

From: [Mike Bomar](#)
To: [Planning Commission](#)
Cc: [Eiken, Chad](#)
Subject: Port of Vancouver - Warehouse Ordinance Amendments Comment Letter
Date: Friday, October 13, 2023 11:33:47 AM
Attachments: [image001.png](#)
[231013POVPlanningCommissionCommentsonCOVWarehouseMoratorium.pdf](#)

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Chair Ledell and Vancouver Planning Commission members,

Please see attached comments from the Port of Vancouver regarding the proposed warehouse ordinance amendments proposed for the upcoming hearing on October 24th. I'm available if you have any questions and will plan to attend the upcoming Planning Commission meeting and Council hearing as well.

Thank you for your consideration and for your service to this community.

Sincerely,

Mike Bomar
Director of Economic Development
3103 NW Lower River Road, Vancouver, WA 98660
(C) 360.839.3577; (Internal) 5300
mbomar@portvanusa.com | www.portvanusa.com | [available port properties](#)

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Friday, October 13th, 2023

City of Vancouver Planning Commission
Attn: Chair Ledell and Vancouver Planning Commission Members
415 W 6th Street
Vancouver, WA 98660

Subject: Proposed Warehouse Code Amendments

Dear Chair Ledell and Planning Commission members:

Thank you for the opportunity to comment on the City's proposed warehouse code amendments in response to the original moratorium enacted on December 12th, 2022, and extended in June of 2023. The Port of Vancouver USA has appreciated the opportunity to talk with City staff to better understand the purpose of the moratorium and to provide input into workable solutions to address staff and Council's concerns. Regarding the staff's proposed recommendations listed in the September 12th, 2023, Planning Commission memorandum, the port has the following comments:

1. Allowance of warehouses larger than 250,000 square feet only in Heavy Industrial (IH) zoning as a limited use.

Recommendation: While most of the port's land is already zoned IH, the port requests to retain flexibility in its Light Industrial (IL) zoned properties that are not adjacent to residential zoned land and that are within one mile of a state or interstate highway. The port's marine / industrial area is focused on receiving, staging and transloading cargo from one mode to another. It is conceivable that future development could require a warehouse facility exceeding 250,000 square feet.

The port appreciates the recognition that a limited use process is more appropriate than a conditional use in IH zones for the type of project under consideration. There are, however, few parcels, such as the port's Parcel 7, which are appropriately zoned as IL and could accommodate a large warehouse without generating the negative impacts of concern in the moratorium. Without favoring the port specifically, the city may consider requiring large warehouses in the IL zones to be located within a certain distance to a state or interstate highway and to be a certain distance away from residential or other zones of concern.

2. Clarification on “warehouse” versus “Warehouse / Freight Movement”

Recommendation: The memo refers to both “warehouses” and “Warehouse / Freight movement.” This should be clarified by referring only to “Warehouse / Freight Movement” as outlined in the current VMC (Vancouver Municipal Code). There are different warehouses defined in the VMC, but the focus is on one warehouse class (“Warehouse / Freight Movement”).

VMC 20.160.D. Industrial Uses classifies “Warehouse/Freight Movement” as:

“5. Warehouse/Freight Movement. Uses involved in the storage and movement of large quantities of materials or products indoors and/or outdoors; associated with significant truck and/or rail traffic. Examples include freestanding warehouses associated with retail furniture or appliance outlets; household moving and general freight storage; food banks; cold storage plants/frozen food lockers; weapon and ammunition storage; major wholesale distribution centers; truck, marine and air freight terminals and dispatch centers; bus barns; grain terminals; and stockpiling of sand, gravel, bark dust or other aggregate and landscaping materials.”

Defining code changes only to the “Warehouse/Freight Movement” use defined above focuses the proposed code changes to developments that results in “significant truck” traffic. Additionally, ensuring that code changes are specific to “Warehouse / Freight Movement” would still allow “Manufacturing and Production Facilities” to be developed in both light and heavy zones areas.

VMC 20.160D defines “Manufacturing and Production” development separately from “Warehouse / Freight Movement”:

Manufacturing and Production. Includes production, processing, assembling, packaging or treatment of semifinished or finished products from raw materials or previously prepared materials or components. Manufacturing production is intended for the wholesale market rather than for direct sales.”

3. Limitation of truck traffic from Warehouse / Freight Movement to Designated Freight Corridors

Recommendation: Change the proposed wording in 20.895.120.B. Traffic (Page 5 of Memo) to the below:

Tractor trailers delivering goods to or from “Warehouse / Freight Movement” covered by this section shall only travel on designated freight corridors.

This recommendation removes the specific reference to named roads and allows the City the opportunity to designate freight corridor restrictions (which could include Fruit Valley Road) throughout the city as necessary, which may change over time.

4. Buffer depth and tree planting requirements

Recommendation: The City should change the buffer depth requirement (proposed 20.895.120 section C.2) from 25 feet to 15 feet, and clearly state that any tree requirement required in proposed 20.895.120 Section D can be planted in the landscaped buffer area. At developer's discretion, allow any tree requirement to be completed at an approved off-site location.

This requirement should also be reconsidered if the project's environmental assessment can mitigate wildlife, water retention and climate impacts in other ways if necessary. The port suggests removing the required area (20% of the building area) from the tree planting requirements.

Increasing the setback to 25 feet AND requiring an additional 20 percent of the building footprint area to be covered by trees significantly impacts the financial viability for a development project so burdened – especially since the proposed code would also restrict development to 75 percent of the project area or less. Without the recommended changes outlined above, the site reduction (100 to 75 percent), landscape buffer (currently 25 feet), and tree plantings (20 percent of building footprint) will make large scale warehouses – whether they are freight related or manufacturing related – extremely difficult to construct.

The Port does not have space in its marine operations area to limit required marine facilities to the proposed “maximum lot coverage of 75 percent” versus the current 100 percent allowed. Additionally, it would not be appropriate or effective to require the port to plant trees in its marine industrial areas.

Allowing the planting of trees offsite, when onsite tree planting is deemed impractical, will also allow developers to use any tree credits they may have or to buy tree credits if needed.

Additionally, reducing the landscape buffer to 15 feet would improve traffic safety – especially as site lines would be obscured as the plantings mature.

5. Trip generation for Warehouse / Freight Movement facilities exceeding 250,000 square feet

Recommendation: Add a traffic metric (such as 100 tractor trailer trips per 24-hour period) in addition to the use and size criteria for “Warehouse / Freight Movement”

facilities exceeding 250,000 square feet to invoke the additional miscellaneous special use standards of proposed in VMC 20.895.120.

