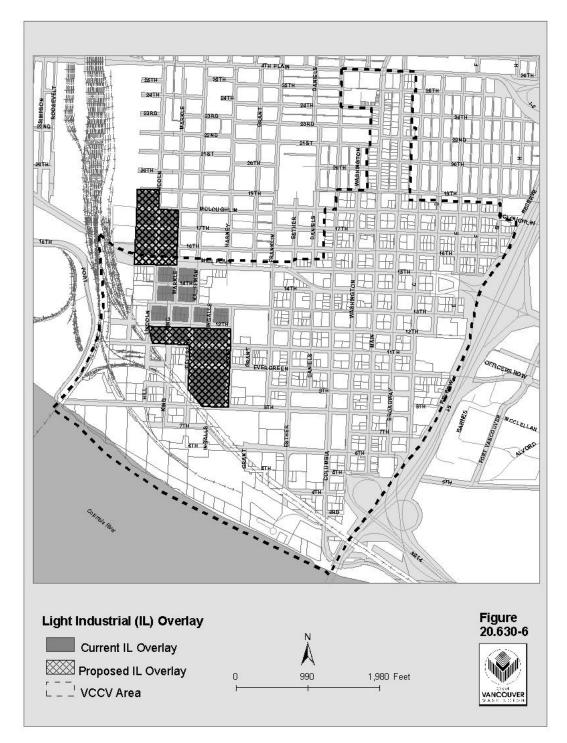


Figure 7-8. Light Industrial (IL) Overlay

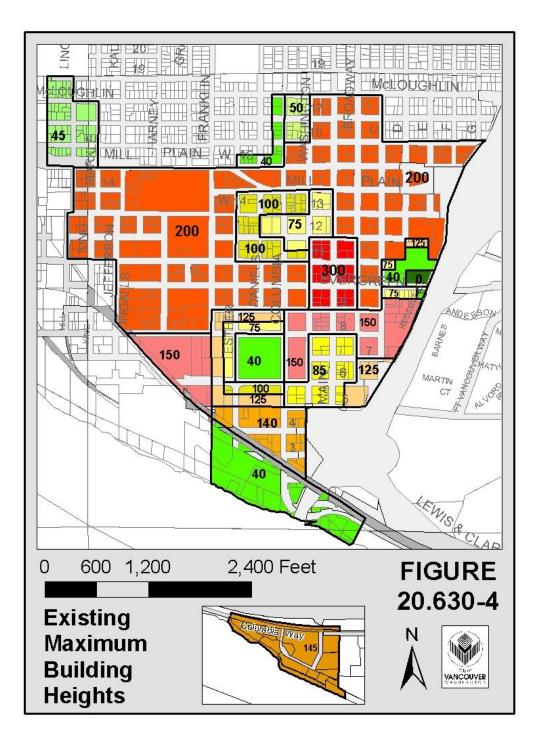


Figure 7-9. Existing Maximum Building Heights

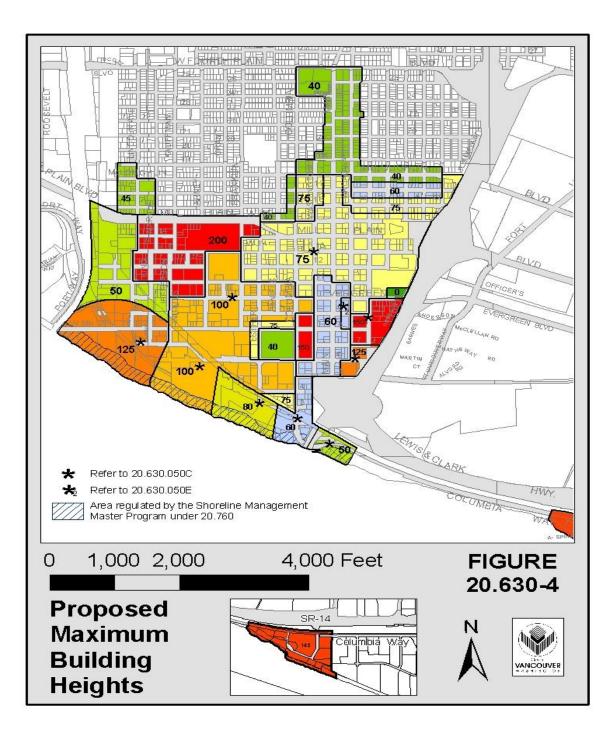


Figure 7-10. Proposed Maximum Building Heights Figure

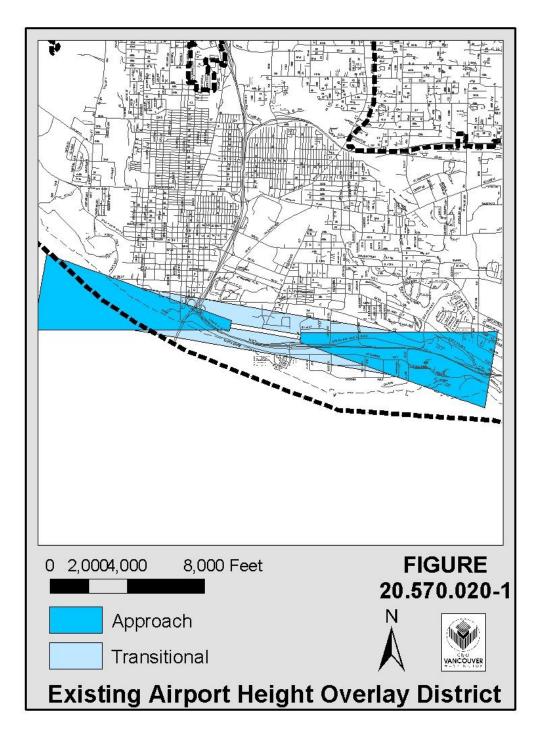


Figure 7-11. Existing Airport Height Overlay District

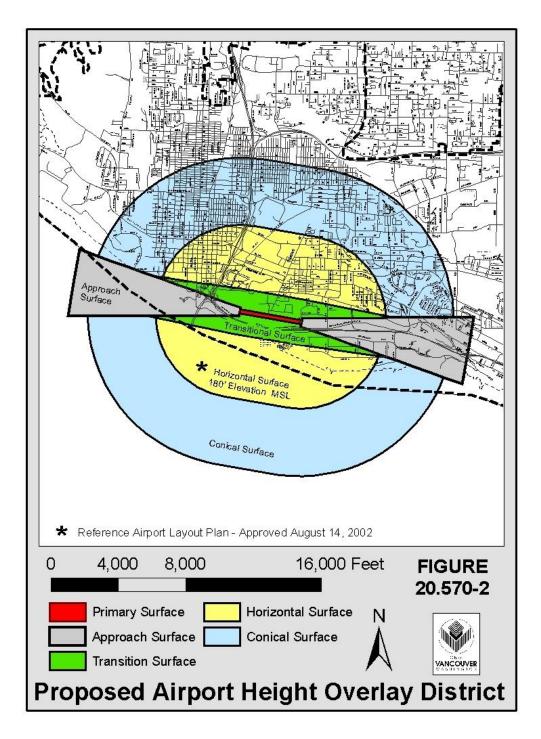


Figure 7-12. Proposed Airport Height Overlay District

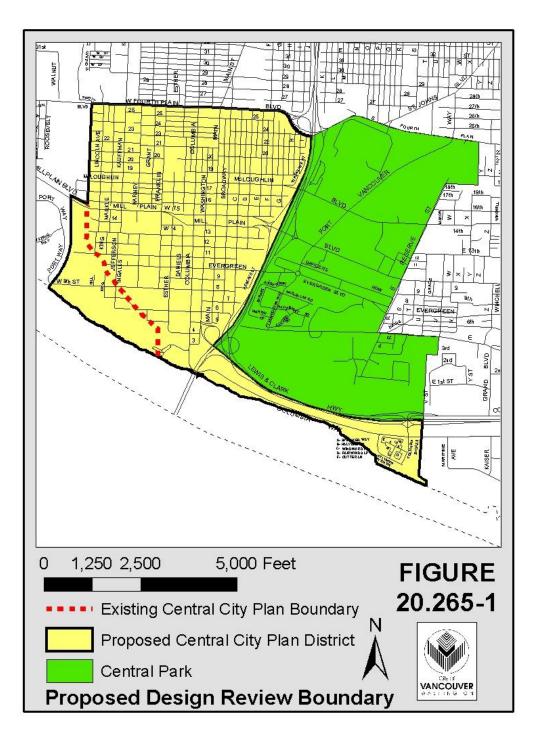


Figure 7-13. Proposed Design Review Boundary

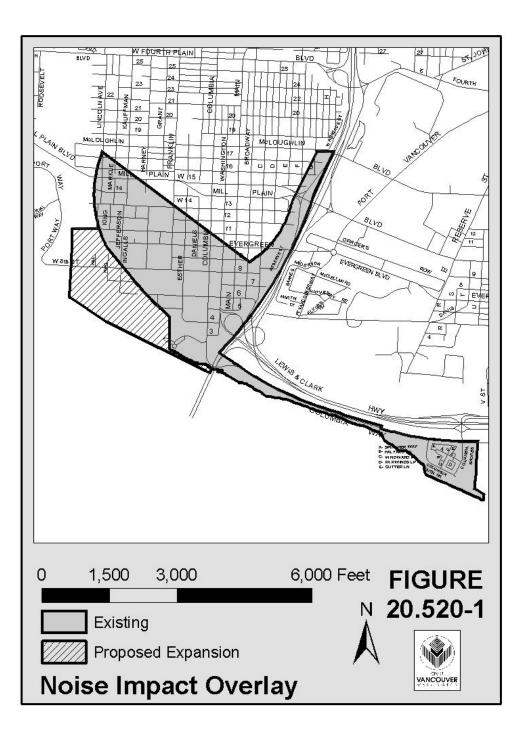


Figure 7-14. Noise Impact Overlay

Nonconforming Use Status					
Use Classification	Parcel	Existing Zoning	Permitted/Nonconf.	Proposed Zone	Non- conforming
AREA 3					
Auto Repair	58905000 (Dabney Alignment)	IH	Limited (8)	OCI	Nonconforming
Auto Repair	59387000 (Morres Auto Body)	IH	Limited (8)	OCI	Nonconforming
Warehouse /freightmove	58747000 (Albina Tank Farm)	IH	Permitted	OCI	Nonconforming
AREA 4					
Industrial Services	59328000 (Pacific Motor Repair)	IL Overlay	Permitted	СХ	Nonconforming
Industrial Services	50820000 (County Storage)	IL Overlay	Permitted	СХ	Nonconforming

Table 7-1. Nonconforming Use Status

CHAPTER 8: CULTURAL AND HISTORIC RESOURCES

INTRODUCTION

This chapter provides a summary of existing archaeological and historic resources and it assesses the potential impacts, mitigation measures, and unavoidable adverse environmental impacts of the project on archaeological sites and historic buildings and structures within the approximately 130-block VCCV (Vancouver City Center Vision Subarea Plan). Historical research, a historic building survey, and an overview of archaeological resources were conducted by Archaeological Investigations Northwest, Inc. (AINW), for the City of Vancouver between November 2005 and January 2006. This chapter also incorporates the results of a historic building survey for the Esther Short Neighborhood completed by AINW in 2004 (Chapman and O'Brien 2004), as well as information from the Esther Short Final Environmental Impact Statement (FEIS) that was completed by the City of Vancouver in 1997. The 1997 Esther Short Redevelopment Plan was adopted to revitalize and redevelop a 30-block area in the older downtown core of Vancouver.

In all, the VCCV consists of six areas or districts (Figure 1-2) that have been surveyed for historic buildings by AINW. The six districts are the Esther Short, Central Downtown, Westside Government, Mill Plain Couplet, Uptown Village, and portions of the Columbia West Renaissance District. The Boise Cascade complex within the Columbia West Renaissance District has not been surveyed for aboveground historic resources since permission to access the complex was denied for this project.

The Esther Short Neighborhood survey completed by AINW in September 2004 for the City of Vancouver (Chapman and O'Brien 2004) inventoried historic buildings and structures within the Westside Government, Central Downtown, and Esther Short districts; a portion of the Columbia West Renaissance District outside of the Boise Cascade boundary; and most of the Mill Plain Couplet District. A total of 245 historic-period buildings were recorded. The Esther Short Neighborhood survey encompassed a much larger area than the current Esther Short District. The Esther Short Neighborhood survey covered all of the current VCCV except for the Uptown Village District and a portion of the Mill Plain Couplet District.

To complete the reconnaissance survey of historic buildings in the VCCV, AINW assessed buildings in the Uptown Village District (the northernmost district) and the remaining portion of the Mill Plain Couplet District. The results for the survey include a list of inventoried buildings that are 45 years in age or older. This list, which includes all 169 historic-period buildings, was generated from the database and is called the Historic Property Inventory Summary Report (Appendix B).

The two surveys have together identified 414 pre-1960 buildings and structures within the six districts in the VCCV. The 414 buildings were entered into the Historic Property Inventory Database (a Microsoft Access application) used by the Department of Archaeology and Historic Preservation (DAHP) and have been submitted to the City of Vancouver for inclusion in the Clark County Cultural Resource Inventory. The threshold used for recording historic-period buildings was

45 years in age, or buildings that appeared to pre-date 1960. Exceptional buildings under this age were noted during the Esther Short Neighborhood survey. A total of 129 buildings in the VCCV are recommended for historic significance status in this Chapter (Table 8-1). Examples of significant buildings are shown in Photos 8-1 through 8-12.

AINW has also completed an archaeological study of previously recorded sites and surveys to determine the potential for prehistoric and historic archaeological discoveries within the VCCV. A small portion of the VCCV has been archaeologically surveyed, and seven resources have been identified (Table 8-2; Figure 8-1). The potential impacts and mitigation measures for sensitive archaeological areas and significant buildings and structures will be presented in this Chapter for each of the six districts within the VCCV.

SUMMARY OF FEDERAL, STATE, AND LOCAL REGULATIONS

The following is a summary of applicable federal, state, and local regulations, ordinances, and codes that concern archaeological resources and historic properties in Clark County. Under the Vancouver Municipal Code (VMC) Chapter 17.39 Historic Preservation, the City provides for the identification, evaluation, and protection of cultural and historic resources and encourages the preservation, restoration, and rehabilitation of these resources for future generations. This applies to properties that are listed in or eligible for listing in the historic or cultural resource inventory for Clark County and to properties that are listed in or eligible to be listed in the National Register of Historic Places (NRHP), the Washington Heritage Register (WHR), and the Clark County Heritage Register (CCHR). The Clark County Historic Preservation Commission serves as the reviewer for historic properties within the City of Vancouver. The Clark County cultural resources inventory is a tool for planning and research, and includes "those resources believed to have cultural or historic significance for Clark County, the region, or the nation." Properties that were listed, and then later demolished, are maintained in the inventory records for historical research purposes.

Under VMC Chapter 20.710, Archaeological Resource Protection, the City encourages the identification and preservation of cultural, archaeological, and historic resources consistent with the GMA of 1990, as amended, and Vancouver's Comprehensive Plan. The City also encourages coordination and consistency in the implementation of the SEPA and the Shoreline Management Act.

The Archaeological Resource Protection code applies "when any item of archaeological interest is discovered during the course of a permitted grounddisturbing action or activity," or when there are indications of the "probable existence of an archaeological site in a disturbance area" that has been permitted. The procedures rely on an analysis of the likelihood that a significant archaeological site may be found on a parcel. The City adopted a "predictive model" in 1995 (Ellis and Wilson 1995) and a revision to the model completed in 2000 (Wilson 2001). The original model included much of the downtown area within the higher probability for finding an archaeological site. The updated model, which had especially intended to include areas where historical archaeological sites may be found, reduced the area of higher probability for finding an archaeological site to the narrow strip between the railroad berm and the Columbia River, at the southern end of the Subarea. The City designates the higher probability areas as Level A and the lower probability areas are Level B.

An archaeological study, called a predetermination, is needed for applications for ground-disturbing activities within Predictive Model Probability Level A, or if the disturbance area is at least five acres in size and entirely within Predictive Model Probability Level B. Also, regardless of the disturbance area size or the Predictive Model Probability Level, when the disturbance area is within one-fourth mile of a known, recorded archaeological site (as measured on a horizontal plane extending in all directions), the code applies and a study is needed.

A development application shall not be determined 'counter complete' until any required predetermination has been completed and the predetermination report submitted to the Director Planning Official. A predetermination is done to determine whether the existence of an archaeological site within a disturbance area is probable. Predeterminations that indicate the presence of cultural resources result in archaeological resource surveys. Significant resources must be addressed for approval of the development.

Archaeological discoveries are also treated in the Revised Code of Washington (RCW) under Chapter 27.53 Archaeological Sites and Resources and Chapter 27.44, Indian Graves and Records. Coordination is often required under RCW Chapter 27.34, State Historical Societies-Historic Preservation and Chapter 27.48, Preservation of Historical Materials. The RCW requires that investigation of known archaeological sites and burials be conducted under a permit issued by the DAHP.

AINW PROJECT PERSONNEL

The historic resource surveys for the VCCV conducted by AINW involved field recordation, background historical research, and consultation with the DAHP and with the City of Vancouver Long Range Planning and Development Review Services, in order to gain information on previously inventoried buildings, structures, and archaeological sites within the subarea. AINW personnel involved in the field surveys to evaluate historic buildings and structures were Judith A. Chapman, M.A., Senior Architectural Historian and Archaeologist; Elizabeth J. O'Brien, B. Architecture, Architectural Historian; Jason M. Allen, M.A., Architectural Historian and Staff Archaeologist; and David W. Cox, B.A., Graphics Specialist and Staff Archaeologist. The archaeological study was researched and written by professional archaeologists, Ms. Chapman, Jo Reese, M.A., R.P.A., and Meredith A. Wilson, M.A. Aside from Mr. Cox, all of the personnel are professionally qualified and meet the Secretary of the Interior's Professional Standards and Guidelines for Archaeology and Historic Preservation.

EXISTING CONDITIONS

Cultural Overview:

Prehistoric Background

The VCCV is immediately north of the Columbia River and is east of the Vancouver Lake lowlands. Interstate 5 borders it on the east. No active streams flow across the area, although a small inlet on the Columbia River near Interstate 5 appeared on historic-period maps but has since been filled. Most of the area is relatively level to gently undulating land and is high enough in elevation to not be threatened by flooding.

Geographically, the central part of Vancouver is within an area called the Portland Basin, an area that encompasses the lowlands where the Willamette and Columbia Rivers meet. Ethnographically, Chinookan-speaking peoples lived in the area, focused along the Columbia River, and Cowlitz people lived nearby to the north. Native American archaeological sites are most commonly found along the waterways, and in the Vancouver area they are especially numerous around Vancouver Lake lowlands, as well as along the Columbia River upstream of Interstate 5. Recorded Native American archaeological resources closest to the VCCV have been found on the Columbia River immediately east of Interstate 5 and in the lowlands around Vancouver Lake. Other areas around Vancouver where archaeological sites are most frequently found are in the Covington or Five Corners area of Orchards and on the terrace overlooking the south side of Burnt Bridge Creek near Andresen.

Prehistoric Native American occupation of the Portland Basin probably began at about the same time as it did in surrounding regions, some 12,000 years ago. However, the evidence for ancient occupation of the Portland Basin has not been found. Rising Holocene sea levels (which would have affected the flow of the Columbia River at least as far inland as Portland) and river flooding have combined to erase or deeply bury low elevations within the Portland Basin.

Archaeological research has demonstrated that Native peoples have been living in the Portland Basin for at least 9,000 to 10,000 years (Ames 1994), although evidence of human occupation from before 2,550 years before present (BP) is sparse. The earliest evidence of human presence in the Portland Basin comes from sites that ring the outer edges of this geographic area. For example, at the Burnett site (35CL96), located high above the Willamette River in the City of Lake Oswego, Oregon, artifacts were stylistically similar to those found in the Cascades and on the Columbia Plateau that date to 8000 to 10,000 BP (Burnett 1991). Recent work at the Sunset Ridge site (45CL488), located in eastern Washougal, has revealed that this site dates to ca. 8000 to 4500 BP (Ozbun and Reese 2003), and another site, 45CL631, located south of Ridgefield, also appears to have been occupied during this time period (Smith et al. 2005).

Examples of excavated sites that have been assigned dates based on radiocarbon samples provide information about Native American occupation in the area around Vancouver. Six radiocarbon dates suggest that site 45CL422, the Covington site, located about six miles northeast of downtown Vancouver near a former wetland in the Orchards area, was occupied as early as 3600 BP and was occupied until 670 BP (Wilson and Roulette 1998). The Cedarbrook site, 45CL454, located between Covington and Vancouver and situated on a terrace high above Burnt Bridge Creek, was occupied at least 2,000 years ago, and probably earlier than that (Musil et al. 1998).

Two recent projects directed by Kenneth Ames at Portland State University have greatly illuminated our understanding of the prehistory of the Portland Basin. The Cathlapotle site (45CL1), is a plank house village site located in the Ridgefield Wildlife Refuge on the Washington side of the Columbia (Ames and Maschner 1999; Ames et al. 1999). The village at Cathlapotle was occupied for 1,000 years and was visited by Lewis and Clark in 1805 and 1806. The Meier site (35CO5), located on the Columbia River near St. Helens, Oregon, features evidence of a single large plank

house that was occupied for approximately 400 years prior to its abandonment shortly before Euroamerican contact (Ames et al. 1992).

The chronology for the last 2,550 years in the Portland Basin is much more secure than earlier periods and was first sketched out by Pettigrew in the 1970s (1977, 1981, 1990). Pettigrew's cultural sequence was based on fieldwork conducted in and around Sauvie Island, located in the Willamette River near its confluence with the Columbia River. The framework includes two phases, the Merrybell Phase (2550-1750 BP) and the Multnomah Phase (1750-100 BP). Pettigrew (1981:137) suggested that the lifeways of Chinookan peoples at the time of contact with Euroamericans had changed little in the 2,600 years covered by the two phases.

Ames (1994) identifies current models of Portland Basin prehistory including suggestions for trends that changed over time, and aspects that remained unchanged over the last 3,000 years. Populations were centered largely in the western portion of the basin near Willamette Falls, Sauvie Island, and Vancouver Lake. Most models suggest that native culture evolved from semi-sedentism (winter residence at a village site and temporary residences at camps for food gathering during other seasons) to full sedentism (year-round residence at a village site). Similarly, most agree that the earliest houses were circular structures built over bowl-shaped pits dug into the ground (pithouses). Rectangular structures called plank houses were built later, probably after about A.D. 1000. People ate a wide variety of foods including wapato (a starchy tuber that grows in swampy areas), camas (a starchy tuber that grows in wet meadows), fish (especially salmon), hazelnuts, acorns, and birds. Changes in use of these resources over time and differences between different areas of the Portland Basin are not well understood. Resource production may have intensified during the later periods as indicated by changes in procurement and processing technologies and increased storage capacity.

Native Peoples—Ethnographic Background

The VCCV is within the area occupied at the time of Euroamerican contact by Chinookan-speaking groups. The Multnomah and Clackamas Chinookans lived along the Columbia from the Sandy River downstream to the Kalama River and up the Willamette River to Willamette Falls (Silverstein 1990: Figure 8-1). In 1805-1806, Lewis and Clark (Moulton 1990:477-478) reported 15 to 20 villages or village clusters in this area, with a total population of about 4,000 to 5,000 people. One of these villages is the Cathlapotle site on the Columbia River west of Ridgefield (Ames and Maschner 1999:112), and another was upstream of Vancouver on the opposite side of the river, in the vicinity of present-day Portland Airport. During the spring, the local population doubled as visitors from neighboring areas moved into the Portland Basin to share in the abundant fish runs and to collect camas in the upland prairies (Boyd and Hajda 1987).

Each of these villages was politically independent, headed by a chief who was usually the wealthiest man in the village. Chiefs had little formal authority but exercised influence through their wealth and personal skills. Below the chiefly families were "commoners" or "followers," who survived both through their own efforts and through the assistance of the chiefly families in times when resources were scarce. At the bottom of the social ladder were slaves, usually owned only by wealthy families and obtained through trade. The Chinookans were at the center of a vast trading network that extended north to Puget Sound, south along the coast and through the Willamette Valley, and east to the Rocky Mountains and beyond (Hajda 1984; Silverstein 1990:541-543).

Chinookan villages consisted of one or more cedar plankhouses with gabled roofs. A typical house ranged from about 10x10 meters (33x33 feet) to 12x12 meters (40x40 feet) and was the residence of two or three extended families. The houses of chiefs were often much larger, with one chief's house near Willamette Falls described as 90 meters (300 feet) long. Families at summer camps occupied simple shelters or windbreaks of mats or brush (Hajda 1994; Silverstein 1990:537-538).

A series of smallpox and malaria epidemics from the 1770s to the 1830s decimated Chinookan populations, killing more than 90% of the population (Boyd 1999: Table 8-3). Some of the survivors signed a series of treaties in the 1850s in which their lands were ceded to the United States. Treaty negotiations with the Chinook, Upper Chehalis, and other tribes in southwestern Washington were broken off in 1855, and treaties were never signed with these tribes. Reservations were established by executive orders for the Upper Chehalis and Cowlitz on the Chehalis River near Oakville in 1864, and on northern Willapa Bay in 1866 for the Lower Chehalis, Chinooks, and others. Many Indians, however, refused to be removed to these reservations (Hajda 1990:514-515). Although most of the Oregon treaties were never ratified, most of the remaining Chinookans in the Portland Basin in Oregon were relocated either to the Grand Ronde, Siletz, or Warm Springs reservations (Beckham 1990:180-183).

Historical Background

A brief historical background overview of the VCCV is provided below. Historical research for the VCCV survey project was conducted at the Clark County Historical Museum in Vancouver and at the Vancouver Community Library. Information was gathered from Sanborn Fire Insurance maps, historical photographs, journal articles, local histories, newspaper clippings, and genealogical files.

Vancouver traces its beginnings to the establishment of a fur trading post by the Hudson's Bay Company (HBC) on the banks of the Columbia River in 1825. Permanent American settlement in the area was assured by 1846, the year a boundary dispute was settled between the United States and Britain. The HBC relocated its base to Victoria, British Columbia, and an American military reserve was later established at the location of Fort Vancouver.

Amos and Esther Short platted a townsite on their 640-acre Donation Land Claim west of the fort; the claim had been settled amid controversy with the HBC in 1846. A portion of the Short claim near the banks of the Columbia River was platted as a 57-block townsite in 1855. Lots were sold that soon formed the nucleus of a new community called Vancouver. The first commercial businesses were built at the lower end along Main and Washington Streets near a steamship landing on the river. The earliest businesses included two saloons, a ten-pin alley, a boarding house, livery stable, blacksmith shop, two general stores, and a brewery. This section was the retail, financial, and hotelier center of the City, but the area has since been altered by the construction of the Interstate 5 interchange in 1954 (Alley and Munro-Fraser 1983:113; McLellan 1935:43; Pundt 1977; Van Arsdol 1986: 8; 51).

Main Street is a former trail turned military road and is a part of the old U.S. Highway 99 route. The 1883 Map of the Country in the Vicinity of Vancouver

Barracks, Washington Territory, shows Main Street as a "Country Road" extending north beyond present Mill Plain Boulevard. This road was one of the earliest wagon roads in the region. The 1910 Map of Clarke County, Washington, shows it labeled as a "Military Road." By the 1920s, it became the route of US Highway 99.

Pioneer businessmen generally built their homes in neighborhoods adjacent to the Vancouver commercial business district, but when the commercial core expanded from Main and Washington Streets, upper-scale houses were built in the newer residential districts to the north and west in platted town additions. The original wood-frame commercial buildings located downtown were eventually replaced with more substantial brick buildings by the late nineteenth century. Several of these buildings were constructed with brick that was manufactured locally by the Hidden Brick Company. Lowell Mason Hidden established a brickyard between 14th and 16th Streets, on the west side of Main Street, in 1871. He built his extravagant brick Victorian house, which still stands, one block to the south. The brickyard was closed in 1992 (Bacon 2003).

The Columbia River was a natural location to start a lumber industry in Vancouver. In the 1880s, the Michigan Lumber Company built a mill at the foot of present Harney Street and the Dubois Brothers built a saw and planning mill at the foot of present Jefferson Street (Figure 8-2). The Dubois mill continued in operation up until after the Second World War. At the turn of the twentieth century, two northwest lumber magnates built the Pittock-Leadbetter Lumber Company in the location of the Michigan mill, and by the 1920s the Pittock-Leadbetter mill was operated by Columbia River Paper Mills. Today, the Boise Cascade lumber complex occupies the location. The Port of Vancouver municipal docks were built between the mill and the present Interstate 5 Bridge, the present vicinity of the Red Lion Inn at the Quay. The Port Warehouse building was incorporated into the construction of the restaurant and bar portion of the Red Lion building. Due to extensive remodeling and later developments at the complex, the building has lost architectural integrity and is not recommended to be a significant historical resource.

Lowell Mason Hidden, the brick maker, was also involved in farming, hotel operation, and civic endeavors in Clark County, and he proposed the need for a railroad to serve Vancouver. In 1886, Hidden and his associates reconnoitered a route from Vancouver to Yakima via Klickitat Pass to find timber, wheat, coal, and other resources. The rail line was built as the Vancouver, Klickitat and Yakima Railroad, but it never reached its lofty goal of a connection with the Great Northern Railroad at Yakima. The line started at a public levee near the original Vancouver townsite plat at the Columbia River shore, then paralleled the river downstream (through the middle of what is presently the Boise Cascade mill property) before curving north along the western edge of the expanded town plat, then east along present Fourth Plain Boulevard. By 1889, the line extended from Vancouver to Brush Prairie. In 1897, the line was purchased by the Portland, Vancouver & Yakima Railway Co. which extended the line to Yacolt in 1902. The Northern Pacific Railroad purchased the line in 1903 and realigned the route to run parallel to the Spokane, Portland and Seattle tracks (see below) on the west side of Vancouver and the tracks along Fourth Plain Boulevard were abandoned. At Vancouver Junction (on the east side of Vancouver Lake, north of Burnt Bridge Creek), the Yacolt Branch (as it was then known) broke off and headed east through Cold Canyon. This line is now known as the Chelatchie Prairie Railroad. The line reached only as far as Chelatchie Prairie in northern Clark County, but had connections to both Kalama to the northwest on the Northern Pacific line and to Yacolt to the northeast. The line is most noted for its use in timber salvage for the Yacolt burn in 1902. By the 1940s, the Northern Pacific Railroad was operating the line (Hanable 2004; Robertson 1995:298-299).

The completion of the North Bank Railroad (the Spokane, Portland and Seattle Railroad) in 1908 with a connection between Vancouver and Portland finally gave Vancouver access to a transcontinental line. The North Bank line paralleled the shoreline to the north of the old Vancouver, Klickitat and Yakima line, then branched at a major "Y" at the west side of town, where a railroad bridge was built. The line was built on a concrete viaduct, essentially dividing the shore industries from the town center and the growing residential areas. The construction of the first railroad bridge across the Columbia River between Portland and Vancouver on the new line in 1908 was considered a boon to commerce, since Vancouver was an agricultural distribution point with extensive outlying manufacturing, lumber, and dairy industries. The bridge replaced railroad ferries. The rail line today is owned and operated by the Burlington Northern Sante Fe (BNSF) Railroad (Pacific Coast Industries 1900; Van Arsdol 1986).

During World War I, shipyards lined the riverbank west of the present Interstate 5 Bridge, where a Spruce Division lumber mill was established in 1918. The local Port Commission and the U.S. Army Corps of Engineers (USACE) worked to deepen and widen the Columbia River and construct dikes and revetments to accommodate shipping. The Columbia River Shipbuilding Company and the Motorship Construction Company, which made wooden ships, were established along the banks. The town surged in prosperity due to the increase in population of shipyard worker families and the military reservists, who provided additional business for theaters and stores (Chamberlain 2002).

Numerous business buildings were constructed to the north of the town core up to Fourth Plain Boulevard along Main Street during the 1920s. A succession of Sanborn Fire Insurance maps shows the progression of development to the north (Figures 8-3 and 8-5). Newspaper articles chronicling the late 1920s noted the large number of residences, close to 400, that had been built in the nearby neighborhoods. The 1930s were less prosperous during the Depression years (Van Arsdol 1986).

During World War II, the shipyards built more than 140 ships and operated two dry docks upstream (east) from the Interstate 5 Bridge. In 1942, the industrialist Henry J. Kaiser built a massive shipyard here along the Columbia River to meet national defense needs following the attack on Pearl Harbor. Many Vancouver houses were transformed into rooming facilities, either single rooms or additions, to house shipyard workers. After the war, urban renewal in the 1950s changed the face of Vancouver. Neighborhood housing was replaced with commercial development, while modern residential growth occurred to the north and northeast of the City core (Van Arsdol 1986).

The completion of a highway bridge across the Columbia River between Vancouver and Portland in 1917 was an engineering feat and a financial accomplishment. At the time it was built, the Vancouver-Portland Interstate 5 Bridge was one of the largest in the world and became symbolic of the new automobile age. Interstate 5 was completed through Vancouver in 1954, using access on the 1917 bridge to Portland. A parallel bridge was built in 1958 to accommodate increased traffic flow on the new freeway (Holstine and Hobbs 2005). In 1961, the Vancouver City Council approved an urban renewal project covering 55 acres, or a total of 28 City blocks (Van Arsdol 1986:10). Many nineteenth- and early twentieth-century buildings were removed or altered at this time. The downtown lost business from competition with shopping malls at Jantzen Beach in Portland and the Vancouver Mall, both built in the 1970s. The 1970s also saw a decline in the economic stability of Vancouver's neighborhoods, brought on by increasing suburban development, the relocation of downtown businesses, and urban renewal.

ASSESSMENT OF ARCHAEOLOGICAL POTENTIAL

The archaeological investigative literature review for the VCCV included obtaining a listing of previously-recorded archaeological sites and researching archaeological survey reports and predeterminations. Background research included a search and analysis of archaeological site distribution maps, site form files, historical maps, and literature pertaining to archaeological research. Site form records and reports were obtained from the DAHP in Olympia and from the City of Vancouver, including records of predeterminations, surveys, and other documents.

The VCCV encompasses a broad area that has potential for both prehistoric and historic-period archaeological sites. The shoreline and its industrial complexes, such as Boise Cascade, are located in a Predictive Model Probability Level A area. The proximity of the Plan Area to the Columbia River and to a slough or inlet that extended into the southern edge of the Plan Area up to the 1880s (Figure 8-6) suggests that the potential for prehistoric sites or habitations from ethnographic-period indigenous Native populations is high (Ellis and Wilson 1994; O'Rourke 2005). Historic-period sites related to Euroamerican occupations connected to the early nineteenth-century fur trade establishment at nearby Fort Vancouver are also possible. Although the Boise Cascade area has been covered with fill and fill extends into the river channel, prehistoric and historical archaeological resources could be preserved beneath several feet of fill near the historic shoreline. For research purposes, the location of the historic-period shoreline relative to the present-day shoreline has been determined, based on Sanborn Fire Insurance maps and other older maps as shown in (Figure 8-6).

The platted town core has potential for historic-period archaeological sites related to the growth and development of the early Vancouver townsite, which was established in 1855. This area, centered by Esther Short Park, may contain deposits related to Euroamerican settlement and occupation. The area is near the HBC fort, later the U.S. Military Reserve, and it was the nucleus of town development (Figure 8-7).

Judging from a review of Sanborn Fire Insurance maps, which illustrate building footprints, it is possible that historic-period archaeological resources will be present beneath the buildings and also in vacant lots and under asphalt-covered parking lots. Some deposits may not represent significant sites, but there is potential for intact archaeological deposits in shafts such as former privies, wells, cisterns, and cesspools. These buried features may contain information important to an understanding of early life in Vancouver. For example, recent archaeology at the Vancouver Conference Center (Site 45CL582) revealed a dense concentration of intact archaeological deposits relating to a former nineteenth-century residential neighborhood in the older downtown section of the City. The potential for intact buried archaeological sites is not limited to areas beneath extant buildings but can include the spaces along the sidewalk and street, and between where former

buildings once stood. Old cisterns at street intersections are likely locations for accumulated debris from the late nineteenth and early twentieth centuries; they were often filled with trash and debris when no longer actively used.

The Sanborn Fire Insurance maps (1880s to 1949) are a useful tool to illustrate this potential for archaeological information on the past use of the older commercial and residential areas. As an integrative instrument to assess changes in the area and identify patterns in urban development, digital versions of the Sanborn maps could be integrated into the City of Vancouver's existing GIS. Building footprints could be shown and associated attributes for each building could be entered into the GIS database.

Archaeological Studies & Previously-Recorded Archaeological Sites:

A total of seven historic-period archaeological sites have been recorded in the VCCV (Table 8-2; see Figure 8-1); one of these also includes a single stone bowl, an isolated prehistoric artifact. There are no recorded prehistoric sites within the VCCV. The DAHP has, in the past, assigned archaeological site numbers to some historic buildings, and these site numbers have remained in the archaeological site files since the late 1970s and early 1980s. (This is no longer the practice; records for historic buildings are kept separately from archaeological resources, and are no longer assigned archaeological site numbers.) These buildings, some of which have been demolished, are listed in Appendix B. Most of these buildings in the VCCV with archaeological site numbers are located in the downtown area within the Central Downtown, Esther Short, and Westside Government districts.

At least 38 previous archaeological projects have been completed in the current VCCV, with additional projects still ongoing in data synthesis and report production phases. The 38 completed project reports reviewed for the VCCV (Appendix B) are mostly predetermination studies, although surveys and data recovery projects also have been conducted. The projects were identified through research at the DAHP and records on file at AINW accumulated from various sources, including the City of Vancouver. Each individual project, either predeterminations or other studies, was counted as a separate project, although multiple projects may have been conducted at the same location. Multiple projects commonly occur when a resource is identified during a predetermination study. A survey project typically follows, and evaluation and data recovery projects also may be necessary. Archaeological projects have been done in all six districts (Appendix B).

Four of the previous projects were multi-County or County-wide overview studies that involved limited fieldwork (Ellis and Wilson 1995; Northwest Archaeological Associates 2000; Skolnik et al. 1979; Wilson 2001). These four multi-County or County-wide projects are excluded from the following discussion of projects by district. Many of the projects overlapped two or more of the districts, and the overlapping projects will be discussed in each district in which the work was done.

Previous archaeological work has been conducted in all of the districts, although fewer studies have been completed in the Uptown Village and Columbia West Renaissance districts. The projects in these two districts included three predetermination studies in the Uptown Village District and seven projects (five predeterminations and two surveys) in the Columbia West Renaissance District. One of the predetermination studies in the Columbia West Renaissance District for the Mill Plain Extension (Crisson and Freidenburg 1997) at the northwest corner extended into the Mill Plain Couplet District. No archaeological resources were identified during these previous projects, although disturbed deposits of undiagnostic glass and ceramics were noted (Mills and Ball 1998). These artifacts were sparse, mixed, and not datable, and were therefore not recorded as an archaeological resource.

Seven archaeological projects were previously conducted in the Mill Plain Couplet District. The previous projects included six predeterminations and one survey. Three of the predetermination studies also extended into the Westside Government District, and one crossed into the Columbia West Renaissance District. No resources have been identified in the Mill Plain Couplet District. Previous projects, however, have documented disturbed deposits of undiagnostic glass and ceramics that were not considered representative of archaeological sites that could be confirmed as historical in age (Freed 1999a; Galm 2000; Mills and Kent 2000).

The majority of the previously conducted archaeological projects are located in the southern portion of the Plan Area, in the Esther Short, Central Downtown, and Westside Government districts. In total, at least 22 previous studies have been completed in these three districts. These projects included predeterminations, surveys, and subsurface testing, and data recovery projects. Several of the testing and data recovery projects are still in the data synthesis and report production phases. The previous projects resulted in the identification of seven archaeological sites:

- Three in the Esther Short District (45CL567, 45CL582, and 45CL646)
- Two in the Central Downtown District (45CL514 and 45CL583)
- Two in the Westside Government District (45CL664 and 45CL666) (see Figure 8-1)

With the exception of a single Native American artifact found at one site (45CL582), these sites are all historic-period resources, typically associated with the early residential and commercial development of Vancouver. Four of the seven sites (45CL514, 45CL567, 45CL582, and 45CL646) were recommended as eligible for listing in the NRHP (Minor 2000; Roulette and White 2005; Stephanie Kramer, DAHP, personal communication 2006). These four sites had intact buried features and substantial artifact deposits, or middens that were from the late 1800s and early 1900s. Sites 45CL583, 45CL664, and 45CL666 were recommended to be ineligible for listing in the NRHP (Chapman et al. 1998; Reese 2001; Stephanie Kramer, DAHP, personal communication 2006). The three ineligible sites were limited to either a single feature or archaeological deposits composed of construction materials and household items.

In addition to the historic-period sites, disturbed historic-period features and mixed deposits of undiagnostic glass and ceramics also were noted in the Esther Short, Central Downtown, and Westside Government districts (Freed 2000; Kent and Reese 2000a; Mills and Ball 1998). These artifacts and features had been disturbed by modern development and were not datable, and therefore were not recorded as resources.

Several of the historic-period archaeological sites mentioned above contain deposits from the late 1800s and early 1900s, in abandoned privies and cesspools, and also include architectural features, and significant artifact deposits. As examples, three historic-period archaeological sites are summarized in the following discussion. All three were verified or were found by manual or mechanical probing as part of survey-phase studies. Two of the sites are examples of significant sites in the Esther Short and Central Downtown districts, while the last, the Carty Lot in the Westside Government District, is an example of a site that was recommended to be not significant. The locations of the sites are shown on the Figure 8-1 map.

Vancouver's Historic Blocks 61 and 65 (45CL646)

Site 45CL646, south of Esther Short Park, is a historic-period site that included intact buried features and a midden deposit. The archaeological deposits are the remains of some of the earliest residential occupation of the City of Vancouver. Blocks 61 and 65 were platted as part of the oldest Vancouver townsite by Esther Short in 1855. The eight lots available on Block 65 were developed between 1892 and 1907 and remained residential until a welding shop was opened in the 1930s. Only one home was built in Block 61 between 1867 and the 1930s, the Charles and Laura Slocum home and stable/carriage house. Archaeological resources documented at the site include two pits, a privy vault, and two cesspools associated with the Slocum House and Stable/Carriage House in Block 61; and five privy vaults, four pits, a trench, and midden deposits associated with the house lots in Block 65. The midden deposit identified in Block 65 contained bottle and windowpane glass, metal, wire nails, brick fragments, charcoal and ash, and whiteware ceramics. The Block 65 features and deposits dated from the early 1900s to 1940. The site was recommended eligible for listing in the NRHP (Roulette and White 2005). The work was done prior to development proposed for *The Columbian* newspaper building.

Killian Pacific Site (45CL514)

Site 45CL514 is a historic-period site that was identified and recorded in 2000 during a construction project in Blocks 32 and 33 of the old townsite of Vancouver. Both blocks were likely occupied by the 1880s. Block 33 is adjacent to Fort Vancouver U.S. Military Reservation, and early development of the block may have been associated with the Fort. Block 32 was first developed in 1884, and was both residential and commercial. Archaeological deposits associated with the site included nine intact features: an ash concentration, a brick-lined dry well, a cobble-lined cellar, concrete foundations, a trash pit, an earthen-walled cellar, an angular rock concentration, and a wood-lined chute. Most of the artifacts were recovered from the cobble-lined cellar, the trash pit, and the earthen-walled cellar. These features contained broken bottle glass, whole bottles, and ceramics that dated to the latenineteenth through the early-twentieth century. The site was recommended eligible for listing in the NRHP (Minor 2000). The site was found during monitoring of construction for an office building.

