

Hello

Just a note to share our thoughts regarding housing code changes. Please feel free to email them to hosts of the next FNA meeting. We recognize that these are not questions; however, our hope is that the recommendations will be discussed at the meeting.

Our recommendations:

1. Property line barriers code allows for 6 ft high shrubs or fencing between established neighborhoods and 3 apartments. Recommend Verti-Crete 8 ft wall barriers between established neighborhoods and development over 25 ft tall (i.e., 3 story apartments).
2. Current code allows for a 5 ft building setback between properties for building new construction. Recommend builders create designs allowing parking lots and old growth tree lines between established neighborhoods and the start of multiple new buildings creating as much space as possible between developments to preserve privacy and shadow lines. This design can be view at Park Apts in our neighborhood.
3. If extending established building heights to accommodate ADU development such as one might find on a garage, recommend the builder place limited 2 story visualization into neighboring back yards. Multiple windows along property lines tends to minimize neighboring privacy and cast shadows. Many neighbors are planting small gardens and need sunshine versus shade.
- 4, If new construction is to receive a discount for using aging in place designs, recommend established senior households wishing to upgrade receive the same discount.
5. We are not in favor of front door designs facing the street. If packages are left on the porch they can be easily viewed and retrieved by anyone.
6. We are not in favor of decreasing apartment building code parking from 1.5 to 1. We believe this will promote more street parking, vehicle theft and safety site endangerment. The extra parking is needed for families owning more than 1 car and visitors.

Ken and Bev Tyler,
1403 NE 131st Ave, Vancouver, Wa 98684

From: [Kennedy, Rebecca](#)
To: [Nischik, Julie](#)
Subject: FW: Community Forum testimony for April 11, 2022; Eliminate Single Family Zoning
Date: Monday, April 11, 2022 1:48:30 PM
Attachments: [image001.png](#)

Julie- please forward the message below to the PC and appropriate staff. Thank you,

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: Sunday, April 10, 2022 3:39 PM
To: City Council <council@cityofvancouver.us>
Subject: Community Forum testimony for April 11, 2022; Eliminate Single Family Zoning

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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.

Hello Mayor, Council Members and staff,

Thank you for the opportunity to testify tonight.

In a few weeks you will have before you proposed code changes to the housing code. I applaud the intention to increase housing density, especially near areas served by transit. It is obvious we still need to increase available housing options and affordability. These proposed changes are consistent with the City's goals to reduce climate impacts and improve equitable access to housing.

I am concerned that the proposed changes for very dense housing may move our city into even more increased division of housing types, segregating low income communities in certain areas while reserving long-standing single-family zones for higher income and privileged citizens.

The Planning Department has indicated it is putting off changes to the Single Family Residential (SFR) zones that were recommended by the 2016 Affordable Housing Task Force Report to “encourage housing diversity and affordability in residential zones while maintaining neighborhood character.” While the current proposed changes allow for cluster/cottage housing and ADUs, duplexes up to 8-plexes are still not specifically allowed in SFR zones. This is despite the existence of duplexes and triplexes already in some of our historic SFR neighborhoods.

We are moving too slowly to change SFR zoning. A proposal in the state legislature to eliminate SFR zoning statewide this year failed based on arguments that local jurisdictions should be allowed to make their own decisions. It is time to make that decision here in Vancouver.

SFR zoning is a vestige of the past where privileged citizens wished to preserve their exclusive benefits. It is inconsistent with the City’s goals to improve equity and reduce climate impacts. I ask you to start now to eliminate SFR zoning either separately or as part of your Climate Action Plan.