Adding a traffic count to the “Warehouse / Freight Movement” use category for proposed warehouses of at least 250,000 square feet would provide a clear metric that both developer and city can understand when applying these code changes. This metric would come from a traffic consultant paid for by the developer.

6. EV outlets at loading docks

Recommendation: Restate 20.895.120 Section D. 6 as outlined below:

All loading docks will have conduit and other electrical infrastructure to allow for future installation of electrical systems to charge electric powered freight trucks servicing the facility.

The port supports and is pursuing electrification within our adopted Climate Action Plan. As currently proposed, however, the port has concerns that underutilized, charging infrastructure would be prone to costly vandalism and theft. Developers would rather have the conduit in place to meet future demands and standardization with the technology in place at that time. Requiring developers to install full charging infrastructure will result in capital wasted as newer and more secure electrical technologies emerge.

7. EV charging stations for parking area

Recommendation: Restate 20.895.120 Section D.7 as outlined below:

For any warehouse over 250,000 feet at least 10 electric vehicle (EV) charging stations will be provided at initial occupancy. Conduit to support EV charging will be constructed to serve all parking spaces at initial occupancy.

Designating a specific number of parking stalls to have EV charging stations (10) meets the City’s goal to have adequate EV charging installed during initial construction. Requiring conduit to be placed for the remainder of the parking stalls allows for future upgrades to occur efficiently as EV’s capture more of the market and anti-vandalism solutions can be developed.

8. Calculation of Total Square Footage

Recommendation: The ordinance should clearly state that the threshold of 250,000 square feet applies to any single structure on a given site, and not the total square footage of multiple separate structures or facilities.

Thank you for your consideration of the Port of Vancouver USA's feedback and recommendations. We look forward to continuing to work with Council and staff throughout this process to ensure an outcome that addresses the City's concerns and continues to responsibly advance trade and economic development within the City of Vancouver and throughout the region.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Bomar". The signature is fluid and cursive, with the first name "Mike" and last name "Bomar" clearly distinguishable.

Mike Bomar

Port of Vancouver USA, Director of Economic Development

From: [Terry Dunn](#)
To: [Planning Commission](#)
Subject: Requested zone change at the corner of SE 15th street and SE 192nd Avenue
Date: Saturday, October 14, 2023 11:56:21 AM

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To the Vancouver Planning Commission,

I am writing to argue against the approval of the zone change at the corner of SE 15th street and SE 192nd Avenue. I hope the commission will take these points into consideration when they make a decision on the zone change.

Firstly, it is disturbing to read the false statements made by Planning Commission staff in support of the change. Staff supports the requested change by saying “applies with applicable criteria for Comprehensive Plan and zoning map changes”. Further, the principal planner states, “the proposed development would be consistent with the surrounding area”. Both these statements are factually false. The change would drastically change the neighborhood character in violation of the Vancouver Municipal Code and the Washington Administrative Code. Nowhere in the neighborhood is there high density housing. The surrounding areas were not constructed/designed to handle high-density living

Secondly, the approach taken by Vance Development in requesting the change is a disingenuous strategic ploy. Vance first requested a change to R-30 zoning allowing 4-story apartment buildings. When the anticipated outrage appeared, Vance changed their request to R-22 zoning which permits 3-story apartment buildings. Vance called this a “compromise” when in fact it is simply a minor change that preserves the high-density apartment building and in no way complies with the requirement to preserve the neighborhood character.

Given all these facts, I hope that the Commission will deny the zone change, notwithstanding the recommendation of the Planning Commission staff.

Sincerely,
Terrence Dunn
1809 SE 18th PL
Vancouver WA 98683
terrydunn11@gmail.com

From: [Heidi Cody](#)
To: [Planning Commission](#)
Cc: [Cathryn Chudy](#)
Subject: Updated ACE Asks and Concerns re: City Warehouse Moratorium
Date: Wednesday, October 18, 2023 11:08:21 AM
Attachments: [Draft ACE asks re Warehouse Moratorium.rev.pdf](#)

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Good morning Planning Commission,

ACE has a slightly updated version of our questions and concerns regarding the Warehouse Moratorium, attached below. The main additions are:

- We will be short of electricity if we don't add trees or solar canopies to most new warehouses
- Require solar panels and batteries on all warehouses
- Electric heat pumps for heating and water should be required. Warehouses should not be allowed to connect to gas for those uses.

If someone could confirm receipt of this email, that would be helpful. We welcome conversation about this and hope you will reach out to us. My phone number is 718-986-2348. Thank you for your consideration and have a wonderful day.

Heidi Cody and Cathryn Chudy

--

Coalition Manager
Alliance for Community Engagement

Draft ACE Asks and Talking Points: Draft Warehouse Moratorium

We are concerned that the Warehouse Moratorium will be a crucial missed opportunity for the City to reduce pollution and emissions, which affects the health of our communities.

The City has a responsibility to follow its core values of equity, safety and climate. The City adopted an ambitious Climate Action Framework with a goal of carbon neutrality by 2040. Setting expectations through Municipal Code around our influx of warehouses is a great opportunity to make meaningful progress on emissions and pollution reduction.

Instead, the City focusing exclusively on warehouses over 250,000 sq. ft. effectively allows developers to have no climate provisions on individual or multi-building warehouses up to 249,999 sq. ft. There are currently no climate considerations whatsoever for the vast majority of warehouses.

Making all warehouses Permitted Use prevents community from engaging in the approval process.

ACE suggests:

- Trees need to be planted and maintained onsite at the largest warehouses. Consider requiring that most pavement be shaded, either with trees or with solar canopies, for most new warehouses, not just the largest ones. We will be short of electricity if we don't. Trees mitigate the heat absorbed by vast areas of asphalt and concrete these warehouses bring.
- Require solar panels (plus 4-hour batteries), ev-ready electrical conduit and wiring, and (double-paned)clerestory windows on the largest warehouses.
- Require solar-ready roofs, ev-ready electrical conduit and wiring of all warehouses over 100,000 sq. ft.
- Prevent municipal code loopholes whereby developers could build a 249,999 sq. ft. warehouse or multiple smaller warehouses to avoid climate provisions. If it's not possible to create air-tight municipal code to prevent that, please change warehouses over 100,000 sq. ft. to Conditional Use.
- Idling for non-electric truck engines should be banned.
- No new buildings should be built, where the primary heating system for space and water is fossil fuel. Electric heat-pump water heaters and space heaters should be required. OR as the Washington State Energy Strategy says – Make new buildings all-electric ready.