Carty Lot (45CL664)

The Carty Lot is associated with a historic-period residence site. The lot was part of the North Vancouver addition to the City, which was platted in 1883. The archaeological deposits are associated with a house that was constructed in the mid-1880s and remained on the lot until it was moved in 1997. The Carty sisters (Belle and Hannah) lived in the house between 1898 and 1934. No intact features were identified at the site. The recovered artifacts included domestic and personal items (such as ceramic and glass tableware, glass bottles, and clothing fragments) as well as structural artifacts (nails, spikes, window glass fragments, and a "skeleton" key). Most of the artifacts were likely related to the occupation of the house by the Carty sisters, with a few artifacts possibly dating to an earlier occupation of the lot. Due to the lack of cultural features, the poor integrity of the archaeological deposits, and

the low potential for important research information, the site was recommended to be not eligible for listing in the NRHP (Chapman et al. 1998). The study was done for an expansion of the Juvenile Justice Facility.

HISTORIC BUILDING SURVEYS

All of the historic-period buildings within the VCCV have been recently inventoried and assessed for architectural significance as part of two studies. The Esther Short Neighborhood survey conducted by AINW in 2004 inventoried 245 buildings that were 45 years in age or older in the Westside Government, Central Downtown, and Esther Short districts, and portions of the Columbia West Renaissance and the Mill Plain Couplet districts. The results of this survey are presented in the City of Vancouver Esther Short Neighborhood Historic Building Survey and Inventory report (Chapman and O'Brien 2004). From the 245 recorded buildings, AINW recommended 14 buildings to be eligible for listing in the NRHP, WHR, and the CCHR and recommended four local Historic Preservation Overlay Districts (Figure 8-8). The 14 buildings were in addition to 13 buildings previously listed in the NRHP in the Esther Short Neighborhood. In all, a total of 27 buildings in the Esther Short Neighborhood are currently listed in or are recommended to be eligible for listing in the NRHP (Table 8-1).

AINW also recommended 63 buildings to be eligible for listing in the CCHR. But this number has been increased to 103 CCRH recommendations for this project (Figure 8-8). The Figure 8-8 map is modified from the Esther Short Neighborhood survey report so that all of the CCHR-recommended resources are shown. AINW is recommending an extension of the existing local Historic Preservation Overlay District 2, as shown by the red-dashed boundary on the Figure 8 map. The proposed overlay district extension would extend from 8^{tth} Street to 12th Street, bounded by Washington Street and Broadway. The northeast block on 12th Street is excluded because of the presence of a modern building on the entire block.

The historic building survey by AINW in 2005-2006 of the Uptown Village and a portion of the Mill Plain Couplet districts for the VCCV identified 169 commercial and residential buildings that are 45 years in age or older (Appendix B). The details of this study are presented below. The AINW Uptown Village and Mill Plain Couplet survey recommended three buildings to be eligible for listing in the NRHP and WHR, and 12 buildings for CCHR listing. AINW also recommends one local Historic Preservation District along Main Street (Figure 8-9).

For the Uptown Village and Mill Plain Couplet survey, the City of Vancouver Long Range Planning Department provided a map and a database listing with 256 addresses. AINW found four additional addresses during the survey that were not represented on the list. Eight buildings on the list have been demolished (Appendix B). The database list of addresses provided to AINW by the City indicated which properties had previously been inventoried. Other previously-inventoried resources were found in the DAHP database of historic buildings. The City also provided AINW with location information for each property, including township, range, section, and quarter-sections; UTM reference numbers; tax/parcel numbers; plat, lot, and block numbers; and year-built dates from the assessor's records for some of the buildings. Dates provided by the assessor's records were checked against historical data and amended when appropriate. When no dates were available, a "circa" date was assigned based on architectural style and/or historical data. The cut-off date was 1960 (45 years in age or older), so buildings with unknown dates of construction that appeared to be from the 1950s but could possibly be from the early 1960s were assigned a circa 1960 date and included in the inventory.

Due to the large number of historic-period resources that were recorded and the non-intrusiveness of the work, only exterior architectural characteristics were recorded during the pedestrian survey. Every building that appeared to pre-date 1960 was photographed with a digital camera. All of those properties that had previously been inventoried were reassessed for significance based on architectural integrity alone. Assessments for architectural significance were based on field observations, sometimes supplemented with limited amounts of historical data. No supplementary historical research on individual buildings was conducted because this was a reconnaissance survey, but it is understood that historical research would be beneficial to determining eligibility status rather than using architectural field data for each address were recorded on Historic Property Inventory Report forms. The forms are produced by the DAHP database of historic properties and buildings and this database becomes a part of the statewide inventory.

The Uptown Village and Mill Plain Couplet districts' inventory included all buildings that were built in or before 1960, even those that had been previously surveyed. The 39 previously surveyed buildings were re-examined to see if changes had occurred that could have compromised their architectural integrity (Appendix B). Many were found to lack architectural integrity and are recommended to be not eligible for listing in the NRHP.

The survey of the Uptown Village District and northeastern edge of the Mill Plain Couplet District for the VCCV resulted in a total inventory of 169 commercial and residential buildings that were 45 years in age or older (Appendix B). From this number, AINW is recommending three historic resources to be eligible for listing in the NRHP (Table 8-1; Figure 8-9). The three eligible resources are the First Christian Church Ensemble located at 1812 Main Street (Photo 8-8) and 111 West 19th Street; the Wisteria Court Apartments (Photo 8-12), located at 2218 Broadway Street; and the McCready Building (Photo 8-9), located at 1916 Main Street. Buildings recommended to be eligible for listing in the NRHP are also recommended to be eligible for listing in the State WHR and the local CCHR. Land use applications that have potential to affect buildings and other sites that are listed in, or qualify for listing in, the National Register of Historic Places, the Washington Heritage Register, or the Clark County Historic Register are subject to the SEPA review process.

AINW is recommending 13 buildings for listing in the NRHP, WHR, or the CCHR (Figure 8-9, Table 8-1). Listing in the CCHR is an honorary designation that denotes historical and architectural significance associated with the heritage of the City. Listing is also used as a planning tool and tax incentives are available to owners of CCHR-listed properties. The Open Space Program for the current use assessment of historic buildings (Chapter 84.34 RCW) is available for CCHR-registered properties. Listing is also used as a planning tool and tax incentives, most notably the Special Valuation for Historic Properties program, are available to owners of CCHR listed properties. Many of the buildings recommended for inclusion in the CCHR may also be eligible for listing in the state and national registers in the future if additional historical research determines they have significance and retain sufficient integrity. One building is currently listed in the CCHR, the Wisteria Court Apartments, and it is also recommended by AINW to be eligible for listing in the NRHP.

AINW recommends the designation of one local Historic Preservation Overlay District in the Uptown Village District (Table 8-1; Figure 8-9). The recommended overlay district is the North Main Street Commercial local district (containing 42 buildings). This recommended local district #7 on (Figure 8-9) contains older buildings that retain architectural or historical importance to the community along Main and Broadway Streets. Overlay districts are intended to preserve the special architectural character and historic significance of certain areas within the City. Even though some of the commercial buildings have been altered, the buildings within the overlay district collectively provide a streetscape reminiscent of an early-twentiethcentury commercial center.

Overall, the two AINW surveys found that most of the recorded buildings have been altered from their original appearances. Alterations that substantially change the historical appearance of a building render it ineligible for listing in the NRHP. It was also found that architectural styles in the VCCV generally reflected prevailing trends from across the nation. Residential architectural styles ranged from Queen Anne houses and cottages dating to the 1890s up to the early 1900s; Craftsman bungalow and foursquare styles from the first two decades of the 1900s; Spanish Mediterranean and Tudor Revival styles from the 1920s and 1930s; Cape Cod and Minimal Traditional forms from the 1940s; Moderne styles from the 1930s to 1950s; and Ranch houses from the 1950s. Commercial buildings within the VCCV likewise demonstrate the changing architectural tastes of the periods during which they were built. More diversity of style was observed on lower Main Street (south of Mill Plain Boulevard) due to the earlier development of that area. North of Mill Plain Boulevard, there is more uniformity of style, though this area demonstrates the range of architectural styles popular since the 1920s when this area was developed. Representative architects and architectural firms include Gough and Hilborn, Architects and Building Engineers, and the Davis Building Company.

POTENTIAL IMPACTS

The Proposed Alternative includes the VCCV, an update of the Esther Short Redevelopment Plan and an effort to foster and guide continued growth and development. The Subarea Plan established districts within the Planning Area with the intent to estimate the potential for each district to contribute to the realization of the Vision's development goals. The No Action Alternative is the existing plan, which is a continuation of the City's current GMA Comprehensive Plan and Esther Short Redevelopment Plan, should the City not adopt the VCCV.

Proposed Alternative:

Potential impacts caused by development within the Subarea to archaeological sites and designated historic buildings are discussed and summarized below for each of the six districts within the VCCV: Columbia West Renaissance, Esther Short, Westside Government, Central Downtown, Mill Plain Couplet, and Uptown Village. Recommendations for significance status of historic structures and buildings are found in Table 8-1. These buildings are either listed or recommended eligible for listing in the NRHP, WHR, CCHR, or local historic overlay districts. Maps in Figures 8-8 and 8-9 show the locations of historic buildings and recommended historic buildings and ensembles within each district that are discussed below; Figure 8-1 shows the locations of the archaeological sites identified.

Columbia West Renaissance

Archaeological

This district includes the northwest corner of the VCCV, which borders the Vancouver Lake Archaeological District; and the Columbia River waterfront east to Interstate 5, adjacent to the HBC Fort Vancouver. Redevelopment of the waterfront would change uses in the area to primarily residential use rather than the present industrial/commercial uses. Redevelopment could impact subsurface archaeological resources that are associated with Native American uses, early activities related to the nearby HBC fort, and from settlements at the Vancouver townsite, first platted in the 1850s. The Columbia West Renaissance District is located within a Predictive Model Probability Level A area for archaeological sites.

The Boise Cascade complex, which encompasses a portion of the Columbia West Renaissance District, was studied for archaeological resource potential in 2005 and the work has been summarized in an Archaeological Predetermination Report (Roulette and Finley 2005). The field reconnaissance consisted of examining the developed complex as well as the shoreline. According to the report, approximately 30 feet of sand and silt dredged from the river covers the shoreline, raising the land approximately 15 feet in height. This fill was probably added starting in 1908, when the railroad bridge and viaduct were built. The most extensive fill is in the location of the Boise Cascade Complex and the Vancouver Terminal near the Interstate 5 Bridge. No prehistoric or historic cultural materials or sites were identified during the predetermination survey, but further study was recommended given the likelihood of a resource being present (Roulette and Finley 2005).

Sanborn Fire Insurance maps and other early maps were analyzed as part of the Subarea Plan and Review to assess the potential for historic-period archaeological sites within the Columbia West Renaissance area. The area is within the early land claims of the HBC, land that was also later claimed by Amos and Esther Short. The maps show that a small part of the original platted townsite of Vancouver is near the present Interstate 5 interchange. Here were located some of Vancouver's earliest stores, hotels, and services, as well as the Vancouver City Flour Mills near a ferry landing on the Columbia River. Most of these early town buildings near the waterfront within the Columbia West Renaissance District were removed during the construction of Interstate 5 and the SR14 interchange. The original, historic-period Columbia River shoreline was inland of where the shore is today within the VCCV (see Figure 8-6). The area north of the 1890s-era shore has greater potential for both significant historic-period and Native American sites than the area to the south.

The VCCV anticipates an expansion of the Interstate 5 crossing, in addition to redevelopment of the Columbia River shore. There could be impacts to undocumented archaeological sites in this area, possibly even prehistoric or ethnographic-period sites, depending on the depth of construction work and whether it will extend to native soils beneath the asphalt and fill. For example, archaeological investigations were conducted to the west of the bridge on a vacant lot with an asphalt surface for an Archaeological Predetermination Report (Freed 2001). The archaeologists observed backhoe excavations through three feet of sand fill, but no historic artifacts were found and no prehistoric materials were recovered.

The northwestern portion of this district is also in an area with likelihood for intact deposits from both the historic period and from Native American use. Prior

disturbance from recent industrial use, however, may have compromised the depositional integrity.

Historic Buildings and Structures

The Boise Cascade complex has not been investigated for historic buildings since access was denied for the current project to survey the complex for historic buildings. With this exception, there is one previously identified historic building within the Columbia Renaissance area: the 1907 Vancouver Railroad Depot at 1301 West 11th Street. The 1908 railroad viaduct may be impacted by the project, but it also has not been inventoried or assessed for its NRHP eligibility (Photo 8-1).

Esther Short

Archaeological

The Esther Short District was examined for archaeological potential in the Esther Short FEIS in 1997 (Freidenburg 1998; The J.D. White Company, Inc. 1997). The Esther Short District is located within a Predictive Model Probability Level B area for archaeological sites, although the earlier predictive model considered it to fall within a Level A probability. However, all of the Esther Short District could be considered as a high probability area because of the location of the three significant archaeological sites in the district and others nearby that are within one-fourth mile (see Figure 8-1). Impacts could likely occur to subsurface cultural resources on all blocks within the Esther Short District.

The old Lucky Lager Brewery block was archaeologically assessed in the mid-1990s and impacts were identified and mitigated. Esther Short Park, which takes up a four block area, and several parcels surrounding it, have already been (or are planned to be) redeveloped. Any further development within the district could impact subsurface, historic-period, archaeological resources. Construction plans to strengthen primary street connections along Columbia and Esther Streets to the waterfront, with a secondary connection on Daniels Street, could affect subsurface archaeological resources, especially in places where cisterns had been placed within the street.

Historic Buildings and Structures

The VCCV calls for the area around Esther Short Park to be built-up with property improvements and infill development. This work could cause impacts to historic buildings, although the Plan intends to protect key historic buildings and established residential neighborhoods. In the 2004 AINW historic-building survey, 11 buildings were recommended for some level of significance status and protection (Table 8-1).

Westside Government

Archaeological

Two archaeological sites have been recorded in the Westside Government District and both are not recommended to be significant. The earlier predictive model considered the area as a Level A probability. Most of the Westside Government District, except for the portion west of Markle Street, should be considered as a high probability area because recorded archaeological sites are located within a onefourth mile radius. Impacts could likely occur to subsurface archaeological resources on almost every block within this area. The potential for archaeological sites is demonstrated by the rate of growth and development depicted on the Sanborn Fire Insurance maps. Residences and outbuildings were located on these blocks by the mid-to-late 1800s.

Historic Buildings and Structures

The VCCV will encourage development within the Westside Government District with services that are complimented by residential and other uses. Overall, the Plan is to protect key historic buildings and established residential neighborhoods, but there could be impacts to historic-period buildings. In the 2004 AINW historic-building survey, 28 historic-period buildings were recommended for some level of significance status and protection (Table 8-1).

Central Downtown

Archaeological

The Central Downtown District is located within a Predictive Model Probability Level B area for archaeological sites based on the 2000 predictive model, although the earlier model placed it within Level A. Almost the entire Central Downtown District, except for a small area near the Mill Plain Couplet, should be considered a high probability area because of the location of recorded archaeological sites within one-fourth mile (see Figure 8-1), and because it directly borders the HBC Fort Vancouver.

The VCCV will convert Main and Broadway Streets, termed the Main Street Corridor, from one-way to two-way traffic. Construction improvements will include a complete reconstruction of the infrastructure in the right-of-way from building-face to building-face, including water, sanitary, storm sewer, curbs, sidewalks, pavement, traffic control devises, landscaping, and installing conduit to allow overhead utilities to be placed underground. The roadway will be rebuilt north of 8th Street on Main and Broadway Streets and old trolley tracks that have been paved over will be removed. Impacts could likely occur to subsurface archaeological resources on every block where this type of work is done. The potential for archaeological sites is demonstrated by the rate of growth and development depicted on the Sanborn Fire Insurance maps. Commercial buildings, residences, and associated outbuildings were located on these blocks by the mid-to-late 1800s.

Historic Buildings and Structures

The VCCV calls for revitalizing uses along the Main Street Corridor. The Main Street Corridor will include Main Street from 5th Street to Fourth Plain Boulevard and its connecting side streets. The plan will involve creating an Evergreen/Main Street pulse point, developing the Kiggins Theater Block, and renovating storefront retail spaces on Main Street, among other changes. Revitalizing the Main Street Corridor will also involve creating a connection between downtown and the Vancouver National Historic Reserve via a 7th Street (Heritage Way) pedestrian bridge. The intersection at Main and 7th Streets will change in pattern and become open to general circulation. A total of 42 historic buildings had been recorded during the 2004 AINW Esther Short Neighborhood survey that could be impacted by these improvements (Table 8-1). Two established overlay district (#1 and #2) and one proposed overlay district (#6) are located in the Central Downtown District.

Mill Plain Couplet

Archaeological

Although the entire area was part of Level A based on the earlier model, the Mill Plain Couplet District is located within a Predictive Model Probability Level B area for

archaeological sites. The east portion of the Mill Plain Couplet District should be a high probability area because of the location of recorded archaeological sites within one-fourth mile and because it is adjacent to the HBC Fort Vancouver. Impacts could likely occur to subsurface archaeological resources on every block within the Mill Plain Couplet District. The potential for archaeological sites is demonstrated by the rate of growth and development depicted on the Sanborn Fire Insurance maps. Residences and outbuildings were located on these blocks by the mid-to-late 1800s.

Historic Buildings and Structures

The VCCV will encourage changes within the Mill Plain Couplet by renovating the Carnegie Library and providing streetscape repairs and improvements on Main and Broadway Streets (described above in the Central Downtown section). These improvements could cause impacts to historic-period buildings that may be impacted by the streetscape repairs. Eleven historic buildings had been recorded during the 2004 AINW Esther Short Neighborhood survey and the Uptown Village/Mill Plain Couplet historic building survey (Table 8-1). One local historic overlay district (#6) is located within the Mill Plain Couplet District.

Uptown Village

Archaeological

The Uptown Village District is located in Predictive Model Probability Level B for archaeological resources and no archaeological sites have been identified within it. Generally, the Uptown Village District is not located within one-fourth mile of recorded archaeological sites. However, impacts could likely occur to subsurface archaeological resources within the Uptown Village District. Archaeological deposits from the mid- to late-nineteenth century are not as likely (but still possible) since development had not spread north along Main Street until the turn of the century, but deposits from the early 1900s may be present. A small portion of the Uptown Village west of Main Street is on the Esther and Amos Short Donation Land Claim, but no buildings or structures from their occupation period are noted on early General Land Office maps (see Figure 8-7) (General Land Office 1861, 1865). A review of nineteenth-century maps shows that no other occupations, such as habitations associated with the HBC, were located in the area (Habersham 1888; Hussey 1957:Plates XX, XXI, and XXVII; Pioneer Real Estate Agency 1889, The National Map Co. 1910).

The Sanborn Fire Insurance map from 1907 (Figure 8-10) provides an overview of development within the present Uptown Village District. There were no commercial buildings along Main Street in 1907, but several substantial houses with associated stable or carriage houses were located on the east side of Main Street in the northernmost blocks. Main Street was lined with a few houses, but there were many vacant lots. Generally, only two to four houses were located on each occupied block, and many lots were vacant until increased development occurred in the 1920s. Large multiple blocks were used for an orchard and for the Hidden Brick Yard, where a prune dryer complex was also located. Residential density is shown on the 1907 Sanborn map only along Columbia Street (Sanborn Map & Publishing Company 1907). AINW recommends that Main Street through the Uptown Village is a high probability area for historical archaeological resources.

Historic Buildings and Structures

The VCCV will encourage change within the Uptown Village District, including Main Street and Broadway streetscape renovations and the construction of streetscape

improvements on Main Street. These renovations and improvements could cause impacts to historic-period buildings. Overall, the VCCV is to protect key historic buildings and the established residential neighborhoods. During the Uptown Village/Mill Plain Couplet survey, 49 historic buildings and one potential local historic overlay district (#7) were recommended for significance status (Table 8-1). The NRHP-listed Carnegie Library Building, included in the total 49 buildings, was recorded during the 2004 Esther Short Neighborhood survey (Photo 8-7).

No Action Alternative:

The No Action alternative (the existing City of Vancouver Comprehensive Plan) is expected to increase residential units by approximately 1,930, increase the number of residents in the area by approximately 3,088 residents, and increase employment by approximately 7,705 people. These increased figures will result in redevelopment within the City Center area. Therefore, redevelopment under the No Action will also result in potential impacts similar to those identified under the Proposed Alternative.

MITIGATION MEASURES

Proposed Alternative:

Archaeological

In the City of Vancouver, the Archaeological Resource Protection Chapter 20.710.070 outlines that an archaeological study is required as part of the development review step when any part of the land is in probability Level A, or when the development is five acres or more in size, or when it is within one-fourth mile of a recorded archaeological site. A study, called a predetermination, is done prior to submitting an application for development (site plan, master plan, building permit, etc.) to determine if an archaeological site is likely within the project, and if the predetermination finds that a resource is likely, a survey is done to verify the presence of the site, delineate it, and provide information about its likely significance.

The update of the predictive model in 2000 removed nearly all of the City's historic core area from the Level A probability, despite explicitly being designed to capture areas where historic-period archaeological sites may be present. Within the VCCV, Level A only includes the land between the BNSF Railroad and the Columbia River in the southern portion of the Subarea, and to the west of the railroad where it curves to the north; this means that Level A is restricted to just the Columbia West Renaissance District. The historical and archaeological background sections of this chapter show that an archaeological site is likely in much of the VCCV, although this high likelihood is for historic-period resources related to the early settlement and growth of the City and related to activities of the nearby HBC Fort Vancouver. Native American sites will most likely be found in the area along the Columbia River and to the west in the low-lying lands around Vancouver Lake, in the currently-designated Level A.

During this study, it became apparent that the City's records did not include all of the archaeological sites identified, which meant some sites subject to the requirement for an archaeological study would be, or were probably, missed. Mapping of the one-fourth-mile area surrounding the existing archaeological sites within the VCCV (Figure 8-11) demonstrates that archaeological studies will be needed throughout much of the VCCV. The historical review strongly suggests that older historic-period archaeological deposits are likely in the area west of Interstate 5, probably south from about Mill Plain Boulevard, which is opposite the northern end of Fort Vancouver. It is recommended that this area be added as probability Level A for archaeological study. Information from the Sanborn maps and other historical sources show that several blocks on the east side of Main Street plus the block where the Hidden family brickworks operated along Mill Plain west of Main Street, should be considered as higher probability areas. The streets in the older areas of the central City, plus Main Street, have cisterns that may have significant archaeological deposits in them (see Figure 8-10). To address this, the following mitigation measures are recommended to be adopted:

The archaeological predictability model should be revised to include all identified archaeological sites.

As an interim measure until the predictability model is completed, the City should include in the City of Vancouver Development Code, Figure 20-710-1 an interim map that identifies the City Center south of Mill Plain as Level A.

The City's Archaeological Resource Protection ordinance outlines provision for a waiver when there has been substantial prior disturbance. Areas paved in the early part of the nineteenth century, and even areas where buildings were constructed, do not meet the standards for this waiver. Several of the archaeological sites recorded in the VCCV, including the significant sites, were under or associated with buildings or former buildings. Mechanical probing should be encouraged as a method for site discovery in these situations.

The ordinance also has a provision for unanticipated discovery of archaeological sites. It is not necessary that the site is found in any particular probability level for this to apply. In a situation where a item of archaeological interest is discovered or uncovered during the course of a ground disturbing activity subject to the City's Development Review, all ground-disturbing activity shall immediately cease and the applicant is to immediately notify the Planning Official and the DAHP. In accordance with state law, other types of ground disturbing activities that uncover an archaeological site should be halted and the DAHP should be contacted in order to address the State's management of significant archaeological sites.

Historic Buildings

In the event that historic buildings will be impacted by direct or indirect actions, procedures under the VMC Chapter 17.39 Historic Preservation, are applicable. This code applies to properties listed in or eligible for listing in the CCHR, the WHR, and the NRHP, and to buildings listed on other local registers for Clark County. The code encourages the protection and restoration or rehabilitation of historic buildings.

Ideally, impacts to historic properties should be avoided or minimized through project redesign as a form of mitigation, such as incorporating new development in a sensitive and compatible manner with the historic fabric of a neighborhood. As mitigation for individual historic properties that may be impacted in some way, especially those listed in or eligible for listing in the NRHP, approaches to treatments should follow the Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties (National Park Service 2006). The standards and guidelines promote protection of the historic building by, in hierarchical order, preservation, rehabilitation, restoration, or reconstruction. **Preservation** retains the existing form, integrity, and materials through conservation, maintenance, and repair. Preservation reflects a buildings continuum over time and the respectful changes and alterations that have been made to it.

Rehabilitation emphasizes the retention and repair of historic materials while making possible a compatible use for a property. In these cases, historic building materials and character-defining features are protected and maintained, but repair and replacement of damaged and deteriorated materials are needed.

Restoration focuses on the retention of materials from the most significant time in a property's history, while accurately depicting the form, features, and character of the original construction. Restoration permits the removal of non character-defining materials from other periods. Upgrades on mechanical, electrical, and plumbing systems, and code-required work, is appropriate.

Reconstruction allows for replicating historic features, such as form and detailing, with new construction. Documentary and physical evidence is used to permit accurate reconstruction with minimal conjecture.

If direct or indirect impacts are unavoidable, the harm can be minimized through the implementation of measures including, but not limited to the following:

- Recordation of significant buildings to meet Historic American Building Survey (HABS) level, including documentary photography, plan and elevation drawings, and descriptive and historical narratives.
- Research historic buildings and make recommendations for NRHP eligibility.
- Conducting detailed surveys and inventories of historic buildings and districts, including local historic overlay districts.
- Public education displays and interpretation.
- Funding for cultural resource protection and other historic preservation activities.

The City of Vancouver should encourage the restoration and rehabilitation of historic buildings by actively promoting current historic preservation tax incentives available through the existing Special Valuation and Current Use programs.

The City of Vancouver should work with the Clark County Historic Preservation Commission for any future expansions of existing or creation of new Historic Overlay Districts.

The design materials that are used during restoration or rehabilitation of a building should be consistent with the historic materials and period of construction. For example, if a building was originally built with bricks from the Hidden Brick Company, compatible bricks should be used. Wooden features on houses should be identified, retained, and preserved, including siding, cornices, brackets, window architraves, and doorway finishes, as well as their paints, finishes, and colors. Architectural metal columns (e.g. cast iron), capitals, window hoods, or stairways should be identified, retained, and preserved. Other finishes that should be retained are pigmented glass panels (vitrolite, carrera), glass block, neon, aluminum,

stainless steel, terra cotta, concrete, concrete block, and stucco finishes from the historic period.

New building façades planned for integration into an existing historic neighborhood should be compatible with the scale and character of adjacent buildings. Building height, façade proportions, exterior surface materials, building setback, and roof forms should be taken into consideration. (Refer to Rehabilitation section above).

Historic storefronts in original condition with large plate-glass display windows and recessed entrances are uncommon, but those that may exist should be retained. Functional and decorative features associated with historic storefronts that may be found on altered buildings include display windows, signs, doors, transoms, kick plates, corner posts, and entablatures. This detailing should be identified, retained, and preserved. Window patterns on the upper floors of commercial buildings, as well as cornice elements and other decorative features, are more common on buildings with altered storefronts and should be retained. The upper portion of a building which may have been used as office or residential space, would be visually related to the historic storefront in form and detail, and that relationship should be maintained.

Columbia West Renaissance

Archaeological

The Columbia Renaissance area is entirely within Level A probability and all new development there will be required to provide an archaeological study as the area has a good probability to contain archaeological resources beneath existing Boise Cascade facilities. The predetermination report for the Boise Cascade property recommended that an archaeological survey be conducted and that an archaeological monitor be present during ground-disturbing activities including geotechnical boring or trenching, contaminated soil cleanup, pavement or asphalt stripping, structure removal, or the excavation of pier footings (Roulette and Finley 2005).

Predetermination reports and/or archaeological surveys are recommended for all areas of the Columbia Renaissance where disturbances may occur because the area is in Predictive Model Probability Level A. Prehistoric and historic archaeological deposits may be present under caps of fill, and beneath buildings and asphalt, and prehistoric resources may be present directly offshore. However, as shown in Figure 8-6, there is substantial fill right along the Columbia River shore that created new land, and the area, beyond the late 1800s shoreline, is not a likely area for an archaeological site.

Historic Buildings

The Boise Cascade complex has not been surveyed for aboveground historic resources. Historic-period buildings and structures that date from the late 1800s and early 1900s, when the original mill was built, may be present within the complex. The complex was not surveyed for the VCCV because access to the property was denied. Prior to issuance of a demolition permit, the complex should be assessed for historical significance and integrity, and if portions of the complex are determined significant, then appropriate mitigation measures should apply. A HABS-level recordation of the significant buildings and structures within the complex would be appropriate.

One other significant building is located in this district, the Vancouver Railroad Depot, but no changes to this structure are proposed as a part of this plan. If the

BNSF railroad berm will be affected in any way, the berm and its associated viaduct should be researched and assessed for inclusion in the NRHP. Appropriate mitigation measures, such as a HABS-level historic documentation, should apply if it is a significant resource and any alterations are planned.

Esther Short

Archaeological

The Esther Short District is highly likely to contain historic archaeological resources. Archaeological surveys are recommended for all blocks within the Esther Short area where ground disturbances may occur because all blocks are within one-fourth mile of a recorded archaeological site. Previous archaeological research within this area has recovered significant archaeological deposits. Historic archaeological features and deposits, and possibly prehistoric sites near the south boundary of the Esther Short area, may be present under extant buildings and sidewalks and in vacant lots and parking lots.

Historic Buildings

A survey and inventory of historic buildings in the Esther Short Neighborhood was completed by AINW in 2004. The only NRHP-listed building is the Slocum House, which had been moved to Esther Short Park. AINW recommended buildings for inclusion in the NRHP, such as the Cushing-Caples House (Photo 8-2), and the report recommended a proposed local overlay district (Table 8-1). If designated historic buildings are impacted by the project, preservation and restoration, including documentation, or rehabilitation mitigation measures should apply.

Westside Government

Archaeological

Archaeological studies are recommended for the Westside Government District where ground-disturbances may occur since many of these blocks are within one-fourth mile of known, recorded archaeological sites. The portion west of Markle Street, which is not subject to the one-fourth mile rule, has potential for archaeological deposits but this area experienced a slower growth and development rate and significant deposits from the late 1800s and early 1900s are less likely. If present, historical archaeological features and deposits may be found under extant buildings and sidewalks, and in vacant lots and parking lots.

Historic Buildings

A survey and inventory of historic buildings in the Westside Government District was completed as part of the Esther Short Neighborhood inventory by AINW in 2004. The only NRHP-listed buildings are the Vancouver Main Post Office and the Chumasero-Smith House, although AINW recorded several other historic buildings and made recommendations for overlay districts and listing in the NRHP, WHR, and the CCHR (Table 8-1; Figure 8-8). If designated historic buildings are impacted by the project, preservation and restoration, including documentation, or rehabilitation mitigation measures should apply.

Central Downtown

Archaeological

Archaeological studies are recommended for the Central Downtown District where ground-disturbances may occur. These blocks are within one-fourth mile of recorded

archaeological sites or are adjacent to Fort Vancouver. Historically, commercial development was concentrated along Main and Washington Streets. In the northeast area, a potential for archaeological deposits exists, especially along Main and Washington Streets, where significant deposits from the late 1800s and early 1900s are likely to occur due to the concentration of residential development north of 9th Street. If present, historical archaeological features and deposits may be found under extant buildings and sidewalks, and in vacant lots and parking lots.

Historic Buildings

A survey and inventory of historic buildings in the Central Downtown District was completed as part of the Esther Short Neighborhood inventory by AINW in 2004. The St. James Cathedral is recommended by the DAHP to be eligible for listing in the NRHP. There are presently two previously-designated local historic preservation overlay districts, #1 and #2. AINW recommends an extension of historic preservation overlay district #2 (Figure 8-8). The AINW study recommended several buildings eligible for listing in the NRHP, WHR, CCHR, and/or local historic overlay districts (Table 8-1; Figure 8-8). If designated historic buildings are impacted by the project, preservation and restoration, including documentation, or rehabilitation mitigation measures should apply.

Mill Plain Couplet

Archaeological

Archaeological studies are recommended for all blocks in the western part on the Mill Plain Couplet District where ground-disturbances may occur because these blocks are within one-fourth mile of known, recorded archaeological sites. The east half has potential for archaeological deposits since each block contained approximately four to five houses and associated outbuildings during the historic-period, and it borders Fort Vancouver. Archaeological deposits from the early 1900s are likely, and some may prove to be significant indicators of early domestic life in Vancouver. If present, historical archaeological features and deposits may be found under extant buildings and sidewalks, and in vacant lots and parking lots.

Historic Buildings

A survey and inventory of historic buildings in the Mill Plain Couplet District was completed as part of the Esther Short Neighborhood inventory by AINW in 2004. Additional buildings were recorded during the AINW Uptown Village/Mill Plain Couplet survey. Several buildings are recommended for inclusion in the NRHP, WHR, CCHR, and/or local historic overlay districts (Table 8-1; Figure 8-8). If designated historic buildings are impacted by the project, preservation and restoration, including documentation, or rehabilitation mitigation measures should apply.

Uptown Village

Archaeological

There are no recorded archaeological sites at present within one-fourth mile of the Uptown Village, except in its southwestern corner. As stated above, the Uptown Village has potential for archaeological deposits but this area experienced a slower growth and development rate, and significant deposits from the late 1800s and early 1900s are less likely. The most likely areas are along the east side of Main Street, especially at its northern end (Figure 8-10), and at its intersection with Mill Plain Boulevard, where the Hidden Brick factory was once located. If present, historical

archaeological features and deposits may be found under buildings and sidewalks, and in vacant lots and parking lots.

Applicants undergoing development in areas with archaeological potential in the Uptown Village District should, at a minimum prior to a development, conduct historical background research to document the date and past use of a building. In the event of an unanticipated archaeological discovery, applicants should be aware of a clause pertaining to the discovery of archaeological resources as outlined in Chapter 20.710.090 of the VMC. The code applies when any item of archaeological interest is discovered during the course of a permitted ground-disturbing action or activity. If an archaeological resource is discovered, all ground-disturbing activity should immediately cease and the applicant should notify the Planning Official and the DAHP. The applicant should then provide for a predetermination report and a survey report, if needed, in accordance with the VMC.

Historic Buildings

A survey and inventory of historic buildings in the Uptown Village area was conducted by AINW and summarized in this Chapter. The survey recommended 19 buildings to be eligible for listing in the CCHR and it recommended one local historic overlay district (Table 8-1; Figure 8-9). If designated historic buildings are impacted by the project, preservation and restoration, including documentation, or rehabilitation mitigation measures should apply.

No Action Alternative:

It is assumed that the same mitigation measures identified under the Proposed Alternative would be appropriate mitigation measures for development projects undertaken under the No Action Alternative.

UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

Proposed Alternative:

There would be no unavoidable significant adverse impacts to archaeological resources after implementation of the mitigation measures specified above. There would be no unavoidable significant impacts to designated historic buildings if the buildings are protected, restored, or rehabilitated, as stated above.

No Action Alternative:

There would be no unavoidable significant adverse impacts to archaeological resources after implementation of the mitigation measures specified above. There would be no unavoidable significant impacts to designated historic buildings if the buildings are protected, restored, or rehabilitated, as stated above.

CHAPTER 8 FIGURES, TABLES AND MAPS

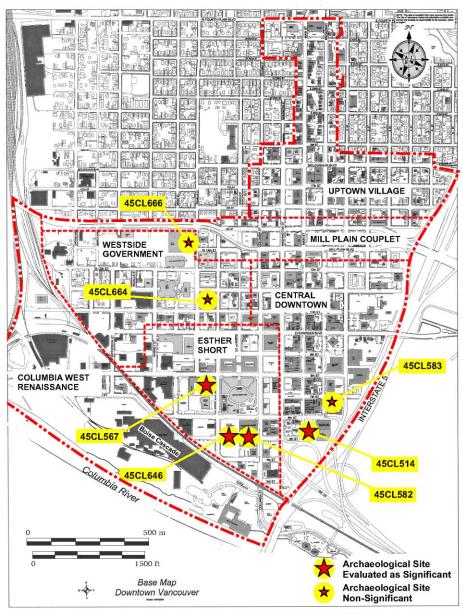


Figure 8-1. Location of recorded archaeological sites within the VCCV Subarea Plan. The sites are listed in Table 2.

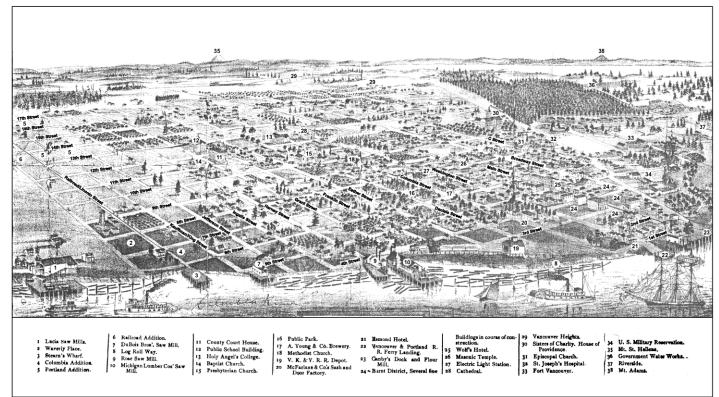


Figure 8-2. Birdseye view of Vancouver in 1889 (Pioneer Real Estate Agency 1889). Modern street names have been added.

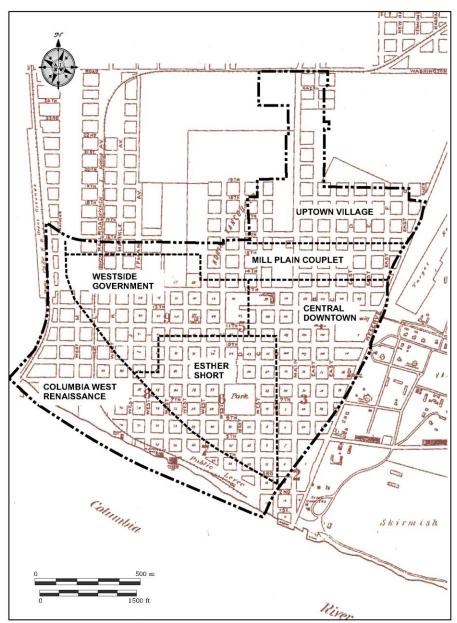


Figure 8-3. Sanborn Fire Insurance Map (1892), with the VCCV Subarea Plan boundaries and Districts shown along the black lines. The north-south streets had letter names at that time.

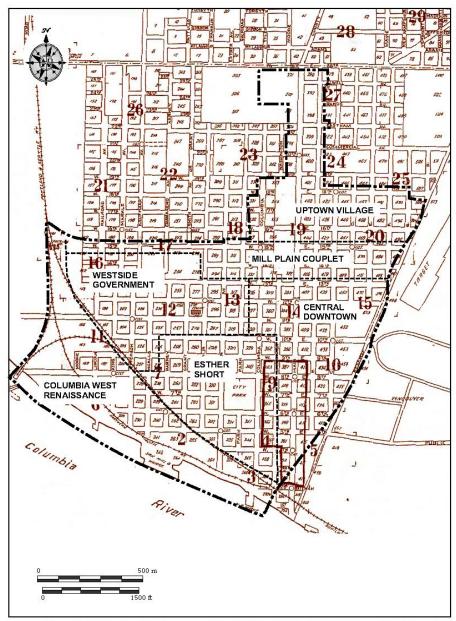


Figure 8-4. Sanborn Fire Insurance Map (1907), with the VCCV Subarea Plan boundaries shown along the black lines.

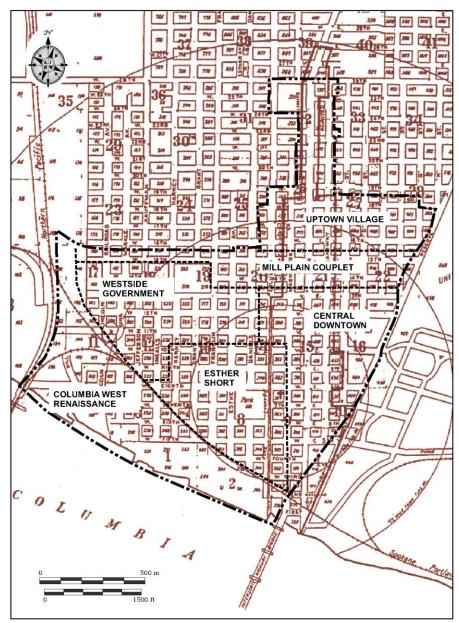


Figure 8-5. Sanborn Fire Insurance Map (1949), with the VCCV Subarea Plan boundaries shown along the black lines. The concentric circles appear on the original Sanborn Fire Insurance Map, and show 1/4 mile, 1/2 mile, and 1 mile radii from Vancouver City Hall.

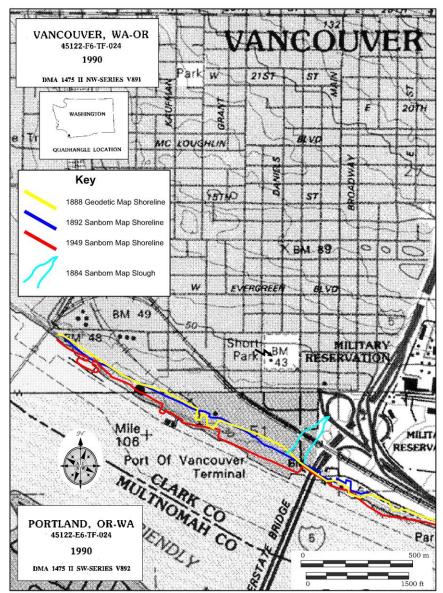


Figure 8-6. Map showing earlier historical shoreline configurations along the Columbia River.

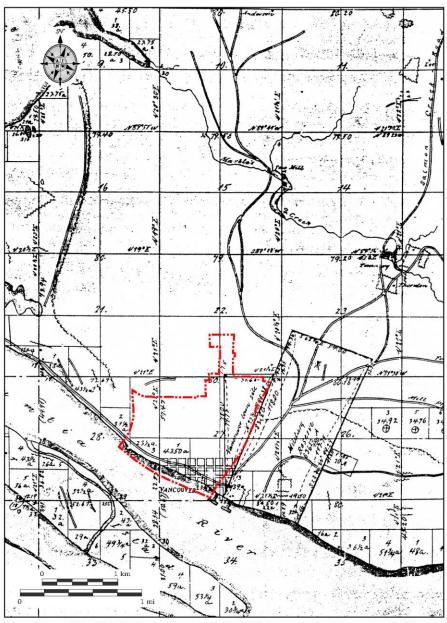


Figure 8-7. 1861 GLO map showing the VCCV Subarea outline (shown in red). The stream drainage within the Military Reserve is not the same as the slough shown on the Figure 6 map.

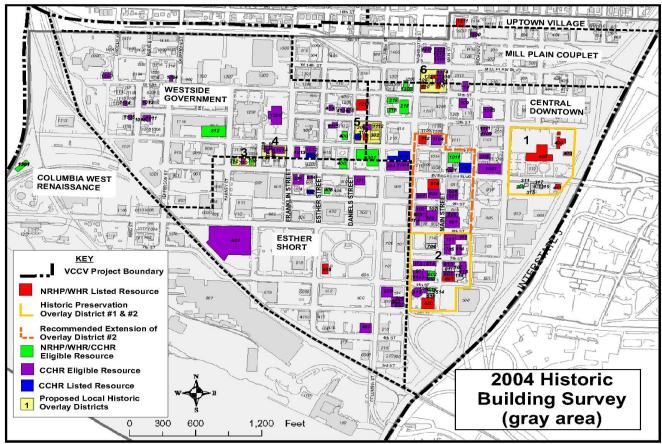


Figure 8. Location of listed and recommended NRHP, WHR, and Historic Preservation Overlays (1-6) in the Columbia West Renaissance, Esther Short, Westside Government, Central Downtown and Mill Plain Couplet for the VCCV Subarea Plan (Revised June 23, 2006).

