



June 14, 2023

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

Dear Commissioners,

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

### **Site Plan:**

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

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

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

### **Dimensional Standards:**

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

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

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

### **Warehousing Moratorium:**

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

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

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

Thank you.  
Sincerely

Peter Condyles  
Senior Project Manager