

From: [Justin Wood](#)
To: [Planning Commission](#)
Cc: [Snodgrass, Bryan](#); [Kennedy, Rebecca](#); [Coutinho, Becky](#)
Subject: BIA Comment on Housing Code Updates
Date: Monday, January 24, 2022 10:47:06 AM
Attachments: [image001.png](#)
[BIA Comment- COV Housing Code Updates.pdf](#)

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Good morning!

In preparation for the commission's workshop on the housing code updates please find the BIA's comments attached. If you have any questions please don't hesitate to contact me.

Best Regards,

Justin Wood | Government Affairs Manager
BIA of Clark County - a Top 30 NAHB Association
Protecting and promoting the building industry.

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January 24th, 2022

Vancouver Planning Commission
415 W 6th St.
Vancouver, WA 98660

COV Housing Code Updates

Dear Chair Ledell and fellow Commissioners,

I am writing to you on behalf of the Building Industry Association of Clark County to provide input on the proposed housing code updates for the City of Vancouver. Building more affordable and middle housing is crucial to solving the housing crisis we face in this state. The majority of the code updates would aid in that effort, however some of the design standard requirements proposed would increase costs, and severely limit the type of housing and amenities that our member's clients demand. As an industry, we want to work collaboratively with the city to provide livable, attractive neighborhoods while providing the necessary flexibility so our members can maximize space, which creates greater value for those seeking housing. Our specific concerns are outlined below.

1. Small-Lot Subdivisions: R-17

The creation of this new zoning type is vital. Land supply is constrained throughout the city and small lot subdivisions create the option for more density, affordable housing, and a neighborhood feel. However, the requirement of onerous design standards would slow down the development of this product type. Specifically, the garage frontage restrictions and rear alley requirement (where feasible) are two standards that would severely limit our members in the type of product they can produce for the public. The rear alley requirement would increase the cost of housing while creating more impervious surface. The elimination of the rear alley requirement wouldn't take any on-street parking away. Moreover, many potential home buyers don't want a backyard surrounded by a sea of asphalt and the noise pollution associated with neighbors' car/garage use. The backyard is a sanctuary, and we should keep it that way. The industry would like to see more flexibility on the rear alley requirement and an explanation on the purpose of rear alleys because they seem to function exclusively for vehicle use. Who will be responsible for the unregulated intersections, sightlines, and maintenance needs that will come from the creation of these rear alleys? Will the front façade garage standard apply to rear alley access frontage?

In addition, the front façade restrictions on garages would severely limit the type of product our members can build. In the R-17 zone, we are talking about lots less than 50ft in width. To provide a bare minimum two car garage, the garage needs to be a little over 20ft in width. A 50% cap on garage frontage would unduly restrict the size of garages on top of current requirements like setback standards. How will allowing more than 50% of the front façade to be garage discourage neighborhood pedestrian activity? At the builder/developer open house presented by staff there was also mention of requiring 9ft of front facing lot width dedicated to the front entry. We support the front entry requirement but implementing a 9ft requirement would limit what homeowners can buy and what our members can build. Both the front façade garage restriction and the 9ft front entry dedication requirement would restrict garage width. This could create massive, unintended consequences. The market wants garage space, and grand theft auto has increased 179% since 2019 within the City of Vancouver. These new street front requirements should not be extended to R-9 and R-6 zoning.

The concerns of homogenous neighborhoods are valid. Our members recognize this and want to work with the city and staff to devise solutions. One solution that the City of Ridgefield has used is instituting both structural and decorative elements to break-up the garage and enhance curb appeal. Structural elements could include a covered porch area with a minimum of 15sqft, dormers, gables, bay windows, 12-inch offset from one exterior wall to another, and balconies. Decorative elements could include garage doors, pillars/posts, eave or barge boards with two material variations, shingles or varied siding in gables, siding shingles, shake, batten board, wainscoting, or similar, brick, stone or cedar accents covering at least ten percent of the front facade wall surface area, variable siding (e.g. shed roof above windows), belly band cladding, etc. The City could require the use of a set number of the previously mentioned design elements that would visually break-up the garage frontage.

The commission should also consider recommending an increase in allowable height in this zone. The 25ft height cap should be increased to 35ft so our members can provide additional value for both homeowners and renters. That 10ft could allow for a work from home space, fitness space, and additional bedrooms to accommodate more individuals living under one roof. This additional space would also benefit renters, allowing for more roommates in one dwelling, thereby lowering the cost of housing.