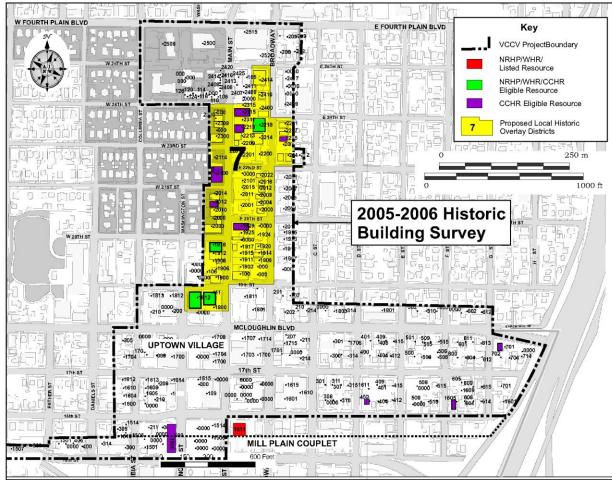
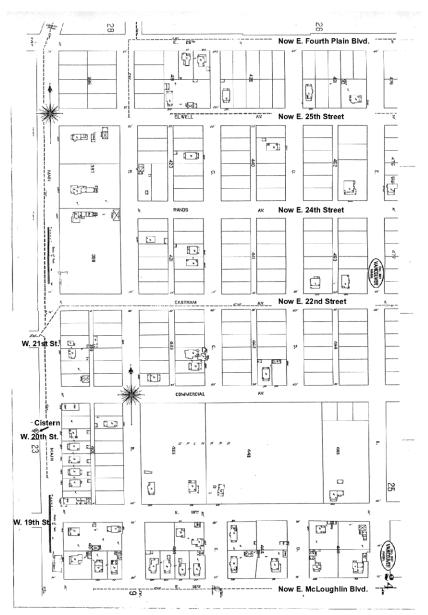
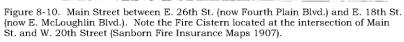


Figure 8-9. Proposed NRHP, WHR, and CCHR resources and the Local Historic Overlay District within the Uptown Village and Mill Plain Couplet for the VCCV Subarea Plan.





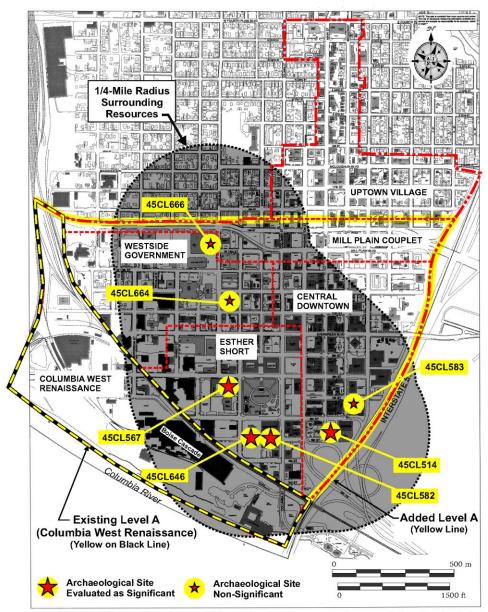


Figure 8-11. Location of area within one-fourth mile surrounding recorded archaeological sites that are within the VCCV Subarea Plan (Dark Grey). The sites are listed in Table 1. (This does not take into account recorded sites to the east.) Area recommended to be added to Level A probability noted by wide yellow line.



Photo 8-1. The Boise Cascade Complex and the BNSF viaduct are located in the Columbia West Renaissance area. These two resources have not been surveyed. The view is to the southwest.



Photo 8-2. Cushing-Caples House (1888), west elevation and south facade. The building is located in the Esther Short area and is recommended eligible for the NRHP, WHR, and the CCHR. The view is to the northeast.



Photo 8-3. Kiggins Theater was designed by Vancouver architect Day W. Hilborn in 1935. The building is in the Central Downtown area and is recommended eligible for the NRHP, WHR, and the CCHR. The view shows the north elevation and the west facade.



Photo 8-4. The Wolf's Supply Company building (ca. 1951) is one of the first tilt-up concrete buildings in Vancouver. The building is located in the Central Downtown area and is recommended eligible for the NRHP, WHR, and the CCHR. The view is to the west.



Photo 8-5. Pepsi building (ca. 1935), south facade. The building is located in the Westside Government area and is recommended eligible for the NRHP, WHR, and the CCHR. The view is to the northeast.



Photo 8-6. The circa 1883 Charles Brown house south facade and east elevation. The building is located in the Westside Government area and is recommended eligible for the NRHP, WHR, and the CCHR. The view is to the northwest.



Photo 8-7. The Carnegie Library (1909) north elevation and west facade. The building is located in the Uptown Village area. The view is to the southeast. It is currently listed in the NRHP, WHR, and the CCHR.



Photo 8-8. The east facade of the 1923-1925 First Christian Church. The building is located within the Uptown Village area and is recommended to be eligible for listing in the NRHP, WHR, and the CCHR.



Photo 8-9. The McCready Building (1928) is located in the Uptown Village area and is recommended eligible for the NRHP, WHR, and the CCHR, and as a contributing resource in the proposed North Main Street Commercial Local Historic Overlay District. The view shows the east facade and the north elevation.



Photo 8-10. The 1925 Schofield Building was designed and built by the Davis Building Company. The building is located in the Uptown Village area and is recommended for the proposed North Main Street Commercial Local Historic Overlay District. The view is to the southwest.



Photo 8-11. The Society Theater (1925) south elevation and east facade. The building is located in the Uptown Village area and is located in the recommended North Main Street Commercial Local Historic Overlay District. The theater has been altered and no longer retains its original interior features or the original entry facade.



Photo 8-12. The Wisteria Court Apartments (circa 1929) east facade and north elevation. The building is located in the Uptown Village area and is currently listed in the CCHR and is recommended to be listed in the NRHP and the WHR.

		EXIS	TING ST	ATUS	AINW RECOMMENDATIONS				
PROPERTY ADDRESS	PROPERTY DESCRIPTION	NRHP	WHR	CCHR	NRHP	WHR	CCHR	OVERLAY DISTRICT*	
COLUMBIA WEST RENAIS	SANCE								
1301 W 11 th St.	Railroad Depot	DE			Х	X	Х		
ESTHER SHORT DISTRIC	Г								
209 W 6 th St.	Commercial Building						X		
801 W 8 th St.	The Columbian Building						X		
408 W 9 th St.	Blaker House				x	x	Х		
400 Columbia St.	Webber Machine Works						Х		
605 Esther St.	Slocum House	х	Х	Х					
902 Esther St.	Dubois House			Х					
914 Esther St.	Queen Anne/Colonial House						Х		
204 W Evergreen Blvd.	Vancouver Marketplace						Х		
311 W Evergreen Blvd.	Commercial Building						Х		
400 W Evergreen Blvd.	First Presbyterian Church				х	x	Х		
511 W Evergreen Blvd.	Apartment Complex						Х		
700 W Evergreen Blvd.	Eddings House				x	x	x	3	
710 W Evergreen Blvd.	Vernacular House							3	
712 W Evergreen Blvd.	Cushing-Caples House			Х	х	x		3	
500 Washington St.	Commercial Building						x		
502 Washington St.	Commercial Building						x		
508 Washington St.	Commercial Building						х		
1004 Washington St.	Commercial Building						x		
WESTSIDE GOVERNMENT	DISTRICT								
310 W 11 th St.	Chumasero-Smith House	х	х	х	I	1		5	
314 W 11 th St.	Kettering House			х				5	
400 W 11 th St.	Charles Brown House				x	x	х	-	
609 W 11 th St	Commercial Building						X	4	
611 W 11 th St.	Vernacular House						X	4	
613 W 11 th St.	Commercial Building						X	4	
615 W 11 th St.	Commercial Building						X	4	

TABLE 8-1. Historic Buildings' Existing Status and AINW Recommendations Within the VCCV Subarea

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812 W 11 th St.	Pepsi-Cola Bottling Company	Х	Х	Х	
309 W 12 th St.	Hamilton House			Х	5
406 W 12 th St.	American Foursquare House			Х	
410 W 12 th St.	Craftsman House			Х	
414 W 12 th St.	Queen Anne House			Х	
1011 W 12 th St.	Queen Anne/Classic House			X	

		EXIS	TING ST	ATUS	AINW RECOMMENDATIONS				
PROPERTY ADDRESS	PROPERTY DESCRIPTION	NRHP	WHR	CCHR	NRHP	WHR	CCHR	OVERLAY DISTRICT*	
WESTSIDE GOVERNMEN	T DISTRICT, continued								
1012 W 12 th St.	American Foursquare House						X		
1015 W 12 th St.	American Foursquare House						Х		
1104 W 12 th St.	Queen Anne House						Х		
1105 W 12 th St.	Queen Anne House (moved to Esther St. in 2006)						x		
1004 W 13 th St.	Commercial Building						х		
1200 W 13 th St.	Varicast, Inc.						х		
1211 Daniels St.	Main Post Office	х	х				Х		
1010 Esther St.	Langsdorf House			Х					
1012 Esther St.	Queen Anne/Classic House						X		
1115 Esther St.	Dutch Colonial House						X		
1013 Franklin St.	Commercial Building						X		
1014 Franklin St.	Queen Anne House						X	4	
1200 Franklin St.	Clark County Courthouse						X		
CENTRAL DOWNTOWN D	ISTRICT								
114 E 6 th St.	Commercial Building					1		2	
105 W 6 th St.	Commercial Building							2	
108-114 W 6 th St.	Schofield Building II						X	2	
107 E 7 th St.	Commercial Building							2	
114 E 7 th St.	Safeway Store						x	2	
115 E 7 th St.	Sparks Motor Car Company						x	2	
113 W 7 th St.	Cady Building						x	2	
101 E 8 th St.	The CC Store						X	2	

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111-119 E 8 th St.	Commercial Building					Í	X	2
114 W 8 th St.	Commercial Building						X	2**
107 W 9 th St.	Commercial Building						X	2**
109 W 9 th St.	Ludesher Building						Х	2**
205 E 11 th St.	Commercial Building						Х	
112 W 11 th St.	Vancouver Telephone Building	Х	X	x				2**
301 W 11 th St.	Wolf's Supply Company				х	x	Х	
302 W 11 th St.	Hamilton-Mylan Funeral Home							5
204-218 W 12 th St.	St. James Cathedral	DE	Х		Х		Х	
100 W 13 th St.	Lowell Mason Hidden House	Х	Х	X				6
110 W 13 th St.	Foster Hidden House and Garage	Х	Х	x				6
109 E 13 th St.	Commercial Building						Х	
110 E 13 th St.	Commercial Building						X	

		EXIS	TING ST	ATUS	AINW RECOMMENDATIONS				
PROPERTY ADDRESS	PROPERTY DESCRIPTION	NRHP	WHR	CCHR	NRHP	WHR	CCHR	OVERLAY DISTRICT*	
CENTRAL DOWNTOWN D	ISTRICT, continued								
1001 Broadway St.	Commercial Building						Х		
1109 Broadway St.	Vernacular House						X		
1111 Broadway St.	Commercial Building						Х		
1205 Broadway St.	Commercial Building						Х		
1112 Columbia St.	American Foursquare/Colonial House							5	
102 E Evergreen Blvd.	Commercial Building			Х				2**	
303 E Evergreen Blvd.	Hilborn Office				х	x	Х	1	
311 E Evergreen Blvd.	Vernacular House							1	
315 E Evergreen Blvd.	Vernacular House							1	
317 E Evergreen Blvd.	Vernacular House							1	
319 E Evergreen Blvd.	Vernacular House							1	
400 E Evergreen Blvd.	House of Providence/Academy	Х	Х				Х	1	
411 E Evergreen Blvd.	Kiggins House	Х	х				х	1	
500 Main St.	Evergreen Hotel	Х	Х				х	2	
510 Main St.	Commercial Building							2	
514 Main St.	Commercial Building							2	
518 Main St.	Vancouver National Bank			х	x	x		2	

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600-602 Main St.	Schofield Building I					1	x	2
602-606 Main St.	Schofield Block				Х	X	X	2
601 Main St.	U.S. National Bank Building	x	X	X			X	2
605-609 Main St.	Engleman Building						X	2
611 Main St.	Commercial Building							2
614 Main St.	Donegan Building						X	2
613-615 Main St.	Kirch Building						X	2
701-705 Main St.	Eichenlaub-Weigel Block						X	2
704 Main St.	Commercial Building							2
801 Main St.	National Bank Building						X	2**
806-808 Main St.	Kiggins Building I						X	2**
809 Main St.	Commercial Building						X	2**
901-909 Main St.	Swank & Co. Department Store						X	2**
902-904 Main St.	Kiggins Building II						X	2**
905 Main St.	Commercial Building						X	2**
910-916 Main St.	Elks Building	x	X				X	2**
1001 Main St.	Commercial Building						X	2**
1011 Main St.	Kiggins Theater				Х	Х	Х	2**
1104 Main St.	Arts Buildings						X	2**
		EXIS	TING ST	ATUS	AI	NW REC	OMMEN	DATIONS
PROPERTY ADDRESS	PROPERTY DESCRIPTION	NRHP	WHR	CCHR	NRHP	WHR	CCHR	OVERLAY DISTRICT*
CENTRAL DOWNTOWN D	ISTRICT, continued				-			
515 Washington St.	Smith Tower						Х	2
607 Washington St.	Schofield Building III						Х	2
809 Washington St.	Commercial Building				1		X	2**
901 Washington St.	Commercial Building						X	2**
1012 Washington St.	Koplan's Furnishings			X				
=	-							

MILL PLAIN COUPLET DISTRICT

Luepke Florist Building

1300 Washington St.

108 W 13 th St.	Commercial Building		6
1500 Broadway St.	Commercial Building	x	
1304 Main St.	Automotive Commercial Building	X	6

Χ

Χ

Χ

1306 Main St.	Commercial Building						X	6
1314 Main St.	Commercial Building						X	6
1400 Main St.	Commercial Building						X	
1410 Main St.	Commercial Building						X	
1416 Main St.	Palace Market						X	
1331 Washington St.	Hidden Barn	X	Х	Х				6
1411 Washington St.	Spic-N-Span Diner						X	
UPTOWN VILLAGE DIST	RICT							
402 E 16 th St	American Foursquare House						X	
100 E 19 th St.	Collings Building							7
111 W 19 th St.	First Christian Church Fellowship Center				x	x	x	7
200 E 22 nd St.	Craftsman House							7
204 E 22 nd St.	Craftsman House							7
1914 Broadway St.	Craftsman House							7
1920 Broadway St.	Craftsman House							7
2000 Broadway St.	Craftsman House							7
2004 Broadway St.	Craftsman House							7
2008 Broadway St.	Craftsman House							7
2012 Broadway St.	Vernacular House							7
2016 Broadway St.	Vernacular House							7
2022 Broadway St.	Craftsman House							7
2214 Broadway St.	Broadway Apartments							7
2215 Broadway St.	Craftsman House						X	7
2217 Broadway St.	Vernacular House							7
2218 Broadway St.	Wisteria Court Apartments			Х	х	x		7

PROPERTY ADDRESS		EXIS	EXISTING STATUS			AINW RECOMMENDATIONS				
	PROPERTY DESCRIPTION	NRHP	WHR	CCHR	NRHP	WHR	CCHR	OVERLAY DISTRICT*		
UPTOWN VILLAGE DIST	RICT, continued									
2221 Broadway St.	Craftsman House							7		
2402 Broadway St.	Commercial Building							7		
2410 Broadway St.	Vernacular House							7		

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2414 Broadway St.	Deluxe Court Apartments							7
1605 F St.	Colonial Revival Duplex						Χ	
1511 Main St.	Carnegie Library Building	X	X	X				
1511 Main St.	Jefferson Davis Highway Monument			X				
1812 Main St.	First Christian Church				Х	Х	Х	7
1900 Main St.	Talbot Building							7
1908 Main St.	Commercial Building							7
1912 Main St.	Commercial Building							7
1916 Main St.	McCready Building				х	Х	Х	7
1917-1919 Main St.	Commercial Building							7
1923-1925 Main St.	Commercial Building							7
1929 Main St.	Commercial Building						Х	7
2000 Main St.	Commercial Building							7
2006 Main St.	Commercial Building							7
2009-2011 Main St.	Commercial Building							7
2012 Main St.	Craftsman House						Х	7
2014 Main St.	Craftsman House							7
2100-2110 Main St.	Commercial Building						Х	7
2209-221 Main St.	Commercial Building							7
2213 Main St	Commercial Building							7
2219-2221 Main St.	Commercial Building						Х	7
2300 Main St.	Society Theater							7
2306-2308 Main St.	Commercial Building							7
2310 Main St.	Commercial Building							7
2312-2314 Main St.	Commercial Building							7
2315 Main St.	Commercial Building						Х	7
701 E McLoughlin Blvd.	American Foursquare House						Х	
1500 Washington St.	Commercial Building						X	

DE = Determined Eligible for the National Register of Historic Places * - Overlay District #1 and #2 are existing ** - Recommended extension of Overlay District #2

TABLE 8-2. Recorded Archaeological Site List

SITE NO./ NAME	SITE TYPE/NRHP ¹ ELIGIBILITY	ADDRESS ²	TOWNSHIP/ RANGE/ SECTION	BLOCK/ DISTRICT	SITE FORM DATE/RECORDER
45CL514, Killian Pacific Site	Historic site: Recommended eligible for listing in the NRHP	513 Main Street	T2N, R1E, S27	Central Downtown	2000 Rob Freed
45CL567	Historic site: Recommended eligible for listing in the NRHP	710 Esther Street	T2N, R1E, S27	Esther Short	2003 Aimee Finley
45CL582, Vancouver Convention Center	Prehistoric isolate, historic site: Recommended eligible for listing in the NRHP	301 W 6 th Street	T2N, R1E, S27	Esther Short	2004 Paul Solimano
45CL583, The Broadway Saloon Site	Historic site: Recommended not eligible for listing in the NRHP	621 Broadway Street	T2N, R1E, S27	Central Downtown	2004 Bill Roulette
45CL646, Historic Blocks 61 & 65 (Columbian newspaper)	Historic site: Recommended eligible for listing in the NRHP	415 W 6 th Street; 411 W 5 th Street; 404 W 4 th Street	T2N, R1E, S27	Esther Short	2005 William White
45CL664, Carty Lot	Historic site: Recommended not eligible for listing in the NRHP	500 W. 11 [™] Street	T2N, R1E, S27	Westside Government	1998 Terry Ozbun
45CL666	Historic site; Recommended not eligible for listing in the NRHP	1300 W Franklin Street	T2N, R1E, S27	Westside Government	2001 Jo Reese 2006 Todd Baker

¹ NRHP = National Register of Historic Places.
 ² Site locations are shown on Figure 1.

INTRODUCTION

This chapter of the Draft Supplemental Environmental Impact Statement (DSEIS) addresses the existing conditions, potential impacts, mitigation measures, and unavoidable significant adverse impacts that the Proposed Alternative and the No Action Alternative are likely to have on recreational (parks, recreation facilities, and open space) opportunities in the area identified under the Vancouver City Center Vision Subarea Plan (VCCV).

EXISTING CONDITIONS

Public Open Space

Vancouver's City Center is an approximate 472 acre area generally defined by the Columbia River on the south, the North/South BNSF Railroad on the west, Mill Plain on the north (the north boundary includes a northern finger from 15th Street to Fourth Plain and south to 19th Street), and Interstate 5 on the east. The plan area covers 130 blocks and represents the "Downtown" urban center identified in the City's Comprehensive Plan. The Plan Area is located entirely within Park District #1, one of ten park and open space service areas located within the Vancouver Urban Growth Area (see Figure 9-1).

Esther Short Park is currently one of only two recreational facilities located within the project area. Esther Short Park is comprised of four city blocks and is approximately five acres in size. The park is located between Esther Street, Columbia Street, 8th Street and 6th Street, approximately 600 feet west of Main Street in downtown Vancouver. The Columbia River is located approximately 1,600 feet, or about six city blocks south of the park.

Esther Short Park, the oldest park in the State of Washington, was extensively redeveloped starting in 1999 based on a renewed master plan for the site. Extensive community interest and philanthropy contributed significantly to the redevelopment effort, resulting in many additional amenities. The resulting redevelopment includes an oval walkway with radiating walks connecting to the perimeter sidewalk, a pavilion/bandstand, a large stone water feature, a large brick civic plaza including a bell tower with a glockenspiel, playground equipment, large expanse of grass, many mature shade trees, benches, a gazebo, an historic bronze sculpture, and a restroom facility. The Slocum House, which was built in 1873 and relocated to Esther Short Park in 1973, is a community theater with year-round entertainment and is located in the southwest corner of the park.

Vancouver Landing is the second publicly-owned recreation facility located in the VCCV plan area. The facility consists of an amphitheater on the Columbia River just west of the Inn at the Quay. The Landing has a concrete surface and electrical hook-ups for power, and is often rented for festivals, special events and concerts. Adjacent to the amphitheater is a floating public dock available for short-term recreational boating moorage.

A few existing recreational features are located just outside of the plan area. The Hough Community Center includes a 25-yard, six-lane lap pool which is operated by

a private non-profit group but which is available to the public. Hough School, a public elementary school operated by the Vancouver School District, is located adjacent to the Community Center and includes a large turf field and playground equipment, which are available to the public during non-school hours. John Ball Park, a city-run, but District owned neighborhood park is located several blocks north and west of the planning area. The 2.5 acre park contains playground equipment, turf play fields and picnic tables.

Several regionally significant recreational facilities are located east of the plan area, on the east side of Interstate-5. The Marshall Center is Vancouver's oldest community center offering a wide variety of recreational facilities and programs for young and old. The Leupke Senior Center is adjacent to the community center and offers facilities and programs specifically targeted to senior citizens. Marshall Community Park is currently undergoing a major redevelopment to include: formalized parking areas, a restroom facility, several picnic tables, a paved walking path system, a large existing play structure, the removal of the old school district carpenter shop building, renewed and irrigated sports fields, a revamped community garden area, accessibility improvements and significant landscaping enhancements. The Fort Vancouver National Historic reserve is located just south and east of the Marshall Community Center. The 366-acre Reserve was established to protect adjacent, significant historical areas. It includes Fort Vancouver National Historic Site, as well as Vancouver Barracks, Officers' Row, Pearson Field, The Water Resources Education Center, and portions of the Columbia River waterfront. The Reserve hosts several large events each year including a Fourth of July Fireworks celebration, Veterans Day Parade, and National Cross-Country Running Championships.

The Planning Area is connected to the Columbia River Waterfront Trail via the sidewalk system along Columbia Street. The trail extends from The I-5 Bridge, along Columbia Way, through the Columbia Shores development, back to Columbia Way, and east to Marine Park and ending at Wintler Park. Total trail length is currently 4.5 miles.

Planning Document Guidance

The City of Vancouver Columbia River Renaissance Master Plan envisions developing a trail that runs along the historic Columbia River waterfront from east of Interstate 205, west to the city center waterfront, through downtown, and connecting with Vancouver Lake Park and Frenchman's Bar Park to the west of the VCCV plan area. Connections from the riverfront area to Esther Short Park and other city center locations are proposed to be improved as part of this plan. The City of Vancouver, as part of the Vancouver National Historic Reserve, is planning to develop a loop trail that will connect the reserve area located east of Interstate 5 (I-5) to the project area via Evergreen Boulevard to Columbia Street. Since these trail improvements are expected to connect through the city center area, they will provide additional pedestrian access from the project area to nearby regional parks facilities and trails. **Figure 9-3** illustrates the park connections within and to the Esther Short Subarea.

The Paths & Trails Element of the Walking and Bicycling Master Plan – a component of the Vancouver Transportation System Plan – and The Downtown Vancouver Transportation System Plan (TSP) include elements directly related to pedestrian and bicycle systems and connections into and through the Vancouver City Center Vision planning area. The plans envision a Historic Vancouver Discovery Trail Loop which traverses through Downtown Vancouver, The Fort Vancouver National Historic

Reserve, with connections to the Columbia River waterfront via crossings under Highway 14 at Columbia Shores Boulevard (from the east end of Pearson Field), via the new Land Bridge (from the Fort Vancouver Historic Area), and via full sidewalk completion and pedestrian system and safety enhancements on Main, Columbia, McLoughlin, Evergreen and 12th Streets – and a possible multiuse path over crossing of I-5 at 7th Street. The plans also envision connections through the planning area to tie the downtown core to the Amtrak Station located at the far west end of the area, as well as connections radiating to and from the Mill Plain Extension pedestrian and bicycle system which runs west-east through the heart of the VCCV planning area. Finally, the plans expect strong pedestrian and bicycle connections throughout the planning area through a system of pedestrian and bicycle friendly street systems, which promote choices in transportation and healthy life styles. This includes improvements to the existing street system as well as the creation/extension of new street and pedestrian connections - including those to the Columbia River waterfront. These pedestrian and bicycle system elements are further supported in the Clark County Trail and Bikeway System Plan, recently adopted on April 4, 2006.

The Vancouver Urban Parks, Recreation and Open Space Comprehensive Plan (May 2002) contains multiple goals and objectives for providing park, recreation and open space amenities for the planning area. The primary goal is to fulfill the goals of the Open Space and Recreation element of the Vancouver Comprehensive Plan, the city's Growth Management Plan. An additional and fundamental goal of the VCCV Subarea Plan is to "deliver quality services to the city's residents," and to "provide a balance of services that enhance the quality of life of all citizens in the community." The Vancouver-Clark Parks & Recreation Department has developed park district boundaries throughout the city. The project area is located entirely within Park District No. 1, which includes approximately 14, 359 acres. The VCCV Planning Area contains approximately 472 acres and is generally located in the south-central portion of Park District No. 1 (see Figure 9-2).

Park District No. 1 currently has eight community parks that total approximately 99 acres, 18 neighborhood parks totaling approximately 34 acres, and three Urban Open Spaces totaling approximately 7 acres. Despite the population growth over the past 2-3 years, District Park No. 1 currently meets the adopted standards for parks and open space for the existing population within the service area.

The adopted Vancouver Urban Parks, Recreation and Open Space Plan establishes standards for the acquisition and development of neighborhood and community parks, and urban open spaces. The plan calls for the acquisition of five acres of neighborhood or community park land per 1,000 persons; and 1 acre of open space per 1,000 persons within each service area. Additionally, the plan calls for the development of 4.25 acres of park land per 1,000 persons throughout the City. These Park District Service Areas are established for both neighborhood and community parks within each Park District. Neighborhood Park Service Areas are developed by identifying un-served neighborhoods with no park within a ½ mile radius. Then, based on population density, physical obstacles such as busy roads, highways, ravines and other physical obstacles to easy access, service area boundaries are adjusted to determine each neighborhood park service area. A similar process is utilized to establish Service Areas for Community Parks, starting with a 3 mile radius.

These numbers of acres are unlikely to be available in a high density, more intensely developed urban environment. New standards may be needed to address a highly intense urban form expected with the Proposed Plan (VCCV).

Growth Management Plan Background Information

The Vancouver Comprehensive Plan currently designates the planning area as City Center, with the exception of Esther Short Park, which is designated Open Space. The Open Space and Recreation element promotes the protection, retention, acquisition, diversity, accessibility, safety, and sanitation of Parks, Open Space, and Recreational Facilities throughout the city. The Vancouver Comprehensive Plan Open Space and Recreation Chapter describes the need to enhance park areas throughout the city both in quantity and quality of parks, provide accessible facilities to the broad spectrum of the community, create a safe and sanitary environment appealing to park users, develop landscaping and planting along transportation routes, and encourage development of trails, greenspace, and riparian corridor systems within the urban area. The City of Vancouver also requires adequate amounts of neighborhood parks, regional parks, special recreation facilities, and trails throughout the community.

POTENTIAL IMPACTS

Proposed Alternative

Public Parks, Open Space and Recreation

The City of Vancouver's Park District No. 1 is expected to provide sufficient park & open space land, and recreation facilities to meet the needs of the increased population anticipated by the VCCV Subarea Plan. The VCCV development goals include approximately 4,551 new residential units, 7,281 new residents, and 9,305 new employees for the total planned area. The existing Capital Facilities Plan component of the Vancouver Urban Parks, Recreation and Open Space Plan does not call for any acquisitions or improvement within the VCCV plan area of Park District #1 through 2008. However, the Department of Parks and Recreation Department is currently updating the Parks, Recreation and Open Space Plan and will include additional acquisitions, and facility development, to serve the development capacity envisioned in the VCCV Plan. The updated Parks, Recreation and Open Space Plan is expected to be adopted by December 2006.

With the Proposed Plan's anticipated increase in residential growth, additional park and open space land will need to be acquired and developed to serve future residents of the area as well as the many visitors that downtown redevelopment is attracting to the downtown and riverfront core. Park impact fees collected from residential development in the city are expected to be used to purchase additional park and open space lands in the Vancouver City Center Vision area over the 20-year Plan period. However, it will be critical to keep the acquisition component of the Park Impact Fee current with the rapidly escalating land prices, to afford the city the financial means to purchase needed lands for parks and open spaces. Additionally, the development component of the Park Impact Fees will need to reflect the relatively high cost of developing land in the VCCV area – land that is frequently more expensive to develop than bare-land, and especially waterfront land that is often constrained with significant federal, state and local regulations. Future redevelopment of the Columbia River Waterfront will allow an opportunity to enhance the existing severely degraded shoreline, extend the existing Columbia River Renaissance Trail westward and provide public open spaces (see Figure 9-3).

Plan Compliance

The Proposed Alternative complies with the Vancouver Urban Comprehensive Parks, Recreation and Open Space Plan. It is also expected to complement the goals of the Renaissance Plan and the Vancouver National Historic Reserve by helping to connect the Waterfront and Fort Vancouver to Esther Short Park and downtown Vancouver.

No Action Alternative

Public Parks, Open Space and Recreation Facilities

The No Action Alternative anticipates a significant growth in residents (3,274) and jobs (7,705) within the plan area. Use of the existing recreation facilities by the community and surrounding residential areas is likely to continue. Based on adopted park standards, it's location in the southern part of the plan area, and it's regionally significant status, Esther Short Park will not be able to accommodate park, recreation and open space needs of the entire plan area at build-out. The Parks Department must continue to pursue property acquisitions in order to meet adopted park standards. Under the No Action Alternative, development of the plan area will occur in a piecemeal and incremental fashion. Without a clear plan, the task of securing park, recreation and open space land that is affordable, well-situated and easily developed will become extremely challenging. Additionally, goals to provide increased connectivity through the downtown core, and to park, recreation and open space amenities located in the immediate vicinity of the plan area, will be compromised without a coherent plan.

Plan Compliance

The No Action Alternative is expected to comply with most policies of the City's Growth Management and Park Plans, but will be limited in others. The No Action Alternative could result in a situation where the plan area is underserved for parks, recreation and open space at build-out failing to meet adopted standards or acquisition and development.

MITIGATION MEASURES

Proposed Alternative

The following mitigation measures should be applied to limit long-term impacts to parks, trails, recreation, and open space. These options should be feasible given that most of the assumed new growth in the plan area will occur through redevelopment of underutilized lands, including the waterfront property and many of the existing surface parking lots.

• City of Vancouver to develop a City Center green spaces program which could include; linear parks and open space, individual public green spaces interconnected by a pedestrian friendly walking system, special recreation facilities such as off-leash dog areas and skate facilities, and urban open space and natural areas adjacent to the Columbia River. The program could be funded by a combination of Park Impact Fees, Real Estate Excise Tax, Grants, and other sources.

- City of Vancouver to secure additional land for parks, trails, recreation facilities and open space during the development review process by identifying important opportunities and negotiating with land owners and developers to acquire fee simple ownership in land sufficient to meet adopted park and open space standards for the service areas with the park district. The program would be funded through a combination of Park Impact Fees, Real Estate Excise Tax, Grants, and other sources.
- City of Vancouver to secure additional land for parks, trails, recreation facilities and open space during the development review process by requiring the dedication of land for parks, trails, recreation facilities and open space sufficient to serve residents of the proposed new residential development. The program could be funded through the issuance of Park Impact Fees Credits, but would likely have to rely on some modified formula of credits based on the high cost of land in the plan area and the significant amount of park acres required for acquisition and development based on adopted park standards. Parks Department should review the acquisition component of the park impact fee and assure the fee reflects increases in land and redevelopment construction costs within a more densely populated urban area.
- In planning for and accommodating additional growth and re-development in the VCCV area, the City of Vancouver should also consider promoting a variety of special recreation and open space facilities, as indicated in the adopted Vancouver Urban Parks, Recreation and Open Space Plan. This should include consideration of water access facilities along the Columbia Riverfront, Off-Leash Dog Facilities to serve residents of the proposed mixed-use high-density multifamily housing units, skate parks to accommodate youth activities and draw enthusiasts away from unlawful street skating, environmental education opportunities along the Columbia River waterfront, historic interpretation throughout the planning area, and development of facilities and systems to promote bicycle and pedestrian commuting and healthy lifestyle choices.
- The Vancouver-Clark Parks & Recreation Department should update the Parks, Recreation and Open Space Plan to include additional acquisitions, and facility development, to serve the VCCV Plan's development capacity.
- The Vancouver-Clark Parks & Recreation Department should continue to manage and maintain Esther Short Park in such a way as to support the heavy use especially during the summer months. Events should continue to be scheduled and managed to avoid conflicting uses and minimize excessive wear and tear on the park, including the turf areas.
- The Vancouver –Clark Parks & Recreation Department should continue to work closely with the City Transportation Department to plan and create userfriendly pedestrian and bicycle systems, increase connectivity, improve the overall streetscape, enhance visual attractions to the downtown area, ensure public safety, and provide attractive greenways leading to the Waterfront Trail and Park, as well as the Fort Vancouver National Historic Reserve and other existing recreation and open space amenities located on the east side of I-5.

Because of the urban nature of the proposed alternative and the assumed high residential densities coupled with the shortage of vacant land within the boundaries

of the plan area, the Vancouver-Clark Parks and Recreation Department may need to consider alternative City Center park standards that accommodate a more intense urban form than the more typical low density suburban type urban form. The alternative standards might consider a reduced acre to population ratio and/or allow for small public pocket parks, urban plazas, and special features i.e. public fountains to help provide park and open space.

- The City of Vancouver should consider new innovative "City Center" park service and design standards more relevant to high density urban development.
- The City of Vancouver should adjust the park impact fees to reflect the cost of land acquisition and park development within the high density and intense urban environment of the city center through special impact fees.

The following mitigation measures will be applied to limit the short-term impacts to parks, trails, recreation and open space:

- The City of Vancouver will continue to collect park impact fees for all new residential housing units constructed in Park District #1. These funds, along with supplemental funding such as Real Estate Excise Tax revenue and grant funds, will be utilized to acquire park property and develop new neighborhood parks. The acquisition and development efforts will continue to be guided by adopted standards and policies included in the Urban Comprehensive Park, Recreation and Open Space Plan. However, the acquisition and development efforts may not directly serve the subject area due to quantified park needs in other areas of the service district. The ability to acquire land in the subject planning area is also highly dependent on the availability and affordability of suitable land, and the presence of a willing seller.
- To the extent practical, the Parks Department will continue to utilize the development review process to identify potential opportunities for land acquisition and/or developer-generated improvements, which provide park-like facilities, trail extensions or other special recreation facilities, which can be considered as park impact fee credits.

Because of the urban nature of the proposed alternative and the assumed high residential densities coupled with the shortage of vacant land within the boundaries of the plan area, the Vancouver Parks and Recreation Department may need to consider alternative City Center park standards that accommodate a more intense urban form than the more typical low density suburban type urban form. The alternative standards might consider a reduced acre to population ratio and/or allow for small public pocket parks, urban plazas, and special features i.e. public fountains to help provide park and open space.

- The City of Vancouver should consider new innovative "City Center" park service and design standards more relevant to high density urban development.
- The City of Vancouver should adjust the park impact fees to reflect the cost of land acquisition and park development within the high density and intense urban environment of the city center through special impact fees.

No Action Alternative

The City of Vancouver will continue to collect park impact fees for all new residential housing units constructed in Park District #1. These funds, along with supplemental funding such as Real Estate Excise Tax revenue and grant funds, will be utilized to acquire park property and develop new neighborhood parks. The acquisition and development efforts will continue to be guided by adopted standards and policies included in the Urban Comprehensive Park, Recreation and Open Space Plan. However, the acquisition and development efforts may not directly serve the subject area due to quantified park needs in other areas of the service district. Additionally, the ability to acquire land in the subject planning area is also highly dependent on the availability and affordability of suitable land, and the presence of a willing seller.

Vancouver-Clark Parks & Recreation Department should continue to manage and maintain Esther Short Park in such a way as to support the heavy use – especially during the summer months. Events should continue to be scheduled and managed to avoid conflicting uses and minimize excessive wear and tear on the park, including the turf areas.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts to parks, recreation, and open space that are likely to occur because of implementing the No Action Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts to parks, recreation, and open space that are likely to occur as a result of implementing the No Action Alternative.

CHAPTER 9 FIGURES AND TABLES

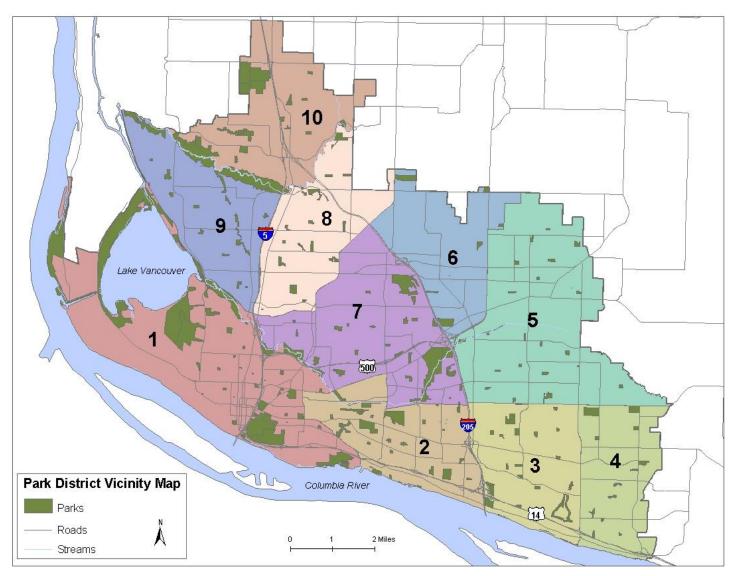


Figure 9-1. Park District Vicinity Map

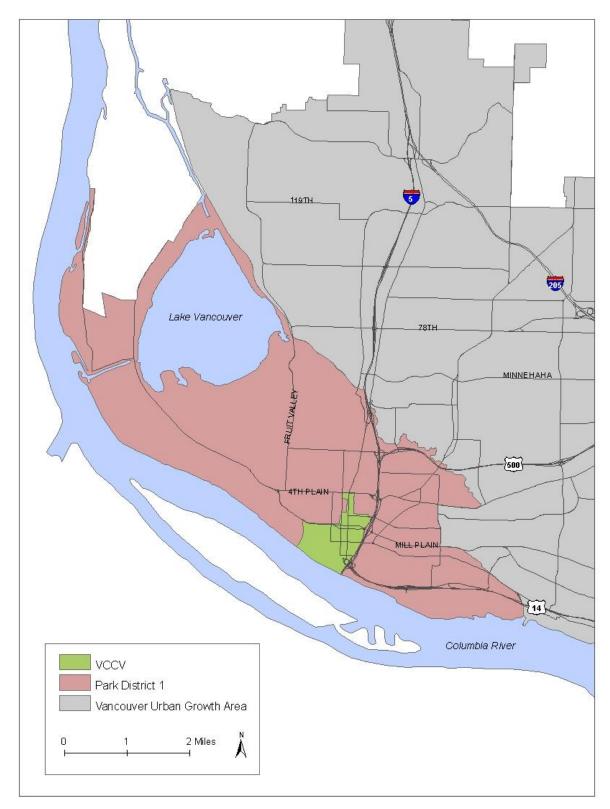


Figure 9-2. Vancouver City Center Plan Area & Park District #1



Figure 9-3. Vancouver City Center Parks & Trails

CHAPTER 10: TRANSPORTATION

The City of Vancouver's vision for the city center (VCCV) embodies a socially vibrant and economically vital urban core with strong emotional and physical ties to its neighborhoods, the Port of Vancouver, Officers Row and the Historic Reserve, and the Columbia River waterfront. Thousands of people will call the downtown home, and many more will travel to the city center every day for work, shopping, business, recreational and cultural opportunities, and access to government services and other civic institutions.

The Vancouver City Center Vision seeks to create a "messy vitality"—one based on diversification and intensification of downtown activity. The success of downtown as a hub of diverse activity will depend on a complete and complex transportation system which focuses on moving people in addition to vehicles.

Vehicle access, circulation, and parking are the core system components, but peak trip demand for access to downtown can never be fully satisfied with vehicle access alone—to do so would contradict the intent of the VCCV by fundamentally changing the look and feel of downtown. As a result, the transportation system that best supports the VCCV is inherently multi-modal. Fulfillment of the plan's land use objectives require that trips coming into and out of downtown and those within downtown need to, at varying levels, use different systems. Diversity of transportation users and trip purposes which result from and support a "messy vitality" (a healthy, varied, and vibrant downtown) require that such systems be in place to create access to services and opportunities for all user groups.

Much of the foundation and many of the policies supporting the VCCV's multi-modal transportation network already exist. Yet each of the systems must be enhanced in specific ways in order to create the required circulation and people-carrying capacity needed to support realization of the City Center Vision. Transit service is very effective at providing peak period capacity over and above what the vehicle system alone can offer. Changes to the transit network are contemplated including addition of higher carrying capacity transit (HCT) to supplement downtown access from both the northern and southern travel markets. Bicycle systems can capture shorter trips within downtown and inner neighborhoods and also serve longer distance trips and commuting travel. Likewise, pedestrian systems are the lifeblood of vibrant downtowns. Sidewalks are the ultimate circulation system for residents, customers, and visitors. All vehicle trips, transit and bike trips included, end up as walking trips downtown.

Each of the systems including the vehicle circulation system have been thoroughly analyzed against a series of alternative build and a no-build scenarios to determine the required multi-modal system improvements which are needed to support the VCCV. The transportation analysis presented below focuses on the complete transportation system-consistent with the Vancouver City Center Vision, it focuses on the full array of system components needed to serve the full range of people one would expect to find in a vital urban core and all of their trip-making needs.

TRANSPORTATION ANALYSIS-CONTEXT

Two other very large projects are currently underway in and around downtown Vancouver both of which could have transportation impacts on the city center. They are

- The Columbia River Crossing Project
 - <u>http://www.columbiarivercrossing.com/</u>
- > The Port of Vancouver Gateway Project
 - http://www.portvanusa.com/property/columbiagateway.html
- The Port of Vancouver Rail Access Project
 - http://www.portvanusa.com/property/columbiagateway.html

These projects present a degree of uncertainty to the analysis completed for the VCCV. However, the latest and best available information has been incorporated and sensitivity testing performed to validate the transportation impact findings and mitigations under various conditions. Refer to Chapter 1 Related Projects and Appendix D for further project description.

GROWTH: LAND USE AND TRIP GENERATION

Table 10-1 summarizes the proposed short and long-term growth totals by VCCV district and Table 10-2 shows PM peak period vehicle trip generation.