So Far So Good: Please do not rezone other parts of the city for Heavy Industrial use to allow the larger warehouses to go in there. Truck traffic associated with these 250,000 sq. ft. warehouses should not be on Fruit Valley Road. Reducing parking lot sizes is good; as is clustering HVAC on rooftops.

City Manager communications would be a good time to bring this issue back to Council.

From: [Kennedy, Rebecca](#)
To: [Nischik, Julie](#)
Cc: [Snodgrass, Bryan](#)
Subject: FW: 192nd and 15th St Rezone Proposal
Date: Saturday, October 21, 2023 3:21:37 PM
Attachments: [image003.png](#)

Julie-

Please distribute to the PC.

Note that I already forwarded this to CMO for distribution to Council.

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



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From: Kevin Barron <kdbarron1974@gmail.com>
Sent: Saturday, October 21, 2023 12:01 PM
To: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>; Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>; Anne.McEnerny-Ogle@cityofvancouver.us; City of Vancouver Washington General Info <CityInfo@cityofvancouver.us>
Cc: achen522@gmail.com; Mtsang621@gmail.com; jacobbillingsley92@gmail.com; sweow@gmail.com; DasGupta44@gmail.com; aebarron@yahoo.com
Subject: 192nd and 15th St Rezone Proposal

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Good afternoon,

We, the neighbors of Bennington and Fishers Landing East, hereby petition the Mayor, City Council,

and City Planning Commission, to reject the proposal (PIR 83420) of rezoning the property on the Northwest corner of 192nd Avenue and SE 15th Street, from Urban Low Density to Urban High Density. The proposed zoning change does not meet the Zoning Changes Approval Criteria (VMC 20.285.050) of compatibility and violates the housing goal/policy of the preservation of neighborhood character outlined in the Washington State Legislature Housing Element (WAC 365-396-410).

There are already several high density residential housing options near the proposed development site, five of which are within a one mile radius, and many others that are in the plans of several future projects in the area. It is worth noting that all of the existing and future planned apartment complexes are either directly adjacent to commercially zoned areas or within mixed use zoned areas. The proposed apartment development is surrounded in all four directions by Urban Low Density zoned areas which is not suitable or consistent with precedent for this type of construction.

Additionally, there are several other potential concerns for our community, such as the impact on schools, traffic, noise, and crime, that need to be addressed and accounted for.

We have attached a zip file, containing the signatures of approximately 600 concerned members of our neighborhood.

We respectfully request that you reject any proposal that includes Urban High Density Zoning.

Sincerely,

Kevin D. Barron and the neighbors of Bennington and Fishers Landing East



From: [Michael Chen](#)
To: [Eiken, Chad](#); [Snodgrass, Bryan](#); [Planning Commission](#)
Cc: [Brett Conway](#); [Scott Moore](#)
Subject: Warehouse Code Amendment - Written Comments
Date: Tuesday, October 24, 2023 10:05:00 AM
Attachments: [mackenzie_monogram_rgb_emailsignature2_a986193c-328e-491e-9e12-e13ead8c5181.png](#)
[00LTR-COV Warehouse Code Amendment-Comment Letter-231024.pdf](#)

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Mr. Eiken and Mr. Snodgrass,

Good morning. Attached you find our written comments based on the draft warehouse code amendment dated October 2, 2023.

We look forward to providing our testimony at this evening's Planning Committee meeting.

Best Regards,

Michael Chen

he/him/his

D 206-582-2573 C 206-734-8428

Land Use Planning

Associate Principal

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October 24, 2023

City of Vancouver

Attention: Chad Eiken, Community Development Director and Bryan Snodgrass, Principal Planner
415 W. 6th Street
Vancouver, WA 98660

Re: City of Vancouver Warehouse Code Amendments

Dear Mr. Eiken and Mr. Snodgrass:

Please accept the following letter as our written comments to the proposed warehouse code amendments, specifically City of Vancouver zoning code section 20.89.120 (Warehouses Larger than 250,000 square feet) as outlined in your October 2, 2023, memorandum to the City Council.

20.895.120.C. – Visual Impact. Item #1 and #2. Generally, measures like façade articulation and landscape buffers relate to certain types of roads or adjacent non-industrial zoned areas. No language as it relates to adjacent non-industrial zoned areas is included and the scoping provision for a public street does not provide latitude for an exception for low volume side streets.

20.895.120.C.1 – Architectural elements. The paragraph does not provide guidance for the applicant and the City planners on the “why” of the provisions. Providing guidance on City goals will provide the developer with a stronger framework to provide excellent architecture and landscape design solutions; and provide staff tools to guide its approval process.

20.895.120.C.2 – A sixty-foot-high wall of conifer trees introduces a visual barrier restricting an Owners legitimate desire to provide a site that utilizes Crime Prevention Through Environmental Design (CPTED) concepts (safety/security design measures). A closed off site works against CPTED concepts that aim to reduce victimization, deter offender decisions that precede criminal acts, and build a sense of community among inhabitants so they can gain territorial control of areas, reduce crime, and minimize fear of crime. We recommend consideration of a “street tree “approach (deciduous) trees, low berms and low shrubs which provide visual access into the property for occupant, visitor, and premise safety. In addition, it is in the public’s interest to allow sufficient visual access to the site to allow wayfinding to both autos and trucks seeking to access a particular site. If the frontage is totally obscured by evergreen trees, additional traffic may be added to adjacent streets due to visitors failing at initial approach to recognize and/or access the property promptly.

20.895.120.D.1 – We strongly recommend the City not provide additional solar panel language or requirements. The State Building Code - current version 2018 and the soon to be adopted 2021 version - have strong and very detailed Renewable Energy provisions. Refer to Section C411. The language provided in the state Code is detailed and beyond what has been provided in the memorandum. Adopting this language would add unnecessary confusion to this issue.

20.895.120.D.2 – We strongly recommend the City not provide additional skylight/clerestory window language or requirements. The State Building Code - current version 2018 - has provided a strong framework for this climate measure and is maintained in the soon to be adopted 2021 version. It is a strong and very detailed daylighting provision. Refer to WAC 51-11C-40232, Section C402.4.2 Minimum skylight fenestration area. The language provided in the State Code is detailed and beyond what has been provided in the memorandum. Adopting this language would add unnecessary confusion to this issue.