2. Cottage Housing

Cottage housing provides a unique opportunity for our members to build more affordable homes with the benefit of a doubling density in the underlying zone. We applaud the efforts of City Staff and the planning commission in modifying the cottage cluster standards. Specifically, allowing 200% density in the underlying zone and the allowance of cottage duplexes would increase housing capacity in the City of Vancouver. However, the industry believes there are additional ways to modify the code, push boundaries, and provide essential housing for the citizens of Vancouver.

First and foremost, the market wants an attached garage. Our members can achieve greater density using attached garages compared to a communal parking arrangement. The citizens of Vancouver are fearful for the safety of their vehicles, and attached garages are one of the solutions and what the market demands. Staff has acknowledged this and provided a 200sqft exemption to the 1,600sqft maximum for an attached garage. While we commend this provision, it clearly doesn't satisfy the intent. A one car garage **bare minimum** is 250sqft. The Planning Commission should recommend an exemption over 250sqft so that garage space is usable. If cottage duplexes are to be allowed, both units should be entitled to the same garage space exemption as a single cottage.

Also, like the R-17 zone, we would like to see the height cap increase from 25ft to 35ft, which would provide the necessary flexibility our members need to create the type of product the public wants. Quite frankly, we are in a housing crisis, and we need more flexibility in our design standards to match the need. Further flexibility on courtyard orientation and open space requirements would be a step in the right direction. Recently, the City of Bend, OR made those changes to their cottage cluster code. It may also suit the commission to contemplate an increase in the number of cottages allowed per cluster as well.

3. Supporting Strategies

Despite our concerns, we appreciate the important work the commission is taking on. We are in full agreement with the changes to ADUs as it relates to garages and setbacks, shared kitchen and bath for apartments, state mandated parking reductions, incentives for visitability, the creation of a denser multifamily zone, and many others. Our association and its members want to build livable, attractive communities so the citizens of Vancouver can achieve the American dream and build generational wealth. Communication with our local jurisdictions is vital and our industry appreciates the opportunity to provide input.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Wood". The signature is written in a cursive, flowing style.

Justin Wood
Government Affairs Manager

From: [Peter L. Fels](#)
To: [Planning Commission](#)
Subject: Testimony for January 25, 2022
Date: Monday, January 24, 2022 5:38:14 PM

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Dear Planning Commissioners and staff,

For the most part, I laud Planning staff for promoting new zones for increased density. One proposal is problematic, which is the provision that provides a density bonus for affordable housing projects to religious institutions but not to non-religious developers. I believe this is a clear violation of the First Amendment's Establishment Clause.

The City Council last year named two priorities for its strategic planning process: climate change and homelessness. It also asked staff to consider Equity, Diversity and Inclusion aspects of all actions.

Increasing housing density supports all of these priorities. Increasing density creates economies that can make housing costs lower. Simply increasing the housing supply helps lower housing costs. Density allows for increased use of public transit, thus reducing vehicle miles traveled and decreasing greenhouse gas emissions. And more affordable housing allows for greater equity in home ownership.

In all of your deliberations in the coming years, I hope you will keep these considerations in mind.

I also suggest the proposed changes do not go far enough. The current codes allow for low and lower density residential zones. These zones encourage single family residential housing and exclude multifamily housing. Duplexes up to 4-plexes are allowed under certain conditions but are not allowed outright. *

Current code is "designed to preserve and promote neighborhoods of detached single dwellings at low intensities" and "enhance and support the integrity of existing neighborhoods". I believe this is code language for preserving and protecting the privileges of people who can afford them, to the detriment of lower income citizens.

Increasing affordability increases equity, diversity and inclusion. I encourage you to look at expanding the current proposals to include all zones, especially single family residential, and to allow and promote increased density throughout the city.

*VMC 20.410.025 Lower Density Residential Zone (reads in part:) "Application of individual zones to specific areas in the City should enhance and *support the integrity of existing neighborhoods*, provide for a range of choices in housing styles and cost, and encourage *compatible* infill development and redevelopment."