Scenario/Sub- District	Retail/Ser vice	Office	Institution al	Restaurant	Dwellings ¹	Light Industrial	Hotels ²
Short-Term							
Central Downtown	39,000	154,000	0	6,000	183	0	0
Esther Short	30,000	350,000	81,500	0	293	0	0
Mill Plain	30,000	80,000	0	0	56	0	0
North Main	5,000	10,000	0	0	44	0	0
Renaissance	60,000	0	10,000	20,000	825	0	200
West Government	0	110,000	0	0	115	0	0
Sub-Total	164,000	704,000	91,500	26,000	1516	0	200
Long-Term							
Central Downtown	41,000	406,000	0	0	312	0	0
Esther Short	26,000	485,000	0	0	57	0	0
Mill Plain	78,000	120,000	0	0	116	0	0
North Main	15,000	10,000	0	0	211	0	0
Renaissance	65,000	450,000	0	0	2189	100,000	0
West Government	12,000	250,000	500,000	0	153	0	0
Sub-Total	237,000	1,721,000	500,000	0	3038	100,000	0

Table 10-1. Proposed Short and Long-Term Development by Sub-District

TOTAL 401,000 2,425,000 591,500 26,000 4,554 100,000 200

Notes: 1. Dwelling unit land use is indicated by the number of housing units (either rental or owned). 2. Hotel land use is shown in number of rooms.

Source: City of Vancouver

Sub-district	Short-Term Period	Long-Term Period	Total Trips
Central Downtown	570	680	1250
Esther Short	980	730	1710
Mill Plain	240	340	580
North Main	100	200	300
Renaissance	770	1,260	2,030
West Government	320	420	740
Total	2,980	3,630	6,610

Table 10-2. PM Peak Hour Trip Generation

Source: DKS Associates

EXISTING CONDITIONS

An existing inventory for all modes studied was compiled to determine the level of activity and/or the facilities that serve each transportation mode.

- Figures 10-1B and 10-1P illustrate the existing bicycle and pedestrian systems with peak hour use by intersection.
- Figure 10-2 shows the existing transit system. Transit service to/from the downtown Vancouver area is provided by C-TRAN the local transit agency. The existing 7th Street transit center Broadway and Washington Street supports a timed transfer system which leads to bus queuing approximately every 15-30 minutes. Current headways provide a transit level-of-service approximately D or better.
- Figure 10-3 shows designated freight routes. Freight activity within the study area is generally in the 2-5% range of motor vehicle activity at each intersection, although it is heavier at intersections on the designated freight route.
- Figures 10-4 and 10-5 show the study are intersections and arterial street designations, respectively. Table 10-3 below gives the existing intersection operating level of service.
- Table 10-4 shows the collision history for study area intersections. Four intersections have crash rates which exceed 1.0. They are Fourth Plain Boulevard with 1) Columbia and 2) Broadway streets, 3) Mill Plain Boulevard/Broadway, and 4) Evergreen Boulevard/Columbia Street.

Intersection		AM Peak			PM Peak	
	Delay	LOS	V/C	Delay	LOS	V/C
Signalized Intersections						
Fourth Plain Blvd/Lincoln Ave	1.8	Α	0.22	3.6	Α	0.33
Fourth Plain Blvd/Kauffman Ave	17.9	В	0.34	16.1	В	0.40
Fourth Plain Blvd/Columbia St	25.3	С	0.54	16.7	В	0.46
Fourth Plain Blvd/Main St	33.5	С	0.60	33.0	С	0.54
Fourth Plain Blvd/Broadway St	19.8	В	0.55	20.7	С	0.61
Fourth Plain Blvd/F St	7.4	А	0.34	5.9	А	0.52
Fourth Plain Blvd/I-5 southbound on-off ramp	7.7	A	0.34	10.5	В	0.50
Fourth Plain Blvd/I-5 northbound on-off ramp	19.6	В	0.33	33.8	С	0.60
Fort Vancouver Way/McLoughlin Blvd	23.8	С	0.41	23.6	С	0.39
McLoughlin Blvd/Broadway St	27.8	С	0.33	20.8	С	0.20
McLoughlin Blvd/Main St	10.7	В	0.33	19.1	В	0.35
Mill Plain Blvd/Lincoln Ave	7.5	А	0.19	7.9	А	0.16

Table 10-3. 2005 AM and PM Peak Hour Intersection Operations

Intersection		AM Peak			PM Peak	
	Delay	LOS	V/C	Delay	LOS	V/C
Mill Plain Blvd/Kauffman Ave	11.3	В	0.25	11.3	В	0.23
Mill Plain Blvd/Franklin St	14.9	В	0.44	13.0	В	0.37
15 th St/Columbia St	7.6	А	0.42	6.7	A	0.31
15 th St/Washington St	4.5	А	0.29	5.7	Α	0.23
15 th St/Main St	5.5	А	0.34	4.5	А	0.35
15 th St/Broadway St	3.8	А	0.44	6.9	А	0.39
15 th St/C Street	16.0	В	0.32	18.1	В	0.29
Mill Plain Blvd/I-5 southbound on-off	52.3	D	0.76	20.8	С	0.74
ramp						
Mill Plain Blvd/I-5 northbound on-off ramp	17.0	В	0.46	> 80.0	F	0.76
Mill Plain Blvd/Fort Vancouver Way	22.1	С	0.42	22.5	С	0.45
Mill Plain Blvd/C St	8.8	А	0.30	15.5	В	0.66
Mill Plain Blvd/Broadway St	11.0	В	0.48	14.2	В	0.59
Mill Plain Blvd/Main St	4.8	А	0.28	9.4	Α	0.56
Mill Plain Blvd/Washington St	11.8	В	0.25	6.4	А	0.35
Mill Plain Blvd/Columbia St	16.3	В	0.46	17.0	В	0.63
Evergreen Blvd/C St	12.1	В	0.29	12.5	В	0.31
Evergreen Blvd/Broadway St	13.6	В	0.41	10.1	В	0.38
Evergreen Blvd/Main St	7.8	Ā	0.28	10.3	B	0.38
Evergreen Blvd/Washington St	14.2	В	0.23	13.1	B	0.33
Evergreen Blvd/Columbia St	18.1	В	0.32	15.4	B	0.39
8 th St/Columbia St	10.2	В	0.24	13.0	В	0.47
8 th St/Washington St	10.1	B	0.16	11.4	В	0.34
8 th St/Main St	10.4	B	0.26	15.0	В	0.26
8 th St/C St	8.0	A	0.30	14.6	В	0.23
6 th St/Columbia St	11.2	В	0.22	12.0	В	0.28
6 th St/Washington St	8.0	A	0.19	12.6	В	0.32
6 th St/Main St	9.2	A	0.15	8.8	A	0.52
5 th St/Washington St	6.3	A	0.20	6.1	A	0.17
Unsignalized Intersections	0.5	~	0.20	0.1		0.71
11 th St/Jefferson St (4-way stop)		Α			Α	
11 th St/Columbia St		A/B			A/C	
11 th St/Washington St		A/B			A/C	
11 th St/Main St		A/B			A/B	
11 th St/Broadway St		A/B			A/B	
11 th St/C St		A/A			A/B	
Evergreen Blvd/Fort Vancouver Way (round	about)	В			B	
9 th St/Columbia St		A/B			A/B	
9 th St/Washington St		A/B			A/B	
9 th St/Main St		A/A			A/B	
9 th St/Broadway St		A/A			A/A	
8 th St/Broadway St		A/B			A/B	
8 th St/King St		A/B A/A			A/B A/A	
4 th St/Washington St						
3 rd St/Columbia St		A/A			A/A	
3 ⁻² St/Columbia St		A/A			A/B	

Notes: Delay = Average intersection delay

A/A=major street LOS/minor street LOSSignalized and all-way stop delay = average vehicle delay in seconds for entire intersection LOS = Intersection level-of-serviceV/C = Volume-to-capacity ratio

Table 10-4. Study Area Intersection Crashes

Intersection	Number of Collisions (2002- 2005)	Million Entering Vehicles (MEV)	Crash Rate
Fourth Plain Blvd/Columbia St	18	4.68	1.28
Final Sur	plemental Environmental Impact S	statement	

Intersection	Number of Collisions (2002- 2005)	Million Entering Vehicles (MEV)	Crash Rate
Fourth Plain Blvd/Broadway St	20	5.18	1.28
Mill Plain Blvd/Broadway St	19	5.71	1.11
Evergreen Blvd/Columbia St	10	3.21	1.04
15 th St/C Street	11	3.92	0.95
Fourth Plain Blvd/Kauffman Ave	10	3.81	0.87
15 th St/Columbia St	7	2.79	0.84
15 th St/Washington St	7	2.89	0.81

Source: City of Vancouver, August, 2005.

FUTURE BASELINE NETWORK IMPROVEMENTS

As noted above the Vancouver City Center Vision is one of several projects which will impact the downtown transportation system. Additionally, the VCCV is really a specific implementation of the adopted comprehensive plan and supporting capital facilities plan. The forecasted land use growth is greater than in the no-action alternative, but it is the increment of growth over and above the adopted comprehensive plan that this evaluation focuses on. As a result there are a series of future baseline improvements that have been identified as the basis upon which project-action impacts are measured.

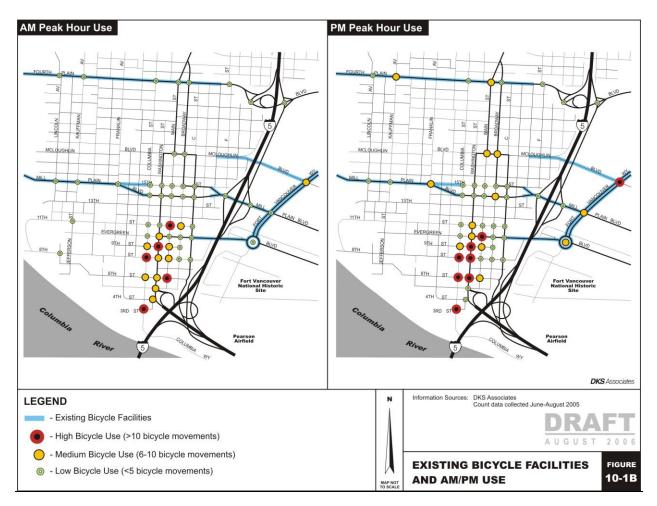
Baseline improvements are illustrated in Figure 10-6 and are detailed in Table 10-5. Baseline improvements are attributed to the City of Vancouver in the case of comprehensive plan projects, and the Columbia River Crossing Project (CRC) and Port of Vancouver as appropriate due to project actions (more information on these projects is available at the websites cited at the beginning of this chapter).

FUTURE NEEDS AND ACTION STRATEGIES

Levels of potential activity were identified for both the short-term (5 years) and long-term (20 years). Future needs and action strategies are presented as follows:

- Vehicle System: Figure 10-7 and Table 10-6
- Freight System: Figure 10-8
- Pedestrian System: Figure 10-9 and Table 10-7
- Bicycle System: Figure 10-10 and Table 10-8
- Transit System: Figure 10-11 and Table 10-9

The identified mitigation measures and strategies are not meant as an exhaustive list, or to preclude alternative mitigation measures that address the identified issues and are acceptable to the city.



CHAPTER 10 FIGURES AND TABLES

Figure 10-1B. Existing Bicycle Facilities and AM/PM Use

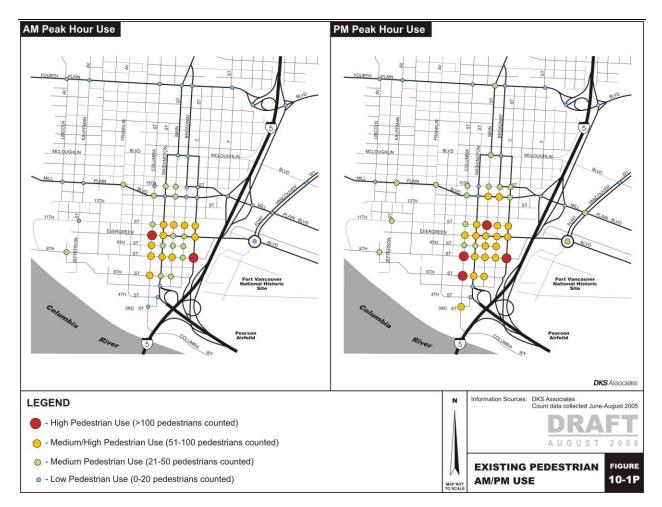
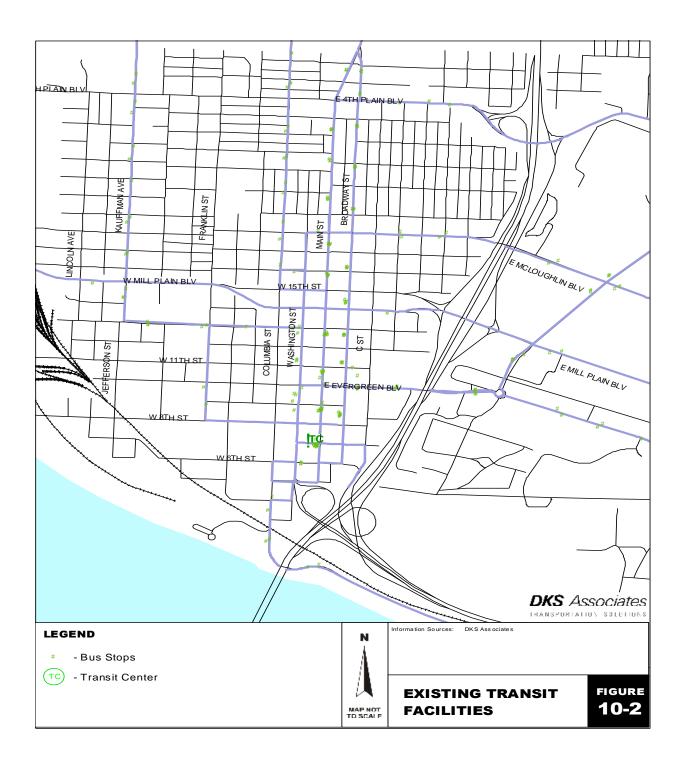
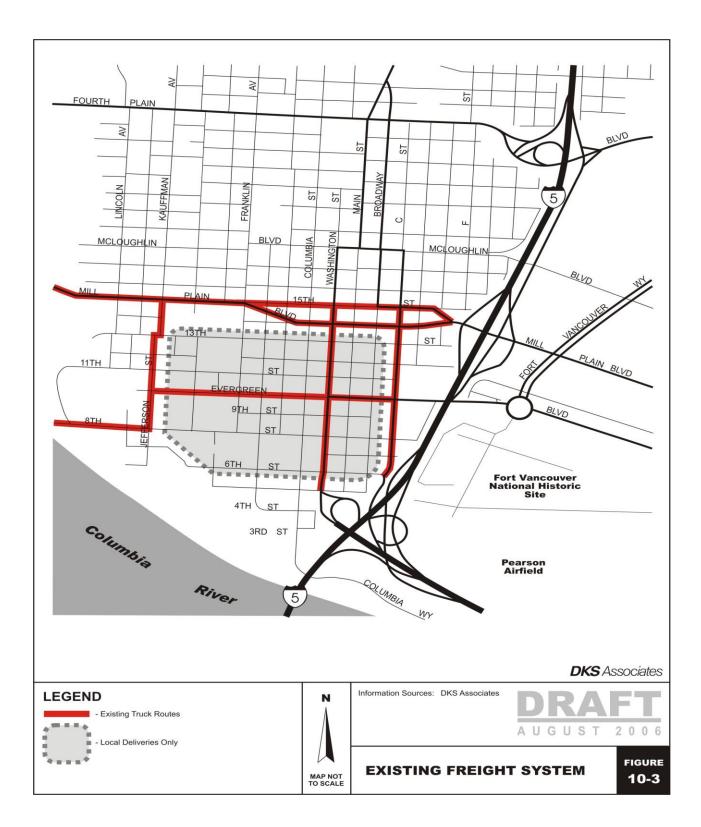
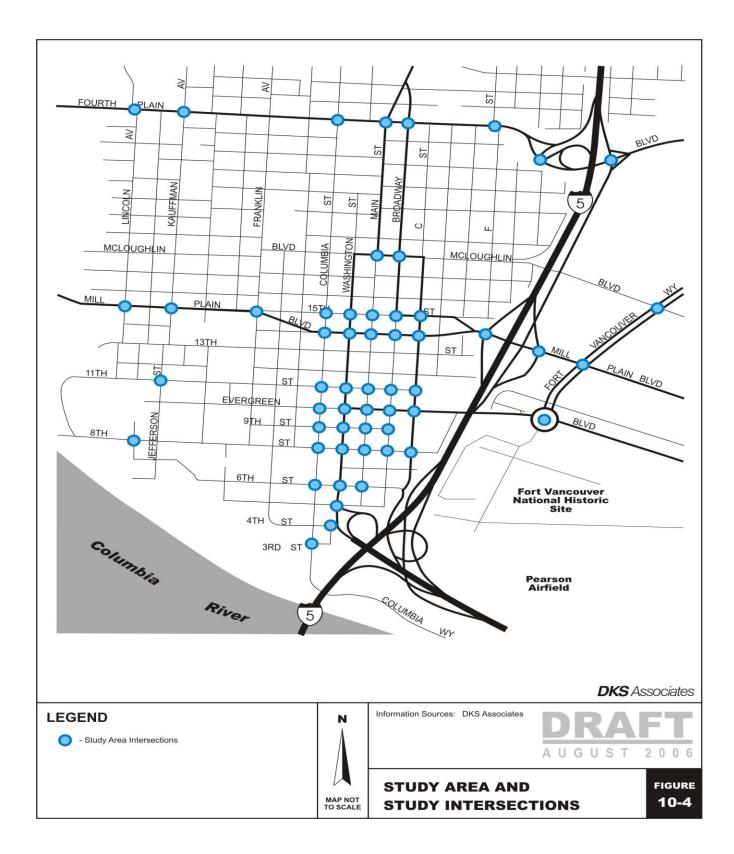
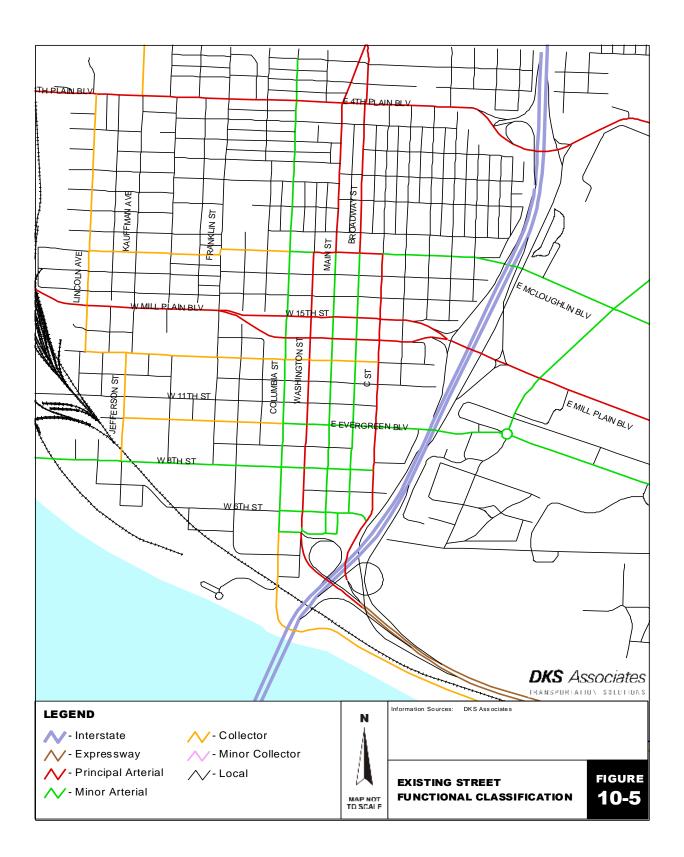


Figure 10-1P. Existing Pedestrian AM/PM Use









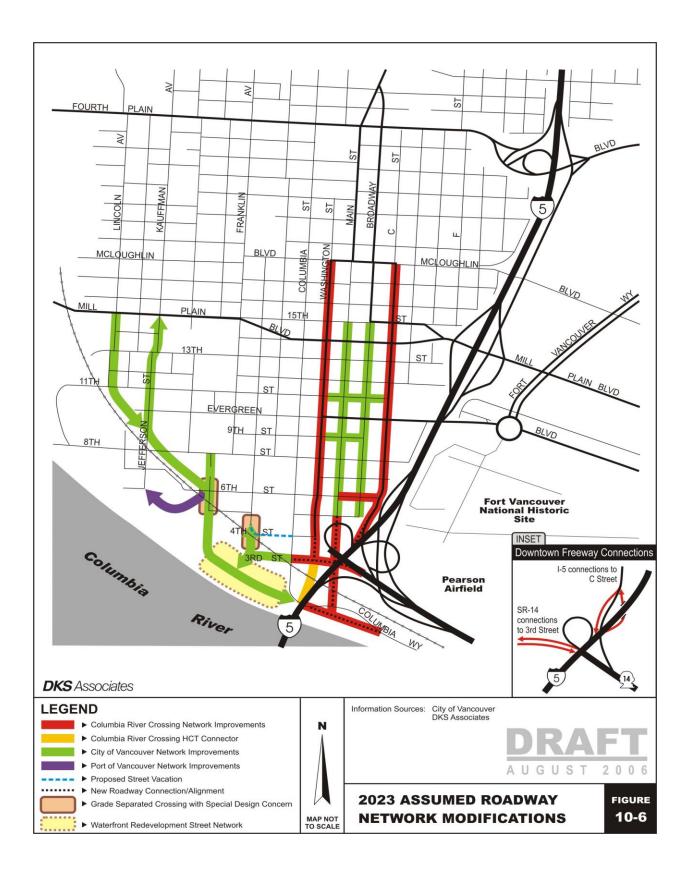
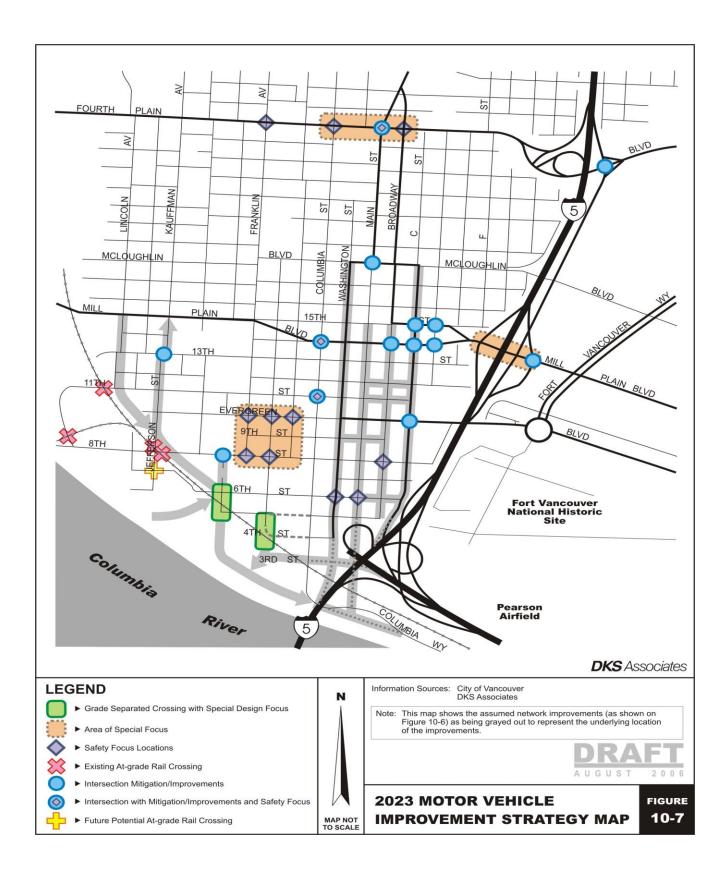


Table 10-5. Future Roadway Network As	-
Columbia River Crossing Projects	Location
SR 14 Eastbound/Westbound Connection	Columbia Street to Interstate 5
C Street Two-way	Mill Plain Boulevard to 6 th Street
C Street Southbound Connection to I-5	6 th Street to Interstate 5
southbound	
Main Street Connection to South	5 th Street to Columbia Way
Waterfront Arterial	
Washington Street Two-way High Capacity	McLoughlin Boulevard to 4 th Street and
Transit	Interstate 5
6 th Street Two-way	Main Street to C Street
Washington Street Two-way Motor	McLoughlin Boulevard to 4 th Street
Vehicle*	
Straighten Columbia Way	Columbia Street to C Street alignment
City of Vancouver Projects	Location
South Waterfront Arterial Roadway	Approximately Grant St. alignment east to
	Columbia
SR14 – 3 rd /4 th Street Connection	Esther Street to Columbia Street
Ester Street extension	4 th Street to South Waterfront Arterial
Westside Connector Arterial	From Jefferson Street just north of 8 th Street
	connecting southeast to 6 th Street.
Lincoln Street – Jefferson/Kauffman Street	Between approximately 9 th Street and Mill
Couplet	Plain Boulevard. A couplet from 8 th Street
	north to Mill Plain was one of the options
	considered. Other option keeps all traffic on either Lincoln or Kauffman. Either corridor
	will work for traffic purposes.
Main Street Reconstruction & Two-way	Mill Plain Boulevard to 5 th Street
Broadway Two-way	Mill Plain Boulevard to 5 th Street
9 th Street Two-way	Washington Street to Broadway
11 th Street Two-way	Washington Street to C Street
Vacate/Realign 4 th Street	Esther Street to Columbia Street
Port of Vancouver Projects	Location
	not shown
Rail Spur West Port Access Road	6 th Street/Grant Street intersection to the
West Port Access Road	west
Joint Jurisdiction Project	
Joint Jurisdiction Project	Location
South Waterfront Arterial Roadway	8 th Street/Grant Street intersection south
Connection (Vancouver and Port of	along Grant Street to new South Waterfront
Vancouver)	Arterial Roadway

Table 10-5. Future Roadway Network Assumptions

* Analysis was conducted with Washington Street as a two-way and one-way facility for motor vehicles. Either operation did not produce additional mitigation measures. Analysis in the SDEIS is representative of Washington Street operating with one-way southbound motor vehicle operations.

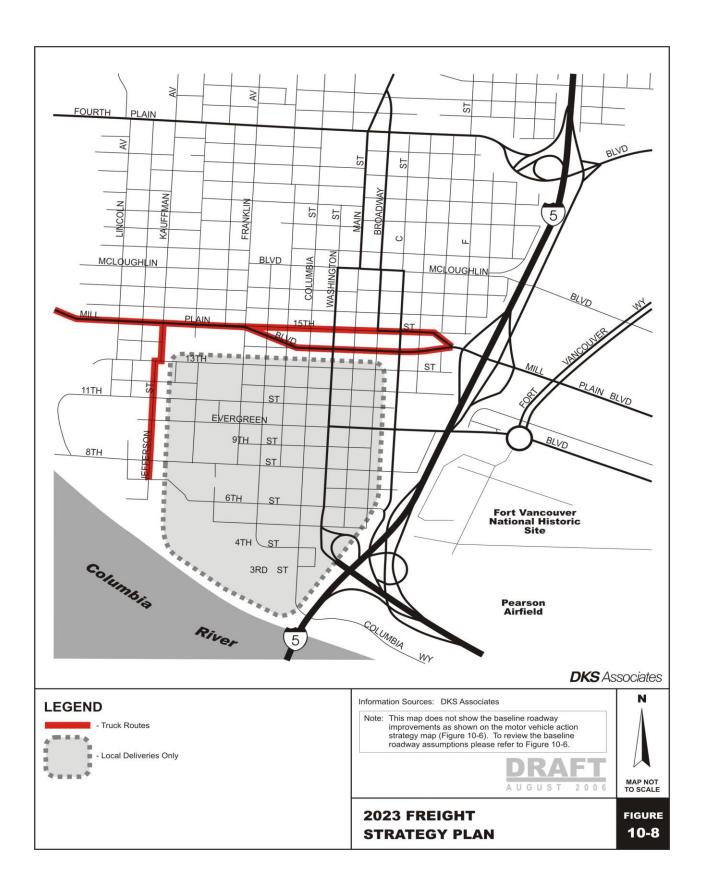


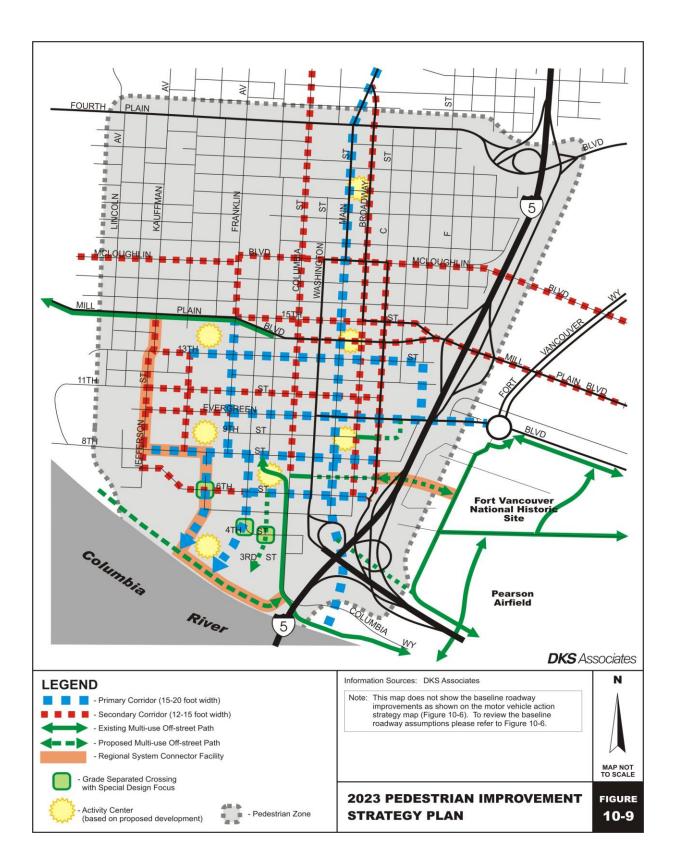
Operational Issues	Proposed Strategy
Fourth Plain Blvd/Main St	Optimize motor vehicle operations through corridor improvements such as
	coordinated signals, phasing improvements, optimized timing, and minor
	geometric modifications.
Fourth Plain Blvd/I-5 Northbound	Add northbound left turn pocket/lane.
Mill Plain Blvd/I-5 Northbound	Optimize motor vehicle operations through corridor improvements such as
	coordinated signals, phasing improvements and optimized timing.
Evergreen Blvd/C St	Modify northbound/southbound geometry to contain left turn pockets with
	permitted phase (part of two-way C Street operations in future). Stripe a
	westbound left turn pocket (not necessary, but would complement the
	eastbound left turn). Optimize motor vehicle operations through
	intersection improvements such as phasing modification and optimized
	timing.
Mill Plain Blvd/Columbia St	Add southbound left turn lane with protected phase (full block). Add
	northbound right turn pocket. Optimize motor vehicle operations through
	intersection improvements such as phasing modification and optimized
Mill Diaire Dhud (Duaa duuau	timing.
Mill Plain Blvd/Broadway	Add southbound left turn pocket with permitted phasing (part of two-way
	Broadway operations in future). Optimize motor vehicle operations through intersection improvements such as phasing modification and
	optimized timing.
Mill Plain Blvd/C St	Add northbound right turn pocket for full block. Optimize motor vehicle
	operations through intersection improvements such as phasing
	modification and optimized timing.
15 th Ave/C St	Optimize motor vehicle operations through intersection improvements
	such as phasing modification and optimized timing.
11 th Ave/Columbia St	Signalize intersection (cusp of meeting peak hour warrant). Optimize
	motor vehicle operations through intersection improvements such as
	phasing modification and optimized timing.
McLoughlin Blvd/Main St	Add eastbound left turn pocket with protected phase. Optimize motor
	vehicle operations through intersection improvements such as phasing
	modification and optimized timing.
New Design Issues	Proposed Strategy
6 th St/Grant St Grade Separation	This intersection, including rail grade separation, will require special
	design based on the need from surrounding proposed development. In
	addition to auto traffic this intersection will serve trucks bound for the
	crescent area north of the Port rail lead line. It will also provide the
	primary west-side connection between the waterfront and regional bike
	and pedestrian system, linking the Columbia River Waterfront Trail to the
Father Street Dail Under grossing	Shared Use facility on Mill Plain Boulevard.
Esther Street Rail Under-crossing	New multimodal rail berm under-crossing consistent with urban plaza style design of existing Esther Street in downtown.
Main Street Revitalization	Develop and implement integrated urban design and streetscape
	transportation improvement to two-way main street.
Washington Street Urban Design	Develop urban design concept and roadway standards for new HCT
Washington Street of San Design	corridor; adopt and implement with new development.
C Street Urban Design	Develop and implement corridor streetscape and street design standards;
	adopt and implement with new development.
Waterfront Street Design	Develop waterfront street and streetscape design standards; adopt and
, j	implement with new development.
Grant St/8 th Street and Jefferson	These roadways/intersections will need improvements/mitigation
Street/13 th Street	consistent with the new roadway network configuration.

Table 10-6. Motor Vehicle Action Strategy

Table 10-6, continued

Safety Issues	Proposed Strategy
Safety Focus Locations	These locations have been identified as areas of special safety concern related to sight distance, speed, or a history of pedestrian or bicycle accidents. They are highlighted here for special attention to intersection operations for vehicles, bikes, and pedestrians. Mitigations might include intersection or signal modifications, new pedestrian crossing technologies or pavement treatments.
Area of Special Focus: Franklin to Daniels between Evergreen and 8 th .	This are has been identified as an area of special safety concern related to sight distance and speed hazard. Potential mitigation could include parking removal and/or landscape treatments, as well as enhanced pavement markings.
Area of Special Focus: Mill Plain Boulevard / I5 Interchange Area	This location is identified as an area of special operational concern because of very heavy peak period vehicle volumes. Improvement may require signal upgrades as well as consideration of lane channelization and vehicle storage.
Area of Special Focus: Fourth Plain intersections with Main & Broadway.	This location is identified as an area of special safety and operational concern because of heavy traffic and pedestrian volumes, close signal spacing, and small turning radii. Improvements may include intersection reconstruction, signal timing adjustments and/or curb extensions.
New At-grade Rail Crossing	Build all-way gate control with wayside horns for any new at-grade rail crossing.
Existing At-grade Rail Crossings at: • 11 th St west of Lincoln St • Jefferson St north of 8 th St • Port Way north of 8 th St • 8 th St east of Jefferson St	Upgrade intersections to all-way gate control with wayside horns. Long term potential closure of crossings on Jefferson and 8 th Streets with completion of west side arterial.



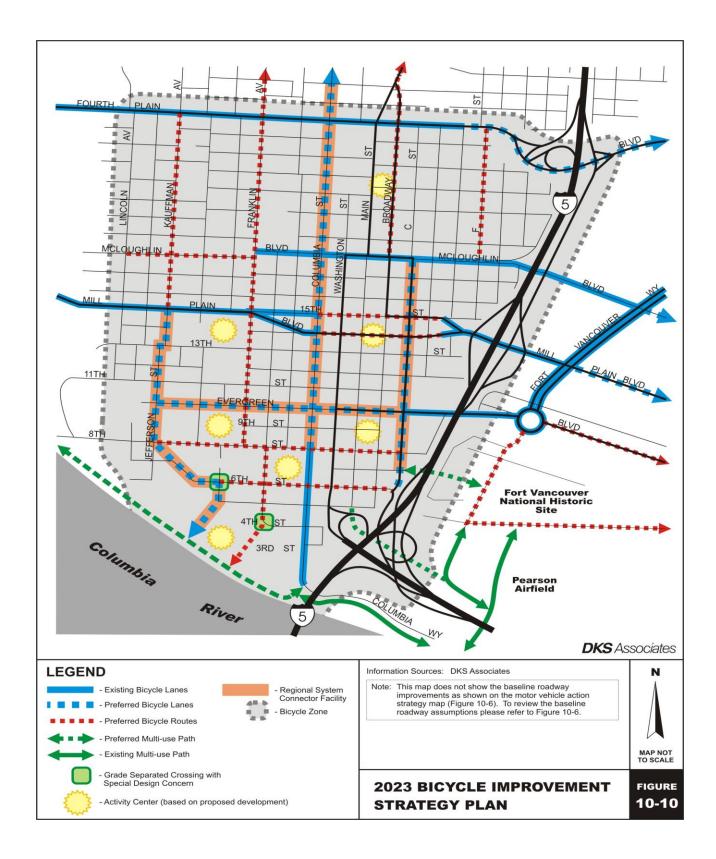


Location	Action Strategy
Franklin Avenue	Designate as Primary Corridor from 8 th Street to Mill Plain Boulevard with 15-20 foot sidewalk facility.
Main Street	Designate as Primary Corridor from off-street multi-use path south of Columbia Way to north of Fourth Plain Boulevard, with 15-20 foot sidewalk facility.
E Street extension	Designate as Primary Corridor from 13 th Street to Evergreen Boulevard with 15-20 foot sidewalk facility.
Grant Street	Designate as Primary Corridor from 8 th Street south to South Waterfront multi-use path with 15-20 foot sidewalk facility.
Esther Street	Designate as Primary Corridor from 8 th Street south to South Waterfront multi-use path with 15-20 foot sidewalk facility.
13 th Street	Designate as Primary Corridor from Harney Street to E Street with 15-20 foot sidewalk facility.
Evergreen Boulevard	Designate as Primary Corridor from Harney Street to Fort Vancouver Way with 15- 20 foot sidewalk facility.
8 th Street	Designate as Primary Corridor from Jefferson Street to C Street with 15-20 foot sidewalk facility.
6 th Street	Designate as Primary Corridor from Esther Street to C Street with 15-20 foot sidewalk facility.
Jefferson Street	Designate as Secondary Corridor from approximately 7 th Street to Mill Plain Boulevard with 12-15 foot sidewalk facility.
Harney Street	Designate as Secondary Corridor from 8 th Street to 13 th Street with 12-15 foot sidewalk facility.
Franklin Street	Designate as Secondary Corridor from Mill Plain Boulevard to McLoughlin Boulevard with 12-15 foot sidewalk facility.
Columbia Street	Designate as Secondary Corridor from 7th Street to north of Fourth Plain Boulevard with 12-15 foot sidewalk facility.
Main Street	Designate as Secondary Corridor from 15th Street to McLoughlin Boulevard with 12-15 foot sidewalk facility.
Broadway	Designate as Secondary Corridor from 6 th Street to north of Fourth Plain Boulevard with 12-15 foot sidewalk facility.
C Street	Designate as Secondary Corridor from 6 th Street to McLoughlin Boulevard with 12- 15 foot sidewalk facility.
McLoughlin Boulevard	Designate as Secondary Corridor from west of Lincoln Street to east of Fort Vancouver Way with 12-15 foot sidewalk facility.
15 th Street	Designate as Secondary Corridor from Franklin Boulevard to E Street with 12-15 foot sidewalk facility.
Mill Plain Boulevard	Designate as Secondary Corridor from Columbia Street to east of Fort Vancouver Way with 12-15 foot sidewalk facility.
13 th Street	Designate as Secondary Corridor from Kauffman Avenue to Harney Street with 12-15 foot sidewalk facility.
11 th Street	Designate as Secondary Corridor from Jefferson Street to C Street with 12-15 foot sidewalk facility.
Evergreen Boulevard	Designate as Secondary Corridor from Franklin Street to Kauffman Avenue with 12-15 foot sidewalk facility.
6 th Street	Designate as Secondary Corridor from Jefferson Street to Esther Street with 12-15 foot sidewalk facility.
South Waterfront Multi-use Path	Implement a multi-use path along the south waterfront from Columbia Way west of Jefferson Street alignment.
Daniels Street extension	Implement a multi-use path along a Daniels Street extension from 6 th Street.
Heritage Bridge Multi-Use Path	Create a multi-use path for pedestrian and bicycle use that crosses Interstate 5 at approximately 5 th Street connection east to Fort Vancouver Way.
7 th Street	Implement a multi-use path from Washington Street to C Street.
9 th Street	Implement a multi-use path along a 9th Street extension from C Street to
	Evergreen Boulevard.

Table 10-7. Pedestrian Action Strategy

Table 10-7, continued

Pedestrian Zone	The entire plan area should be designed with pedestrians in mind in order to promote and facilitate pedestrian trips within the study area. Consideration should be given to street furniture and other street amenities (such as covered walkways and convenient transit plazas where appropriate). Additionally, all signalized crossings should be upgraded to include countdown timers for pedestrian crossings and the most up to date ADA treatments. Un-signalized crossings should provide for enhanced safety with pavement markings, treatments, and/or raised platforms.
Design Issues	Proposed Strategy
6 th St/Grant St Grade Separation	This intersection will require special design consideration for implementation based on the need from surrounding proposed development.



Location	Action Strategy
Columbia Street	Implement bicycle lanes from 8 th Street to north of Fourth Plan Boulevard
C Street	Implement bicycle lanes from 6th Street to McLoughlin Boulevard
Jefferson St/Kauffman St	Implement bicycle lanes from Mill Plain Boulevard to 8 th Street
Jefferson St/8 th Street intersection	Implement bicycle lanes along future roadway alignment
to 6 th Street/Grant Street	running southeast to northwest connecting these two intersections.
Fourth Plain Boulevard	Implement bicycle lanes from E Street to east of Interstate 5 as a Preferred Bicycle Route, which has shared space for bicycle use.
McLoughlin Boulevard	Implement bicycle lanes east of Fort Vancouver Way.
Evergreen Boulevard	Implement bicycle lanes from Jefferson Street to C Street, and east of Fort Vancouver Way.
Kauffman Avenue	Designate facility from Mill Plain Boulevard to Fourth Plain Boulevard as a Preferred Bicycle Route, which has shared space for bicycle use.
Franklin Avenue	Designate facility from Mill Plain Boulevard to Fourth Plain Boulevard as a Preferred Bicycle Route, which has shared space for bicycle use.
Broadway	Designate facility from McLoughlin Boulevard to Fourth Plain Boulevard as a Preferred Bicycle Route, which has shared space for bicycle use.
Esther Street	Designate facility from 8 th Street to South Waterfront Multi-use Path as a Preferred Bicycle Route, which has shared space for bicycle use.
Fort Vancouver Way	Designate facility from Evergreen Boulevard to E 5 th Street as a Preferred Bicycle Route, which has shared space for bicycle use.
McLoughlin Boulevard	Designate facility from Lincoln Street to Franklin Avenue as a Preferred Bicycle Route, which has shared space for bicycle use.
Mill Plain Boulevard/15 th Street	Designate facility from Columbia Street to D Street, and east of Fort Vancouver Way as a Preferred Bicycle Route, which has shared space for bicycle use.
Evergreen Boulevard	Designate facility east of Fort Vancouver Way as a Preferred Bicycle Route, which has shared space for bicycle use.
8 th Street	Designate facility from Jefferson Street to C Street as a Preferred Bicycle Route, which has shared space for bicycle use.
6 th Street	Designate facility from Grant Street to C Street as a Preferred Bicycle Route, which has shared space for bicycle use.
E 5 th Street	Designate facility east of Fort Vancouver Way as a Preferred Bicycle Route, which has shared space for bicycle use.
South Waterfront Multi-Use Path	Create a multi-use path for pedestrian and bicycle use along the South Waterfront area (tied to redevelopment of the area) from Columbia Way to west of Jefferson Street.