Thank you.

s/

Peter Fels



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

4/11/2022

RE: Housing Code Updates 2022

Housing Initiative LLC is a local non profit housing developer specializing in housing for very low-income and extremely low-income individuals. We have developed several projects in the City of Vancouver and are in strong support of the City’s efforts to increase access to affordable housing through strategic changes to the code and select development incentives. We generally agree with the proposed changes in the draft, though we would like to recommend that the CX District Parking Space Requirements align more closely with requirements elsewhere in the draft code revisions as well as state RCW 36.70A.620 requirements when it comes to Seniors and People with disabilities. Specifically in Table 20.945.070-7, CX District Parking Space Requirements in the draft memo, we would like the code to reflect our addition in red below:

Table 20.945.070-1 CX District Parking Space Requirements	
Land Use	Parking Requirements
Multi-Family Housing, market rate and low-income	0.75 space/dwelling unit
Senior Housing and people with disabilities	0 spaces for residential units 0.75 space per employee ¹ plus one visitor space per 10 residents
All Other Residential Uses	1 space/dwelling unit
Transient lodging	1 space/living unit

We commend the City on its forward thinking approach to tackling the affordable housing crisis. City staff has been inclusive in giving the local housing development community, including ourselves, opportunities to voice concerns and share ideas, many of which are reflected in the draft. We support the draft Housing Code Updates the City is proposing.

Cordially,

Sierk Braam, CEO
Housing Initiative LLC

From: ssilvey643@aol.com
To: [Planning Commission](#)
Subject: Citizen Communication
Date: Tuesday, April 12, 2022 8:05:38 AM
Attachments: [Comments for 12 april meeting.pdf](#)

You don't often get email from ssilvey643@aol.com. [Learn why this is important](#)

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Sir,

I have attached my comments in the PDF

these are in regards to the two power point presentations and title accordingly

TA

Steven Silvey
PO BOX 5216
Vancouver, WA 98668
360-882-3181

Comprehensive Plan –Project Initiation

Slide # comment

4

So what are community values? Which community? Are these segmented to an unfortunate method of race based?

Given that must accommodate state, is the infrastructure capable?

5

Please explain the definition of Equity? Nowhere does it seem to be written down as this is what is deemed such a term, only what someone thinks it is in their mind, since this term and others are used though out where is the definition that is to be used for it?

6

What is with letters, where are definition?

Use of % is false when in fact all data is not present, while this appears large 76% what is that of total community, area, etc? Why not include the greater Portland Vancouver zone?

8-10

Where are photos of these areas, taken at night when parking is not available, or of fields and 3 to 4 story units, Why is it again separation as to race, is this not going backwards as to all are to be equal, or is this a divide the groups up to create hostility.

11

Basically it is called supply and demand,

12

Equity, does not hard work count for anything? If one group gets something based on race, that is racist, if one group uses drugs and so forth are we to give them all the stuff that others worked and sweated for? Build outcome? Currently local building codes are not enforced, poor quality workmanship, no inspections and no code requirements for basic enclosure

13

Climate, sorry, things change, and if you put 40 people in a room designed for 10 it gets a bit warm, if jobs are spread all over and not in a central location there is no public transportation to take care of it,

Housing Code Updates

Slide 6

- a- So no 2 car garage?
- b- Parking is minimal at best in today's approved developments, how come no pictures of mess it creates?

Slide 8

- a- Are street trees going to be better than in past
- b- Is line of sight going to be considered
- c- When purchasing a house is builder and seller and buyer all given notice that guest have no parking space
- d- When purchasing home or renting is tenant buyer made aware only 1 vehicle is allowed?

Slide 10

- a- So these apartments are for only a single person?
- b- With only 1 parking space then they shall be affordable so only 1 member need work

Slide 12

- a- Where are jobs?
- b- Transit runs 24 hours a day
- c- Transit runs to my work space
- d- Since no one can visit due to lack of parking how is care to get and take care of my medical needs

Slide 16 to 17

- A- Nice pictures but where are the ones of units off 79 Ave, Burton road, and surrounding area?
- B- What is fire code considerations in parking plan
- C- Too many neighborhoods have only streets with parking one side, and short driveways that do not accommodate average car, and no transits in the near.

Slide 20

- A- What about fire hazard? Since require plants,
- B- What about type of plant
- C- No driveway with 5 foot set back

Slide 24

- a- Where is parking?