*VMC 20.410.010 Purpose. (reads in part:) "Preserve and promote neighborhood livability and protect the consumer's choices in housing. The Low-Density Residential Districts *are primarily designed to preserve and promote neighborhoods of detached single dwellings at*

low intensities. Flexibility in housing type is promoted by allowing manufactured homes, duplexes, and planned unit developments under special conditions.” (Italics added)

Thank you for your consideration.

s/Peter Fels

From: [Kennedy, Rebecca](#)
To: [Nischik, Julie](#)
Subject: FW: today's planning commission meeting
Date: Tuesday, January 25, 2022 11:01:09 AM
Attachments: [image002.png](#)
[image001.png](#)

Julie-

Please forward the below to the Planning Commission. Thanks,

Rebecca Kennedy | Deputy Director
Pronouns: She/Her/Hers
CITY OF VANCOUVER, WASHINGTON
Community Development Department (CDD)
M: (360) 624-6070 | **O:** (360) 487-7896
rebecca.kennedy@cityofvancouver.us
www.cityofvancouver.us



Please note that I am working remotely. Please call my mobile number if you need to reach me over the phone. Learn more about the [City's COVID19 Response here](#).

From: Peter L. Fels <plfels@gmail.com>
Sent: Tuesday, January 25, 2022 10:55 AM
To: Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>
Subject: Re: today's planning commission meeting

Thank you!

Since sending the letter, I came across this article by the Sightline Institute, titled "18 Reasons Why Washington Should Legalize Middle Housing". Would you also please distribute the link to PC members and staff? Thanks again.

<https://www.sightline.org/2021/12/10/inslee-prioritizes-housing-bill-to-deliver-more-homes-washingtonians-want/>

Peter Fels

On Tue, Jan 25, 2022 at 10:47 AM Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us> wrote:

Hi Peter, we do not send an automatic confirmation for registering to provide comment- if you

signed up, you will be called on. We also do not confirm receipt of written comments automatically, but your comments were received and have been distributed to the Planning Commission.

Thanks for your engagement in this and 'see' you at the meeting tonight,

Rebecca Kennedy | Deputy Director
Pronouns: She/Her/Hers
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Please note that I am working remotely. Please call my mobile number if you need to reach me over the phone. Learn more about the [City's COVID19 Response here](#).

From: Peter L. Fels <plfels@gmail.com>
Sent: Tuesday, January 25, 2022 10:28 AM
To: Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>
Subject: today's planning commission meeting

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Hello Rebecca,

I thought I signed in yesterday to testify at today's PC meeting, but I have not received confirmation.

I also sent a letter.

Did you receive them? Or shall I re-submit?

Thank you,

Peter Fels

From: ssilvey643@aol.com
To: [Planning Commission](#)
Subject: Jan 25 meeting subjects
Date: Monday, January 24, 2022 9:58:25 PM

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City Planners,

RE: Housing Code Update -

It again appears the planners do not live in the area or in projects where parking is limited.

On a purely social sense, since Washington State has become a place of a sanctuary state, meaning it allows those whom are from a different land to stay, it should be noted that in many cases multiple residents reside in apartments and houses, all with their own transportation meaning more than 1 vehicle. Further past practice has shown that both the planning department and building code enforcement have failed, in making neighborhoods livable by limiting parking places, by reduced setbacks, sidewalks not meeting code or setbacks, minimal width streets, and really common sense building basics. This is further compounded by the fact that the city does not require the builder or seller to point out the driveway does not even allow parking of compact car because it is too short, and or further that the garage while it may be built to proper depth now includes a water heater, furnace and or other appliances which limit the depth of the garage, and or place a door and step which limit egress/ escape from unit and depth of parking a vehicle.

Slide 3 mentions livability....

Slide 5 .. how much set back from side walk? Sidewalk appears not to meet code as greater than 3 degree slope.

Slide 6 ,, mentions limited width of garage to allow on street parking but many of new developments have parking only on 1 side, and those with 2 sides there is minimal space to drive down, thus vehicles wait to traverse.

Slide 11... Only 1 vehicle per unit! This shall be stated in the lease or rental agreement? Have you examined existing apartment complexes in the city after 6:00Pm or before 6:00AM to see the parking?

Slide 12... Where is the parking? How many spaces? What size?

Slide 13... Again no parking, can park on street.. Really.. Where? Is it marked per unit?

Slide 20... Where do visitors park? Is it noted in lease or sales agreement they may not have a car or private transport, or are they to take the spots of those allowed on street in slide 13?