Table 10-8. Bicycle Action Strategy

Table 10-8, continued

Heritage Bridge Multi-Use Path	Create a multi-use path for pedestrian and bicycle use that crosses Interstate 5 at approximately 5 th Street connection east to Fort Vancouver Way.
Fort Vancouver Way extension	Create a multi-use path for pedestrian and bicycle use that extends south from Fort Vancouver Way (at E 5 th Street) to connect southeast to the existing multi-use path that crosses SR-14.
Bicycle Zone	The entire plan area should all be designed with bicycles in mind in order to promote and facilitate bike trips within the study area. Consideration should be given to supply adequate bicycle parking, convenient and safe routes and bike lanes, and intersection crossing safety.
Design Issues	Proposed Strategy
6 th St/Grant St Grade Separation	This intersection will require special design consideration for implementation based on the need from surrounding proposed development.

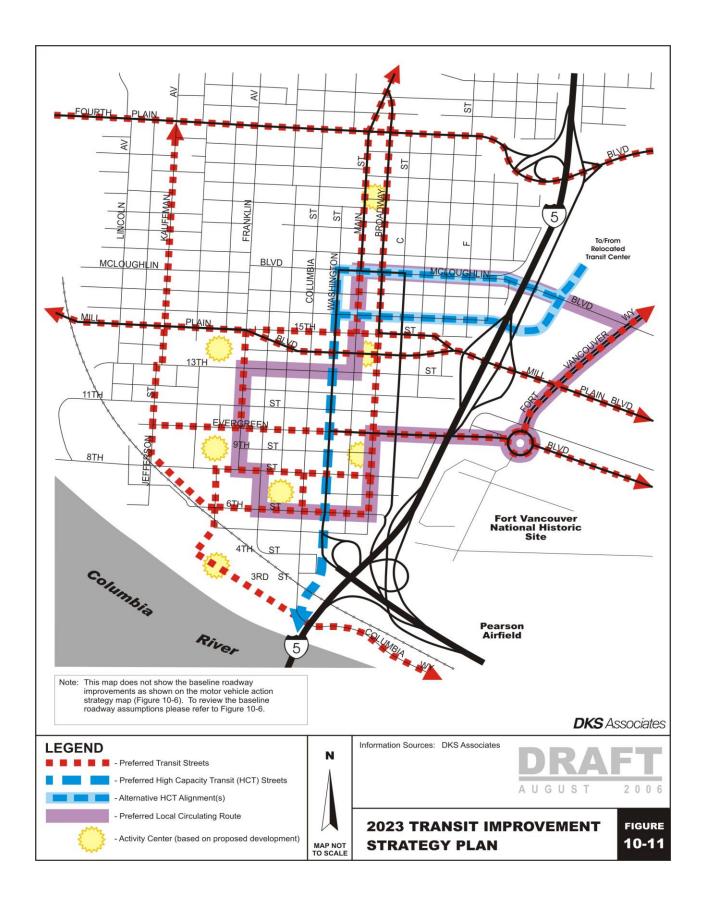


Table 10-9. Transit Action 9			
Street Designations	Location		
Preferred Transit Street	Kauffman Avenue from Fourth Plain Boulevard to 13 th		
Designation	Street		
Preferred Transit Street	Jefferson Street from 13 th Street to 8 th Street		
Designation			
Preferred Transit Street	6 th Street extension (from Grant Street) to 8 th Avenue		
Designation			
Preferred Transit Street	Grant Street south to south waterfront arterial		
Designation			
Preferred Transit Street	South waterfront arterial (from Grant Street to Columbia		
Designation	Street)		
Preferred Transit Street	Columbia Way from I-5 to the east		
Designation			
Preferred Transit Street	Franklin Street from Mill Plain Boulevard to Evergreen		
Designation	Street		
Preferred Transit Street	Esther Street from Evergreen to south waterfront arterial		
Designation			
Preferred Transit Street	Main Street from north of Fourth Plain Boulevard to		
Designation	Evergreen		
Preferred Transit Street	Broadway from north of Fourth Plain Boulevard to		
Designation	Evergreen		
Preferred Transit Street	Evergreen from Jefferson Street to Fort Vancouver Way		
Designation	(and to the east)		
Preferred Transit Street	Fort Vancouver Way from Evergreen to McLoughlin		
Designation	Boulevard (and to the north)		
Preferred Transit Street	Mill Plain Boulevard from Fort Vancouver Way to Lincoln		
Designation	Avenue (and to the west)		
Preferred Transit Street	15 th Street from Franklin Avenue to E Street		
Designation			
Preferred HCT Street	Washington Street from I-5 to 16 th Street		
Designation			
Preferred HCT Street	Option A: Along Washington Street from 16 th Street to		
Designation	McLoughlin Boulevard, then heading east along McLoughlin		
-	Boulevard to east of I-5		
Preferred HCT Street	Option B: Along 16 th Street east crossing I-5 then north to		
Designation	cross McLoughlin Boulevard		
Preferred Local Circulating	From McLoughlin, Main St. south to 13 th Street, west on		
Route	13 th Street to Franklin Avenue, south on Franklin Avenue		
	to 8 th Street, east on 8 th , south on Esther, east on 6 th ,		
	north on Broadway, east on Evergreen, north on Fort		
	Vancouver Way, west on McLoughlin.		

Table 10	-9. Tran	sit Action	Strategy
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Table 10-9, continued

INTRODUCTION

The provision of parking in downtown cannot be seen as a stand-alone solution in and of itself. A successful and vital downtown is an area that has a clear sense of place and identity, comprised of an exciting and attractive mix of uses and amenities. People do not come downtown to park. People come downtown to experience an environment that is unique, active and diverse. As such, the true role of parking is to assure that the desired vision for downtown is fully supported.

Parking must be managed to assure that priority land uses are supported with an effective and efficient system of access that caters to the needs of priority users. The City of Vancouver's priority user for the public system of parking has been identified as the <u>patron</u> <u>of downtown</u>, the person who shops, visits or recreates in the City Center

The City of Vancouver, through its Parking Advisory Committee and City policy, concluded that the objective of parking management in downtown should be to implement a plan that supports the development of a vibrant, regional center. The components of this plan need to provide a simple and understandable system that is safe, secure, affordable and well integrated into the traffic system and other access modes. Parking management for the downtown should recognize the role of the public sector in providing parking for patrons of the downtown, as well as seeking out opportunities for creating partnerships with the private sector to improve access and support of alternative modes of access.

The purpose of Vancouver's adopted Parking Management Plan is to implement a workable parking and transportation management program for the downtown. The plan identifies and addresses parking and access constraints and opportunities and immediate to near-term improvements to serve patrons, employees and residents of the downtown. The plan is also flexible enough to provide the City with mid- and long-term solutions to assure that parking management strategies and programs are implemented in a manner that best serves the unique and changing nature of the downtown business environment.

EXISTING CONDITIONS

Most parking in downtown Vancouver is supplied through on-street spaces and off-street lots. The highest amount of off-street parking is located in the Central Downtown area with approximately 1/3 of the total parking supply of the plan area. All other areas generally have the same amount of parking. The majority of these stalls are 1 or 2 hour (short-term) and 10 hour (long-term) metered. The approximate existing parking supply is 9,725 with approximately 2,000 of these as on-street parking stalls. Refer to Appendix C for the parking study.

A high percentage of land in the downtown area is developed as private off-street parking lots. Off-street surface lots are an inefficient use of downtown land and reinforce the singleoccupancy vehicle as the preferred mode of transportation. The utilization of private offstreet spaces occurs at a rate below 50%, according to City of Vancouver records; however, since most spaces are reserved for employees, very few spaces are available for shoppers. Low utilization illustrates the effect of minimum parking ratios established for past development, which has resulted in minimal control of the supply and a surplus of reserved parking spaces and some shortfalls in short-term parking for shoppers. As a result, parking access for a growing short-term/visitor customer base is limited, thereby hindering retail and entertainment based development.

Long-term leases held by downtown employers or real estate interests control a large portion of the existing parking spaces in downtown Vancouver parking garages. These parking spaces are reserved for monthly parkers. Reserved spaces do not allow sharing with complementary uses and must be reserved at all times under the current agreements. Due to this current structure (and its inherent inefficiencies), there are more parking spaces in downtown Vancouver than would be necessary to serve existing need than under a more efficient management plan.

Since 1999, the City of Vancouver has developed two specific public/private partnerships where parking has been provided by the City to support broader public sector goals for parking management. These projects (West Coast Bank and Vancouver center) resulted in the addition of 1,042 parking stalls to the downtown under City control and management. The parking in these facilities, combined with greater oversight and management of the onstreet parking system, are intended to

(a) support and attract economic developments within the downtown (i.e., West Coast Bank, Convention Hotel and Conference Center, Vancouver center and Esther Short Sub-Area Redevelopment) and

(b) initiate a transition of publicly owned/managed parking to a higher mix of convenient, attractive and economical patron parking. City control and management of these strategic facilities assures an ongoing role for the City in parking management.

Summary of Applicable Regulations and Ordinances

City Of Vancouver Zoning Ordinance

The City of Vancouver Zoning Ordinances related to parking and applicable to the Plan Area are as follows:

- Chapter 20.550 Transit Overlay District (voluntary district): Parking regulations for Transit Overlay Districts are established in Section 20.550. "The provisions of this Chapter are voluntary and incentive based, and may be applied to parcels located within the boundaries of the Transit Overlay District at the applicant's request. . . . Development environments shall be designated as Tier 1 and Tier 2. The Tier 1 environment will be oriented towards higher densities and more transit-friendly urban design that could be associated with high capacity transit or increased transit service. Development within Tier 2 shall encourage increased densities and be subject to certain development regulations, at a less restrictive level, but will also encourage the use of alternative transportation modes and pedestrian and transit friendly development.
- The purpose of parking standards within the Transit Overlay District is to manage the supply of surface parking by establishing minimum and maximum parking requirements in order to promote transit and pedestrian use and the efficient use of land; to substantially reduce the number of parking spaces between the building and the street to create more direct and convenient pedestrian/transit access; and to encourage pedestrian-oriented activity at the street for a more enjoyable pedestrian experience, see Figure 11-1.

- Shared parking is allowed to meet minimum requirements if a formal joint use agreement is executed. Structured parking is addressed only in that retail use is encouraged on the ground floor. Compliance with this ordinance, however, is voluntary and there are no assurances that the benefits that could be derived from the ordinance would occur
- Chapter 20.945 Parking and Loading: The stated purpose of this section of City Code is to "provide for safe and complete connections to the transportation system, and safe on-site circulation for motorists, bicyclists and pedestrians. In addition, these standards are intended to provide for adequate vehicle parking with appropriate landscaping"
- This section of the City Ordinance establishes minimum parking space requirements for new or modified buildings. Parking requirements may be met by long-term lease arrangements in public or private parking structures. It also establishes the required dimensions for parking spaces. The minimum parking requirements in the downtown are substantially less than in other commercial districts, primarily due to access to public parking and transit service. One parking space is required for each residential unit, and one parking space is required for every 1,000 square feet of non-residential use
- Chapter 20.630.060 Downtown District Parking Control: This section of the City Ordinance establishes the purpose of parking control in the Downtown District as well as boundaries for such control (see Figures 7-6 and 7-7). The purpose of this district is "intended to prevent disruption of pedestrian circulation; to provide for smooth traffic flow; to prevent excessive use of downtown land for parking; to ensure the most efficient provision of parking facilities; to preserve the continuity of retail use and building frontage in the downtown shopping area; and to protect the public health and safety"

Parking Management Plan

To develop a parking and access plan for downtown, it was first necessary to understand the dynamics of land use, access and growth that are unique to Vancouver. The City of Vancouver conducted a comprehensive survey and analysis of the downtown parking system in 1998.1 Subsequent to this process, the City engaged the Parking Advisory Committee in 2000 and 2001 to develop a formal Parking Management Plan and Policy to guide the operation of existing City parking assets and inform development of future supply. The City Council adopted the Parking Management Plan in 2001. The City and the Parking Advisory Committee were able to identify several "consensus" challenges and opportunities that served to inform the Parking Management Plan and Policy.

The consensus of stakeholders was the priority customers of Downtown Vancouver are its patrons; those who come repeatedly to shop, dine, recreate and be entertained (i.e., those who spend money). The general profile of the patron is short-term stays that result in a high turnover of parking in the downtown. As patron demand increases, parking opportunities both on and off-street will be required to assure continued access. Public sector efforts and resources in the area of parking management should be directed toward patron demand. The private sector can be an ally in facilitating access for employees and residents as well as support for, and participation in, alternative transportation mode programs and strategies.

The fact that the Parking Advisory Committee has prioritized the downtown patron as the focal point of parking management is not to downplay the importance of other users of the downtown. The Parking Advisory Committee has defined a benchmark against which management and decision-making for publicly controlled supply is measured (i.e. the 85% Occupancy Standard). The Parking Advisory Committee recognizes that constraints and conflict for demand within the supply will occur and that decisions and strategies will have to be implemented that guarantee access to the priority patron.

Guiding Principles for Access

The central elements of the City's Parking Management Plan and Policy can be summarized into ten Guiding Principles to facilitate future decision making related to parking and access in the downtown.

- 1. Make the downtown accessible to all users through multiple modes
- 2. Provide sufficient and convenient parking
- 3. Make the downtown core conveniently accessible for the priority user of the public parking system the patron of downtown
- 4. Provide adequate employee parking and encourage other modes
- 5. Promote strategic development of off-street facilities
- 6. Manage all public facilities using the 85% Occupancy Standard, which serves as a benchmark for decision-making and assures priority users of the parking system are consistently accommodated
- 7. Preserve and expand on-street parking wherever possible
- 8. Improve access linkages between districts and the downtown core
- 9. The City should lead in the development of access options for patrons (customers and visitors) of the downtown and actively partner with the business community to provide incentives for additional access and growth
- 10. The "parking product" in the downtown should be of the highest quality to create a positive customer experience with parking and the downtown

Parking Management Plan – Strategies Implemented

Specific parking management strategies have been identified and implemented since adoption of the Plan. These include:

- Creation of a permanent Parking Advisory Committee
- Designating a Parking Manager charged with facilitating the Parking Advisory Committee process and acting as a liaison/partner with the City in managing parking in the downtown.
- Establishing a decision-making "trigger" that compels ongoing review of the parking system (i.e. the 85% Occupancy Standard)
- Programs to improve signage, communications and branding of the parking system (i.e., Park N Go).
- Re-mixing parking time stay allowances to assure access for priority customers
- Programs and strategies for evaluating and implementing parking pricing

- Capturing additional on-street parking supply
- Specific policy level actions to reduce levels of parking abuse

Recommendations for changes in current policy/code and several near-term strategies continue to optimize the efficiency of the existing parking inventory in Downtown Vancouver. Additional mid and longer-term strategies are also under consideration by the Parking Advisory Committee.

Parking Management Plan – Strategies to be initiated

As the Parking Advisory Committee moves forward with its work, several programs and/or studies will be initiated. These include:

Operating Principles/Parking Management Zones

To assure that parking serves both priority patrons and the unique economic development vision of the downtown, the Parking Advisory Committee will be considering parking management zones for Downtown Vancouver. Parking management zones represent "economic activity zones" in the downtown that are both reflective of existing land uses in addition to areas where future growth of specific economic development is anticipated and desired. From an access perspective, each zone needs to be managed in a manner that supports priority economic uses and users identified for that zone.

Zone boundaries will be established based on the existing economic and transportation characteristics, as well as desired uses for the area. Over time, management zones should be refined and redrawn to reflect the characteristics of development and uses appropriate to each zone.

Uptown Village Parking Study

The City has formed an Uptown Village Parking Management Plan Committee to review and evaluate concerns regarding parking in the Uptown Village district as well as to initiate planning and strategic decision making for ongoing parking management in the area. A member of the Vancouver Parking Advisory Committee serves as a liaison with the committee.

The Uptown Village area maintains a unique blend of commercial, retail and residential uses that stakeholders in the area believe will require an innovative, flexible and responsive approach to parking management and transportation planning. The Uptown Village Parking study will involve:

- A physical survey and quantification of parking resources in the area
- Parking and occupancy counts for both weekday and weekend activity
- Development of priorities and guiding principles for parking access for both on- and off-street parking assets
- Recommendations for near-term strategy implementation to improve existing parking operations
- Recommendations for the management and permitting of future parking supply

Over the course of the study process, dialogue with the Uptown Village Parking Management Plan Committee will result in the development of functional alternatives and strategies to improve identified deficiencies or shortcomings and initiate a framework plan for the ongoing management of, and planning for, access in Uptown Village. As stated, the work of the Committee will be supplemented and informed by data derived from a parking inventory analysis. The study was initiated in November 2005 and is expected to be completed by April 2006.

Westside Expansion Project

The parking situation in the western and southern sections of the downtown area has changed over the past few years, particularly with the opening of the Clark County Public Service Center at 13th and Franklin and the opening of the Hilton Hotel and Vancouver Convention Center in June 2005. These projects (as well as general growth in the area) have increased parking demands and congestion in the area near 6th and Esther Streets and around the courthouse. Growing constraints on the parking supply require planning and strategies to improve the parking turnover in the area.

The City and the Parking Advisory Committee have initiated a review of the situation in this area of the downtown along the lines of the Uptown Village Parking Study outlined above. The study is reviewing the parking situation in the area and will come up with recommendations to address identified concerns. This study will be launched in February 2006, with completion anticipated by the end of 2006.

POTENTIAL IMPACTS

Proposed Alternative

Based on the amount of projected growth within the plan area and the current City code minimum parking requirements, the increase for the downtown area parking supply would be approximately 14,070 new parking spaces, which is an increase from the existing 9,725 by approximately 144% (refer to Appendix C for parking study). To provide this number of new parking spaces is unrealistic within a City Center with the vision of more highly intense urban round-the-clock mixed uses. Instead, the City may choose to make the downtown accessible to all users through multiple modes of travel and to consider a policy shift to replace parking minimums and adopt parking maximums thereby encouraging tighter, more pedestrian friendly development called for by the Proposed Plan vision.

The City has a significant stake in the management of parking. The Parking Management Plan recommends goals and strategies that would assist the City in achieving its goals of reduced auto reliance and promoting economic development. One way of achieving this would be to reduce the needed parking supply through the use of shared parking, increased transit use, and increased walking and bicycling for short trips. There are some questions, however, if existing code would support the full list package of recommendations. The Transit Overlay District Ordinance would allow for shared parking and it states parking maximums, but it appears that this only applies to surface lots, which are not generally allowed in the Study Area. It is unclear if shared parking would be allowed in off-street parking structures for the purposes of meeting minimum parking space requirements and it is unclear if the reduced parking minimums would apply to structured parking garages.

Finally, given the mixed-use nature of desired development, the amount of parking required by City Code may overstate demand. This would result in a surplus of parking, which would

reduce the potential economic viability of the area by unnecessarily increasing construction costs.

No Action Alternative

The No Action Alternative would likely have less mixed-use development and opportunity for shared and/or more efficient use of parking. This would be less than the Proposed Alternative. While the current parking code would likely be adequate to support the parking demand generated under the No Action Alternative, this code would not necessarily best serve the Study Area in terms of meeting the City's goals of reducing the reliance on the automobile, improving transit use, and promoting economic development.

MITIGATION MEASURES

Proposed Alternative

For development to proceed as per the Parking Management Plan and to achieve the Proposed Plan's (VCCV) vision and goal of a vibrant city center for shopping, working, living, recreation and entertainment and the customers, visitors, employees and residents of those uses, the following parking mitigation measures should be implemented.

The downtown Parking Management Plan's recommendations, strategies and operation improvements listed below should be put into place.

- Make the downtown accessible to all users through multiple modes
- Provide sufficient and convenient parking
- Make the downtown core conveniently accessible for the priority user of the public parking system—the <u>patron</u> of downtown
- Provide adequate employee parking and encourage use of other modes
- Promote strategic development of off-street facilities
- Manage all public facilities using the 85% Occupancy Standard, which serves as a benchmark for decision-making and assures priority users of the parking system are consistently accommodated
- Preserve and expand on-street parking wherever possible
- Improve access linkages between districts and the downtown core
- The City should lead in the development of access options for patrons (customers and visitors) of the downtown and actively partner with the business community to provide incentives for additional access and growth
- The "parking product" in the downtown should be of the highest quality to create a positive customer experience with parking and the downtown
- Implement programs to improve signage, communications and branding of the parking system (i.e., Park 'n Go TM)
- Re-mix parking time stay allowances to assure access for priority customers
- Evaluate and implement parking pricing strategies
- Support and expand "shared use" parking opportunities
- Implement actions to reduce levels of parking abuse
- Provide parking in a manner that supports TDM programs and transit
- Provide parking in such a manner that it supports economic development

Current City policy requires minimum numbers of parking spaces for new commercial and residential buildings in downtown. These minimums often require more parking than is necessary to support the development project and compact and efficient land use and urban form. To help achieve the Proposed Plan vision of urban mixed use development and the

City's goal of reducing automobile dependence, promoting economic development, supporting transit, and creating a strong pedestrian environment, the following parking policy should be adopted:

The City should:

- Eliminate parking minimums for commercial development in the downtown thereby encouraging tighter, more pedestrian-friendly development.
- Reduce parking minimums for residential development in the downtown commercial zone in tandem with restrictions on residential on-street permit parking in the same zone to assure that priority users are accommodated within the on-street supply.
- Implement maximum parking caps on both residential and commercial development, until such time that surface parking lots are prohibited within the Parking Control District 20-630-5, to support and facilitate more efficient land use and integration with City goals for increased use of alternative transportation modes (i.e., transit, bike, walk and rideshare).
- Limit the development of new surface parking facilities in the downtown, recognizing the inefficiency of land use that such facilities create.
- Provide incentives to encourage structural parking in the downtown to prevent excessive use of downtown land for parking and to preserve the continuity of retail use and building frontage in the downtown shopping area.
- Coordinate parking policies, programs and strategies to facilitate the transition of a greater percentage of users of the downtown (particularly employees) into alternative modes of access (i.e., transit, bike, walk). This will assure that public investment in parking will prioritize customer/visitor access and reduce the overall supply of parking built utilizing public resources.

For development to proceed as per the Parking Management Plan and to help achieve the Proposed Parking policy and the City's goal of reducing automobile dependence, promoting economic development, supporting transit, and creating a strong pedestrian environment, revisions to the City Code would be required. This would include revising City ordinances to:

- Encourage the use of shared parking facilities in the new development where shared parking can be utilized
- Set parking maximums based on a realistic assessment of parking needs of specific development proposals that help assure that parking is not oversupplied
- Eliminate the requirement of developers to lease off-street parking to meet parking supply minimums
- Reconsider parking fee-in lieu's paid to the City for developments that do not provide basic minimum parking. Funds could be used to enhance the overall transportation network for the area (i.e., short-term parking, transit, bike and walk options)
- Restrict the use of reserved parking spaces to promote efficient use of parking facilities
- Require a plan to provide informational signage to guide drivers to public garages near retail and short-term parking and integrate this plan into the downtown area plan
- Require the non-conforming surface parking lots located within the proposed Parking Control district (Figure 7-7) to meet VMC standards for the following purpose to prevent disruption of pedestrian circulation; to provide for smooth traffic flow; to ensure the most efficient provision of parking facilities; and to protect the public health, safety, and welfare by controlling erosion and dust and by preventing bodily injury and crime.

The city should adopt the proposed Parking Control shown in Chapter 7 (Figure 7-7) and the following purpose language, *This district is intended to prevent disruption of pedestrian circulation; to provide for smooth traffic flow; to prevent excessive use of downtown land for parking; to ensure the most efficient provision of parking facilities; to preserve the continuity of retail use and building frontage in the downtown shopping area; and to protect the public health, safety, and welfare by controlling erosion and dust and by preventing bodily injury and crime.*

The city should establish parking management zones that provide more "district specific" parking management strategies and controls consistent with the economic development and land use plan for those areas of the downtown.

No Action Alternative

The No Action Alternative would result in similar significant impacts on parking as the Proposed Alternative. The above measures would mitigate these impacts; however, they would not be as effective given that the mix of uses would not likely be as great as the Proposed Alternative.

UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

Proposed Alternative

No unavoidable significant adverse impacts were identified for the Proposed Alternative.

No Action Alternative

No unavoidable significant adverse impacts were identified for the No Action Alternative.

CHAPTER 11 FIGURES AND TABLES

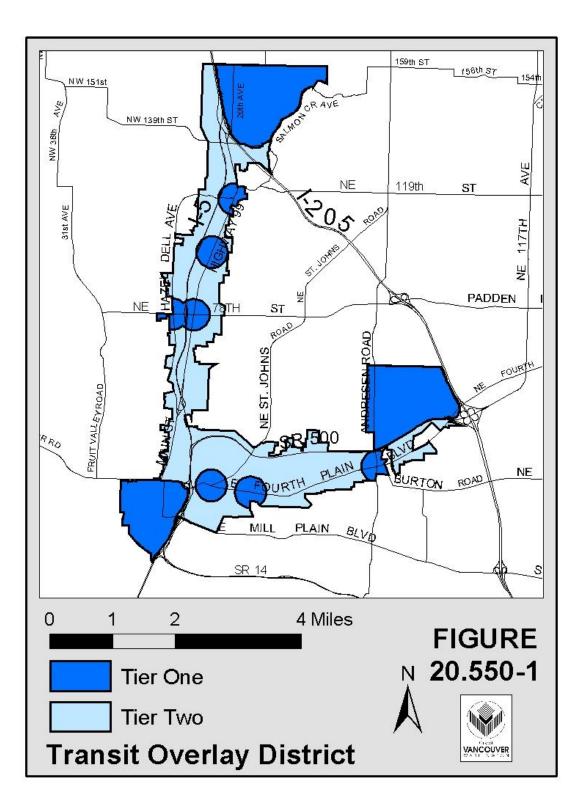


Figure 11-1. Transit Overlay District

CHAPTER 12: PUBLIC SERVICES AND UTILITIES

INTRODUCTION

This chapter addresses the existing conditions, potential impacts, mitigation measures, and unavoidable significant adverse impacts that the Proposed Alternative and the No Action Alternative are likely to have on public services and utilities.

SUMMARY OF VANCOUVER'S GROWTH MANAGEMENT PLAN POLICIES

A Vision For The Vancouver Urban Area

The overall objective set by the Growth Management Plan on public services for downtown Vancouver is that there are sufficient public facilities and services necessary to serve new development, and that services are available concurrently with development. All public service facilities currently comply with the goals for public service in the Growth Management Plan and are expected to comply for both the Proposed Alternative and the No Action Alternative.

FIRE

Existing Conditions

The City of Vancouver's Fire Department provides all fire services within the City limits of Vancouver. Agreements with Hazel Dell Fire District 6 and the Portland Fire Department allow for additional support to the City on occasion. The City of Vancouver's Fire Department has approximately 196 firefighters (166 paid and 30 volunteers). There are eight fire stations located within the City limits. Station 82, located on 900 West Evergreen, is the closest station to the Plan Area. Station 82 has one ladder truck that includes lifesupport equipment, a fire engine, seven firefighters and one battalion chief on duty. Station 86 is the next closest station on 400 East 37th Street, with one fire engine. A private ambulance company the American Medical Response NW (AMR) provides additional life response trucks. AMR has one ambulance located in the downtown area 24 hours a day. An additional seven ambulances are located in the Clark County area, with approximately five within the City limits. Clark County Emergency Services, located on 710 West 13th Street, dispatches emergency calls to the fire department, ambulance service, and the police. The ambulance service has a response time of 7:59 or less 90% of the time within the downtown area. Response time for fire services is approximately two minutes within the orange shaded area of the Maximum Building Heights Map, Figure 7-10 and three to five minutes for other areas.

The funding source for the City's fire department is the City's General Fund. Clark County's Emergency Services are funded by agencies that use the dispatch service and from a 911 telephone tax.

The City of Vancouver's Fire Department's Fire Marshal's Office works with the public in lowering the risk of fires by providing safety inspections and fire prevention education. They also participate in the plan review for code compliance in new construction for fire and life safety issues with The Department of Development Review Services. This helps to assure the full spectrum of public safety features for new developments to comply with the uniform building, fire, and mechanical codes and standards.

POTENTIAL IMPACTS

Proposed Alternative

The Proposed Alternative is expected to increase residential units by approximately 4,551, increase the number of residents in the plan area by approximately 7,281, and increase the number of employees by 9,305. These increases are likely to result in an increase in emergency calls from the Plan Area. The increase in population will result in increased revenues from the subarea, which applies to the City's General Fund, and may be used for additional services. The City of Vancouver's Fire Department has developed a Business Plan and is currently working on a Standard of Cover document that establishes a standard of care for Fire Department services. As the City grows, it is expected to increase demand for emergency services, fire prevention services and Fire and Arson Investigations. The Proposed Plan Alternative will impact the Fire Department. To assure that current services do not deteriorate at some point in the near future additional staffing will be needed. Because the fire department cannot add firefighters one at a time, thresholds for adding staff to respond to the Proposed Plan's increased service demands will need to be determined over the course of this 20-year plan. The Standard of Cover planning document will in part address some of these issues.

No Action Alternative

The No Action Alternative (the existing City of Vancouver Comprehensive Plan) is expected to increase residential units by approximately 1,930, increase the number of residents in the area by approximately 3,088 residents, and increase employment by approximately 7,705 people. These increased figures will also result in an increase in calls to the fire department. The fire department will accommodate this increase by providing fire services as necessary. Although there will be a smaller increase in population with this alternative, there will be an increase in tax revenue from the subarea, which would be applied to the City's General Fund, and may be used for additional fire services.

The City of Vancouver's Fire Department has developed a Business Plan and is currently working on a Standard of Cover document that establishes a standard of care for Fire Department services. As the City grows, it is expected to increase demand for emergency services, and fire prevention services. The No Action Alternative will impact the Fire Department. To assure that current services do not deteriorate at some point in the near future additional staffing will be needed. Because the fire department cannot add firefighters one at a time – thresholds for adding staff to respond to the Proposed Plan's increased service demands will need to be determined. This is expected to be at least partially addressed in the Standard of Cover planning document.

MITIGATION MEASURES

Proposed Alternative

The following mitigation measure will be applied to limit long-term impacts to fire services in the Plan Area: development within the Plan Area will be required to comply with all International Building, Fire and Mechanical Codes. When the population increases by 29,153 and 1,218 businesses are added, the Fire Marshal's Office will need an additional Deputy Fire Marshal to maintain current service levels. Additionally, one firefighter would be required for every 1,311 population increase (6 total). However, it is not practical to add one firefighter at a time. Therefore, a reasonable planning approach for additional firefighters to deal with the increased service demands posed by high-rise buildings and increased population density should be determined.

Planning for access to the waterfront Columbia West Renaissance area should include consideration of emergency response, particularly in the event of a major disaster.

No Action Alternative

The following mitigation measure will be applied to limit long-term impacts to fire services in the Plan Area: development within the Plan Area will be required to comply with all uniform building, fire, and mechanical codes and standards. When the population increases by 29,153 and 1,218 businesses are added, the Fire Marshal's Office will need an additional Deputy Fire Marshal to maintain current service levels. Additionally, one firefighter would be required for every 1,311 population increase (3 total). However, it is not practical to add one firefighter at a time. Therefore, an incremental planning approach for additional firefighters to deal with the increased service demands posed by high rise buildings and increased population density should be determined.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts to fire services that are likely to occur because of implementing the Proposed Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts to fire services that are likely to occur because of implementing the No Action Alternative.

POLICE

Existing Conditions

The City of Vancouver Police Department provides public safety and law enforcement services within Vancouver's city limits. Vancouver Police officers respond to 911 and non-emergency calls, conduct criminal investigations, support traffic safety, and provide many specialty functions to support Vancouver's high quality of life. In 2006, Vancouver Police was budgeted 199 commissioned officers and 33 civilian positions. The plan area is located in Patrol District 1 and officers are deployed from Central Precinct, located at 2800 NE

Stapleton Rd near Fourth Plain Boulevard. Vancouver Police Headquarters is located at 605 E Evergreen Blvd near downtown Vancouver.

POTENTIAL IMPACTS

Proposed Alternative

The Proposed Alternative is expected to increase the number of residents in the plan area by approximately 7,281 and employees by approximately 9,305. Increased residential population, jobs, and traffic will increase calls for police service. Current service levels indicate that approximately 10 additional officers will be needed to serve this area. 4 civilian positions will also be needed.

The increase in population will result in increased tax revenue from the subarea, which would be applied to the city's General Fund and may be used for additional police services.

No Action Alternative

The No Action Alternative is expected to increase the population by approximately 5,372 residents and employees by approximately 9,203 people. These increased figures will also result in an increase in calls to the police department, and current service levels indicate that approximately 7 additional officers will be needed to serve this area. Three civilian positions will also be needed.

Although there will be a smaller increase in population with this alternative, there will be an increase in tax revenue from the subarea, which would be applied to the city's General Fund and may be used for additional police services.

MITIGATION MEASURES

Proposed Alternative

To improve site security and prevent crime in the area, building designs must include adequate lighting and other safety features. Vancouver Community Policing Specialists are trained in Crime Prevention Through Environmental Design and are available to work with Design Review Services to provide safety design input. Based on current staffing and local needs, we anticipate hiring 1.3 officers and 0.47 citizens per 1,000 new residents. Other factors may need to be taken into account as this area grows and changes.

No Action Alternative

To improve site security and prevent crime in the area, building designs must include adequate lighting and other safety features. Vancouver Community Policing Specialists are trained in Crime Prevention Through Environmental Design and are available to work with Design Review Services to provide safety design input. Based on current staffing and local needs, we anticipate hiring 1.3 officers and 0.47 citizens per 1,000 new residents. Other factors may need to be taken into account as this area grows and changes.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts to police services that are likely to occur as a result of implementing the Preferred Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts to police services that are likely to occur as a result of implementing the No Action Alternative.

SCHOOLS

Existing Conditions

The project area is located in Vancouver School District #37 (the "district"). There are 35 schools located in the district, including four high schools, an alternative high school, a combined high/middle school for arts and academics, six middle schools, 21 elementary schools, and one early childhood education center and one day treatment center. The plan area falls within the attendance boundaries of Hough Elementary School, Discovery Middle School, and Hudson's Bay High School.

Basic Ed Enrollment and Capacity (October 2005)

	<u>Enrollment</u>	<u>Capacity</u>
Hough Elementary	267	322
Discovery Middle	663	840
Hudson's Bay	1,519	1,470

Hough Elementary and Discovery Middle School are currently under capacity. Hudson's Bay is over capacity.

School impact fees are collected from applicable residential developments in the City of Vancouver under the Growth Management Act. These fees are used by the district to assist in providing new capital facilities related to growth.

New suburban schools with associated sports fields require a certain number of acres. The generally accepted size for school sites are as follows:

- New elementary schools approximately 10 acres
- New middle schools approximately 20 acres
- New high schools approximately 30 to 50 acres

Large sites like these are unlikely to be available in a high density, more intensely developed urban environment. New standards for a school model that better adapts to the urban form may be needed.

POTENTIAL IMPACTS

Proposed Alternative

The Proposed Alternative is expected to increase the number of residential units in the project area by approximately 2600 units above the No Action Alternative. The district uses the following average student generation rates for all schools within the Vancouver School District to determine the number of students produced per new multi-family housing unit:

Vancouver School District Student Generation Rates

(Per Multi-Family Housing Unit)

Elementary	0.145
Middle School	0.059
<u>High School</u>	<u>0.066</u>
Total	0.270

Application of the student generation rates to the increased number of multi-family residential units in the plan area results in an additional 377 elementary students, 153 middle school students, and 172 high school students. Discovery Middle School would be able to accommodate the increase in middle school students. The number of new elementary students added to the current enrollment would significantly exceed the capacity of Hough Elementary School. Hudson's Bay High School is already over capacity.

No Action Alternative

The No Action Alternative represents the existing City of Vancouver Comprehensive plan, which includes the Vancouver School District's Six Year Capital Facilities plan.

MITIGATION MEASURES

Proposed Alternative

The district can accommodate additional students within the city center plan area in existing classroom space, with portable classrooms, adjusting school attendance boundaries, or building additional school capacity.

Because of the urban nature of the proposed alternative and the assumed high residential densities coupled with the shortage of vacant land within the boundaries of the plan area, the Vancouver School District may need to consider innovative school alternatives that accommodate a more intense urban form than the typical one storey school building with fields. These alternatives may include smaller building footprints, partnerships with other public/private entities for education related services, co-location within buildings with other uses, the renovation of existing office buildings, and shared-public-park and open space.

• The City of Vancouver should work with the Vancouver School District to consider new innovative school standards for building and site design more relevant to high density urban development.

- The City of Vancouver will work with the Vancouver School District to adjust the school impact fees to reflect the cost of schools within the high density and intense urban environment of the city center.
- The City of Vancouver should work with the Vancouver School District and other public/private parties to provide new school sites, as needed, within the VCCV.

No Action Alternative

The district can accommodate additional students within the Plan Area in existing classroom space, through the use of portable classrooms, adjusting school attendance boundaries, or building additional school capacity.

Unavoidable Significant Adverse Impacts

Proposed Alternative

An unavoidable significant impact may occur if the Vancouver School District determines that a capital facilities bond is necessary to provide additional school sites and/or school capacity and the community does not provide the needed votes to pass the bond.

No Action Alternative

There are no unavoidable significant adverse impacts to school services that are likely to occur as a result of implementing the No Action Alternative.

POTABLE WATER

Existing Conditions

Water supply to the Plan Area is excellent. Water pressure is 75 to 80 psi, and produces fire flow of 3,000 gpm at street level. The entire Plan Area is currently served.

The water distribution pipes are old (1900 – 2005) and are replaced as redevelopment occurs. Existing pipes are made of ductile iron cast, uncoated steel, galvanized steel, and Matheson cast materials. Ductile iron pipe is the current City standard, and has been installed in 7th Street with the construction of the Transit Mall, in Washington Street during road improvements, Columbia Street with the 1997 improvements, 9th Street for the housing development, 8th Street/Esther for streetscape improvements, 16th Street for leak abatement, and 13th Street for the government area development. All other pipes in the Plan Area will require evaluation based upon new demands.

POTENTIAL IMPACTS

Proposed Alternative

The Proposed Alternative anticipates new development of buildings and streets in the Plan Area. Any new street construction near the old water distribution lines may cause the older water pipes to rupture. Many lines are also undersized for the redevelopment of the area. The VCCV (Vancouver City Center Vision Subarea Plan) anticipates buildings up to 150 feet in height; water pressure at the street elevation would not be adequate to serve the upper floors of these buildings.

No Action Alternative

The No Action Alternative also anticipates new development of buildings and streets, although at a less intensive level than the Proposed Alternative. Any new street construction near the older water distribution lines may cause the old water pipes to rupture. The older lines are most likely undersized for the redevelopment of the area. This alternative allows building heights up to 300-feet in height; however, because of Federal Aviation Administration (FAA) regulations this height could not be achieved. Therefore, in reality, this alternative would also have buildings up to 150-feet in height; water pressure at the street elevation would not be adequate to serve the upper floors of these buildings.

MITIGATION MEASURES

Proposed Alternative

It is the City of Vancouver's responsibility to maintain the existing water lines. When a portion of the subarea and redevelopment plan is constructed and includes street construction, where necessary, the City will replace all adjacent substandard water pipe with engineered ductile iron pipe, and replace all substandard fire hydrants with new hydrants that meet City standards. Any development proposal that requires fire flow in excess of 3,000 gpm will require additional review by the City of Vancouver and potential additional facilities may be required to be installed by the developer. Fire flow values are for street elevation; multistory proposals will require additional developer installed fire protection systems in compliance with City requirements (e.g., automatic sprinkler systems) to provide the necessary fire protection and water pressure increase to supply the upper floors of the buildings.

No Action Alternative

It is the City of Vancouver's responsibility to maintain the existing water lines. When a portion of the subarea and redevelopment plan is constructed and includes street construction, where necessary, the City will replace all adjacent substandard water pipe with engineered ductile iron pipe, and replace all substandard fire hydrants with new hydrants that meet City standards. Any development proposal that requires fire flow in excess of 3,000 gpm will require additional review by the City of Vancouver and potential additional facilities may be required to be installed by the developer. Fire flow values are for street elevation; multistory proposals will require additional developer installed fire protection systems in compliance with City requirements (e.g., automatic sprinkler systems) to provide the necessary fire protection and water pressure increase to supply the upper floors of the buildings.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts anticipated because of the Proposed Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the No Action Alternative.

SEWER

Existing Conditions

The City of Vancouver serves sanitary sewer to the entire Plan Area. The majority of the sewer system was constructed with clay pipes between 1905 and 1915. Although old, these pipes are often in good condition unless they have been disturbed. There is also a 1948 concrete interceptor sewer, 33 inches in diameter, which traverses the southern portion of the Plan Area and a 24-inch clay interceptor in Lincoln Street that has been lined with a cured in place pipe. A portion of this clay interceptor is also in 16th Street. There are several stretches of new 8-inch PVC pipes in the Plan Area that have been installed within the last eight years to replace the older clay pipe. These pipes were installed in coordination with roadway and/or adjacent development improvements. One pump station also serves the area. It is located at 2nd and Columbia and receives flows that are generated south of the 33-inch interceptor.

The Southside Interceptor caries flows from the Plan Area to the Westside Water Reclamation Facility located west of the Plan Area. This facility has a capacity of 21.3 million gallons per day (mgd). It is currently operating at approximately 10 mgd.

The inflow and infiltration in the area is predominately estimated at 1,100 gallons per acre per day (gpad) in the Sanitary Sewer Master Plan.

POTENTIAL IMPACTS

The impacts for either alternative are only slightly different and mitigation for either is the same. Neither has an adverse impact, and either alternative may help decrease inflow and infiltration into the sanitary sewer system.

Proposed Alternative

The Proposed Alternative for the Plan Area will likely generate approximately 0.97 mgd of flow to the Westside Water Reclamation Facility, based on the City of Vancouver's Master Plan criteria. This is a relatively insignificant decrease from that estimated for the No Action Alternative. Actual flows could be higher than the No Action Alternative based on the expected number of residents (7,281) and employees (9,305) in the area. Any increase is not expected to be significant given the capacity available in the sewer mains and at the reclamation facility. New street construction in the vicinity of any old clay sewer pipes will be evaluated to determine if it will be prudent to replace the pipes with new PVC pipes or line them.

No Action Alternative

The No Action Alternative for the Plan Area will likely generate approximately 1.00 mgd of flow to the Westside Water Reclamation Facility, based on the City of Vancouver's Master Plan criteria. New street construction in the vicinity of any old clay sewer pipes will be evaluated to determine if it will be prudent to replace the pipes with new PVC pipes or line them.

MITIGATION MEASURES

Proposed Alternative

It is the City of Vancouver's responsibility to maintain existing sewer pipes, and provide capacity at the treatment facility. When a portion of the area is redeveloped and includes street construction, the City will evaluate the condition of the existing sewer in the street and replace any deteriorated pipes with new pipes or line them as deemed appropriate. Funding for the replacement pipes will come from the City of Vancouver's Capital Improvement Program. The Westside Water Reclamation Facility has adequate capacity to serve the Proposed Alternative.

No Action Alternative

It is the City of Vancouver's responsibility to maintain existing sewer pipes, and provide capacity at the treatment facility. When a portion of the area is redeveloped and includes street construction, the City will evaluate the condition of the existing sewer in the street and replace any deteriorated pipes with new pipes or line them as deemed appropriate. Funding for the replacement pipes will come from the City of Vancouver's Capital Improvement Program. The Westside Water Reclamation Facility has adequate capacity to serve the No Action Alternative.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts anticipated because of the Proposed Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the No Action Alternative.

PUBLIC WELL WATER SUPPLIES

Existing Conditions

Currently, Vancouver draws all of its potable water supply from wells. No public water well is located within the proposed redevelopment area; however, the City's water system serves this entire Plan Area with potable water. The existing water system supplied the past industrial and commercial users in the area with more water than what is projected for the

redevelopment proposal. This system is the City's responsibility for maintenance and operation.