20.895.120.D.4 – How will engine idling be enforced? How would this provision be addressed within the Site Plan Review process?

20.895.120.D.5 – The technology for charging electric powered trucks is changing rapidly. The electrical load/demand is significant. This requirement places a huge financial burden on the developer of new warehouses for technology that may be outdated or not even used by future tenants. Additionally, the electrical utility company may not be able to meet the power demands of this requirement.

20.895.120.D.6 – EV charging. We strongly recommend the City not provide additional EV Charging language or requirements. The State Building Code - current version 2018 - has provided a mild framework for EV Vehicle charging infrastructure and the requirements are significantly increased in the soon to be adopted 2021 version. It is strong and configured into three tiers: 10% EV charging stations, 10% EV-Ready spaces, and 10% EV-Capable spaces. Refer to WAC 51-50-0429 Section 429—Electric vehicle charging infrastructure. The language provided is beyond what has been provided in this memorandum. Adopting this language would add unnecessary conflicting language to this issue.

We look forward to providing verbal testimony at the October 24, 2023, Planning Commission meeting.

Sincerely,



Brett Conway
Associate Principal



Michael Chen
Associate Principal

From: [Heidi Cody](#)
To: [Planning Commission](#); [Eiken, Chad](#)
Cc: [Small, Rebecca](#); [Dalgaard, Stacey](#); [Lande, Aaron](#); [McEnery-Ogle, Anne](#); [Holmes, Eric](#); [Stober, Ty](#); [Fox, Sarah](#); [Harless, Kim](#); [Perez, Diana](#); [Hansen, Bart](#); [Paulsen, Erik](#); [Cathryn Chudy](#)
Subject: ACE letter to Planning Commission re: Warehouse Moratorium Code Changes
Date: Tuesday, October 24, 2023 11:26:50 AM
Attachments: [ACE City Warehouse Code changes response.pdf](#)

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Hello Chair Ledelll, Planning Commission, Chad Eiken and everyone else,

Attached please find a letter from Alliance for Community Engagement to the Planning Commission about the City's Draft Warehouse Moratorium. Please feel free to contact us if you have any questions.

Thank you for your work.

Sincerely, Heidi Cody and Cathryn Chudy

--

Coalition Manager
Alliance for Community Engagement

October 24, 2023

Alliance for Community Engagement (ACE)

City of Vancouver Planning Commission

Dear Chair Ledell and Planning Commission,

Thank you for your ongoing work with the Warehouse Moratorium. Alliance for Community Engagement submitted a list of concerns and questions about the Draft Warehouse Moratorium to the Planning Commission and the Community Development Team. Yesterday we received a memo from Chad Eiken addressing ACE's concerns and the Port of Vancouver's concerns. While ACE still has concerns, we appreciate being allowed to comment on this important policy, and thank the Community Development Department for communicating with us about it.

ACE is concerned that this Warehouse Moratorium is a missed opportunity to meaningfully reduce greenhouse gas emissions in keeping with our ambitious Climate Action Framework goals.

The threshold of 250,000 square feet for considering warehouse code changes has had a determinative effect for all warehouses under that threshold. We find it problematic that a 249,999 sq. ft. warehouse or smaller simply has no climate expectations to meet, considering that the City has a city-wide carbon-neutrality goal of 2040.

We understand the Green Building/Policies Standards don't yet exist. But delaying climate measures for all warehouses under 250,000 sq. ft. until the Green Buildings Standards are established creates a policy gap that misses a decisive moment to curb greenhouse gas emissions. The same is true for the current lack of requirements that heat pumps be used exclusively for space and water heating in warehouses.

The Community Development Staff responded in its Oct. 23 memo that they were not proposing climate requirements for warehouses under 250,000 sq feet in order to be consistent with the Moratorium. However, the Moratorium is not the only City Council directive. City Council policies go beyond warehouses, and the goal of those policies is to aggressively reduce emissions community-wide by 2030. In the Council meeting on Oct 23, Council expressed concern about the lack of data visualization that shows where the City is at currently in reducing emissions, versus where the City should be at to meet impending emissions reduction goals. Council also asked for a continued sense of urgency about those deadlines.

ACE suggests that the Planning Commission recommend that new buildings should NOT generate greenhouse gas emissions. The City's goal is to reduce emissions.

ACE also recommends that the Planning Commission revise the warehouse size threshold and apply it to *groups of buildings that exceed 250,000 sq. ft. in a single development application*. Otherwise warehouse developers are likely to use this loophole to avoid climate measures the City should implement.

Questions about the data:

ACE wonders what data City planning staff used to make their recommendations. For example, is there any evidence that planting trees elsewhere actually offsets the environmental impacts of lots of pavement, truck traffic and a very large building? A cluster of small buildings would produce even more pollutants and heat mass than one mega building, as more concrete and steel would be used in construction.

Similarly, was any environmental analysis done of the impacts of a 250,000 sq. ft. warehouse, compared to a slightly smaller one (or a cluster of smaller ones, or of locating more heavy industry in an existing IH zone compared to spreading IH out across the city. If not, what justifies this arbitrary 250,000 sq. ft. cutoff?

Other concerns:

- Solar cells on warehouse roofs would shade the buildings, thereby reducing heat and cooling energy costs.
- All tree plantings required of the largest warehouses should be located on site.
- Neither the site plan review process (Type II Action) nor the SEPA review process offer nearly as much public engagement process as Conditional Use Permitting would.

Thank you for:

- The requirement for EV conduit/wiring and double-paned clerestory windows.
- Maintaining Fruit Valley Road Neighborhood as a high priority equity area, and naming Fruit Valley Road as a freight corridor that does not need more truck traffic.
- Banning idling for non-electric truck engines.
- Not rezoning parts of the City to Heavy Industrial to accommodate the largest warehouses.
- Maintaining a 25 ft. tree buffer on the largest warehouses

Lack of clarity:

ACE is looking for clarification on if/how climate measures can/will be applied to new warehouses after these code changes pass with this Warehouse Moratorium.

- Will there be Interim Green Building/Policies Standards applied for warehouses smaller than 250,000 sq. ft.?
- Is there a meaningful distinction between the land use policy permits and building permits? How do these permit processes affect new warehouses?

As the City continues to implement new policies, every effort should be made to incorporate actions that reflect the urgency of achieving emissions reductions to meet the goals and deadlines established by the Climate Action Framework. Tonight the Planning Commission's question to itself should be: are your recommendations to Council consistent with the Council's policy goal of reducing emissions? The current draft Warehouse Moratorium seems to be a missed opportunity to operationalize our Climate Action Framework. Thank you for your consideration, and for your work.