Slide 27

- a- No approval of code changes,
- b- Do any of the folks writing these live in these areas or look at what have currently created
- c- Since current and past codes have not been followed what guarantee is there that these shall be followed, but only to add cost to building
- d- Are all these units equipped with 400 amp power for their electric cars?
- e- Is the power grid capable for these units
- f- Shall buyers and tenants be made aware there is no parking, or only 1 vehicle and that size of vehicle is such and such given the 10 foot space allowed to park in?
- g- Shall the tenant and or buyer be made aware that guest parking is only 1 space for 3 units, and since there is only 1 space for a unit parking, his spouse shall have to park in street somewhere else, thus eliminating guest parking.

From: [Margaret Milem](#)
To: [Planning Commission](#)
Subject: Public Comment re Housing Code Update proposal
Date: Monday, April 11, 2022 9:06:51 PM

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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.

I would like to continue to advocate for increased setbacks between new apartment construction and existing homes. Developers could incorporate these setbacks into their designs by placing parking between apartment buildings and existing homes.

-- Margaret Milem

From: Snodgrass, Bryan
Sent: Monday, April 11, 2022 6:05 PM
To: Glen Yung <incrediblehistorichomes@gmail.com>
Subject: FW: Fair market rent v AMI

Glen

City CDBG staff advise that HUD has recently updated the Fair Market Rents for Vancouver. Now FMR for a Vancouver studio is \$1,416 and for a 1-BR is \$1,512, while a single person earning 80% AMI can afford \$1,354 in monthly rent and utility costs. Here is a table with other household and unit sizes.

Household size	80% AMI	Affordable @ 80%	FMR	Difference
1 person	\$54,150	\$1,354	\$1,416 studio	-\$62
2 people	\$61,900	\$1,548	\$1,512 1-BR	\$36
3 people	\$69,650	\$1,741	\$1,735 2-BR	\$6

From: Glen Yung <incrediblehistorichomes@gmail.com>
Sent: Monday, April 11, 2022 7:29 AM
To: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Subject: Re: Fair market rent v AMI

Thanks Bryan. Please keep me posted. Thanks!

Glen Yung

On Sun, Apr 10, 2022, 10:46 PM Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us> wrote:

Glen

I am still tracking some of this down, but wanted to report back with what I had. Fair Market Rent and Median Income are different things. My general understanding of FMR is that it is basically a percentile of the average rents being paid in an area (see HUD definition [here](#), and federal statute [24 CFR 888.113](#)) They are estimates of 40th percentile gross rents being paid for standard quality units within a metropolitan area or nonmetropolitan county. AMI as you know is the median income for a typically multi-county area. I'll let you know what else I can get on this before Tuesday. BRS

The statute requires we provide a density bonus for projects meeting the 80% threshold. Local communities can decide if they want to extend eligibility beyond faith based groups and what the extent of the bonus is, but we can't decide to offer it only for projects at 60% AMI or less, for example.

From: Glen Yung <incrediblehistorichomes@gmail.com>
Sent: Wednesday, March 30, 2022 1:23 PM

To: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>

Subject: Re: Questions

Thank you for the information. So this would mean that in order to maintain compliance with an 80% AMI restriction, they can rent the restricted units for up to \$1,547/month (incl. utilities). From the same packet that the chart comes from, it states that the Vancouver fair market rent for a one bedroom apartment is \$1,331.00 (incl. utilities). From my understanding, this means that an 80% restricted one bedroom unit can be rented at \$216.00 (1547-1331) ABOVE market rate and still be in compliance. Is this correct? If so, this indicates that we would likely be offering a density bonus for the purpose of producing below market rate units, but could very well end up with at or above market rate rents.

As far as the ADU issue, the problem is that the EXISTING garages are ALREADY in the restricted sight clearance areas and a dangerous condition already exists. My point was that I don't think that it is responsible to allow a building being converted/rebuilt as an ADU to remain non-conforming IF it is ALREADY non-compliant to the sight clearance restriction area. (See attached section of VMC)

Thank you!