POTENTIAL IMPACTS

Proposed Alternative

Vacant portions of the Plan Area that are proposed for redevelopment are not currently using City water; however, in the past, industrial use of potable water was greater than the usage projected for redevelopment. The Proposed Alternative projects a total of 7,559 fixture units at completion. From the 1994 Uniform Plumbing Code (UPC), Chart A-2, the total projected domestic flow will be 1,083 gpm. This is a conservatively high value because it combines the commercial and residential flow, which may be unnecessary since one part of the VCCV Subarea Plan includes combined live / work areas. In these areas, people would either be consuming water at their residence or their place of business—not both.

Fire flow (not domestic water usage) to the Plan Area will be the critical demand on the system. Fire flow of 3,000 gpm is available at street elevation to the Plan Area. Development proposals will be evaluated individually based on square footage and construction type to determine the required fire flow.

The model for the VCCV uses a 17,000 square-foot floor plate as a typical commercial office building. In this case, for Type I-FR or Type II-FR construction, the three largest successive floor areas would be combined to determine the fire area. A fire area of 51,000 square feet requires a fire flow of 2,500 gpm, and fire flow can be reduced by 75% (not less than 1,500 gpm) if the buildings are provided with automatic sprinkler systems. The impacts to the water supply do not require mitigation since capacity is available.

No Action Alternative

Vacant portions of the area that are to be redeveloped are not currently using City water; however, in the past, industrial use of potable water was greater than the usage projected for redevelopment. The No Action Alternative projects a total of 3,137 fixture units at completion. From the 1994 UPC, Chart A-2, the total projected domestic flow will be 450 gpm.

Fire flow (not domestic water usage) to the area will be the critical demand on the system. Fire flow of 3,000 gpm is available at street elevation to the Plan Area. Development proposals will be evaluated individually based on square footage and construction type to determine the required fire flow and if necessary, new facility requirements.

MITIGATION MEASURES

The City of Vancouver has indicated a fire flow of 3,000 gpm and adequate water supply for either Alternative.

Proposed Alternative

For proposals requiring fire flow in excess of 3,000 gpm, the City of Vancouver will determine facility requirements in compliance with existing codes as specific proposals and building plans are submitted. No mitigation is required for proposals that can be served by the existing capacity.

No Action Alternative

For proposals requiring fire flow in excess of 3,000 gpm, the City of Vancouver will determine facility requirements in compliance with existing codes as specific proposals and building plans are submitted. No mitigation is required for proposals that can be served by the existing capacity.

Unavoidable Significant Adverse Impacts

Proposed Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the Preferred Alternative.

No Action Alternative

There are no unavoidable significant adverse impacts anticipated as a result of the No Action Alternative.

ACRONYM GLOSSARY

American Medical Response NW (AMR) Archaeological Investigations Northwest, Inc. - AINW Before Present (BP) **Best Management Practices - BMPs** Burlington Northern Santa Fe - BNSF City Center - CX Clark County Heritage Register - CCHR Community Commercial - CC Community Resource Team - CRT Department of Archaeology and Historic Preservation - DAHP Draft Environmental Impact Statement - DEIS Draft Supplemental Environmental Impact Statement - DSEIS Environmental Impact Statement - EIS Federal Aviation Administration - FAA Final Environmental Impact Statement - FEIS Growth Management Act - GMA Historic American Building Survey (HABS) Hudson's Bay Company - HBC Hydrologic Soil Group - HSG Heavy Industrial – IH Light Industrial – IL Medium-Density Residential - R-22 Mixed Use - MX National Environmental Policy Act - NEPA National Register of Historic Places - NRHP National Marine Fisheries Services - NOAA National Pollution Discharge Elimination System - NPDES Revised Code of Washington (RCW) State Environmental Policy Act - SEPA The Washington Department of Ecology (Ecology) & (DOE) Uniform Plumbing Code (UPC) U.S. Environmental Protection Agency - EPA U.S. Army Corps of Engineers – USACE U.S. Fish and Wildlife Service - USFWS Vancouver City Center Vision Subarea Plan - VCCV Vancouver Municipal Code - VMC Washington Department of Fish and Wildlife – WDFW Washington Heritage Register - WHR

GLOSSARY

dBA – A-weighted decibel, unit of noise measurement that incorporates a filtering system to approximate the response of the human ear commonly used in environmental noise DNL – measure of the overall noise over an entire 24-hour day, accounts for the higher sensitivity to noise in the nighttime, used as a measurement community noise exposure, also referred to as L_{dn}

Decibel - unit of measure used to describe noise levels

EIS – Environmental Impact Statement

 L_{eq} – unit of noise measurement to describe the mean sound energy level over a specified period of time

Maintenance area – geographic area that complies with the AAQS, but where historic air pollution levels have exceeded the AAQS

 μ g/m³ – micrograms per cubic meter

Noise Impact Overlay District – Area defined in the City of Vancouver zoning ordinances where noise levels without mitigation may exceed acceptable levels for human habitation Nonattainment area – geographic area in which air pollution levels exceed the AAQS

 $\rm PM_{10}$ – Particulate matter with an aerodynamic diameter of 10 micrometers or less ppm – parts per million

SIP – State Implementation Plan, the federally approved plan prepared by each State to attain and maintain compliance with the AAQS and to implement federally mandated air quality regulations

SWCAA – Southwest Clean Air Agency - government agency responsible for air pollution control and planning in Lewis, Wahkiakum, Cowlitz, Skamania, and Clark Counties WAC – Washington State Administrative Code

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COMMENTS AND RESPONSES TO THE DSEIS



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RECEIVED

1

SEP 0 6 2006

LONG RANGE PLANNING DEPARTMENT

Sandra Towne, Principal Planner City of Vancouver Long Range Planning PO Box 1995 Vancouver, WA 98668

Re: Proposed Vancouver City Center Vision Subarea Plan DSEIS for the VCCV Subarea Plan

Dear Sandra:

September 5, 2006

Identity is pleased to have been a partner in the creation of the Vancouver City Center Vision and supports the proposed VCCV Subarea Plan and the DSEIS for the VCCV Subarea Plan.

We are eager to see some of the new pieces begin falling into place.

Thanks for you partnership.

Sincerely,

inger

Ginger Metcalf Executive Director

Response to Comment 1: Letter – Ginger Metcalf, Executive Director, Identity Clark County

Response to Comment 1-A

Comment noted. No response necessary

Page 1 of 1

Towne, Sandra

2

 From:
 Burdick, Stephen

 Sent:
 Tuesday, September 12, 2006 11:52 AM

 To:
 Towne, Sandra

 Subject:
 Comment of Draft Environmental Impact Statement for the Vancouver City Center Vision Plan - Proposed Heights & Historic District

Sandra,

The DEIS for the VCCV plan shows Historic Preservation Overlay District #2 being extended up to 12th on each side of Main Street and a sixty foot maximum height limit imposed on this historic preservation overlay district. While I believe that both the historic preservation overlay district and the sixty foot maximum height area boundaries ought to be identical, I believe that these two maps are in error and that they were intended to terminate at 11th on the East side of Main Street and include only the South half of the block bound by 11th, 12th, Main and Washington.

This is because:

А

- The 1111 Main Street building that occupies the entire block North of 11th on the East side of Main Street was constructed in 1990. So, it is not a historic building and its heights will be what they are for decades to come.
- 2. The two buildings North of 11th on the West side of Main Street that warrant the protection of the Historic Preservation Overlay District #2 are the Telephone Exchange Building and the Arts Building both located on the Southern half of this block.
- 3. The North half of the block bound by 11th, 12th, Main and Washington is now vacant or occupied by one story, non-historic buildings and the City is encouraging the redevelopment of this half block up to the 75' maximum height limit with a mixed-use concept.

Steve Burdick

09/12/06

Response to Comment 2: E-Mail – Stephen Burdick, Economic Development Director, City of Vancouver

Response to comment 2-A

Comment noted. The Historic Preservation Overlay #2 boundary extension (Figure 8-8 on page 137) has been adjusted to exclude the northern 1/2 block bound by 11th, 12th, Main and Washington. The northern portion of this block was demolished several months ago in preparation for redevelopment.

For consistency and logic the Maximum Building Heights Map, VMC Figure 20.630-4 is adjusted to exclude the northern $\frac{1}{2}$ of the block bound by 11^{th} , 12^{th} , Main and Washington and the full block bound by 11^{th} , 12^{th} , Main and Broadway from the 60' building height area. Instead, include the above mentioned $\frac{1}{2}$ and full block in the 75' building area.

Page 1 of 1

Towne, Sandra

3

 From:
 Burdick, Stephen

 Sent:
 Tuesday, September 12, 2006 10:49 AM

 To:
 Towne, Sandra

 Cc:
 Wuest, Phil

 Subject:
 Comment on Draft Environmental Impact Statement on the Vancouver City Center Vision Plan

Sandra,

Since the early 1980's the downtown business community has lobbied for an exit from I-5 Southbound into the lower Main area. A few years ago City Transportation developed draft plans for such an exit onto 6th. However, the DEIS for the VCCV plan does not reflect this connection as an assumed transportation improvement.

I think that consideration of this exit is necessary.

Steve Burdick

09/12/06

Response to Comment 3: E-mail - Stephen Burdick, Economic Development Director, City of Vancouver

Response to comment 3-A

Comment noted. This exit has been considered and, while it is still identified in the Transportation Element of the adopted Comprehensive Plan, it is not addressed by the VCCV transportation analysis. The VCCV transportation analysis uses a base interstate system similar to what exists today, with some modification to access ramps to account for potential changes that may occur with implementation of the I-5 Columbia River Crossing Project. However, because of limited right-of-way through that portion of the corridor, existing substandard interchange spacing (merge and weave distances), the height of the potential new freeway section, and the challenge of keeping an efficient connection between SR14 and Mill Plain Boulevard it appears unlikely that a 6th Street I-5 southbound off-ramp can be constructed. This plan does not rule out such a ramp, nor does the transportation impact analysis rely on it. This is a prudent approach to analyzing potential future transportation impacts.

Page 1 of 1

Towne, Sandra

4

From:Burdick, StephenSent:Monday, September 25, 2006 5:12 PMTo:Towne, Sandra

Subject: Comment of the Draft Environmental Impact Statement for the Vancouver City Center Vision Plan

Thank you for the presentation on September 21 to the City Center Redevelopment Authority Board of Directors on the Draft Environmental Impact Statement for the Vancouver City Center Vision plan. The Board requests that one change be made to the proposed revisions to the City's Maximum Height ordinance. That proposed change is shown as a redline to the proposed revision as follows:

C. Building heights in the Downtown Plan District vary from 40 to200': based on the intentions listed under 20.630.050A, Purpose. In areas noted by an asterisk in figure 20.630.4, the City to maximize development opportunities shall may allow increase in building height, including any roof-top mechanical appurtenance to a height equal but not exceeding those consistent with FAA regulation, Part 77.

09/26/06

Response to Comment 4: E-mail - Stephen Burdick, Economic Development Director, City of Vancouver

Response to comment 4-A

Comment noted. This change allows the city to consider all of the criteria listed under 20.630.050A for those properties requesting additional height in the areas noted by an asterisk. As it is written, only the FAA regulation criteria would determine whether additional height is appropriate. The additional considerations in determining adjusted building heights within the mapped asterisk areas include; facilitating redevelopment opportunities and maximizing waterfront development; meeting historic preservation goals; and protecting adjacent residential and commercial neighborhoods.

Page 1 of 1

Towne, Sandra



From: Lawry, Chad

Sent: Wednesday, September 27, 2006 12:12 PM

To: Towne, Sandra

Bivins, Don; Crawford, Jim Cc:

Subject: Draft Supplemental Environmental Impact Statement

Hi Sandra,

I have reviewed this document pertaining to the Vancouver City Center Vision Subarea Plan. Just a couple of items.



1. References to a former code group: "the uniform building, fire and mechanical codes". We are no longer under the uniform codes, now we are under "the International building, fire and mechanical codes". These references occur on Page 207 line 6; Page 208, paragraph 1, line 2; Page 208 paragraph 2, line 2.

2.

Page 208 describes 3 of the 4 core service functions provided the Fire Marshal's Office. One very important FMO service that that was omitted is fire and arson investigations.

Page 208 sums up Fire Department impact mitigation measures with population growth criteria for adding з. staffing. Do we also want to mention the corresponding fire apparatus and fire stations that also will need to be addressed with substantial population growth? It sounds like you are familiar or involved with the Fire Department's "Standard of Cover" work so perhaps this has already been taken into consideration.

Thanks for the opportunity to review and comment. I hope that helps,

Chad Lawry, CFI - Deputy Fire Marshal City of Vancouver Fire Department Direct (360) 759-4418; Cellular (360) 606-9024; Fax (360) 696-8283 Address: City of Vancouver - DRS 2nd Floor - PO Box 1995, Vancouver, WA 98668 www.vanfire.org

09/27/06

Response to Comment 5; E-mail – Chad Lawry, Deputy Fire Marshal, City of Vancouver

Response to comment 5-A

Comment noted. The reference to the "Uniform Building, Fire and Mechanical Codes" will be replaced with the "International Building, Fire and Mechanical Codes" in the Fire subsection of Chapter 12, Public Services and Utilities

Response to comment 5-B

Comment noted. The additional core service of the City Fire Department includes <u>Fire and</u> <u>Arson Investigations</u> this is added to the Fire subsection of Chapter 12, Public Services and Utilities.

Response to comment 5-C

Comment noted. The City of Vancouver Fire Department did take into consideration impacts such as new apparatus and fire stations in planning for population growth impacts. The Vancouver City Center Vision Subarea Plan Draft Supplemental Environmental Impact Statement supplements the City of Vancouver Comprehensive Plan Environmental Impact Statement, 2004.

Page 1 of 1

Towne, Sandra

From: Art on the Boulevard [genegrace@artontheboulevard.org]

Sent: Thursday, September 28, 2006 1:57 PM

To: Towne, Sandra

Cc: Burdick, Stephen

Subject: From Art on the Boulevard

Dear Sandra

) sent Tim Leavitt an email and subsequently received a response from Steve Burdick. He asked that I forward my comments to you.

I am the gallery assistant for Art on the Boulevard - a Friends of the Arts gallery located in the Vancouver Marketplace. One of the things that greets me every morning when I go to work, is a plethora of ugly boxes containing apartment information, free newspapers etc. These monsters are chained together on corners all over downtown. Ugly!

Gene Wigglesworth, Gallery Manager of Art on the Boulevard, has mapped the downtown area from Mill Plain to Sixth Street and I-5 to Franklin, and counted over 200 boxes on various corners. The record is on C Street, 17 in a row.

Gene has done the research across N. America and the best ordinance comes from Spokane, Washington. They have controlled the number of boxes since 1966. Gene has left the ordinance with a variety of people at City Hall, including the City Attorney's office. I'm emailing to ask you to please accept our recommendation as a comment on the Draft Environmental Impact Statement for the Vancouver City Center Vision plan. And specifically to request that NO boxes be anywhere around the gorgeous Esther Park area. Too much passion and money has gone into that area for it to be marred by ugly boxes.

Should you have any questions, please feel free to call Gene at 750-4499, Tues to Sat. Or his cell 772-4363. Sincerely Jaynie Roberts Gallery Assistant Art on the Boulevard www.artontheboulevard.org

09/28/06

Response to Comment 6; E-mail – Jaynie Roberts, Gallery Assistant, Art on the Boulevard

Response to comment 6-A

Comment noted. The following mitigation measure is added to Chapter 7, Land Use and is further added to the Summary Table 1-1 in Chapter 1:

The City of Vancouver should consider a requirement to consolidate existing news racks and boxes with a consistent color and style.

Page 1 of 1

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Towne, Sandra

From: DS4600@aol.com

Sent: Friday, September 29, 2006 9:51 AM

To: Towne, Sandra

Subject: CPZ2006-00034

Sandra,

I would like to comment on this proposed change. As owner of Vancouver Iron & Steel, Inc., (VISI) and Swartz Steel LLC located at 13th and Lincoln. I am also a resident of Vancouver living at 4600 Olive St.. VISI has been in operation as a steel foundry in Vancouver continously since **1928** and currently provides approximately 50 Union jobs to our community. We are currently actively involved with the City to obtain building permits to add onto our existing facility and to build an additional new warehouse building on our property. We are also in the midst of upgrading our current facility so we can totally process our production at our Vancouver site which will lead to the transfer of approximately 20 additional jobs from our Portland facility. Our outlook for continued growth in Vancouver is excellent and should allow us to continue to provide 50 to 100 Union jobs with excellent benefits.

My concern is, if I understand the proposed change properly, the loss of the light industrial buffer to our east. Our facility is Heavy Mfg. and zoned Heavy. It only seems reasonable to buffer a zoned Heavy Industrial site with light industrial. We have a buffer to the north, the Mill Plain overpass, to the west, Burlington Northern and to the south, Burlington Northern and Emerald Services.

It then would only seem logical and beneficial to VISI's continued growth to have a buffer of atleast one half of the block to our east zoned for light industrial development which does not conflict with it's current use.

Sincerely, Vancouver Iron & Steel, Inc. Swartz Steel LLC

Dan Swartz President & Owner 503-821-8106

09/29/06

Response to Comment 7; Email – Dan Swartz, President & Owner, Vancouver Iron & Steel, Inc

Response to Comment 7-A

The City Center Mixed Use zone allows commercial, office, residential and limited light industrial uses. Many of the CX uses are compatible located next to industrial uses.

The property owner of the 2 parcels referred to in the comment has sent an email supporting the removal of the Light Industrial Overlay and allowing the underlying CX zone to guide development. He owns several other parcels on this block and wishes for them to all be the same zone.

An implementing measure of the proposed plan lifts the Light Industrial Overlay from the above mentioned parcels located on the west portion of the city block bounded by 13^{th} , Lincoln, Markle and 14^{th} .



GENERAL O.O. HOWARD HOUSE • 750 ANDERSON STREET • VANCOUVER, WASHINGTON 98661

Main: 360.992.1800 Fax: 360.992.1810



RECEIVED

OCT 05 2006

LONG RANGE PLANNING DEPARTMENT

October 2, 2006

Ms. Sandra Towne Principal Planner City of Vancouver Long Range Planning Department PO Box 1995 Vancouver, WA 98668-1995

Dear Ms. Towne:

I am writing on behalf of the Vancouver National Historic Reserve Trust in support of the Vancouver City Center Vision & Subarea Plan, and we urge its adoption. The Vancouver National Historic Reserve is greatly impacted by downtown and our surrounding neighborhoods. Experience has clearly shown that the success of the Esther Short Subarea and Redevelopment Plan has greatly contributed to cultural tourism on the Historic Reserve, and has helped to facilitate our planning for capital and program development that will continue to enhance economic development. We believe that the Vancouver City Center Vision & Subarea Plan (VCCV) will also impact the Historic Reserve in such a positive manner.

We clearly see the benefit of the enhanced symbiotic relationship between the Historic Reserve and the developments envisioned through the VCCV. Waterfront redevelopment will complement riverfront planning by the Trust, the City, and the National Park Service. An extension of incentives and capital development to expand the revitalization from Esther Short to a much broader area will clearly enhance visitation, economic growth, and a healthy, vibrant community. Protection of historic buildings is certainly in keeping with our own historic preservation work, and the VCCV's recognition of the importance of arts and culture aligns with our own program development.

The specific recommendation in the VCCV calling for a connection between downtown and the Historic Reserve via a pedestrian bridge over I-5 from Seventh Street (Heritage Way) to Hatheway Street is already a component of the Long Range Plan adopted by the Reserve Trust, the City of Vancouver, and the National Park Service. We appreciate the recognition of its importance and its inclusion in the VCCV.

Given recent discussions concerning the options being considered by the Columbia River Crossing Task Force, however, we would encourage the VCCV to consider advocacy regarding a "lid" over the freeway from 7th Street to Evergreen Blvd. While the feasibility of a freeway lid is currently being studied by Columbia River Crossing staff, we believe that, if possible, an I-5 cover would provide a much more enhanced connection between downtown Vancouver and the Historic Reserve. Actually, it would serve to help restore the historical connection between the Historic Reserve and downtown Vancouver that was lost when I-5 bisected our community.

Noise and visual abatement of freeway traffic facilitated by the lid would be much more than mitigation; it would provide a tremendous environmental enhancement. Further, as the lid could incorporate green space and visual enhancements, we would have the opportunity to provide the public with space that could be utilized and enjoyed more than a pedestrian crossing. A lid would also provide the opportunity to restate our community identity to north-bound travelers as Washington's gateway. Advocacy for a freeway lid, in lieu of the pedestrian bridge, would certainly be in keeping with the vision of the VCCV.

Sincerely,

Elson Strahan President and CEO

Response to Comment 8; Letter – Elson Strahan, President and CEO, Vancouver National Historic Reserve

Response to Comment 8-A

Comment noted. The I-5 Columbia River Crossing project is outside of the scope of this supplemental environmental impact statement. However, the project is described in the document as a related project. The City continues to work as an integral part of the Columbia River Crossing Team to assure that the City's needs and future planning goals in relation to the I-5 project are addressed.

Page 1 of 1

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Towne, Sandra

 From:
 CHRIS C BOTELHO [chrisbotelho7@msn.com]

 Sent:
 Monday, October 09, 2006 8:26 PM

 To:
 Towne, Sandra

Subject: Fw:

----- Original Message -----From: <u>CHRIS C BOTELHO</u> To: <u>sandra/towne@ci.vancouverwa.us</u> Sent: Monday, October 09, 2006 8:18 PM



Jacob Swalling etal doing business as S and F Enterprises is requesting that Lots 4 and 5 of Block 20, Portland Addition be in included in the rezoning plan for the surrounding lots (city center mixed use). We would prefer that all our lots remain in the same zoning. We support the plan for city center mixed use for our block and the surrounding blocks.

10/10/06

Response to Comment 9; Email – Chris Botelho property owner

Response to Comment 9-A

Comment noted. The proposed implementing zoning for the VCCV Plan as analyzed in the SEIS proposes to change Mr. Botelho's properties to City Center Mixed Use (CX) zone by lifting the existing Light Industrial overlay. The proposal to lift the Light Industrial Overlay would allow the opportunity for all of his properties under the same zone of CX to redevelop.

LANDERHOLM, MEMOVICH, LANSVERK & WHITESIDES, P.S.

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Michael Simon

October 10, 2006

r. . .

Mr. John Caton, Chair City of Vancouver Planning Commission City Hall Council Chambers 210 E. 13th Street Vancouver, WA 98660

OCT 10 2006

DEVELOPMENT REVIEW SERVICES

RECEIVED

Re: The Academy

Dear Mr. Caton and Members of the Planning Commission:

I represent Oliver Hidden with concerns he has regarding the Vancouver City Center Vision Subarea Plan (VCCV). These concerns deal with the Historic Academy Building and grounds. Because I am sure you have received a lot of information on the VCCV, I will keep my comments brief.

Height Limitations

The height limitations proposed for the Academy property are 0 feet, 40 feet and 75 feet. We are asking that these be reconsidered.

First, the 0 feet limitation is not realistic and does not allow any development on that parcel at all. We are aware of the Academy's historical significance and would agree that any building built on that property with reasonable height limitations would have to respect the Academy and the Officer's Row designs. We would be willing to work with Staff to come up with wording that would satisfy the concerns about the architectural design and scale.

Next, we don't believe the 40 foot limitation on the existing Academy building is realistic. The building and its cupola easily exceed 40 feet and we would not want to jeopardize the rebuilding of the cupola if something happened to it. Therefore, we request that the building height be raised to the top of the cross on the cupola to make sure that it could be rebuilt if something happened to it.

Finally, we would ask that the height limitation on the entire property be raised to the same level as the proposed development immediately to the south on the Carr Automobile Dealership property. If something were to happen to the Academy, the property is situated nearly identically to that property and could be developed as a bookend to it. Although four criteria are Mr. John Caton, Chair Re: The Academy October 10, 2006 Page 2

considered in Chapter 7, Land Use (p. 71) of the DSEIS, only two apply to this property, namely: (1) scale of development adjacent to it; and (2) to include buffer areas to residential zones on the northern border of the downtown area. It is immediately adjacent to I-5 and has sufficient area to build a similar development. Although we hope nothing ever happens to the Academy because of its historical significance, we don't want to be foreclosed in the future if something should happen to it.

The Proposed Existing Non-Conforming Surface Lots

Staff proposes that Section 20.630.060G be enacted to require that all unimproved parking lots be improved to current parking lot development standards within two years of the date of enactment of the Ordinance. We oppose this recommendation based on a number of factors including the questionable legality of it.

The reasons we have for opposing this are:

- it would be unduly expensive;
- (2) It would actually discourage redevelopment because by requiring the improvement of parking lots, it makes them more valuable, therefore more expensive to purchase and therefore less likely to be redeveloped. If the goal of the VCCV is to maximize redevelopment, this would be counterproductive.



(3) The problem with these existing gravel parking lots will gradually be resolved with the enactment of the other sections of the Ordinance and therefore there will be no net "loss" in the establishment of new gravel parking lots. With any new development associated with the gravel parking lots, they will have to comply with the existing codes and be improved. In fact, the draft Supplemental Environmental Impact Statement, Chapter 11, Parking does not even discuss the gravel parking lots and gives no rationale for this proposal.

(4) Although the Ordinance is worded in terms of non-conforming surface lots, this is probably incorrectly worded. These lots are not non-conforming when it comes to zoning. They do not comply with the current parking lot development standards of VMC 20.945.040, but this does not make them non-conforming uses. We have been in contact with the City Attorney's office regarding this issue and will be presenting that office with a memorandum which will be based along the lines of this argument.

A protected non-conforming use generally grants the right to continue the existing use but does not grant the right to significantly change, alter, extend or enlarge the existing use. Zoning ordinances may provide for the termination of a non-conforming use by abandonment or reasonable amortization provisions. This is based on the idea that a non-conforming use is inconsistent with the ultimate purpose of zoning ordinances which is to combine certain classes of buildings and uses to certain locations. Thus, when you have a non-conforming use, you have Mr. John Caton, Chair Re: The Academy October 10, 2006 Page 3

no guarantee that that use can continue in perpetuity. *Rhod-A-Zalea v. Snohomish County*, 136 Wn.2d 1, 3-6, 959 P.2d 1024 (1998). Parking lots are not non-conforming uses in the VCCV area. They are allowed uses. Therefore, they are not subject to abandonment or a reasonable amortization schedule. The retroactive application of a statute is disfavored in the law. *Lewis v. City of Medina*, 13 Wn. App. 501, 535 P.2d 150 (1975). A remedial act cannot be given retroactive effects if it affects a vested right. *In the Matter of FD Processing, Inc.*, 119 Wn.2d 452, 832 P.2d 1303 (1992).

Vested rights are specifically provided for building permit applications under RCW 19.27.095 and any proposed division of land under RCW 58.17.033. Under both statutes, a development must be considered under the zoning or other land use control ordinances and building permit ordinances in effect at the time of the application. A vested right cannot be affected retroactively if such retroactive application would affect or impair existing rights. See Moran v. City of Seattle, 179 Wn. 555, 560, 38 P.2d 391 (1934). In it, a statute that limited the City's collection of past due water and electricity bills to those past due for four months or less was held invalid because to hold otherwise would deprive the City of the benefit of a prior law. Similarly, to require the owners of any existing graveled parking lots to improve them would deprive them of the benefit of the prior law. This applies not only to the Academy property, but to any other gravel parking lots in the City.

It could be argued that the Academy was built a long time ago before there were any zoning laws or building codes. This may be correct, but it is a situation with many buildings in the City of Vancouver and the situation with each graveled parking lot "or other non-permanent surface" (whatever that is) cannot be looked at individually. Under the proposed changed Ordinance, they are all treated the same. To pass this Ordinance opens up a Pandora's box of potential government intrusion into the existing rights of owners of multiple residences and buildings in the City. This would allow the City to require that any building built before there were building codes or zoning to be brought up to present codes. That simply has never been done and is a very dangerous precedent.

Sincerely,

LANDERHOLM, MEMOVICH, LANSVERK & WHITESIDES, P.S.

MICHAEL SIMON MS/lng cc: Mr. Oliver Hidden

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Final Supplemental Environmental Impact Statement for the Vancouver City Center Vision Subarea Plan Page 257

Response to Comment 10; Letter – Michael Simon, Landerholm, Memovich, Lansverk & Whitesides, PS representing Oliver Hidden

Response to comment 10-A

Comment noted. The height of the Academy building including the cupola is approximately 60 to 65 feet exceeding the existing and proposed maximum building height of 40 feet. Figure 20.630-4 is changed to incorporate the Academy building and remainder site within the 75 foot (with asterisk) maximum building height, with the exception of the small area in the southeast corner of the lot that under the existing maximum building height regulation and the proposed regulation allows zero (0) building height. The zero building height is a product of the historic nature of the building and site. This area under zero height is the historic grand garden entrance for the Academy and is within the Historic Preservation Overlay #1, (see below VMC 20.510.020).

The change to 75 foot height on the property was determined based on the proposed maximum building height purpose: to facilitate redevelopment opportunities, to meet historic preservation goals, to protect adjacent residential and commercial neighborhoods, and comply with FAA regulations. North and adjacent to the Academy property is an existing residential neighborhood, the site and building is a notorious historic treasure and to facilitate redevelopment that will respect the historic nature of the site and buildings the 75 foot (with an asterisk) height is a well balanced solution. The asterisk allows for a process for proposed development to possibly build higher than the dedicated height shown on Figure 20.630-4 if the applicant for the proposed development receives FAA approval and shows that the development meets compatibility criteria.

Vancouver Municipal Code further supports VMC 20.510.020A2 states, due to the importance of the Providence Academy, the Academy buildings, and the Academy grounds to the cultural, economic, and architectural history of Vancouver, and due to the unique character established by the buildings and grounds in combination with each other and with their surroundings, it is the policy of the city to preserve Providence Academy and critical open spaces integral to its site, and to ensure the compatibility of new construction or alterations to existing buildings, with the character of the historical buildings on the site.

VMC 20.510.020A2a states, Construction shall not be allowed in the area between a line parallel to the East Evergreen Boulevard façade (main façade) of the main Academy building and the street property line along East Evergreen Boulevard from the existing outbuilding between the main Academy building and East Evergreen Boulevard to the street property line along West Reserve Street. This regulation is necessary to preserve the unique open space which provides a setting for and which is an integral part of the Providence Academy site...

Response to comment 10-B

Comment noted. To clarify the nonconforming surface lots the following language is added to Chapter 11, Parking as an implementing mitigation measure and is further added to the Summary table in Chapter 1.

• Require the non-conforming surface parking lots located within the proposed Parking Control district (Figure 7-7) to meet VMC standards for the following purpose to prevent disruption of pedestrian circulation; to provide for smooth traffic flow; to ensure the most efficient provision of parking facilities; and to protect the public health, safety, and welfare by controlling erosion and dust and by preventing bodily injury and crime.

The city should adopt the proposed Parking Control shown in Chapter 7 (Figure 7-7) and the following purpose language, *This district is intended to prevent disruption of pedestrian circulation; to provide for smooth traffic flow; to prevent excessive use of downtown land for parking; to ensure the most efficient provision of parking facilities; to preserve the continuity of retail use and building frontage in the downtown shopping area; and to protect the public health, safety, and welfare by controlling erosion and dust and by preventing bodily injury and crime.*

Response to comment 10-C

The Washington Supreme Court has noted that "[c]ourts have consistently recognized that nonconforming uses are subject to subsequently enacted reasonable police power regulations..." *Rhod-A-Zalea & 35th, Inc. v. Snohomish County*, 136 Wn. 2d 1 (1998). In the *Rhod-A-Zalea* case, the Supreme Court cited with approval an Arizona case, *Watanabe v. City of Phoenix* 683 P.2d 1177 (1984) which upheld a City of Phoenix requirement to pave a nonconforming unpaved parking lot. We believe that the two-year time period to require paving of unpaved downtown parking lots would be upheld as both a land use regulation (because it has a reasonable phase-out [amortization] period) and as a reasonable health and safety regulation because of safety and environmental issues presented by unpaved parking lots.

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October 10, 2006

City of Vancouver Planning Commission City of Vancouver PO Box 1995 Vancouver, Washington 98668-1995 11

REGENTED

OCI 10 2000

LONG FANGE PLANNING DEPARTMENT

RE: Port of Vancouver USA Comments on VCCV Draft SEIS

Dear Members of the Planning Commission:

The Port of Vancouver (Port) submits this comment letter in response to Vancouver City Center Vision (VCCV) Subarea Plan, VCCV Subarea Plan (PRJ2006-00074, SEP2006-00074); Planned Action (CPZ2006-00037): Rezones (CPZ2006-00030, 00031, 00032, 00033): VMC Amendments (CPZ2006-00034).

The Port would like to indicate its support of the planning work that the City of Vancouver (City) has completed on the VCCV plan for downtown Vancouver. We would also like to note that the following are preliminary comments and that we may provide additional input prior to the closure of the public comment period on the Draft Supplemental Environmental Impact Statement (Draft SEIS) on October 16, 2006, or as public comment at the upcoming City Council hearing in November.

Related Projects, Chapter 10, pages 5, 11, and 167: The Gateway Subarea Plan is listed as a related project in various places in the Draft SEIS. Since the Draft SEIS was prepared, the scope of the Gateway project has been revised. Currently, a National Environmental Policy Act (NEPA) Draft EIS is being prepared for the Port's Columbia Gateway site. This site incorporates over 500 acres of marine and industrial development and is located approximately 3 miles from the rail bridge on the western portion of downtown Vancouver to the site.

The Port is also currently preparing designs for additional separate rail access projects. Within downtown Vancouver, the Port is designing a new connection along 7th Street to provide service to Lafarge and Albina in the Columbia West Renaissance area of the VCCV. This project will eliminate rail conflicts with the waterfront, provide for rail access to the west Vancouver industrial area, and allow for development of the Boise Cascade property.

Additionally, the Port will design separate rail projects that connect from the Lafarge spur to Great Western Malting and Terminals 2, 3 and 4. This rail access project is essential to provide for current and future Port operations.

The Draft SEIS does not describe the rail transportation network proposed for the VCCV and adjacent areas. However, the Draft SEIS indicates that there will be new all-way gate controls for any new at-grade crossings and that existing intersections at 11th Street, west of Lincoln Street, Jefferson Street, north of 8th Street and Port Way, north of 8th Street and 8th Street east of Jefferson Street, should be upgraded to all-way gate control with wayside horns, and that there should be long-term potential closure of crossings on Jefferson and 8th streets with the completion of the west side arterial. Although the final design of the rail in the VCCV area has not been completed, it is unlikely that these projects will affect at-grade crossings or rail horn warnings.

Planning Commission 10/10/2006 Page 2 of 3

The Port requests that the City work with the Port to include the most up-to-date information on the current Gateway and rail projects in the Final VCCV SEIS. The Port also requests that the Final SEIS reflect the importance of industrial lands to our community's health and that rail transportation to the Port and future decisions concerning rail crossings and operations recognize the need for continued rail access and additional capacity to industrial uses in the Columbia West Renaissance area west of the VCCV.

Page 5: The Draft SEIS suggests that the Gateway project includes "... new industrial zoned land west of the current Port." The Columbia Gateway project does not include new industrial zoned land. The Port's Parcel 7, approximately 53 acres north of SR 501, which is not part of Columbia Gateway, is proposed for rezoning to industrial use. The Port's Gateway project will develop lands already zoned for industrial use. The Port requests the Final SEIS reflect this information.

Pages 25 and 76: Amending the zoning in Area 3 from IH to OCI and removing the light industrial overlay will affect existing light industrial businesses important to the industrial and economic vitality of Vancouver. The Port understands the encouragement for retail, office and institutional development with an emphasis on residential uses in the VCCV. However, the Port requests that the Final SEIS analyze and recognize the significance of these changes. The Port also suggests that VCCV and Final SEIS address the existing light industrial uses and potential future clean industries in the Columbia West Renaissance area of the VCCV to allow for their continued use and potential expansion for light industry.

Page 27: Identity Clark County jointly presented at most of the organizations listed and the Port also participated in these presentations. The Port would like the Final SEIS to reflect this information.

Page 35, Table 3-2: Does the new jobs number of 9,405 include redevelopment potential for the light industrial area in Area 3? Please address this in the Final SEIS.

Pages 50 and 56: In various sections of the Draft SEIS, there is concern about train horn noise at 8th Street, Jefferson Street and West 11th Street. Port designs for rail in this area are being developed and it is too soon to conclude that the 8th Street and Jefferson at-grade crossing will be closed once the 6th and Grant crossings are reconstructed. Additionally, closure of 8th Street and Jefferson are not caused by the Port's rail project. The VCCV Final SEIS should reflect this. Further, since rail access is a primary feature of the Port's operations, the Port requests to be notified and involved with any future train horn quiet-zone study or proposed mitigation or improvements. The VCCV Final SEIS should explicitly recognize the importance of the Port's rail access and ensure the Port's participation in any rail-related studies or improvement designs.

Pages 83, 178, 57, Appendix: In various sections of the Draft SEIS, a series of capital improvements are addressed, including primary street connections to the waterfront and a secondary connection to the waterfront. The Port understands that at the current time, these facilities are not designed or funded; however, they could affect Port properties and supporting activities. Additionally, although the Port is partnering with the City to consider road improvements in the Columbia West Renaissance area, the Port rail network improvements do not directly relate to any existing roadway network or rail trestle modifications. The Port requests to be included in all stages of design development of these facilities; the Final SEIS for the VCCV should recognize the information about rail access and ensure Port involvement in all project designs affecting rail access.

Page 86: In various sections of the VCCV and Draft SEIS, extension of the Noise Impact Overlay District to Lincoln Avenue is recommended. With the proposed rezones in these areas, the Port understands that residential uses could occur nearer to Port facilities. The Port requests that the Draft SEIS reflect that potential downtown uses will be locating close to an active industrial area which is proposed to continue operations.

Planning Commission 10/10/2006 Page 3 of 3

Page 182: The Draft SEIS recommends building new at-grade rail crossings with all-way gate control, as well as upgrading existing intersections to all-way gate control with wayside horns, and long-term potential closure of crossings at Jefferson and 8th streets with completion of the west-side arterial. Again, the Port respects the concerns for safety and needs to ensure continued effective rail operations and access to Port facilities. The Port requests that the Final SEIS carefully analyze these issues.

Thank you for the opportunity to provide these preliminary comments on the Vancouver City Center Vision Plan and Draft SEIS. We would be happy to answer any questions or concerns you have about the information above.

Sincerely, Port of Vancouver, USA

Tode M. Coleman, PE Deputy Executive Director

cc: Sandra Towne, COV Senior Planner Larry Paulson, Executive Director

Response to Comment 11; Letter – Todd M. Coleman, PE, Deputy Executive Director, Port of Vancouver USA

Response to Comment 11-A

Comment noted. For accuracy, the following language replaces existing language on page 58, Chapter 5, Noise subsection Mitigation Measures, Train Horns and is further added to the Summary Table 1-1 in Chapter 1:

It may be possible to close the at grade crossing at 8th Street and Jefferson once the rail under crossing on 6th Street and Grant Street is reconstructed. If this crossing is closed sometime in the future, noise levels would be substantially reduced.

Response to Comment 11-B

Comment noted. An Appendix D is added that includes the Port's description of the Columbia Gateway Site Project and the Rail Realignment Project. For clarity and accuracy the following description under Chapter 1 Related Projects, is changed to the following:

Port of Vancouver -Columbia Gateway Site Project

The Port owns approximately 1,059 acres comprising Parcels 3, 4, and 5, known as Columbia Gateway, which are located south of SR 501 (Lower River Road) in the City. The Port originally proposed the development of Parcel 3 of Columbia Gateway to include a rail and road component. In April 2006, the Port and lead federal agencies made a collective decision to change from a Habitat Conservation Plan approach to an ESA Section 7 consultation through the Clean Water Act 404 permitting process. As a result, an agreement was reached that the US Army Corps of Engineers (Corps) is the lead federal agency for the project.

The Port is proposing to develop its Columbia Gateway (Parcel 3) for marine and light industrial uses. Mitigation and habitat creation for impacts on Parcel 3 would be developed on Parcels 4 and 5. The proposed project would also include constructing a turning basin adjacent to the Columbia River navigation channel and constructing two to three marine terminals in the river. The Port is currently preparing a NEPA EIS for Columbia Gateway. The Corps is the lead agency for the NEPA EIS. A scoping meeting has been held, and the EIS is being prepared. The NEPA EIS is also intended for use during SEPA compliance for state and local permitting. Please refer to Appendix D and/or the Port's website at: http://www.portvanusa.com/property/columbiagateway.html

Port of Vancouver Rail Access Project

Presently, the existing Port rail facilities extend from the Burlington Northern Santa Fe Railway (BNSF) mainline to the Hill Track on Port property and terminate at Gateway Avenue at the Port's Terminal 4. The Port is proposing to construct a rail access project to allow for industrial and economic development. Rail access improvements to the Port have several project elements. Schedule 1 begins in the vicinity of the BNSF Mainline near Esther Street to the west of the Boise property. This project will require SEPA compliance. The remaining Schedules 2 through 4 include a rail access line between the Port's existing facilities and the BNSF mainline, and extend the tracks to Old Lower River Road to create better rail access for the Port's existing clients and redevelopment within the existing Port facilities.

The rail improvements within the existing Port facilities are a separate project under a separate NEPA process, with FHWA performing as the funding and lead federal agency with the Port as the applicant. NEPA compliance is beginning for this project. Separate SEPA compliance will also be completed as required. Please refer to Appendix D and/or the Port's website at: http://www.portvanusa.com/property/columbiagateway.html

The following language is added to Chapter 10, Transportation, subsection Transportation Analysis Context:

The Port of Vancouver Rail Access Project

http://www.portvanusa.com/property/columbiagateway.html

Refer to Chapter 1 and Appendix D for additional description of the Port Projects.

Response to Comment 11-C

Comment noted. For further clarification, the following language is added to the middle of the first paragraph on page 26 and in the middle of the second paragraph on page 78: <u>The change to OCI will allow new clean light industrial uses, the existing clean light industrial uses to remain and if desired to expand as allowed by VMC 20.440.030. The existing heavy industrial uses as identified in Table 7-1 will become legal non-conforming uses and new heavy industrial uses would not be allowed. The lifting of the Light Industrial area; however, the City Center Mixed Use zone does allow limited light industrial uses. Table 7-1 identifies two existing industrial uses that would become legal non-conforming uses after the overlay is removed. The other uses in the proposed Area 4 rezone may continue under the City Center Mixed Use zone.</u>

An analysis discussion of potential impacts for the rezone of Area 3 from Heavy Industrial (IH) to Office-Commercial-Industrial (OCI) is found on page 78 under Potential Impacts, Area 3 – IH Zone to OCI Zone. An analysis discussion of potential impacts for the rezone of Area 4 to lift the Light Industrial overlay allowing the underlying zone of City Center Mixed Use (CX) to govern the identified parcels (Figure 7-2 on page 89 and Figure 7-8 on page 95) is found on pages 78 and 79. In addition, Table 7-1 on page 102 identifies nonconforming use status of existing uses under the proposed zones.

Response to Comment 11-D

Comment noted. The following language is added to Chapter 2 - page 28 first paragraph: <u>Identity Clark County, the Port of Vancouver, USA and City staff jointly</u> presented the Subarea Plan to numerous organizations including the following:...

Response to Comment 11-E

Table 2-1, approximate land use growth totals- Proposed Plan (VCCV) on page 34 identifies the new jobs number of 9,405 as the total area for the proposed plan, including Area 3. Area 3 is not changing comprehensive plan designations. The rezone to OCI continues the land use designation of Industrial.