Sincerely,
Alliance for Community Engagement (ACE)

From: [Chris Erickson](#)
To: [Planning Commission](#)
Subject: Comments on Zoning Map Changes
Date: Tuesday, October 24, 2023 11:41:05 AM

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I wholeheartedly support the four Comprehensive Plan and zoning map designation change requests as outlined in the Fall 2023 presentation, particularly the 192nd Ave/15th St site. Everyone knows we're in a housing crisis and upzoning a small site like this is but one step towards solving the problem. Quite frankly, I'm disappointed that this is not a mixed use development. We know that suburban sprawl has killed our cities and continuing to build residential-only development is asinine. I'm also disappointed that Vance Development decreased the upzone from R-30 to R-22. If the development must be residential only, then it should be as dense as possible. Caving to a few loud detractors is unacceptable. Their selfishness is only surpassed by their hypocrisy. They [say](#) that they are "sympathetic" to the housing crisis and "want to help the city reach its goal of getting denser housing". Just not here. Not in *their* backyard. (Sidenote: This development barely affects the surrounding homes as the traffic studies have shown a negligible increase in traffic on surrounding streets, the site is insular meaning residents will not travel through the adjacent neighborhoods to reach their complex, and the buildings themselves would be a *whopping* 2-3 stories poking up behind their fences. Boo-hoo.) No doubt these critics, including one Andrew Chen, will be present at the community meeting to air their grievances. I suspect they will bring up the same tired, unfounded arguments that always get brought up in these situations. Do not let a few disgruntled (and in my opinion, entitled) residents get in the way of progress. I'd love to see this site be denser and include mixed uses. But if it must be residential only, the denser the better. At the end of the day, R-22 is better than a vacant lot. I urge the Planning Commission to support the zoning changes and send their recommendations to the City Council. We can create a livable, vibrant city, and every site, no matter how small, helps us achieve these goals.

Chris Erickson
Vancouver Resident

From: [Bev & Ken Tyler](#)
To: [Planning Commission](#)
Subject: Fircrest Neighborhood Association Statement re: SEPA
Date: Monday, October 23, 2023 7:50:20 PM
Attachments: [SEPA Statement - Final FNA Version.docx \(1\).pdf](#)

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My name is Beverly Tyler. I serve as Fircrest Neighborhood Association Development Chair. In June of 2023, Fircrest Neighborhood Association wrote a membership statement regarding loosing" SEPA usage. I have attached a copy of the statement for your reference and will also be presenting the material virtually on behalf of FNA.

Beverly Tyler
1403 NE 131st Ave
Vancouver, Wa 98684
Ph: 360-256-3417

**FIRCREST NEIGHBORHOOD ASSOCIATION’S STATEMENT RE:
PROPOSED SEPA THRESHOLD CHANGES**

The Fircrest Neighborhood Association met on June 6, 2023, to discuss the proposal to adopt loosened state environmental regulations for new residential developments.

The Fircrest Neighborhood Association understands the need for increased housing in the City of Vancouver and recognizes that these changes would increase the construction of single- and multi-family housing projects.

However, one role of government is to balance competing goals, and the goals that are supported by the SEPA process are important.

The State Environmental Policy Act known as SEPA has been around since 1971. The SEPA process helps cities analyze the environmental impacts of proposed construction projects while (1) protecting environmental impacts on floodplains, wetlands, trees, archeology and water and (2) mitigating impacts from traffic and surface run-off. These issues can affect other residents in the area.

The SEPA process acts as a safeguard, providing another “**pair of eyes**” to ensure our environmental and archeological treasures are preserved. SEPA offers an explicit “**guideline**” for environmental protection as well as providing an important process to appeal decisions. Changing the thresholds, especially the multi-family housing threshold from 20 units to 200, increases the probability that environmental and archeological issues will be overlooked, resulting in damages in the very areas that SEPA is intending to protect. It is also very concerning that there would be **no opportunity to appeal decisions in order to address SEPA-related concerns**.

The memo presented by the City Manager states that developments under 200 units rarely have issues arise through the SEPA process, but “rarely” indicates that there have in fact been instances when the SEPA process has discovered problems and led to mitigation measures.

The Fircrest Neighborhood Association (FNA) has consistently advocated for the environment and supported Vancouver’s rich culture of caring for the natural resources around us. The City of Vancouver has shown time and time again the value it places on green spaces and the environment. Loosening the state environmental regulations tilts the balance too much toward development and away from protecting the environment. It would be sad and concerning to see the City of Vancouver shift away from its own principles of environmental sustainability and the value it places on “parks, green spaces, and other natural systems” (December, 2022 Climate Action Framework).

Votes in favor - 14

+ 2 who had to leave the meeting early before all the revising/editing was done.

Votes opposed - 0

+1 who had to leave the meeting early before all revising/editing was done.

Reasons for opposition: Concerns about limited housing in the city and the resulting high cost of housing

Abstained - 0

From: [Kennedy, Rebecca](#)
To: [Nischik, Julie](#)
Subject: FW: No Re-zone @15th and 192nd.
Date: Tuesday, October 24, 2023 11:17:21 AM
Attachments: [image003.png](#)

Please forward to PC. 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



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OUR FUTURE 2045

Learn more about [Our Vancouver](#): an effort to update our City's plan for growth and development over the next 20 years.

From: Deej H <deej.harriman@gmail.com>
Sent: Tuesday, October 24, 2023 11:06 AM
To: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>; Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>; Anne.McEnery-Ogle@cityofvancouver.us; City of Vancouver Washington General Info <CityInfo@cityofvancouver.us>
Subject: No Re-zone @15th and 192nd.

Some people who received this message don't often get email from deej.harriman@gmail.com. [Learn why this is important](#)

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Good Morning,

I just wanted to add my 2 cents about the rezone. **Not if favor**

The planned development location is already close to a number of high density residential housing alternatives, all located within a mile of each other, or are planned to be available in nearby planned developments (near the transit center and behind Banfield Corporate). It is important to note that every residential complex, both planned and existing, is located inside mixed-use zones or immediately next to commercial zones. The planned apartment complex is encircled by Urban Low Density designated zones on all four sides, which is inappropriate and inconsistent with previous

construction precedents for this kind of building.