20.410.010 Purpose. Preserve and promote neighborhood livability and protect the consumer's choices in housing. The Low-Density Residential Districts are primarily designed to preserve and promote neighborhoods of detached single dwellings at low intensities. Flexibility in housing type is promoted by allowing manufactured homes, duplexes, and planned unit developments under special conditions. Compatible nonresidential development, such as elementary schools, churches, parks, and child care facilities are permitted at appropriate locations and at an appropriate scale. (Ord. M-3709 § 3, 2005; Ord. M-3643, 2004)

You are not following your own purpose, you are creating a chaos or where to park, and or how does one earn a living. Meaning that since you have gotten away from having industrial areas, where one could take a bus to work, to one of these independent clusters spread around it is not easy to get to without private transportation and or possibly taking up to 1.5 hours or longer to get to work. We are not Europe where the street car comes every 15 minutes to take you down the street; you are lucky if it comes every hour here and then the walk from or to the stop is great. In Europe one can catch the street car, and then it connects to the regional, and then the next, but all is coordinated, we cannot even do with C-Tran.

Page 16 the dwg. Is out of scale, this distorts the perception that all is okay... the car is too small, An average vehicle is approximately 15 foot in length. So the set back is 30 foot plus, !!!

Page 20... 20 foot to opposite side of alley,,, not much turning radius, especially when someone is park in area,

In all areas it appears you wish to create or get people out of vehicles but are not doing so in a proper manner or way. In essence you have put your cart before the horse in that you seem to have some goal of control what folks should be able to do or have, yet you have not created the bus or train routes and time frame to get people quickly and economically between point A and B. You have not concentrated employment centers or set up bus routes to the port.

Sad, really that in your goal to provide livable areas, you only create grief and headaches, do not follow your own rules and regs, allow things to slide, do not do the inspections and require builders to follow them.

Steven Silvey

From: lconaway50@aol.com
To: [Planning Commission](#)
Subject: updates to zoning codes
Date: Monday, January 24, 2022 3:14:25 PM

CAUTION: This email originated from outside of the City of Vancouver. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The proposed code changes will alter significantly the livability and desirability of our city. People need more than 4 walls to make a home. They also need some space for a yard in which children can play or gardens can be planted. They need some semblance of privacy and quiet. When people are jammed together in small spaces they tend to become more irritable and aggressive. If you want to see the results of the code changes you are proposing, then you only have to look at the housing projects in large cities in the east and midwest.

Affordable housing doesn't have to mean crowded and unhealthy conditions for the people who live there. There should be required space between units, green spaces in the development where people can walk and areas where children can play.

Many of the current developments lack the above unless they are in very expensive high-end projects.

In terms of the environment, we need more trees and grass, not less. We need to consider the impacts on our air and water that large developed areas would cause.

I hope you will consider your actions carefully as the impacts will be long-term.

Thank you for your consideration.

Linda Conaway

From: [Don Steinke](#)
To: [Planning Commission](#)
Cc: [Nancy and Peter Fels](#); [Cathryn Chudy](#)
Subject: Public input to the VPC
Date: Tuesday, January 25, 2022 11:08:11 AM

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From Don Steinke

To the Vancouver Planning Commission

I will not be attending today, but please consider my comments.

When I attended planning commission meetings in the late 1990s, the first question asked by the commission of staff was . . . “Is this project compatible with the Puget Sound Stormwater Manual?”

In 2022, for every proposal, please ask “Will this project help Vancouver meet its official goals of reducing ghg emissions at least 50% by 2030?”

A key consideration is to not allow projects that will become financial barriers to clean energy.

On average, it costs about \$6000 extra to trench through pavement to install conduit for each parking EV plug. The owner of commercial property will not do it after the pavement is poured.

All buildings need to be electric ready for furnaces, water heaters and cook stoves.

Almost all buildings need to be solar ready. Maybe parking lots should also be solar ready. It has been determined that if every parking lot in Los Angeles was shaded with solar panels, their output would exceed demand.

Money spent adding lanes becomes a barrier to transit viability.

I am paying a great deal of attention to legislation now being considered in Olympia. I’m excited about the future. Change is coming.

WSU is in charge of managing vehicle electrification for the Department of Enterprise services in Olympia. We attended their webinar last Friday. We need charging infrastructure for fleets – such as for garbage trucks, Amazon, UPS, FedEx, and school buses.

Thanks for your consideration!

Don Steinke