Response to Comment 11-F

Comment noted. The following mitigation measure is added to Chapter 5, Noise in subsection Mitigation Measures, Train Horns and is further added to the Summary Table 1-1 in Chapter 1:

Since rail access is a primary feature of the Port's operations, the Port shall be notified and involved with any future train horn quiet-zone study or proposed mitigation or improvements.

Response 11-G

Comment noted. The following mitigation measure is added to Chapter 7, Land Use, subsection Mitigation Measures, Area 2- Rezone and Area 3 – Rezone:

The City of Vancouver will work with the Port of Vancouver on any projects affecting rail access.

Response 11-H

Comment noted. The following language is added to Chapter 7, Land Use; subsection Potential Impacts, Area 2- IH Zone to CX Zone (Waterfront redevelopment) page 80, 5th paragraph.

However, the proposed rezones will present the opportunity for downtown uses to locate closer to an existing active industrial area, which is proposed to continue operations. Because the City Center Mixed Use allows a varied mix of uses including commercial, limited light industrial no potential impacts are predicted.

Response to Comment 11-I

The identified mitigation measures and strategies are not meant as an exhaustive list, or to preclude alternative mitigation measures that address the identified issues and are acceptable to the city.

LANDERHOLM, MEMOVICH, LANSVERK & WHITESIDES, P.S. ATTORNEYS AT LAW

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Randall B. Printz

October 10, 2006

City of Vancouver City Planning Department Attn: Sandra Towne P.O. Box 1995 Vancouver, WA 98668-1995 RECEIVED OCT 10 2006 LONG RANGE PLANNING DEPARTMENT

Re: VCCV Subarea Plan

Dear Sandra:

We represent Gramor Development, who is in the early stages of designing and developing the Boise Cascade site located in the City of Vancouver. We wish to commend the City for the effort it has put forth in attempting to further refine its vision for Downtown Vancouver and in identifying a variety of strategies to assist in the implementation of that Vision.

The City is proposing the Boise Cascade site for inclusion into: the Vancouver City Center Vision (VCCV); the Columbia River Shoreline Enhancement Plan District (CRSE); the Special Columbia River Management Area (SCRMA) of the City's Shoreline Master Program; the CX Zoning District; and, into the, to be created, Columbia West Renaissance District (CWRD). Pursuant to the State Environmental Policy Act, the City, acting as Lead Agency, has developed and released a Draft Environment Impact Statement (DEIS) analyzing the probable significant adverse environmental impacts which may occur as the result of the creation or amendment of the above mentioned ordinances or documents. Additionally, the DEIS identifies a variety of measures to mitigate the potential adverse impacts of the above described actions.

We have reviewed the proposed actions by the City, as well as, the DEIS and offer the following comments. First, we recognize that several of the actions proposed by the City and analyzed by the DEIS relate to a much larger geographic area than either the Boise Cascade site or the proposed CWRD. Our comments, while potentially applicable to other geographic areas, are intended to primarily relate to the effect of the City's actions and the DEIS analysis upon the development of the Boise Cascade property.

1) THE VCCV

We support and encourage the City's vision for a vibrant "messy vitality" waterfront with a variety of uses, including commercial and a significantly dense residential component. The

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Re: VCCV Subarea Plan October 10, 2006 Page 2

vision provides for a variety of things including "waterfront development supported by a full service grocery and a lifestyle center. It also provides for maximum parking ratios and an elimination of surface parking.

As currently contemplated by the City, the CWRD will develop under a master plan. Because the development of this area is in its infancy and since it will have to go through a master planning process with the City, we would suggest that site specific uses such as "life style center" or "full service grocery" and site specific limitations on things like surface parking or parking ratios not be determined at this time.

Rather, we believe these items are better addressed in the context of an overall master plan where the applicant and the City can better tailor development standards to a particular master planned proposal. Currently, there is insufficient information known about the precise location of shorelines boundaries and their buffers, as well as transportation circulation and connection to the existing street grid of the City. Similarly, specific retail and office users are not yet known; each will have particular requirements and needs in order to construct a building or operate a business in the CWRD.

While surface parking limitations or other implementation measures identified in the vision e.g., specific uses and near and long term transportation improvements, may ultimately be found by the City to be appropriate; at this time, there is insufficient transportation, environmental or actual use information in which to base specific implementation requirements upon. We suggest that the implementation measures in the vision be identified as "potential" or "possible" measures that may be utilized to implement the Planned Action and specifically development of the CWRD.

2) DEIS Noise

The DEIS identifies potential noise impacts to the CWRD. These impacts are identified as being principally caused by trains, airplanes and auto/truck traffic. The DEIS also identifies specific measures to mitigate these impacts, including restrictions on balconies and outdoor use, establishment of a "train horn quiet zone", and restrictions on residential development in the northwestern portion of the CWRD.

Depending upon building materials, building proximity to these sound emitters, building orientation, as well as other factors, some or all of the mitigation measures provided for in the DEIS may or may not ultimately be necessary or desired by the City. We strongly suggest that the mitigation measures provided for in the DEIS are identified as "potential" measures, and language is added to the FEIS indicating that other mitigation measures not identified in the DEIS may be appropriate or necessary. Further, such language should provide that at the time of a specific development proposal in conjunction with a master plan, mitigation measures will be specifically identified and imposed by the City based upon the specific impacts created by the proposed design and use mix of that master plan.

Re: VCCV Subarea Plan October 10, 2006 Page 3

Natural Environment

The DEIS identifies a number of potential impacts to the natural environment that may be caused by implementation of the City's proposed actions, including a Planned Action ordinance for the CWRD. The DEIS also provides for a variety of specific mitigation measures to offset the identified impacts. These mitigation measures include, but are not limited to, reestablishment of native vegetation, and the regrading of steep banks on the Columbia River.

At this time, there is insufficient information about the CWRD's specific uses, the locations of those uses or their intensities to prescribe specific mitigation measures for these potential impacts. Further, some of the identified mitigation measures could trigger the necessity for additional permits from State, Local and/or Federal agencies. Such permits may or may not be granted by these entities.

The identified list of mitigation measures provided for in the DEIS may or may not be appropriate or desired depending upon the ultimate master plan design. We suggest the City add language to the FEIS indicating that the mitigation measures identified in the FEIS are "potential" mitigation measures; and that specific mitigation measures including some or all of the measures identified in the DEIS or other mitigation measures not mentioned in the DEIS will be identified and imposed by the City at the time of review of a site specific master plan.

Transportation and Parking

The DEIS identifies a variety of transportation impacts potentially created by the City's proposed actions and subsequent actions of others likely to follow. These principally include the addition of more vehicle trips in the downtown area and the need for more parking in the CWRD. The DEIS also identifies a long list of proposed measures to mitigate the impacts of the additional vehicle trips that will likely be caused by the City's actions and subsequent development activities likely to follow.

Again, as with Noise and the Natural Environment, because there is no specific master plan currently before the City, it is difficult to prescribe a precise set of mitigation measures for these actions. Additionally, some of the mitigation measures identified may be precluded due to issues relating to the BNSF railroad or the design of the new I-5 bridge. Additionally, it is highly unlikely that any one development proposal, or even area of development, will result in the need for all of the mitigation measures provided for in the DEIS. It is our understanding that the City has identified these as being potentially necessary for the **full build out** of the City Center Vision Area.



We would suggest that language be added to the FEIS which clarifies the intent of the identified mitigation measures provided for in the DEIS; and specifically provides that the list is not intended to be either exhaustive or preclude other transportation mitigation alternatives that the City may deem appropriate for any given future development proposal.

Re: VCCV Subarea Plan October 10, 2006 Page 4

CX ZONE AMENDMENTS Uses

While both the VCCV and the proposed CX Zone contemplate an intense mix of uses in the CX Zone generally and the CWRD specifically, there is also reference to "limited commercial". The VCCV, as well as the DEIS, contemplate over 100,000 sq feet of retail in the CWRD. This, in and of itself, seems to exceed the term "limited". Uses identified in the VCCV such as "Full Service Grocery" or "Life Style Center" also seem at odds with the term "limited"

We suggest that no minimum or maximum retail square footage numbers be currently prescribed in either the VCCV or the DEIS. For DEIS purposes, (identifying probable significant adverse environmental impacts) we suggest using a "highest reasonable number" standard in order to assure that all of the potential impacts are identified at this time in these environmental documents. We would additionally suggest that approximately 250,000 square feet of retail be utilized in the DEIS for adverse impact analysis. While this number may be higher than what the eventual full build out of the area may generate, because of the several year time frame in which this area will likely build out and the density of the proposed residential, the market may support up to that amount of retail five or ten years from now. Since the VCCV, as well as the DEIS, are attempting to identify potential impacts of full build out, we believe the highest numbers reasonably possible should be used in the analysis.

Parking

The CX amendments propose regulations on various types of parking. Consistent with the comments above, while such regulations may be appropriate in the future, until the City has a site specific master plan, it will be difficult to determine what are the best locations and types of parking that will achieve the City's goals and be supported in the market place.

View

The City proposes to add the following language to the CX ordinance: "Within the Columbia West Renaissance District, buildings shall be arranged and designed to maximize views and preserve views of the shoreline." While there is no question that the City has an interest in the views that are affected by waterfront development, the language as drafted would preclude virtually any development on the Boise Cascade site that was higher than the BNSF rail berm. The term "preserve" means to maintain the existing view shed as it currently exists. The term "maximize" further strengthens this provision.

We do not believe that the City's intent is to require that all development be one story below the height of the rail berm. In fact, the VCCV appears to contemplate multi-storied buildings providing a very dense environment. This vision is in direct contravention of the proposed ordinance language. We would suggest that the proposed language be stricken and that replacement language be provided which indicates that the City will consider views when

Response to Comment 12; Letter – Randall Printz, Landerholm, Memovich, Lansverk & Whitesides, PS, representing Gramor Development

Response to Comment 12-A

Life style center and full service grocery are only two examples given within a general subarea policy to help define "support services". The policy states "encourage key support services, such as a full service grocery store and lifestyle retail center." The uses listed in the VCCV are not required land uses.

The Mill Plain and 15th Street Couplet District development goals table on page 18 of the Proposed Plan identifies neighborhood oriented retail and regional retail including a grocery store. Through a public process, a downtown grocery store was identified as a desired service in the city center. As additional residential units develop, the potential need will become greater and more probable. To comply with Comprehensive Plan Policy, services within walking distance should be provided and may be necessary if the Vision's emphasis on residential development is accomplished. Again, the uses listed in the VCCV are not required land uses, but the plan policies identify residential development with supporting services as key to the success of a pedestrian-oriented, urban density downtown.

Response to Comment 12-B

None of the identified improvements are listed as mandatory and none are tied to a particular development in the vision document. At this level, the short term and long term projects are general findings, generally consistent with the Vision Plan. Additionally, all of the concept improvements are consistent with the plan and are ultimately needed for full build out of the VCCV Plan. For example, it calls for a) extending Esther Street through the rail berm to the south, b) improving the Jefferson/Kauffman Corridor to the south, c) considering Grant Street for improvement and to serve as access to the waterfront district, d) and constructing a new east/west arterial south of the rail berm to serve waterfront development

Response to Comment 12-C and 12-D

Comment noted. The following language is added to Chapter 5, Noise, subsection Mitigation Measures and is further added to the Summary Table 1-1 in Chapter 1:

The mitigation measures listed are not exhaustive or preclusive of alternative mitigation strategies provided that they address the same issues and achieve the same end.

Response to Comment 12-E

Staff proposes to add the following language in Chapter 10, Transportation subsection, Future Needs and Action Strategies and further added to the Summary Table 1-1 in Chapter 1:

The identified mitigation measures and strategies are not meant as an exhaustive list, or to preclude other mitigation measures that address the identified issues and are acceptable to the city.

The same language proposed above will be incorporated into the Transportation Appendix.

Our mutual goal is to provide a flexible implementation framework while ensuring adequate mitigation of identified deficiencies that occur as a result of growth.

Response to Comment 12-F

The retail development goals for the Columbia West Renaissance District are based on the Plan's vision for Main Street to develop as a primary retail area rather than the waterfront and the vision's emphasis for residential development on the waterfront. In addition, the retail market analysis completed by Leland Consulting (found in the Land Use Appendices) recommended no more than approximately 125,000 sq ft of retail. These factors guided the retail development goals. However, as stated on page 16 of the Plan, "as future development progresses it may be necessary for district boundary lines to be somewhat permeable allowing one district to absorb a portion of another district's development goal in any use category. In addition, the flexibility to respond to market trends may result in a shift from the residential use category to the office use category or vice versa as long as the impact characteristics are similar and the overall impacts do not exceed plan targets."

Response to Comment 12-G

The proposed parking policy on page 10 of the VCCV document implements Comprehensive Plan policy. The policy is based on work and analysis completed by the City's parking consultant and a public process. The Vancouver Parking Advisory Committee unanimously voted to recommend the policy as written in the Plan. The implementing mitigation measure for parking control is found in Chapter 7 as Figure 7-7. The parking control amendment implements the city's vision (plan policy) for the city center as a pedestrian oriented urban density active city center.

Response to Comment 12-H

Comment noted. The comment refers to the proposed Waterfront Design Standards developed as mitigation for redevelopment of the waterfront. The city will consider the following language:

Within the Columbia West Renaissance District, buildings shall be arranged and designed to preserve views of the shoreline to the extent reasonably feasible.



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LONG RANGE PLANNING DEPARTMENT

October 10, 2006

City of Vancouver, Planning Commission City of Vancouver PO Box 1995 Vancouver, Washington 98668-1995

RE: Comments on the VCCV Draft SEIS In Regard to Riverwest Concept Plan

Dear Members of the Planning Commission:

I have reviewed the Draft Vancouver City Center Vision Subarea Plan (VCCV) and the associated Draft Supplemental Environmental Impact Statement (VCCV DSEIS). Generally, I support the vision of Downtown Vancouver as it is presented in the VCCV, and the goals and policies proposed to achieve that vision.

I would, however, like to make several comments regarding the VCCV and the associated VCCV DSEIS as certain policies and goals proposed in those documents relate to the forthcoming Riverwest development project. These comments are preliminary and are summarized below (for the Planning Commission's consideration on October 10, 2006). We will provide you with further comments on the VCCV DSEIS, as necessary, prior to closure of the public comment period on October 16, 2006 and at the City Council hearing anticipated to take place in November.

Riverwest Concept

As it is currently conceived, the Riverwest project is composed of several multi-story, mixed-use buildings that would include residential, commercial, and institutional uses with associated structured parking and access ways. The project would occupy a 3.4-acre site, located south of East Evergreen Boulevard, east of "C" Street, west of I-5, and north of East 8th Street in downtown Vancouver, Washington (site).

VCCV Proposed Land Use Allocations by Category and District

According to the VCCV, the site is within the Central Downtown District. The VCCV contains two charts which identify the total amount of floor area to be allocated to various land use categories within each of the downtown districts by VCCV's horizon year (2023).¹ Those allocations are identified as a guide to future development rather than as fixed totals, but the amounts of space currently identified for the Central Downtown District appear to be deficient in several respects, considering the types and proportions of uses proposed for Riverwest. Specifically, the Draft VCCV identifies the following land use allocations within the Central Downtown District by 2023 (*italicized*) which I compare to the uses proposed in the current Riverwest concept plan.²

¹ VCCV, p. 16 and 19

² Riverwest Redevelopment Project, Ankrom Moisan Architects, March 2006

500 East Broadway, Suite 110 O Vancouver, Washington 98660 O Telephone 360.567.0626/503.227.0423 O Facsimile 360.567.0621

City of Vancouver Planning Commission Re: Comments on the VCCV Draft SEIS In Regard to the Riverwest Concept Plan October 10, 2006 Page 2

- No institutional floor area allocation—Riverwest proposes an approximately 100,000 square foot (sf) library, which I presume would be considered an institutional use.
- 60 hotel rooms—Riverwest proposes approximately 90 hotel rooms.
- 80,000 sf of retail—Riverwest proposes at least 13,000 sf of retail, plus an approximately 4,500 sf restaurant (or a combined total of approximately 17,500 sf of retail).
- 560,000 sf of office—Riverwest proposes at least 100,000 sf of office space.
- 495 residential units---Riverwest proposes approximately 195 residential units.

Comments

The lack of any institutional use floor area allocation and the deficiency of 30 hotel rooms are of immediate concern, but all of the use allocations identified for the Central Downtown District may be inadequate considering the uses proposed for Riverwest alone. Based on a conversation with City staff on October 2, 2006, I understand that the Draft VCCV is intended to be revised and that the total use VCCV category allocations can redistributed among the five proposed City Center Districts without affecting the validity of the VCCV DSEIS overall.



I respectfully request the Planning Commission to confirm that 1) the Final VCCV and associated Final SEIS will recognize the uses proposed for Riverwest, and 2) the final use allocations identified in those documents for the Central Downtown District will provide for the following types and proportions of uses proposed for Riverwest (all proposed figures are approximations):

- A land use type and floor area allocation to accommodate the proposed approximatelyt 100,000-sf library
- Accommodation of the proposed approximately 90 hotel rooms
- Accommodation of the proposed approximately 17,500 sf of retail floor area (including the proposed restaurant)
- Accommodation of the proposed approximately 100,000 sf of office floor area
- Accommodation of the proposed approximately 195 residential units

Thank you for your time and consideration.

Sincerely,

Lance Killian Evergreen Investors, LLC

Response to Comment 13; Letter – Lance Killian, Evergreen Investors, LLC (Killian Pacific)

Response to Comment 13-A

The uses evaluated in the VCCV study are not required land uses. From a transportation analysis perspective, they simply provide the raw input for analysis—peak hour trips. We are satisfied that the transportation analysis adequately supports development of a library in place of the general office use evaluated in the plan, and find that the peak hour trip generation rates are similar enough to fit under the umbrella of the SEIS analysis, findings, and mitigations.

As stated in the VCCV Plan on page 16, the city understands that the timing and extent of development will depend on market factors that are not predictable. Therefore, the goals for each district are meant to guide future development rather than act as fixed district goal total.

Response to Comment 13-B

The City does believe that the predicted development goal totals for the Subarea is sufficient for the life of the plan. As stated in the plan, "the goals for each district are meant to guide future development rather than act as fixed district goal totals." The plan further states that, "as future development progresses it may be necessary for district boundary lines to be somewhat permeable allowing one district to absorb a portion of another district's development goal in any use category."



October 9, 2006

City of Vancouver

P.O. Box 1995

Sandra Towne, Principal Planner

Long Range Planning Department

Vancouver, WA 98668-1995

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OCT 11 2006

LONG RANGE PLANNING DEPARTMENT

PORT OF PORTLAND

Portland International Airport 7000 NE Airport Way Portland OR 97218 Box 3529 Portland OR 97208 503 460 4151

RE: Draft Supplemental Environmental Impact Statement for the Vancouver City Center Vision Subarea Plan

Dear Ms. Towne:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Vancouver City Center Vision (VCCV) Subarea Plan. The Port of Portland has worked with the City of Vancouver on numerous issues in the recent past related to noise management and land use planning surrounding PDX. A major example of this was the 2005 Part 150 Noise Compatibility Study for Portland International Airport (PDX). The City of Vancouver had significant input in the development of the Part 150 recommendations. The Port is currently working closely with the City's Pearson Field Manager, Sean Loughran, on other airport land use and noise compatibility issues.

The Port's comments on the DSEIS are limited to the analysis and proposed mitigation measures in Chapter 5: Noise.

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The Port strongly supports the mitigation measure in the proposed alternative to expand the City's Noise Impact Overlay District to include the Columbia West Renaissance District. Expansion of the Noise Impact Overlay is also a recommendation in the PDX Part 150 Noise Compatibility Study.

We recommend that the City also add to the Noise Impact Overlay a requirement for an avigation noise easement for new development in this area. We recommend an easement with requirements similar to that required by the City of Portland in their Noise Impact Zone, but broadened to reflect the fact that "noise levels in this area are a result of the combined effect of aircraft, railroad and

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traffic operations^{*1}. The City of Portland's Noise Impact Overlay can be found in Chapter 33.470 of the City of Portland Zoning Code and is also attached.

The DSEIS states that, "the results of (long-term noise) measurements support the conclusion that overall noise levels in the area (the CX zone or City Center) are uniformly high and are typical of urban commercial/industrial areas and urban residential areas near airports. All monitored sites have Ldn greater than 65 dBA, which is the abatement threshold for the Noise Impact Overlay District." The Federal Aviation Administration regards typical *incompatible* land uses at or above the 65Ldn noise contour to include residences, schools and nursing homes². The decision to allow construction of, or otherwise regulate development, however rests with the local government. Preventative measures taken by the City in advance of development such as the requirement to provide noise disclosure statements to potential residents and the requirement for avigation noise easements will assist potential future residents in making an informed decision prior to moving into this area.

Sincerely,

C

Dason A. Gater

Aviation Planner

c: Sean Loughran Chris Corich Lise Glancy PDX CNAC members



¹ On pages 50 and 56-57 in Chapter 5, the DSEIS incorrectly states that the PDX 65Ldn contour will expand in future years.
² Ldn is the approved measure used by the Federal Aviation Administration for evaluating aircraft

² Ldn is the approved measure used by the Federal Aviation Administration for evaluating aircraft noise exposure.

Response to Comment 14; Letter – Jason Gately, Aviation Planner, Port of Portland

Response to Comment 14-A

Comment noted. The comment supports the proposed extension of the Noise Overlay District as noted in the SEIS (Figure20.520-1)

Response to Comment 14-B

The city's Noise Impact Overlay District is expanded to include the southwest portion of the Subarea boundary through the implementing mitigation measures for the VCCV and is discussed in Chapter 5, Noise. The Noise Impact Overlay provides for a required disclosure statement as a condition of a building or development permit for residential use within the Noise Impact Overlay District....Such statement shall clearly document that the premises may be adversely affected by noise.

Response to Comment 14-C

Comment noted. Comment noted. The following language is added to Chapter 5, Noise, subsection -Mitigation Measures, Expansion of the Noise Impact Overlay District, end of 1st paragraph:

<u>The City of Vancouver must plan for and examine long-term uses in the Subarea plan.</u> <u>Therefore, it is appropriate to anticipate the future boundary of the 65 DNL contour as</u> <u>presented in the *Portland International Airport Future year Noise* Analysis¹.</u>

¹ BridgeNet International, November, 2005



LONG RANGE PLANNING

DEPARTMENT

MEMORANDUM

TO:	Sandra Towne, Principal Planner
FROM:	Sean Loughran, Manager, Pearson Field Airport
CC:	Aviation Advisory Committee Kerri Wohler, Washington State Department of Transportation, Aviation Division
RE:	Draft Vancouver City Center Vision & Subaras Plan & Draft

Draft Vancouver City Center Vision & Subarea Plan & Draft Supplemental Environmental Impact Statement

I have reviewed the Draft City Center Vision Subarea Plan (VCCV), Draft Supplemental Environmental Impact Statement (DSEIS) and Appendices. As you know, I have consulted with the Vancouver Aviation Advisory Committee, Washington State Department of Transportation – Aviation Division and Federal Aviation Administration (FAA) throughout this planning process. Our goal has been to provide sound technical assistance that contributes to the development of land use policies that protect the approaches to Pearson Field Airport, prevent the establishment of hazards to air navigation and acknowledge the existence of aircraft over-flight and associated noise impacts in downtown Vancouver. The Vancouver Aviation Advisory Committee has greatly appreciated the effort City Planning and Economic Development staff has invested in better understanding issues associated with the airport. I am confident that the strong planning and development policies defined in the VCCV and Subarea Plan will serve to shape the development of our downtown in a way that moves us toward our vision for a vibrant and diverse city center while honoring the rich history that has shaped us.

Consistent with RCW 36.60.547 (Growth Management Act), every county, city and town is required to adopt comprehensive plan policies and development regulations that will discourage the siting of incompatible uses adjacent to public use general aviation airports. Further, Vancouver Comprehensive Plan Policy PFS-20 acknowledges the importance of Pearson Field and the City's commitment to encouraging compatible land uses and discouraging activities that could impact the present and/or future use of the airport. Although the City of Vancouver already has an airport overlay district, downtown building height zoning and a noise impact overlay district, the policies proposed in the VCCV and Subarea Plan will substantially improve the accuracy and clarity of land use regulations related to Pearson Field. This improved guidance will not only serve to preserve the safe operation of the airport but will aid the development process by providing complete and timely information to anyone involved in the development of land within the airport influence area. The proposed policies reflect Federal and State guidance that establishes minimum standards for safe airport operations. It is important to keep in mind, as you have clearly stated in the proposed development code language,

that while the VCCV and related implementing policies identify and define the various airport influence areas, they do not negate a developer's responsibility to submit all necessary information to the FAA for a review of a project with respect to airspace.

In addition to the review of land use and building heights, the Draft Supplemental Environmental Impact Statement does a thorough job of describing and evaluating the existing noise environment within the district. Noise sources include traffic on Interstate 5, local street traffic, rail traffic, industrial sources, general urban noise and aircraft noise from both Portland International Airport (PDX) and Pearson Field. Although I believe the report is mistaken in describing the advancement of the 65 DNL noise contour associated with PDX (see note below), I agree with the conclusion that noise impacts are expected to result from implementation of the Proposed Alternative and that the Noise Impact Overlay District boundary should be amended as indicated to better represent the noise foot print in downtown Vancouver. Although the district may be outside the 65 DNL noise contour for Portland International Airport, the proposed Columbia West Renaissance district will continue to be over flown by aircraft from both PDX and Pearson Field. The entire district will be subject to considerable noise from aircraft, trains and other sources. While the Aviation Advisory Committee does not object to the proposed zone changes, they do believe it is important that the City's development code serve to properly inform and guide the development of property in known noise impacted areas. The VCCV presents a good opportunity to update the Noise Impact Overlay District language to include requirements for noise disclosure statements and noise easements as appropriate.

The following excerpts from the Draft Supplemental Environmental Impact Statement should be revisited to insure their accuracy:

Page 71, Maximum Building Heights and Significant View Corridors: The last sentence of the section states that "heights shown on the existing map are unachievable because of existing Federal Aviation Administration height restrictions based on the nearby Pearson Airpark." It would be more accurate to state that some of the heights allowed in accordance with the existing map exceed FAA standards. Although the new building heights map and airport overlay make a significant improvement in accurately depicting the airport surfaces consistent Federal Regulation 49 CFR part 77, some heights on the existing map are already consistent with FAA standards.

Page 80, Maximum Building Heights and View Corridors: The first sentence of this section states; "proposed amendment to 20.630.050, Maximum Building Heights lowers building heights: to reflect the Federal Aviation Administration Regulations Part 77…" It is important to acknowledge that while the proposed amendments lower building heights in some areas, they also increase building heights in others. (Similar statement on Page 87, Maximum Building Heights.)

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B

Page 50, Aircraft Noise: This section states: The 65 DNL contour in the future will expand in size to include the VCCV Subarea south of Esther Short Park. According to the Draft Part 150 Noise Compatibility Study for PDX, the 65 DNL contour just touches

the southeast corner of the district and the future 65 DNL is slightly smaller not larger. In the future the 65 DNL Noise Contour will not expand to include Esther Short Park.

The final paragraph of this section discusses noise associated with Pearson Field. While it is important to identify Pearson Field aircraft and a contributing factor to high ambient noise levels down town, it is also important to quantify that contribution. According to the noise contours prepared for the 2001 Airport Master Plan, Pearson Field's 65 DNL contour is well east of the VCCV's eastern boundary.

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Response to Comment 15; Letter – Sean Loughran, Manager Pearson Field Airport

Response to Comment 15-A

Comment noted. For accuracy and clarification Chapter 7, subsection, Potential Impacts, Maximum Building Heights and Significant View Corridors, last sentence, is changed to read:

Some of the heights allowed in accordance with the existing map (Figure 7-9) exceed FAA standards. Although the proposed building heights map and airport overlay make a significant improvement in accurately depicting the airport surfaces consistent Federal Regulation 49 CFR part 77, some heights on the existing map are already consistent with FAA standards.

Response to Comment 15-B

Comment noted. For accuracy and clarification Chapter 7, subsection, Potential Impacts, Maximum Building Heights and view corridors add the following sentence:

While the proposed amendment lowers building heights in nearly all circumstances, in a couple of locations building heights are increased. These increased areas include the waterfront area changing from 40 feet to 60 feet; the blocks south of Evergreen between 'C' Street and I-5 changing from 75 feet to 150 ft; and the 2 blocks bounded by McLoughlin, 16th Street, Washington and Columbia changing from 50 ft to 75 ft. These increased heights were determined when considering the purpose and goals of the Maximum Building Heights regulation; therefore, no potential impact is predicted.

Page 87, the proposed maximum building heights is an implementing mitigation measure for the redevelopment of downtown.

Response to Comment 15-C

Comment noted. The following language is added in Chapter 5, Noise; subsection Existing Conditions, Aircraft Noise in the middle of the 1^{st} paragraph and the end of the 2^{nd} paragraph:

Added to the middle of the 1st paragraph

Part 150 document, which considers a short-term time frame (generally 5 years), does not show an expansion of the 65DNL contour in 2008. However, the Portland International Airport Future Year Noise Analysis1 report shows that the 65 DNL contour for Alternative 3 does expand in approximately 2030 when compared to the 2008 noise contours in the Part 150 document.

Added to the end of the 2nd paragraph

The noise contours developed for the 2001 *Pearson Field Airport Master Plan*² show the 1999 65 DNL contour extending approximately 110 feet from the west end of the runway, which is well east of the Subarea boundary. For 2020, with a slight growth (9.1 percent) in aircraft operations, the Master Plan states that the difference in the size of the noise contour is predicted to be negligible. The 65 DNL boundary on the west side will remain the same in the future: approximately 110 feet from the runway. This will be outside the Subarea boundary. Although the 65 DNL noise contours for 1999 and 2020 are outside the VCCV

Subarea, the proximity of the airfield to the Subarea means that smaller privately-owned aircraft would use the VCCV Subarea airspace for approaching and departing.

¹ BridgeNet International, November, 2005 ² City of Vancouver, October 2001



Date: October 12, 2006

Sandra Towne, City of Vancouver Long Range Planning

OCT 16 2006 LONG RANGE PLANNING

- To: Dean Irvin, Main Street Steering Committee Chair, on behalf of the Main Street Steering From: Committee
- RE: DSEIS Comment for Main Street District Design Handbook and the Vancouver City Center Vision Plan

Early in the process to redesign Main Street from 5th to 15th streets, the project team and Steering Committee determined that this is more than a transportation project-it is an opportunity to recapture the corridor's historic legacy as the economically robust heart of downtown Vancouver. By coupling the redesign with a broader retail framework, the Main Street project can launch a new commercial revitalization of Main Street. It is our hope that this project will extend that vitality along streets intersecting Main Street and link to the economic resurgence taking place in other parts of downtown Vancouver. This vision is detailed in the retail strategy, design standards, fundamental design guidelines, and public area requirements for Main Street outlined in the draft Main Street District Design Handbook.

A 10-member Steering Committee-comprising business owners, property owners, architects, historic preservation advocates, and local citizens-worked with the project team to develop the guidelines and standards in the handbook.

At several stages during the design process, the project team's recommendations were approved by the Steering Committee and presented to the public in a series of meetings (including two community open houses, two property owner meetings, and two business owner meeting). In addition, surveys, comment forms, and three newsletters were distributed to business, property owners, and the public at large. These public involvement forums provided opportunities for the community to review the design recommendations and be part of the process of revitalizing Vancouver's Main Street.



The attached final draft of the Main Street District Design Handbook is the culmination of that process. The Steering Committee urges you to consider the handbook as a tool to be adopted in the DSEIS comment review process for the Vancouver City Center Vision Plan.

Sincerely,

Dean Irvin, Chair, Main Street Project Steering Committee

Response to Comment 16; Letter – Dean Irvin, Chair, Main Street Project Steering Committee

Response to Comment 16-A

The Draft Main Street District Design Handbook, which includes a retail strategy, design standards, fundamental design guidelines and public area requirements, is an excellent product to help guide the future of the design and retail framework of Main Street. The SEIS does recognize the project as an implementing mitigation measure for potential growth impacts based on the Proposed Plan policies of "messy vitality" and the revitalization of Main Street. The mitigation calls for the city to develop and follow a Main Street Design and retail strategy to enhance the vitality and preserve the character of Main Street and its major connections. However, the Main Street District Design Handbook has not completed a public review or legal notice and therefore can not be included in the Final Supplemental Environmental Impact Statement.



Date: October 12, 2006

OCT 16 2006

LONG RANGE PLANNING DEPARTMENT

To: Sandra Towne, City of Vancouver Long Range Planning From: Dean Irvin, Main Street Steering Committee Chair

RE: DSEIS Comment For Vancouver City Center Vision Plan

As chair of the City of Vancouver's Main Street project Steering Committee, I would like to include a comment pertaining to the Vancouver City Center Vision Plan, specifically regarding consolidated newspaper/publication modules.

Since April 2006, the Main Street project team and Steering Committee have been working diligently on the design of the corridor improvements of Main Street, from 5th to 15th streets. The project team has employed a variety of means to engage the community and gather public perspective and input on the Main Street design process. Led by the 10-member project Steering Committee, which has thus far met six times, this public involvement process has included open houses, targeted meetings for business and property owners, feedback forms, and a mix of informational materials. The result is a plan that was created by and for the community that we feel will ultimately lead to the successful retail and streetscape revitalization of Main Street—and, we hope, spread its success beyond the project area.

Throughout the process, one concern that was consistently identified was the current location of news and publication boxes chained to lampposts, which detracts from an attractive pedestrian environment. Given this input, the project team developed a unique design proposal which includes "ganged" or modular news boxes and corrals. The benefit of these proposed solutions would be to improve streetscape aesthetics by consolidating existing boxes into a City-installed modular box or corral located on side streets intersecting with Main Street. These proposals have received the support of the project Steering Committee and the community at subsequent public meetings. To ensure that all parties could provide input on the changes, the project team met with the owners of existing boxes on October 10, 2006 to discuss the City's proposed design guidelines. The overall consensus among the group was a willingness to work with the City to help improve the downtown area; they were ultimately amenable to finding a mutually beneficial solution. Additional meetings with this group have been scheduled to discuss specifics and ensure that the final design is acceptable to all parties.

Given the wide support for the proposed design guideline, we encourage the Vancouver City Center Vision to incorporate a similar standards in its plan. This will help ensure that downtown Vancouver's streetscape is attractive and that pedestrians will be unencumbered by disorderly displays of publications. Please see the attached design guideline handbook for details on how modular news boxes will be implemented for the Main Street project, and how they could be included in the Vancouver City Center Vision Plan.

Thank you for this opportunity to comment on your important project. I and the rest of the Steering Committee hope you will consider similar guidelines to assist in continuing to make downtown Vancouver an attractive pedestrian, retail, and residential environment. If you have any questions, please do not hesitate to call me at 360.737.8929.

Sincerely,

Dean Irvin, Chair, Main Street Project Steering Committee

Response to Comment 17; Letter – Dean Irvin, Chair, Main Street Project Steering Committee

Response to comment 17-A

Comment noted. To mitigate for potential growth impacts based on the Proposed Plan policies of "messy vitality" and the revitalization of Main Street the following mitigation measure is added to Chapter 7, Mitigation Measures, Proposed Plan and further added to the Summary Table 1-1 in Chapter 1:

The City of Vancouver should consider a design requirement to consolidate existing news racks and boxes with a consistent color and style.



STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT 128 - 10th Avenue SW • PO Box 42525 • Olympia, Washington 98504-2525 • (360) 725-4000

October 12, 2006

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OCT 16 2006

LONG RANGE PLANNING DEPARTMENT

Ms. Laura Hudson Long Range Planning Manager City of Vancouver Post Office Box 1995 Vancouver, Washington 98558-1995

RE: Proposed Vancouver City Center Vision Subarea Plan (VCCV) and amendments to its development regulations that will implement the comprehensive plan

Dear Ms. Hudson:

Thank you for sending the Washington State Department of Community, Trade and Economic Development (CTED) the proposed amendments to the City of Vancouver's comprehensive plan and development regulations that we received on September 22, 2006. We recognize the substantial investment of time, energy, and resources that these documents represent.

When cities and counties work with citizens to discuss their priorities for the future, they must balance important considerations—using land wisely, providing the foundation for economic vitality, and protecting environmental and natural resources. In creating your comprehensive plan and development regulations to meet the unique needs of your community, you, along with other local governments planning under the Growth Management Act (GMA), have made important and long-lasting choices. These choices can sustain the quality of life that makes Washington a rer.tackable place to live and create the predictability needed for economic investment.

The City of Vancouver began redevelopment and revitalization of its downtown in 1995. Over the years, citizens, the public sector, and the private sector have benefited from planning that integrates the GMA with the State Environmental Policy Act. The City Center Vision Subarea Plan builds from, and expands the planning approach started with redevelopment of the Esther Short area. The city's work then was a fine example of subarea planning. The proposed plan continues in that vein. Congratulations!

We wanted to use this opportunity to remind you of a clause in ESSB6427, enacted in 2006 by the Washington State Legislature. Section (2)(5)(b) clarifies that adoption of comprehensive plan amendments necessary to enact a planned action under RCW 43.21C.031(2) may be



Ms. Laura Hudson October 12, 2006 Page 2

scheduled more frequently than once a year. The modification holds for amendments that are consistent with the public participation program established by the city. This improvement to the GMA should help the City of Vancouver maintain the momentum for downtown revitalization and redevelopment.

Congratulations to you and your staff for the good work these amendments embody. If you have any questions or concerns about our comments or any other growth management issues, please call me at (360) 725-3065. We extend our continued support to the City of Vancouver in achieving the goals of growth management.

Sincerely,

Narin R. Berkhur

Karin R. Berkholtz Growth Management Planner Growth Management Services

KRB:lw

cc: Sandra Towne, Principal Planner Leonard Bauer, AICP, Managing Director, Growth Management Services, CTED David Andersen, AICP, Plan Review and Technical Assistance Manager, Growth Management Services, CTED

Response to Comment 18; Letter – Karin R. Berkholtz, Growth Management Planner, State of Washington Department of Community Trade and Economic Development

Response to Comment A

Comment Noted. No response necessary

Lee E. Coulthard

500 E. Broadway, Ste 603 Vancouver, WA 98660 360.750.8907 H 360.607.4224 C

16 Oct 2006

Sandra Towne Long Range Planning City of Vancouver 1313 Main St. Vancouver, WA 99668-1995 LONG RANGE PLANNING DEPARTMENT

OC1 1 6 2006

RECEIVED

Dear Sandra,

It was a pleasure to hear your presentation at the Heart of Vancouver meeting last Thursday. Too bad there wasn't time for more discussion. However, that could have gone on indefinitely.

I took your suggestion to review the VCCV SDEIS and would like to compliment you and your staff for the fine work done in preparing this document. There was not enough time for me to review it extensively but it looks pretty thorough. A few comments that I am submitting for your consideration (attached) may be worthwhile as this document proceeds in the review and approval process.

If you have any questions, please contact me at your convenience.

Thank you,

hu Contitu

Att: SDEIS Comments

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Vancouver City Center Vision OCT 1 6 2006 Draft Supplemental Environmental Impact Statement RANGE PLANNING DEPARTMENT

Comments:

<u>Noise</u>

(A)

As the Columbia River Crossings Alternatives are developed, narrowed and ultimately implemented, noise levels along the final routing are most certainly going to change. Noise level monitoring was not done adjacent to I-5 at the RiverWest and West Coast Bank locations. If the freeway is raised it is likely to increase noise levels at these locations. Consideration should be given to noise abatement walls that would either absorb noise or reflect it upward. In addition, compression (Jake) braking should be banned on I-5 along the east side of the VCCV sub-area.

B

With projected increases in train traffic, the grade crossing whistle blowing is going to be intolerable. Every effort should be made to eliminate them altogether or mitigate the impact with gates that preclude the use of the whistles. Lately, the whistle blowing is becoming a contest of wills.

Transportation

Several of the current Columbia River Crossings Alternatives will have a major impact on downtown Vancouver. The need to provide relief of I-5 congestion must not be done at the expense of the revitalization of downtown. Serious consideration should be given to providing artiel and mass transit options across the Columbia near the current railroad bridge. Depending on how the Columbia River Crossing Project develops, downtown Vancouver could either be cut off and isolated or gutted and divided. The SDEIS addresses the need to coordinate the needs of downtown with those of the Columbia River Crossing Project, but there is a lot of momentum to do something at the risk of doing it wrong.

Bicycle lanes need to be wide enough to accommodate bi-directional mixed use particularly for any Columbia River Crossing Project Alternative.

Parking



Many cities and businesses have outsourced parking control and development. The SDEIS limits this option by insisting on city control and management. As Vancouver struggles to balance its current budget, it has proposed raising parking fees. This may drive away customers that are so vital to the businesses trying to bridge to the future when the population base is large enough to sustain them. In addition, we seem to be making it more difficult for employees to find parking. Many of these employees are minimum wage earners and increased fees are likely to drive them away as well. We need to ensure that these issues are addressed before they become a problem and not after businesses start to fail. The Main/Broadway Rennovation project alone will be difficult for some of these businesses to survive. Outsourcing parking administration and contol may be answer worth serious consideration.

Appearance



With the passage of the smoking ban in public places the city sidewalks are suffering the accumulation of cigarette butts. The SDEIS should address this growing issue by advocating receptacles for spent cigarettes and encouraging/requiring business owners to sweep up the mess in front of their establishments on a daily basis.

Response to Comment 19; Letter – Lee Coulthard

Response to Comment 19-A, 19-C and 19-D

This comment is in reference to the Columbia River Crossing Project and associated potential noise impacts to Vancouver's city center and is outside of the scope for the SEIS for the VCCV Subarea Plan. An EIS under NEPA for this project is in the early development stage. However, that stated the VCCV Subarea Plan includes goals that can be utilized as the City participates in the I-5 Columbia River Crossing Project. These guiding goals are found on page 11 of the Proposed Plan. In addition, a brief description of the Columbia River Crossing Project as a related project can be found in Chapter 1, Summary, Related Projects. You may comment to the Columbia River Crossing Project team http://www.columbiarivercrossing.com.

Response to Comment 19-B

Chapter 5, Noise, identifies train horn noise as a potential impact and identifies recommended mitigation measures.

Response to Comment 19-E

The issue of outsourcing parking administration is outside of the scope of the SEIS for the Vancouver City Center Vision Subarea Plan. The environmental analysis discusses proposed code amendments that would implement the Subarea plan as well as mitigate for potential impacts. The point that outsourcing the City's parking administration may be a valid and feasible possibility for the city to explore. However, that policy issue would be considered in a different process than the VCCV/SEIS planning documents. Additionally, whether the city in the future outsources or continues to self administer, parking policy and implementation measures must be in place to guide future parking in the city.

Response to Comment 19- F

The issue of accumulation of cigarette butts on the city sidewalks is important however; this is a specific maintenance project issue outside of the scope of the SEIS for the VCCV Subarea Plan. The environmental analysis for the VCCV Subarea Plan is a non-project programmatic level of analysis.

20 Clark County Historic Preservation Commission

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OCT 16 2006

October 12, 2006

LONG RANGE PLANNING DEPARTMENT

Ms. Sandra Towne Long Range Planning Department City of Vancouver PO Box 1995 Vancouver, WA 98668-1995

SUBJECT: Review of Draft Vancouver City Center Vision & Subarea Plan & Draft Supplemental EIS (and Appendices)

Dear Ms. Towne:

 \mathcal{B}

(C)

The Clark County Historic Preservation Commission (CCHPC) has reviewed the subject documents and has the following comments:

1. The CCHPC is appreciative and supportive of the historic structure survey and inventory study the city has carried out in conjunction with the VCCV Subarea Plan. This data will be extremely useful for both the City and the CCHPC in future historic preservation planning efforts.