In addition, there are a number of other possible issues that our community may be concerned about, such as the effect on schools, traffic, noise, and crime, all of which need to be taken into consideration. Our teachers just got through a strike, I see adding this and the number of students that come with it (approx. 90) as a burden to an already fragile ecosystem.

The traffic study alone calls a need for change to 15th that would be needed with the high density flow off of 15th. As of right now the only other place that does that is off of 192 and 20th and that has 2 lanes of traffic allowing for a better flow. 15th is a single lane through-way that already has backups because of the timing of lights at 15th and 192nd.

Lastly, I would be concerned for our local station and police force having to take on additional services potentially increasing the response call time for our local neighborhoods.

Thank you,
DJ Harriman

From: [Don Steinke](#)
To: [Planning Commission](#); [Nischik, Julie](#)
Cc: [Heidi Cody WCA](#); [Cathryn Chudy](#); [Sean Denniston](#)
Subject: Planning Commission agenda items, Oct 24, 2023
Date: Tuesday, October 24, 2023 10:35:42 AM

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I would like to speak tonight and provide written comments now.

From Don Steinke -- Climate Action of Southwest Washington, member of ACE

To the planning Commission at the City of Vancouver, and staff
Re Beyond the warehouse moratorium . . . to Vancouver's emissions reduction goals.

Hello Chair Ledell, Commission, and staff,

I was very impressed by staff for bringing forward the warehouse moratorium proposal about 10 months ago and yesterday, I was very impressed with the staff progress report on the Climate Action Framework at the Council workshop.

But then . . . 2 council members said, our first benchmark is to reduce emissions 80% in city operations by 2025. Could we have an interim report on progress toward that goal? And the next benchmark is to reduce emissions 80% community wide by 2030. Another expressed eagerness to do more, faster, because the clock was ticking. I heard no dissent about that point.

Therefore, I'm concerned, and ACE is concerned that by focusing only on warehouses that exceed 250,000 sq feet, we are missing an opportunity and we are guaranteeing that emissions will increase instead of decrease. This is true not only regarding the warehouses, but for zone changes for the multifamily developments on the agenda tonight.

For every proposal, the questions that should be asked are, *Will this development be consistent with the City's Climate Action Policy Goals? Will this development increase emissions and what can be done to eliminate them?*

Our state goal for reducing emissions is very ambitious, but Vancouver's goal is more ambitious. Therefore, we need to go beyond state implementation policies.

All new construction should be all-electric ready, solar ready, and EV ready and exceed state energy efficiency standards. More on that in my written comments.

For fifty years, we've been funding energy efficiency upgrades for homes. The PUD and the County worry every year if Congress will approve the Low-income heating assistance program, commonly called LiHeap, for another two years. It's a lot cheaper to maximize efficiency at the beginning.

We need solar, because the law requires Clark PUD to provide for demand, and the PUD will purchase polluting energy on the market if they need to and they need to do that the most in the summer, according to their latest power supply workshop.

25 years ago, every proposal that came before the planning commission was met with the question, does this proposal comply with the Puget Sound Stormwater Manual? Now, for every proposal ask: *Will this development be consistent with the City's Climate Policy Goals? Will this development*

increase emissions and what can be done to eliminate them?

And do not accept renewable energy credits as substitutes. They rarely generate new clean energy investments.

Staff is planning to conduct a greenhouse gas inventory soon. Every inventory for the rest of this decade will show an increase if we continue to allow the more obvious burning of fossil fuel to increase.

Even more so if the embodied emissions from concrete and steel are included in the inventory.

Yes, the task is daunting, but we can do better.

Not only should the buildings be solar ready, they should install solar either on site or within close proximity. The City of San Jose hired Sean Denniston cc'd of America's Vancouver as their consultant for their Climate Action Plan.

Their draft plan 3-4 year's ago added a great deal of nuance to the solar and EV charging requirements. If a building wasn't suitable, solar could be added in a defined zone near the building and the number of charging plugs varied depending on the type of development.

The PAE building in downtown Portland produces more electricity in a year than it consumes.

Don Steinke

From: ssilvey643@aol.com
To: [Planning Commission](#)
Subject: Planning commission meeting
Date: Tuesday, October 24, 2023 7:23:54 AM

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.

Sirs

The following are some comment from reviewing your Fall 2023 comprehensive plan.....

It appears that in most of these projects, the impact on parking, density are affected, and the excuse of state mandate is used too much.

192nd Ave

The question to ask is parking which tends to be limited in any project built currently. Example abound within the city over the recent years, yet the city continues on their quest of no parking spots or 1/2 space per unit, which then impacts the old neighborhoods as the overflow goes there. The concept drawings do not in many case ever match what is built, as has been demonstrated many time, most recently on 18th St.

They mention jobs in the area, what is area, 3 miles, 6 miles, and 20 miles? Area these jobs paying enough to support rent at least then 30% of take home, or is more like 50 to 60 % of take home, thus increasing likely hood that there are 2 to 3 workers per unit, thus requiring more transport and parking.

While a state law may require something is it feasible? Is it practical and where is the study, data, research to show this. To state that one must do something because some pie in the sky person believes it is not a reason. One must be honest in the fact that should they wish to increase housing then the Projects are next, meaning, like Chicago, ST Louis, East Berlin, and other area, 20- **30** story tenement buildings, on the bus line, or tram line. But given the fact that industrial jobs are not here due to code changes, elimination of supplies, etc.: where is it that these people work, what is it that they do?

The other question with all these buildings is the water run-off calculated and system capable of handling it? As recently explained to me there seems to be a double taxation for property owners, and issues that come up.

Wood Duck springs...

Is the wetlands designation to stay, seems that in the past the city planners have turned a blind eye to fill in on some areas and then allowed building of houses, and

this resulted in agriculture to drill new wells as the building project pumped out water to a level to allowing piping to go in, lowering intake of existing well pumps.

Miller Map change:

When state that public services reviewed traffic, are these the same folks whom when questioned about a flaw in a traffic study told the judge it didn't matter. That allowing only one exit on a narrow street, for over 200 homes to escape in case of emergency, such as fire in the remaining wetlands and now homeless camps hiding in them.

The lack of parking and no city ordinance for tenets that they may not have a car exists, where do they park, again with cutting back on space, and not dealing with reality creates real world issues.

Date park:

54 housing units and only 44 parking spots, and power point map shows on street parking currently in photo, so only .75 cars per unit, and these folks work where? Earn how much?