Glen

From: Mark Madden <madden@wdcproperties.com>

Sent: Friday, April 1, 2022 12:10 PM

To: Nischik, Julie <Julie.Nischik@cityofvancouver.us>; vasupv@fvrl.org; charles_a_spear@yahoo.com; karpjd@comcast.net; DAHP <SEPA@dahp.wa.gov>; Fish & Wildlife Group <R5Planning@dfw.wa.gov>; Mary Mattix <mmattix@portvanusa.com>; Matt Graves <mgraves@portvanusa.com>; Matt Harding <mharding@portvanusa.com>; Patty Boyden <pboyden@portvanusa.com>

Cc: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>; Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>; Coutinho, Becky <Becky.Coutinho@cityofvancouver.us>; Frank Stock <fstock@wdcproperties.com>

Subject: Re: SEPA DNS and Checklist for Housing Code Update

Thanks Julie,

WDC Properties has completed eight affordable multifamily rental projects in the mid town Vancouver and Evergreen Corridor Districts, approx. 282 units. It has been a very successful relationship with the city, and the community. Our desire was to build more, but have found recent zone code changes and tax abatement program changes, have impacted the economics of the new project proforma, stopping our ability to proceed.(so far 3 new projects at 350 units total).

The key to our developments has been a mixture of both parking on site offsets, site FAR density, limited retail requirements, coupled with affordability component to abate real estate taxes.

(For the record please note all new multifamily project lenders(and appraisers) do not weigh street facing mixed use retail at old valuations -pre pandemic, more like 25-50% post pandemic, so the project has to carry that retail sq ft as a deficit long term and the owner has to provide more equity LTC for the offset decreased valuation).

The ideal mix for affordable product in Vancouver is as follows:

*4-6 story density with limited property line setbacks, up to 100 units per acre.

(Example: Rosa Apartments built last two years, on 16th/17th-C / D block has 96 units, four story-two buildings facing streets, 56 parking stalls on site, with on street parking as an offset prior to code changes, retail live work on street facing units, and ten year real estate tax abatement at 20% of total units meeting 100% MFI for family of four).

*On site parking at .75 per unit, with street facing stalls as a contributing factor

*10 year real estate abatement on 100% of the project units and improvements, with 85% MFI family of four, effecting 20% of the total project units.(prefer 15-25 year Tax abatement program agreements).

*Retail requirements allowing live work units on ground level up to a maximum 100% street frontage units, with none on non street facing units.

On site surface parking in urban projects is extremely difficult even for market rate multifamily projects. Affordable multifamily projects cannot support a 1:1 per unit vehicle requirement (nor more expensive underground or structured parking options) but do provide lesser cost housing opportunities for the lower income tenants. Many affordable tenants do not have the funds or income for private vehicles ownership, instead using (and supporting) mass transit or third party vendor services. Thereby lowering the need for on site surface parking. Overflow parking can be allotted to project street facing parking. A majority of project street overflow is during the non peak business hours & days, evenings and weekends. Basically, if the city wants more density, for affordable rental housing, parking offsets and building height (4-6 stories) are required.


We hope there will be further discussions regarding zone code changes as we would love to participate in creating more workforce low income rental housing in Vancouver.

Thank you for your time in this matter

Best regards

Mark Madden CEO
WDC Properties
503-221-2900

Memorandum

To: City of Vancouver Planning Commission
From: Chuck Green, PE 
Copies: Tim Leavitt, PE
Date: April 11, 2022
Subject: Comments on Proposed Parking Code Changes, Housing Code Updates

Planning Commissioners: thank you very much for this opportunity to provide comment and feedback related to the consideration for parking code changes related to the slate of Housing Code Updates you are considering. My comments below specifically refer to proposed changes in off-street parking requirements for affordable housing, senior housing and disabled housing. I have been the author of several recent parking studies, reduction requests, and variance requests related to these specific uses.