2. The CCHPC would like to work with the City implementing the recommendations provided in the study, particularly those concerning expansion of existing or creation of new Historic Overlay Districts. A joint effort would be particularly critical to the Historic Overlay Districts considering the pending changes to the related Ordinance.

3. The CCHPC feels it is critical the City incorporate a historic preservation component into all efforts to revitalize any of the Districts where historic structures are present. Not only should key historic buildings and neighborhoods be protected, but also the owners of historic structures recently identified in the inventory should be encouraged to undertake restoration of their buildings. The CCHPC recommends using the data collected in the recent survey to focus on potentially significant structures and strongly promotes the adaptive reuse of such structures.

Identify, evaluate, designate and assist in the protection of Clark County's irreplaceable historic and cultural resources. Clark County Department of Community Development P. O. Box 9810, Vancouver, WA 98666-9810 Phone: (360) 397-2375 We thereby suggest incorporating such an effort into the "Recommended Implementation Measures" section on page 14 of the Draft VCCV & Subarea Plan. For instance, the list of recommendations in this section includes references to the "City's Residential Tax Abatement Program" to encourage residential uses and the possible formation of "Local Improvement Districts" to fund infrastructure improvements. We suggest including a similar recommendation for historic preservation in this section as follows:

- Encourage the restoration and rehabilitation of historic buildings by actively promoting current historic preservation tax incentives available through the existing Special Valuation and Current Use programs.

4. Providing site specific locations of archaeological resources is not only inappropriate but also in violation of Washington State law. In order to safeguard and preserve these resources, we recommend deleting this information from Figure 8-1 on page 130, Figure 8-11 on page140, and Table 8-2 on page 153.

Thank you for the opportunity to comment on the subject documents. We look forward to working with the City in promoting historic preservation in our community.

Sincerely,

Rob Aned

Robert A. Freed, Chair Clark County Historic Preservation Commission

Response to Comment 20; Letter – Robert Freed, Chair, Clark County Historic Preservation Commission

Response to Comment 20-A

Comment noted. The inventoried historic and cultural resources contained in Appendix B were mailed to DAHP staff on September 5, 2006 and will be shared with the Clark County Historical Museum.

Response to Comment 20-B

Comment noted. The following mitigation measure is added to Chapter 8,Cultrual and Historic Resources, subsection Mitigation Measures, Historic Buildings and further added to the Summary Table 1-1 in Chapter 1:

The City of Vancouver should work with the Clark County Historic Preservation Commission for any future expansions of existing or creation of new Historic Overlay Districts.

Response to Comment 20-C

Comment noted. The following mitigation measure is added to the SEIS Chapter 8,Cultrual and Historic Resources, subsection Mitigation Measures, Historic Buildings and further added to the Summary Table 1-1 in Chapter 1:

The city should encourage the restoration and rehabilitation of historic buildings by actively promoting current historic preservation tax incentives available through the existing Special Valuation and Current Use programs.

Response to Comment 20-D

A great deal of discussion and careful consideration was given prior to including a map showing archaeological sites. For example, in preparing the graphics, overly large symbols were selected to not pinpoint the precise location of the resources. At all of these sites, large buildings and parking lots either currently occupy the locations or are being constructed presently. The public knows about several of the sites, as newspaper stories have been done about them, and artifacts from some of them have been on display for the public.

An important recommendation included in the study has been to add the area west of Interstate-5 and south of Mill Plain Boulevard as probability Level A, ensuring that projects subject to development review will include an archaeological study. This recommendation was based on the number and significance of archaeological sites found in that area, and the noting the locations of the recorded sites provided some of the basis for defining the Level A area to be added to the GIS. The maps show this in a way that cannot be as easily explained by words. The presence of archaeological site locations in the VCCR area clearly argues for more consideration of archaeological resources in much of the heart of Vancouver. Having this information in a public document is intended to heighten awareness of the importance of archaeological sites. The visual representation of these recorded sites, which are now gone, is also intended to provide the public with information about the history of the area, recognizing that the citizens of Vancouver have an interest in the history of the area. The City will not use this as a precedent for providing site location information to the public, and hopes that if site location information needs to be provided to the public for some reason, that doing so is thoughtfully considered.



United States Department of the Interior

NATIONAL PARK SERVICE Fort Vancouver National Historic Site 612 East Reserve Street Vancouver, WA 98661

RECEIVED 0CT 1 6 2006

A3815 (FOVA-PWR)

October 8, 2006

LONG RANGE PLANNING DEPARTMENT

Ms. Sandra Towne Principal Planner City of Vancouver Long Range Planning Department P.O. Box 1995 Vancouver, Washington 98668-1995

Dear Ms. Towne:

I greatly appreciate the opportunity to review the work done with regard to the Vancouver City Center Vision & Subarea Plan. I found that the draft plan as well as the accompanying supplemental Environmental Impact Statement documents to be quite extensive. On behalf of the National Park Service, I am writing in support of the plan and my comments are as follows:

Vancouver is a city that is rich in legacy and as a community we are privileged to have a history that is nationally and internationally significant. I believe it is appropriate to recognize the historic central business district—which I characterize as Esther Short Park and the surrounding area including the waterfront and what is now the Vancouver National Historic Reserve—as the heart and soul of Vancouver. This place where so many different peoples passed through and incredible events took place merits special, thoughtful attention. This plan begins to give recognition to this very special place. I think it would be highly beneficial to see more written in the plan in a background section, which spoke to the Indigenous Peoples who were here, the Hudson's Bay Company and the Village that brought over 35 different Tribes, Hawaiians and others to our shores, and the establishment of the US Army post here in 1849. I think recognizing this internationally significant history in this plan will be very useful and appropriate and give the plan context.

I strongly recommend and support that planning and management of the Center Subarea Plan, the Vancouver National Historic Reserve, adjoining waterfront and the Clark College area be done with an eye to where possible creating visions that are compatible and supportive. We are all within a very small footprint of each other and our actions and activities need to be supportive and constructive. The plan speaks to waterfront development which will provide for public access, continued revitalization and capital development to areas adjacent to Esther Short Park, as well as recognition and protection of historic buildings. Financial support, protection of resources and public access are key to keeping this area alive and is consistent with the mission of the Vancouver National Historic Reserve and the National Park Service. Certainly, any opportunities to educate the public about the history of this area would be of additional service. This could come by way of signage, waysides, literature, and brochures. We would strongly support any such actions to be cooperatively worked through with the Vancouver National Historic Reserve partnership.



The specific recommendation in the draft plan identifies a connection between downtown and the Vancouver National Historic Reserve by way of a pedestrian bridge over I-5 from Seventh Street to Hatheway Street. This pedestrian crossing is also recognized in the Vancouver National Historic Reserve Long Range Plan and noted in the park's General Management Plan. Along with the land bridge over Highway 14 (which is currently under construction), the Seventh Street crossing will serve as a vital connecter and we support this crossing. However, during recent I-5 Crossing meetings, the opportunity for a cover lid to reconnect the Historic Reserve with the historic downtown has been discussed. The Seventh Street pedestrian crossing would not be necessary if a cover lid is developed.

A cover lid could reconnect the land, afford the opportunity for the City to provide an inspirational, oneof-a kind park and other public spaces as well as thoughtful, critically important development opportunities. I think we could and should look creatively in designing such a lid. There have been those who have questioned if the lid approach might be somewhat higher even if I-5 is lowered in this area. I believe where there is a desire to do something spectacular, an innovative solution can be found. I think we only need look to the land bridge as an example. This lid could serve as a bridge and help eliminate the very negative impact that the I-5 has done in dissecting the City. This lid could serve as a signature venue as the land bridge will do shortly for our community. The internationally significant history here deserves such special attention, and I think we could hardly ask for less. We strongly advocate the idevelopment of a cover lid and recommend that this concept be incorporated into your plan.

Thank you for providing us with the opportunity to review your plan. Please contact me if you have any questions.

Sincerely, naci man Tracy A. Fortmann

Superintendent

CC: Jan Bader, COV VNHR Lead Elson Strahan, VNHRT President

Response to Comment 21; Letter – Tracy Fortmann, Superintendent, United States Department of the Interior, National Park Service

Response 21-A

The scope and nature of the document is a summarized vision and subarea plan that implements the Comprehensive Plan. Brevity is the very nature of the document, with to the point principles, goals, policies and guidelines. A policy included in the document states, "Protect key historic buildings and established residential neighborhoods."

Staff agrees that there may be opportunities to educate the public about the history of this area. The proposed implementing waterfront design standards include the following language, "Incorporate information about the Columbia River's natural resources and cultural history into the design of provided riverfront features such as public art, and interpretive signs. The City will coordinate with the National Park Service on any future proposals concerning historic interpretation etc.

Response to comment 21-B

This comment is in reference to the Columbia River Crossing Project and associated potential impacts to Vancouver's city center and is outside of the scope for the DSEIS for the VCCV Subarea Plan. An EIS under NEPA for this project is in the early development stage. However, that stated the VCCV Subarea Plan includes goals that can be utilized as the City participates in the I-5 Columbia River Crossing Project. These guiding goals are found on page 11 of the Plan. In addition, a brief description of the Columbia River Crossing Project as a related project can be found in Chapter 1, Related Projects. You may comment to the Columbia River Crossing Project team http://www.columbiarivercrossing.com.

There may be opportunities to educate the public about the history of this area. The proposed implementing waterfront design standards include the following language, "Incorporate information about the Columbia River's natural resources and cultural history into the design of provided riverfront features such as public art, and interpretive signs." The City will coordinate with the National Park Service on any future proposals concerning historic interpretation etc.

DSEIS Comments Vancouver City Center Vision Subarea Plan RECEIVED

22

OCT 16 2006

LONG RANGE PLANNING DEPARTMENT

c/o Sandra Towne, Principal Planner City of Vancouver, Long Range Planning Dept. P.O. Box 1995 Vancouver, WA 98669-1995

The Vancouver School District has reviewed the DSEIS for the Vancouver City Center Vision (VCCV) Subarea Plan dated September 2006 for implications to sustainable, quality schools. We have several general comments, in addition to specific comments on the Public Schools sections.

Beginning of General Comments

Introduction:

Thank you for including schools in the planning process. We greatly appreciate the effort of City staff to reach out to schools.

Vancouver School District (District) supports the development of a sustainable learning community within greater Vancouver and Clark County. Characteristics of a sustainable learning community include: increase family-wage jobs, improve jobs/housing balance, prioritize redevelopment in urban areas, provide a variety of housing prices and types, encourage integrated affordable housing, provide equitable distribution of affordable housing in the County, achieve proportionate residential densities in the County, promote mixed use developments/sub-area plans, and promote balanced development along transportation corridors.

Education literature suggests that land use policy decisions have an affect on education. The City of Vancouver's interest in quality schools provides for the District to participate in the decision making process for the vision for the future of the Vancouver urban core.

The future quality of life in Clark County depends on strategic planning for community development (appropriate housing, jobs, and infrastructure) that supports developmental assets and success in lifelong learning for every person in our community.

As a more urban district, we have found that housing and land use policy is school policy. Where a child lives largely determines that child's educational opportunities. Research in several states, DSEIS Comments October 13, 2006 Page 2 of 4

including Washington indicates a direct relationship between the percentage of economically disadvantaged children in a school and student achievement.

Social capital, a subset of developmental assets, is the combination of interpersonal relationships that provides support to a student (e.g., family, churches, clubs, public institutions, etc.). Studies have shown that the more social capital a student has, the better he/she learns. Economically disadvantaged students have more limited sources of social capital.

Providing a variety of housing prices and types within a school attendance area allows economically disadvantaged children into mainstream, middle-class communities, which improves learning success for all. (The converse is true – a disproportionate concentration of low quality, low income, high density housing in a school attendance area reduces student achievement.)

Efforts to reach all children are even timelier in light of the requirements of the federal and state mandates associated with the "No Child Left Behind Act". <u>All schools and all groups of students</u> must show substantial annual improvement.

The community needs balanced, quality, affordable housing throughout the County. The relationship between household income to housing prices is also a factor affecting the ability of Clark County's residents to secure adequate housing. Family wage jobs are the other side of the housing affordability equation.

Comments:

The District supports the intent of the VCCV Subarea Plan to redevelop Vancouver's urban core with <u>residential development</u> and a lively mix of supportive activities and employment that will "establish the downtown as a regional center for commerce, culture and urban living."

We encourage the City to pursue a complete, integrated, adaptable urban neighborhood that focuses on providing the full array of infrastructure and services within walkable distances. We understand that the first citizens in urban neighborhoods tend to be singles, young couples, and empty nesters. However, other urban areas have found that over time and/or with the appropriate facilities, the demographics change to a more diverse population, including children. This diversity is essential to long-term sustainability of the public (and private) investment. Upfront provision of the living accommodations and services necessary to encourage this age DSEIS Comments October 13, 2006 Page 3 of 4

diversity at the outset will allow Vancouver to avoid the dilemma that "the Pearl" is having; "how to serve the families and children after the fact?"

We can't emphasize enough the need for open spaces, parks, playgrounds, community services, shopping, and, of course, schools to provide this sustainable context. In addition, residential housing offerings should provide a variety of housing prices and types, <u>including the provision of housing</u> <u>suitable for families, in order to offer a viable alternative to suburbia and to be sustainable over time</u>. We can draw examples of this kind of urban neighborhood environment from "the other Vancouver" (see attached article).

We look forward to working with the City to <u>provide innovative urban schools</u> for future students. We are open to pursuing alternatives including smaller building footprints, partnerships with other public/private entities for education related services, co-location within buildings with other uses, the renovation of existing office buildings, and shared park and open space. With this in mind, we would like the City to consider allowing schools in the OCI zoning category. Schools are already allowed in the CX zone.

End of General Comments

Beginning of Specific Comments to Public Schools

p. 21, Table 1-1. Summary of Potential Impacts, Mitigation Measures and Unavoidable Adverse Impacts. Schools. Proposed Alternative, Mitigation Measures. Add the following bullet: The City of Vancouver will work with the Vancouver School District and other public/private parties to provide new school sites, as needed, within the VCCV. There is more certainty if the bullets include the use of "will" instead of "should" in the mitigation bullets. p. 25, Plan Principles, 5th bullet. Add "and open spaces/parks" after transportation.

p. 76, Proposed Land Uses, last paragraph. The District supports the development of new waterfront design standards for the land along the waterfront. It is necessary to incorporate this land into the city's vision for the future.

p. 155, first paragraph. John Ball Park is a city-run, but District owned neighborhood park.

p. 157, first paragraph. Although the number of acres of parkland are difficult to come by in an urban environment, parks/open space are critical to a sustainable downtown. All the best urban living environments include generous parks/open spaces. Again, the district is concerned about long-term sustainability of the public investment.



p. 160. After reading these bullets, it is apparent that there are no park funds available for this effort. What alternative funding is being pursued?

DSEIS Comments October 13, 2006 Page 4 of 4

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p. 167, Table 10-1. Long-Term, Renaissance District. Why are the vast majority of dwelling units in this district rental? That seems counter intuitive to a sustainable urban environment.

p. 210, Schools. Existing Conditions, last paragraph. Substitute the language below:

New suburban schools with associated sports fields require a certain number of acres. The generally accepted size for school sites are as follows:

New elementary schools – approximately 10 acres

New middle schools – approximately 20 acres

New high schools – approximately 30 to 50 acres
 Large sites like these are unlikely to be available in the high density, intensely developed urban environment. New standards for a school model that better adapts to the urban form may be needed.

p. 212, Schools. Proposed Alternative, Mitigation Measures. Add the following bullet: The City of Vancouver should work with the Vancouver School District and other public/private parties to provide new school sites, as needed, within the VCCV.

p. 212, Schools. Proposed Alternative, Unavoidable Significant Adverse Impacts. Insert "additional school sites and/or" between "provide" and "school".

End of Specific Comments

Response to comment 22; Letter – Vancouver School District

Response to comment 22-A

Comment noted. The suggestion to allow schools in the OCI zoning category is outside of the scope of the Vancouver City Center Vision environmental analysis. However, the city is willing to work with the Vancouver School District to explore this issue.

Response to comment 22-B

Comment noted. The following word is changed in the mitigation measure under Chapter 12, Schools:

The City of Vancouver <u>will</u> work with the Vancouver School District and other public/private parties to provide new school sites, as needed, within the VCCV. There is more certainty if the bullets include the use of "will" instead of "should" in the mitigation bullets.

Response to comment 22-C

Plan policy includes the following: Focus waterfront redevelopment on residential uses supported by significant public access, recreation, cultural, hospitality, entertainment... Under General Recommendations page 14, "Assist in land assembly for significant uses such as housing, employment, public open space....

Response to comment 22-D

Comment noted.

Response to comment 22-E

Comment noted. As a correction, the following language is added to Chapter 9, Parks and Recreation, page 155, first paragraph:

John Ball Park is a city-run, but District owned Neighborhood Park.

Response to comment 22-F

Comment noted. No response necessary

Response to comment 22-G

As discussed in the mitigation measures of the Parks Chapter:

The City should adjust the park impact fees to reflect the cost of land acquisition and park development within the high density and intense urban environment of the city center. The City of Vancouver will continue to collect park impact fees; the Parks will continue to utilize the development review process to identify potential opportunities for land acquisition and/or developer-generated improvements

Response to comment 22-H

The correction to Table 10-1 in Chapter 10, Transportation is made changing the assumption from rental to ownership – there is no difference in transportation trips whether rental or owned. This was an initial transportation assumption that did not get changed in the later phase of the analysis. The assumption was never a land use or vision assumption – in the case of the vision and land use ownership was always assumed.

Response to comment 22-I

Comment noted. The following language replaces language in Chapter 12, Public Services and Utilities, subsection Schools, Existing Conditions:

New suburban schools with associated sports fields require a certain number of acres. The generally accepted size for school sites are as follows:

- <u>New elementary schools approximately 10 acres</u>
- New middle schools approximately 20 acres
- <u>New high schools approximately 30 to 50 acres</u>

Large sites like these are unlikely to be available in the high density, intensely developed urban environment. New standards for a school model that better adapts to the urban form may be needed.

Response to comment 22-J

Comment noted. The following language is added in Chapter 12, Public Services and Utilities, subsection Schools - Proposed Alternative, Mitigation Measures and further added to the Summary Table 1-1 in Chapter 1.

The City of Vancouver should work with the Vancouver School District and other public/private parties to provide new school sites, as needed, within the VCCV.

Response to comment 22-K

Comment noted. The following language is added in Chapter 12, Public Services and Utilities, subsection Schools - Unavoidable Significant Adverse Impacts <u>"additional school sites and/or"</u>



23

703 Broadway, Suite 610, Vancouver, Washington 98660

360-695-4116 FAX 360-695-3678 e-mail ginger@identityclarkcounty.org

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OCT 1 6 2006

LONG RANGE PLANNING

DEPARTMENT

Directors CHAIRMAN

Ed Lynch VICE CHAIRMAN Scott Horenstein The Scott Horenstein Law Firm PLLC

Joe Kortum Southwest Washington Medical Center

Sandra Towne City of Vancouver Long Range Planning PO Box 1995 Vancouver, WA

Re: DSEIS Comments for Vancouver City Center Vision Plan

Dear Sandra:

October 16, 2006

Following review of the DSEIS for the Vancouver City Center Vision Plan, we having the following comments:

The Summary of Potential Impacts nicely illustrates responsible planning consistent with the City's Comprehensive Plan and GMA. The Vancouver City Center Vision Plan provides the necessary improved and expanded design and development guidelines.

The proposed rezones and amended design guidelines support the City of Vancouver and the Community Resource Team's vision for a livable downtown and promote the quality of life envisioned for our City. Three areas of specific concern are:

- Building height restrictions to accommodate Pearson Airpark flight patterns
- The need for explicit standards as affect the placement and design of news and publication boxes, and
- The need for the elements of rail noise emissions mitigation to be addressed sooner rather than later.

Thanks for the opportunity to comment.

Sincerely,

Jinger Metcaef

Ginger Metcalf Executive Director

SECRETARY TREASURER

Eric Fuller Eric Fuller & Associates, Inc.

Patricia Bishop Patricia Bishop Real Estate Services

Mitch Bower Mitchell Bower Jr. Business Consulting

Bob Byrd Pacific Die Casting Corporation

Scott Campbell The Columbian

Parker Cann Columbia Credit Union

Kim Capeloto Bank of Clark County

Paul Christensen Realvest Corporation

Ron Frederiksen **RSV** Construction Services, Inc.

David Groth PGP Valuation, Inc.

Elie Kassab Prestige Development

Lance Killian Killian Pacific

Tom Mears The Holland, Inc.

Scott Milam

Tami Nesburg Regents Bank

Pat Sheaffer Riverview Community Bank

Tom VanSweringen The Vancouver Clinic Keith Wallace

Frumenti, Lander & Wallace, P.S.

Executive Director Ginger Metcalf

Executive Assistant Kathy Davis

Response to comment 23; Letter – Ginger Metcalf, Executive Director, Identity Clark County

Response to comment 23-A

Compliance with Federal Aviation regulation is only one consideration for maximum building height. The other considerations are as follows:

To facilitate redevelopment opportunities and maximize waterfront development, to meet historic preservation goals (including preservation of architectural character), to protect adjacent residential and commercial neighborhoods (including compatibility in scale and character).

Response to comment 23-B

Comment noted. To mitigate for potential growth impacts based on the Proposed Plan policies of "messy vitality" and the revitalization of Main Street the following mitigation measure is added to Chapter 7, Mitigation Measures, Proposed Plan:

The City of Vancouver should consider a design requirement to consolidate existing news racks and boxes with a consistent color and style.

Response to comment 23-C

The city is working and will continue to work with the Port of Portland and BNSF on this issue.

RECEIVED

		OCT 16 2006	24	
Towne	, Sandra	LONG RANGE PLANNING	27	
From:	Holly K. Chamberlain [hollyc@visitahc.org]	DEPARTMENT		
Sent:	Monday, October 16, 2006 5:02 PM	INS	TNERTON TONOT	
To:	Towne, Sandra	ENINNA		
Subject: Draft Vancouver City Center Vision Subarea Plan comments		a Plan comments 900	L I	
Dear Sandra:		ED	Ивсан	

Just one thought!

A

On page 18, of the Draft City Center Vision Plan, a referral is made about renovating the Carnegie Library. I suggest changing that to Clark County Historical Museum, as that is the current use. Perhaps Clark County Historical Museum (former public library). I am not certain whether the original name was Vancouver Public Library or Carnegie Library, but the current name seems better in this instance.

Thanks,

Holly

Holly K. Chamberlain Education and Volunteer Manager Architectural Heritage Center/Bosco-Milligan Foundation 503-231-7264 phone 503-231-7311 fax hollyc@VisitAHC.org www.visitAHC.org

Center address: 701 SE Grand Ave. Portland, OR 97214

Resources and Inspiration for Historic Preservation

Current Exhibits:

"Artful Entries: Doors of History," through January 6, 2007 "Reading Hardware," through October 2006

Upcoming Event:

"Riches of a City" Heritage Auction, October 21, 2006

10/17/06

Response to comment 24; Letter – Holly K. Chamberlain, Education and Volunteer Manager, Architectural Heritage Center/Bosco-Milligan Foundation

Response to comment 24-A

Comment noted. The correction on page 18 of the Vancouver City Center Vision Subarea Plan is made to <u>Clark County Historical Museum</u>



25 RECEIVED

STATE OF WASHINGTON

OCT 1 9 2006

LONG RANGE PLANNING Department of Archaeology and Historic Preservation PEPARTMENT 1063 S. Capitol Way, Suite 106 • PO Box 48343 • Olympia, Washington 98504-8343

(360) 586-3065 • Fax Number (360) 586-3067

October 16, 2006

Ms Sandra Towne, Principal Planner Long Range Planner City of Vancouver P.O. Box 1995451 Vancouver, Washington 98668-1995

In future correspondence please refer to: Log: 101306-16-CL Re: Draft Vancouver City Center Vision Subarea Plan

Dear Ms Towne:

Thank you for providing the Washington State Department of Archaeology and Historic Preservation (DAHP) with the Draft Vancouver City Center Vision (VCCV) Subarea Plan plus the Appendices and Draft Supplemental Environmental Impact Statement (DSEIS). On behalf of DAHP staff and the State Historic Preservation Officer (SHPO), I have taken the opportunity to review the documents to assess impacts of plan implementation upon significant cultural resources (archaeological and historic properties) within the planning area.

As a result of my review I am submitting the following comments and/or recommendations regarding the VCCV:

- 1. The Draft VCCV is an impressive document and evidences considerable work and effort that will go to shaping the design and character of downtown Vancouver well into the future. The City is to be commended for undertaking this effort and its commitment to revitalization of downtown Vancouver.
- 2. I note and support the Land Use Plan Policy on page 3 stating "Protect key historic buildings and established residential neighborhoods." DAHP looks forward to working with the City toward fulfilling this policy.

I recommend that a "Guiding Principle" be added on page 3 that articulates broad support for cultural 3. resource protection toward shaping the future of the subarea. Such a statement may be worded something like the following:

> Acknowledge the preservation of archaeological and historic properties as a means to enhance the city center's vibrancy and sense of place, by protecting and incorporating significant resources.

It is also recommended that similar language supporting historic preservation in the city center be included in the General Recommendations on pages 14-15. In addition, it is recommended that the tables with specific recommendations for each district beginning on page 17 be expanded to include a category for historic buildings together with the number of inventoried properties in each district and

citing of prominent examples.

In regard to Chapter 8: Cultural and Historic Resources, comments and/or recommendations are as follows:

5. The last sentence in the third full paragraph on page 117 seems a bit confused and misleading. In essence, all properties that are listed in, or eligible for listing in, the National Register of Historic Places, the Washington Heritage Register, and/or local registers of historic places, are subject to SEPA regulations. The last phrase of the existing language seems to confuse SEPA reviews with the recently signed Governor's Executive Order 0505 that addresses state funded projects that affect cultural resources. Therefore, I recommend changing the sentence to read something like the following:

Land use applications that have potential to affect buildings and other sites that are listed in, or qualify for listing in, the National Register of Historic Places, the Washington Heritage Register, or the Clark County Historic Register are subject to the SEPA review process.

6. In the last paragraph on page 117, the fifth sentence (beginning with "Since the City of...") is again a bit confusing and incorrectly mixes two different issues in one sentence. It is accurate that the City of Vancouver is a Certified Local Government (CLG) that represents a formal partnership amongst the City, DAHP, and the National Park Service. However, the Special Valuation tax incentive program is available for adoption by any local government jurisdiction regardless of CLG status. Therefore, I recommend deleting this sentence and revising the second sentence in the paragraph to read something like the following:

Listing is also used as a planning tool and tax incentives, *most notably the Special Valuation* for *Historic Properties program*, are available to owners of CCHR listed properties.

7. In the next to the last sentence in the last paragraph on page 117, I recommend that the last phrase in the sentence be changed to the following:

Many of the buildings...they have significance and retain sufficient integrity.

In the first full paragraph on page 120, the last sentence refers to the fact that the 1908 railroad viaduct may be impacted by projects in the Columbia Renaissance area, but has not yet been inventoried. It would be important to make a recommendation here to support and reiterate recommendations found on page 126 that evaluation for significance of the viaduct should be conducted before any more land use planning and decisions are made that could affect the viaduct. This proactive work will help to avoid the unfortunate circumstance that led to recent demolition of the Boise Cascade complex without any inventory and register eligibility assessment.

Beginning on page 118 in discussion about potential impacts of implementing the VCCV and the six districts within the VCCV subarea, the document includes summary statements that are typically worded as "...the Plan intends to protect key historic buildings and established residential neighborhoods." While this is a positive goal for historic preservation, it would be useful if the Plan



would describe how the intent of these statements are to be implemented. Therefore, I recommend that Chapter 8 and the VCCV (and other chapters of the document) include discussion about *how* historic buildings and established residential neighborhoods are going to be protected as the plan is implemented. What mechanisms and/or incentives will be implemented that will lead to protection of historic properties? Plus who, how, and when will these mechanisms be put into place?

10. In the last two paragraphs at the bottom of page 124 and regarding "Mitigation Measures" the narrative should make clear that not just buildings and archaeological sites (as discussed earlier on pages 123 and 124) but also districts, structures, and objects need to be acknowledged and addressed by the plan. This is important to note since other kinds of historic properties could be affected by plan implementation, such as the railroad viaduct as discussed previously. Therefore, I recommend that the term "historic properties" or "historic resources" be used in the narrative and captions, as appropriate, when referring to broader categories of property types other than just buildings. In addition, I also recommend that the first two sentences in the last paragraph on page 124 be revised to read something like the following:

Ideally, impacts to historic properties should be avoided or minimized through project redesign by incorporating new development in a sensitive and compatible manner with the historic fabric of a neighborhood. As mitigation for historic properties that may be impacted in some way, approaches to treatments should follow the Secretary of the Interior's Standards..."

11. In the middle of page 125 and pertaining to implementation measures to minimize harmful direct or indirect impacts to cultural resources and historic properties, the second "bullet" point ("Research historic buildings and make recommendations for NRHP eligibility") should not be considered a mitigation measure since this language reads like a survey and inventory process that theoretically should already be completed as part of implementing the VCCV and the district plans. In addition, this documentation would be redundant to the recordation work referred to in the first point.

12. In addition, the last "bullet" point ("Funding for culture and arts.") is inappropriate and substitutes mitigation for harmful affects to the arts with mitigation for damage to cultural and historic resources. Therefore, this point should be reworded to read <u>"Funding for cultural resource protection and other historic preservation activities.</u>" In addition, this paragraph should include other mitigation measures such as "funding for programmatic historic preservation efforts," "adoption of preservation incentives," or "negotiated development agreements" to mention a few examples. It should be highlighted that the list on page 125 is only a sample of many such potential measures.

13. The remaining paragraphs on pages on 125 to the top of page 126 actually relate to the U.S. Secretary of the Interior's Standards for Rehabilitation and seem a bit too specific to be part of a policy level document. The "Treatment of Historic Properties" is referred to at the bottom of page 124 and is certainly appropriate. Therefore, I recommend including a specific reference to the "Rehabilitation" standards in the sixth paragraph on page 125.

14. I also recommend that this discussion include a recommendation for developing and implementing design guidelines for the subarea and/or the six districts that are tailored to the character of each district. These local design guidelines should be fundamentally based upon the Secretary of the Interior's Standards for Rehabilitation.



15. On page 126, regarding the Boise Cascade complex, see comment 8 above. In light of the recent demolition of the complex, it is recommended that the City identify and implement specific measures to avoid loss of potentially significant cultural and historic resources without appropriate public review and comment.

16. I note in Figure 8-1, Figure 8-11 and Table 8-2 identification of specific archaeological sites and locations that have been identified in the subarea. While recognizing that most of these sites are historic archaeological resources and have been excavated to some degree (such as the Convention Center site), I recommend that reconsideration be given to publishing such site-specific information in the document. Although these downtown sites are not as culturally sensitive as other sites in the Vancouver region, publication of this information should not be seen as setting a precedent for providing information in future plans or documents.

17. I recommend that the inventoried historic and cultural resources contained in Appendix B be reviewed with DAHP staff for concurrence on National Register and Washington Heritage Register eligibility determinations.

The above comments/recommendations complete our review of the Draft VCCV. Again, thank you for the opportunity to review and comment. Also, we commend the City for undertaking this planning effort in support of downtown revitalization in Vancouver. We look forward to continue working with you, the City and the Clark County Historic Preservation Commission toward protecting significant cultural resources in the planning area. Feel free to contact me at 360-586-3073 or <u>Greg.Griffith@dahp.wa.gov</u> should you have any questions.

Sincere Greg Griffith

Deputy State Historic Preservation Officer

c: Karin Berkholtz, Growth Management Service Clark County Historic Preservation Commission



Response to Comment 25: Letter – Greg Griffith, Deputy State Historic Preservation Officer, Department of Archaeology and Historic Preservation, State of Washington

Response to comments 25-A, 25-B, 25- G, and 25-L

The Subarea plan includes a policy to "protect key historic buildings and established residential neighborhoods." The Subarea plan implements the Vancouver Comprehensive Plan, which includes policy, CD-11 Archaeological and historic resources, *Protect and preserve cultural, historic and archaeological resources. Promote preservation, restoration, rehabilitation, and reuse of historically or architecturally significant older buildings. Continually increase knowledge and awareness of historic and archaeological resources, further developing the city's identity and allure. Work with Clark County to maintain state Certified Local Government Status.*

Implementation measures are in place under the Vancouver Municipal Code (VMC) Chapter 17.39 Historic Preservation, the City provides for the identification, evaluation, and protection of cultural and historic resources and encourages the preservation, restoration, and rehabilitation of these resources for future generations. The Clark County Historic Preservation Commission serves as the reviewer for historic properties within the City of Vancouver and the VMC includes implementation regulation for historic preservation overlay Districts (VMC 20.510).

Additional implementation measures recommended in the DSEIS Chapter 8 include the extension of the existing Historic Overlay #2 and the establishment of 5 additional Historic overlay districts. The Maximum Building Heights Map respects historic preservation. In the DSEIS (Chapter 7) the maximum building heights map proposes heights in consideration of four criteria, one of which states, to meet historic preservation goals (including preservation of architectural character). The VCCV Subarea Plan and Chapter 7 of the DSEIS include the Main Street Project as an important implementation of the Plan and as mitigation to future urban redevelopment. The recently completed Draft Main Street Project includes a Main Street Design Handbook. The draft guidelines address issues of character and pedestrian emphasis. The DSEIS under Chapter 7 recommends a mitigation measure to extend the geographic boundary for the Downtown Design Guidelines Manual to include the entire VCCV Subarea boundary.

Response to comment 25-C

Comment noted. For clarification, the following sentence will replace the last sentence in the third full paragraph on page 120 - Chapter 8, Cultural and Historic Resources, subsection Historic Building Surveys.

Land use applications that have potential to affect buildings and other sites that are listed in, or qualify for listing in, the National Register of Historic Places, the Washington Heritage Register, or the Clark County Historic Register are subject to the SEPA review process.

Response to comment 25-D

Comment noted. For clarification, the following sentence will replace the fifth sentence in the last paragraph on page 120 - Chapter 8, Cultural and Historic Resources, subsection Historic Building Surveys.

Listing is also used as a planning tool and tax incentives, most notably the Special Valuation for Historic Properties program, are available to owners of CCHR listed properties.

Response to comment 25-E

Comment noted. For clarification, the following phrase is added to the sixth sentence in the last paragraph on page 120 – Chapter 8, Cultural and Historic Resources, subsection Historic Building Surveys.

Many of the buildings recommended for inclusion in the CCHR may also be eligible for listing in the state and national registers in the future if additional historical research determines they have significance and <u>retain sufficient integrity</u>.

Response to comment 25-F

Comment noted. Page 124 is under the subsection Potential Impacts. In this subsection, the potential impacts are identified. Page 128 is under the subsection Mitigation Measures. In this subsection, the mitigation measures for the identified potential impacts are listed. For consistency and readability, the entire SEIS is formatted as such.

Response to comment 25-H

Comment noted. For clarification, the first two sentences in the last paragraph on page 127, Chapter 8, Cultural and Historical Resources, subsection Mitigation Measures, Historic Buildings are revised to read as follows:

Ideally, impacts to historic <u>properties</u> should be avoided or minimized through project redesign by incorporating new development in a sensitive and compatible manner with the historic fabric of a neighborhood. As mitigation for historic <u>properties</u> that may be impacted in some way, those listed in or eligible for listing in the NRHP, approaches to treatments should follow the Secretary of the Interiors Standards. . .

Response to comment 25-I

Comment noted. The completion of the inventory study is an implementing mitigation measure, which is noted in Chapter 8, Cultural and Historic Resources, subsection Mitigation Measures, Reconstruction.

Response to comment 25-J

Comment noted. The following language replaces the last bullet under Reconstruction on page 128 of Chapter 8, Cultural and Historic Resources, subsection Mitigation Measures, Historic Buildings:

Funding for cultural resource protection and other historic preservation activities.

Response to comment 25-K

Comment noted. For clarification, the following reference is added to the first full paragraph of page 129 in Chapter 8, Cultural and Historic Resources, subsection Mitigation Measures, Historic Buildings:

(Refer to Rehabilitation section above)

Response 25-M

The following is policy language (still in draft form) recommended to be added to the BLD POL 1502 Demolition of Structures:

<u>Historic Preservation Review required for structures listed on a historic register or older than</u> 50 years.

Prior to issuance of a demolition permit for any structure that is either listed on a historic register or older than 50 years shall be reviewed by a planner for compliance with applicable historic preservation ordinances.

Archaeological predetermination may be required for demolition in Archaeology Level A Areas

Demolition permit requests within a Level A "High Probability" area for archaeological resources which involve excavation below the foundation shall be accompanied by an archaeological predetermination report and fee, pursuant to VMC 20.710. Such predetermination shall be reviewed and signed off by a planner prior to issuance of the demolition permit.

Response to comment 25-N

A great deal of discussion and careful consideration was given prior to including a map showing archaeological sites. For example, in preparing the graphics, overly large symbols were selected to not pinpoint the precise location of the resources. At all of these sites, large buildings and parking lots either currently occupy the locations or are being constructed presently. The public knows about several of the sites, as newspaper stories have been done about them, and artifacts from some of them have been on display for the public.

An important recommendation included in the study has been to add the area west of Interstate-5 and south of Mill Plain Boulevard as probability Level A, ensuring that projects subject to development review will include an archaeological study. This recommendation was based on the number and significance of archaeological sites found in that area, and the noting the locations of the recorded sites provided some of the basis for defining the Level A area to be added to the GIS. The maps show this in a way that cannot be as easily explained by words.

The presence of archaeological site locations in the VCCR area clearly argues for more consideration of archaeological resources in much of the heart of Vancouver. Having this information in a public document is intended to heighten awareness of the importance of archaeological sites. The visual representation of these recorded sites, which are now gone, is also intended to provide the public with information about the history of the area, recognizing that the citizens of Vancouver have an interest in the history of the area. The

City will not use this as a precedent for providing site location information to the public, and hopes that if site location information needs to be provided to the public for some reason, that doing so is thoughtfully considered.

Response to comment 25-0

Comment noted. The inventoried historic and cultural resources contained in Appendix B were mailed to DAHP staff on September 5, 2006.

Page 1 of 1

Towne, Sandra

26

From: Baugh, Gerald

Sent: Wednesday, October 18, 2006 4:55 PM

To: Towne, Sandra

Subject: FW: Re-zoning proposal before Planning Commission

Sandra Here are comments from Albina Fuel for the VCCV

GB

From: Jeff Arntson [mailto:jeff.arntson@albina.com] Sent: Wednesday, October 18, 2006 4:44 PM To: Baugh, Gerald Subject: Re-zoning proposal before Planning Commission

Gerald,

A

I am concerned with the plan before the planning commission to limit the maximum building heights to 60' in the blocks bounded by Evergreen Blvd and 8th St between Broadway and Main Street. As you know, there is interest in developing a parking structure on those blocks that could probably exceed the proposed height limitation. My company is interested in pursuing this project if the opportunity exists to build on portions of the remaining land taller buildings than the parking structure. My desire is to change the maximum height restriction to 150'. That is the proposed height limitation of the blocks directly to the east.

As the City of Vancouver does have an interest in the parking in this area, I would hope that my suggestion will be given serious consideration. If you or any city staff would like to talk to me about the suggestion, I can be reached at (360)816-8012.

Best regards, Jeff Arntson Vice President Albina Fuel Co.

10/19/06

Response to comment 26; e-mail – Jeff Arntson, Vice President, Albina Fuel Company

Response to comment 26-A

Comment noted. To ensure that the proposed parking structure in the eastern ½ blocks bounded by Evergreen and 8th between Broadway and Main Street can be built at 60 feet at the higher elevation on Evergreen and south to 8th street which is at a lower elevation and yet maintain a flat roof plane the Proposed Maximum Building Heights Map (Figure 20.630-4) is changed to add an exception marked by *₂ on the map. The exception reads: Within the area noted by *2 on Figure 20.630-4 the roof plane of an allowed 60 ft parking structure at Evergreen may extend south as a flat roof plane to 8th Street (understanding that because of the elevation difference the roof height at 8th Street may be more than 60 feet).

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805 Broadway Street, Suite 725 Vancouver, Washington 98660 main 360.699.5900 fax 360.699.5899 www.stoel.com

MARK R. FEICHTINGER Direct (503) 294-9276 mrfeichtinger@stoel.com

October 18, 2006

Planning Commission City of Vancouver c/o Ms. Sandra Towne, Senior Planner Long-Range Planning PO Box 1995 Vancouver, WA 98668-1995

Re: Maximum Building Heights under Vancouver City Center Vision Subarea Plan

Dear Planning Commission Members:

We represent Downtown Vitality Partners, L.L.C. ("DVP"), the developer of the new Columbian office building, and other properties in the Esther Short area.

With the vacation of 5th Street, DVP owns Block 29 (the site of the new Columbian office building), Block 28, vacated 5th Street between Block 28 and Block 29, and a significant portion of the west half of Block 27 north of the railroad berm. DVP and the City have been cooperating extensively with respect to traffic configurations, utility undergrounding and other infrastructure projects in the Esther Short area.

The most recent draft of the maximum building heights for the VCCV shows a 100-foot height limitation with an asterisk to designate subject to FAA restrictions. DVP requests a change to the draft map prior to its final adoption, for the following reasons and as set forth below:

1. The City and DVP are cooperating in the potential exchange of properties within existing Block 28, 4th Street and Block 27 to facilitate a realignment of 4th Street along the railroad berm. The net result of those transfers is shown on the attached Exhibits A-1 and A-2.

Those transfers would result in a contiguous parcel owned by DVP consisting of most of Block 28 (except a small portion conveyed to the City in the southwest corner), a triangular piece in existing 4th Street, and a small triangle within Block 27, as indicated on Exhibits A-1 and A-2.

Oregon Washington California Utah Idaho

PortInd2-4590197.2 0021285-00011



October 18, 2006 Page 2

It is the intent of DVP, of course, to potentially construct a parking structure on this contiguous ownership to serve its headquarters facility, with residential or commercial development above the parking structure. It would be awkward to have different height limitations for different portions of the structure.

For this resulting contiguous ownership of property, the height should be the same; that is, 100 feet, with an asterisk to indicate subject to FAA restrictions.

2. Because survey work remains to be completed to depict the exact metes and bounds description of these property exchanges, and because it is always possible that circumstances may change alignments or other considerations, it would be easiest if the 100-foot coloration and asterisk appeared on the VCCV maps of maximum heights as applying to the entire existing Block 28, all of existing 4th Street south of Block 28, and the western half of Block 27. Because the exchange may not be completed before the adoption of the VCCV, it is also important that the entirety of existing Block 28 retain the 100-foot height limitation with asterisk, even as to that portion which may ultimately be conveyed to the City as part of the realignment.

Please see the net effect of the requested map change on Exhibit B, attached.

3. If this map change is not made, then DVP will have to condition its transfer to the City upon further amendment of the VCCV of this height limitation to reflect a uniform height of 100 feet, with the asterisk for FAA limitations, for this new contiguous ownership. That would potentially delay the realignment of 4th Street pending such amendment processes, which realignment is in the City's and DVP's strong interests.

Thank you for your consideration.

Yours very truly, Mark R. Feichtinger

MRF:lxh Enclosures cc: Downtown Vitality Partners, L.L.C.

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Response to comment 27; Letter – Mark Feichtinger of Stoel Rives representing Downtown Vitality Partners, L.L.C

Response to comment 27-A

Comment noted. To allow a contiguous building height on the parcels that now include 4th Street (realignment of 4th Street and easement conveyance is presently in process) the Maximum Building Heights Map (Figure 20.630-4) is adjusted to include the entirety of 4th Street within the 100 ft. (with asterisk) building height located adjacent and to the north.