Other comments:

Changing codes is all find and well, but how about following the rules currently and in past. Having recently been involved in a repair, remediation project for the community I live in I find it amazing that one must get permits yet the city did nothing to enforce code, in the past, and follow rules and regs, yet the current owners must now pay. Further that one would expect that if you received the permit which states land size, distances etc that they would be accurate since in fact they have the city stamp, yet they are not.

So if past practice is any indication of what goes on it is a sad day for this city, as they continue to use excuses to justify their existence, rules and changes, yet allow the politicians to make unfounded decisions which shall affect all quality of life, and lower the quality of neighborhoods within the city.

TA

Steven Silvey

Vancouver, WA

From: [Corinna Dollar](#)
To: [Planning Commission](#)
Subject: Public comment regarding planned rezone of 192nd Ave.
Date: Sunday, October 22, 2023 11:00:06 AM
Attachments: [image.png](#)
[image.png](#)

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

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.

Greetings,

We are residents of 18915 S.E. 12th Way and will be directly affected by the proposed rezone of the 192nd Ave. property that will be discussed at the Planning Commission Meeting on October 24th.

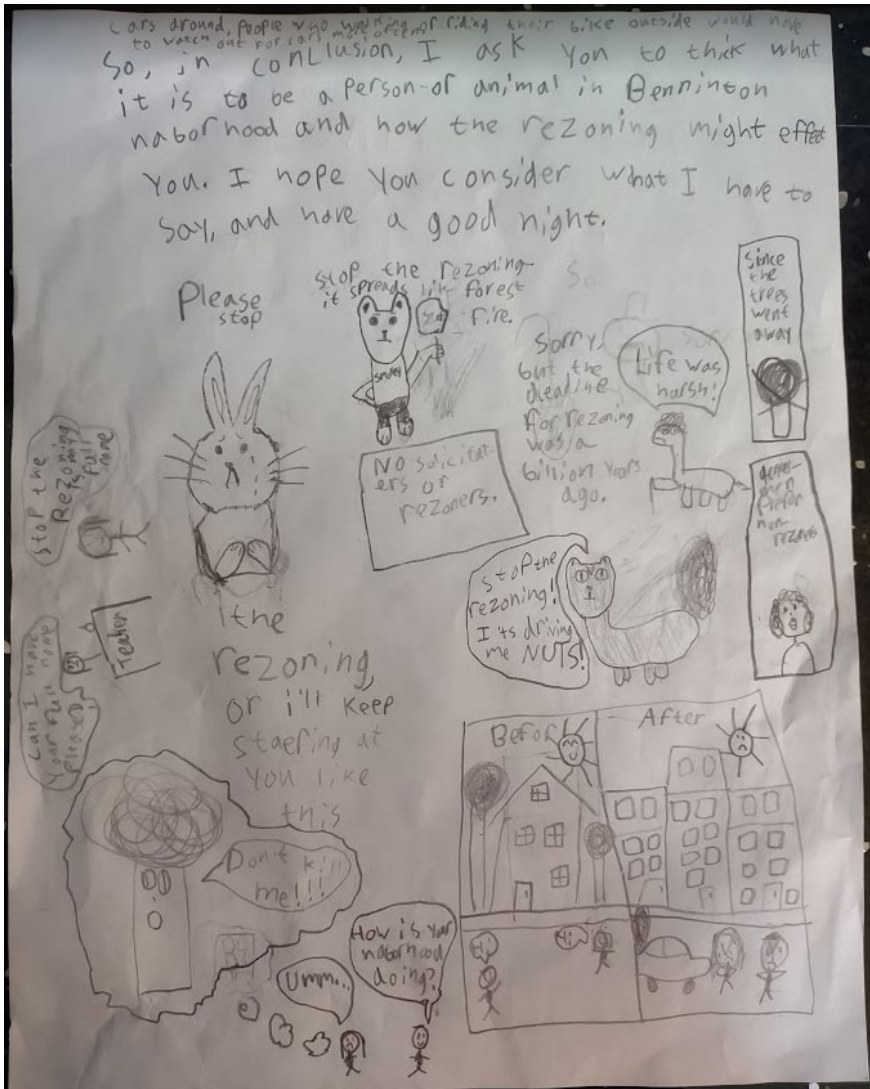
Our backyard faces the property in question, and would be greatly impacted by the proposed rezone for apartments, with a loss of trees, wildlife, and the addition of a 2-3 story building looking directly into our yard.

Our 11 year old daughter prepared comments she wanted to present at the upcoming meeting, but as we cannot attend on the 24th we offer them here:

Hi. My name is Mera, and I believe we should Not rezone.

One reason is for the animals sake. Birds and squirrels need ^{all} trees to build their nests and rabbits need ^{of} bushes to hide in. If there are future plans to remove most of these ^{it} would take a while for those animals to find ^{new} home. A backyard without animals wouldn't be a very happy place to be in. And if most of the trees were removed it wouldn't be a very good view, either.

If there are 296 apartments, that means that there would be a lot of noise, people, cars, motion and maybe even a few fights! Bennington, a peaceful, quiet neighborhood, would turn into a loud, busy place. People who live there would want to move out, and no one would want to move in. The houses would become cheaper and cheaper until they would be so cheap, landlords might lose money, and the city would have to tear them down. And if there are more



Thank you for your consideration.

Corinna Dollar
18915 SE 12th Way
Vancouver, WA 98683
(206) 496-8522

Timothy Dunton
2114 Main St., #196
Vancouver, WA 98660

October 17, 2023

Planning Commission Vancouver, WA,

I urge you NOT TO APPROVE the rezoning application that has been submitted for the properties at 3607, 3701, 3701 ½ E. 18th St., 98661.

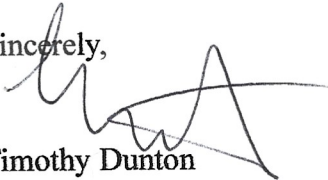
The neighborhood does not need any more low- income housing. VC 20.870.010 prohibits a disproportionate burden to fall on one area. While 54 units are proposed, we all know that 54 people may be housed, but another 54 (or more) will be hanging around the neighborhood. That's the way it works, and we've all seen it long enough to know that's the truth. The small park just adjacent to these properties is already filled with homeless people and evidence of drug use, such that the children living on 17th and 18th streets can't even use the park to play.

I have owned many units on E. 18th for many years. I have seen the area improved dramatically and do not want to see it go back to how it was, with homeless people wandering around and and higher crime rate.

Another homeless community in this high crime neighborhood is very unfair to residents in the smaller apartment buildings and single family homes who are trying to live in peace!