Affordable Housing Parking (50% AMI)

In the last few years as a consultant with my firm of Otak, Inc., I have authored a number of parking studies focusing on various affordable housing proposals, including those with very-low household incomes (50% or less of Area Median Income or AMI) on behalf of affordable housing development applicants. These studies have included case study research from local as well as west coast projects. One of these for The Meridian (Housing Initiative, LLC) was provided to the Planning Commission as part of a February 2020 staff memo on proposed off-street parking changes¹.

Case study research concluded that multi-family housing targeting families of very-low income (50% or less of the AMI) and extremely-low income (30% or less of AMI) experienced low levels of auto ownership. In other words, owning and operating an automobile tends to be beyond the financial capability of many of these families. Auto ownership under these economic situations was much less than the 75% of the number of dwelling units included in the statute as well as what is being proposed in the code changes citywide, and in most cases these auto ownership rates were less than 30% of the number of units.

In many of these case studies, instead of trips being made in automobiles owned by tenants, they were either ride-sharing arrangements (pick up and drop off at the site by others), transit, or bicycle.

We appreciate the recognition of applicability of changes in state statute related to affordable housing in the past 2-3 years. RCW 36.70A.620 "Minimum residential parking requirements". I support the proposed code change

¹ https://www.cityofvancouver.us/sites/default/files/fileattachments/planning_commission/page/40196/06_parking_variance_request_2_2.pdf

with regard to affordable housing; however, I would recommend that there be a consideration for a lower minimum requirement based on cases where the development proposal is within ¼ mile of high-frequency transit (15-minute peak service or more frequent), provision of protected bicycle parking above the minimum requirements, and/or a pick-up/drop-off space for ridesharing trips.

Disabled Housing

Similar to the affordable housing situation, case studies have shown that for housing targeting people with disabilities, automobile ownership by residents is also low. In many cases, residents are unable to drive themselves and must rely on ridesharing, paratransit/C-VAN, walking or bicycling as transportation modes.

As with the affordable housing category, the recognition of applicability of changes in state statute related to housing primarily intended for disabled residents contained in RCW 36.70A.620 “Minimum residential parking requirements” is also appreciated. I support the proposed code change with regard to housing primarily for disabled residents; however, I would recommend that there be a consideration for a lower minimum requirement based on cases where the development proposal is within ¼ mile of high-frequency transit (15-minute peak service or more frequent), provision of protected bicycle parking above the minimum requirements, and/or a pick-up/drop-off space for ridesharing or paratransit trips.

Senior Housing

Senior housing is a little more complex. There are a variety of types of senior living facilities: Independent living, assisted living and memory care. There is subsidized senior housing (Vancouver Housing Authority) as well as private operators. Each experiences different parking capacity needs, especially in terms of memory care, where residents are generally unable to possess a driver’s license or own an automobile. Some allowance or guidance in code to reflect the different senior living arrangements should be included.

My case study research includes information from the Institute of Transportation Engineers’ (ITE) *Parking Generation Manual*, several local senior living facilities of various mixes of the three types of senior living facilities, and some national case studies as well.

ITE’s *Parking Generation Manual* for senior housing indicates an average of 67% peak parking demand per living unit. Local case studies have shown much lower percentages, ranging from less than 20% to approximately 60% of the number of living units. National studies have indicated similar conclusions.

The proposed ratio of 75% of the number of living units, plus one visitor space per ten (10) residents, seems reasonable except for the case of estimating the number of residents. While in many cases senior housing tends to be single-occupant units, not all of them are, especially for private-operator independent living facilities. Perhaps one space per unit would be something that could be more easily estimated.

Also, newer privately built and operated senior living facilities have other uses which allow outside customers, such as salons and pubs/restaurants. While the 75% ratio may seem high, it should be high enough to capture resident parking demand, office and maintenance staff, and on-site commercial establishments such as salons and pubs. The number of visitor spaces should then be based on number of units, rather than number of residents, to be more readily estimated.