Our neighborhood has done its time, do not approve the rezone from R18 to R30!

Sincerely,


Timothy Dunton

October 24, 2023

VIA EMAIL ONLY

City of Vancouver Planning Commission
Attn: Chair Ledell
City Hall
415 W. 6th Street
Vancouver WA 98660

Email: PlanningCommission@cityofvancouver.us

Re: **192nd Avenue Comprehensive Plan and Zoning Map Changes**
Our File No. 54595-81718

Dear Chair Ledell and Planning Commissioners:

Jordan Ramis PC represents Gary Vance, the applicant for the 192nd Avenue Comprehensive Plan and Zoning Map changes. This proposal to rezone the current site from R-6 to R-22 will facilitate the creation of much needed market-rate and affordable housing. Importantly, the proposal fully conforms to all applicable requirements contained in state and local law, including those contained in the Vancouver Municipal Code, the Vancouver Comprehensive Plan, the draft Housing Action Plan, the Vancouver Action Plan, the Revised Code of Washington, and the Washington Administrative Code. The Project Summary, as part of the applicant's submission, is included in the staff report for the October 23, 2023 Planning Commission meeting and fully details this compliance. Additionally, city staff fully concur with this analysis and fully support the project.

Project opponents have raised issues concerning compliance with Vancouver Municipal Code 20.285.050 and Washington Administrative Code 365-196-410. This memo reviews the code sections in question and details how the project fully conforms with the above.

1. Per Vancouver Municipal Code 20.285.050, the Proposed R-22 Zoning is More Consistent with the Vancouver's Long-Range Planning than the Existing R-6 Zoning

Project opponents contend that the proposal is not consistent with VMC 20.285.050, which establishes the approval criteria for comprehensive plan amendment and zone changes. Importantly, they do not point to any particular subsection, but rather the approval criteria as a whole. However, as reviewed below, the proposal is fully aligned with the applicable approval criteria.

The proposed R-22 zoning allows for appropriate residential density in a fully urbanized community that currently lacks a variety of housing options available for Vancouver residents at all spectrums of the economic ladder. The addition of denser housing in the neighborhood would help address recent studies that show a significant housing deficit across Clark County and within the City of Vancouver. The proposal will help introduce a housing type not broadly available in the immediate area and will

provide a combination of market rate rental units and covenanted affordable units, which serve broader economic segments of the population. Further, the request is consistent with actions outlined in the city's Housing Strategies, which the City Council reviewed in July of 2022 and specifically included recommendations for upzoning near important transit corridors in order to ensure new housing is interconnected into the transportation network.

The proposal is consistent with the Community Development, Housing, and Public Facilities elements of the Comprehensive Plan in that it facilitates dense residential development in an urban area with adequate public services, including utilities, and is adjacent to employment and personal services such as grocery, restaurant, and leisure. Development of the site is expected to include the completion of frontage improvements, including the construction of bicycle lanes and the addition of sidewalks on SE 15th Street, which will improve multi-modal connectivity throughout the neighborhood. As reflected in the revised transportation analysis that is included in the applicant submittal, the eastbound left-turn queues at SE 192nd Avenue and SE 15th Street are expected to exceed the storage length currently provided on the roadway and, as such, the applicant anticipates that an extension of this turn lane will be required at the time of site redevelopment. Additionally, the incorporation of specific site development compatibility considerations including enhanced landscaping, substantial open space, the preservation of existing mature trees, and limited building heights, will facilitate elegant integration with the existing neighborhood.

Specifically, in order to ensure the smooth integration of a future project into the existing build environment, and to minimize potential impact, the applicant is unilaterally proposing to adhere to the following design standards:

- Buildings adjacent to the west and north property lines will be setback at least 35 feet from the property line and will be limited to two stories.
- Buildings adjacent to SE 15th Street and SE 192nd Avenue will be limited to three stories.
- Any three-story building will be setback at least 120 feet from the north and west property line; and
- The site will include a 20-foot-wide landscape buffer in excess of setback requirements along the north and west property lines that will consist of existing mature trees and other natural features.

In sum, these standards will further enhance the built environment and the proposal will bring critically needed market-rate and affordable housing to the City of Vancouver. As discussed above and fully detailed in the applicant's submittal documents, the proposal fully conforms with Vancouver Municipal Code 20.285.050 and the rezone will better meet the intent of the city's Comprehensive Plan and associated documents than the existing R-6 zoning.

2. The Proposal is Consistent with the Requirements of Washington Administrative Code 365-196-410

Project opponents contend that the proposal is not consistent with WAC 365-196-410, which establishes the requirements the city must follow when implementing the housing element section of

its Comprehensive Plan. Again, project opponents do not point to any particular subsection, but rather the approval criteria as a whole. Despite this, WAC 365-196-410 is applicable to jurisdictions, not individual projects. As such, it is not applicable to the proposal itself.

Subsection 410 requires cities and counties to develop a housing element that includes: 1) An inventory and analysis of existing and projected housing needs; 2) A statement of the goals, policies, and objectives for the preservation, improvement, and development of housing, including single-family residences; 3) Identification of sufficient land for housing including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, group homes and foster care facilities; and 4) Adequate provisions for existing and projected housing needs of all economic segments of the community. Importantly, there is no evidence on the record that indicates the city has failed to properly implement its housing element. Additionally, if the project opponents wish to attack the underlying housing element, doing so in a collateral manner by attacking the proposal is not the appropriate forum.

Regardless of the above and read in the most generous light, project opponents argue that the proposal does not conform with the city's housing element. As discussed above and fully detailed in the applicant's submittal documents, the proposal fully conforms with the housing element. Importantly, housing production in the city and county as a whole, is not keeping pace with population growth, which is resulting in a housing supply deficit.

In a Housing Strategies Workshop presentation prepared by city staff and delivered to City Council in July of 2022, staff detailed how housing production has not kept up with growth and demand for housing. According to this analysis, the city had a housing deficit of 5,670 units. Staff estimated that the city would need to produce at least 2,500 housing units annually in order to keep pace with population projections and eliminate the housing deficit within a 10 year period.

In order to facilitate the creation of these units, staff identified a number of key strategies including the upzoning of land near high quality transportation corridors. The applicant's proposal seeks to implement this strategy by utilizing an existing regulatory process (annual comprehensive plan amendment and concurrent zone change) to upzone a site from R-6, a low-density residential zone with a net density range of 4.5 to 5.8 units per acre, to R-22, a high-density residential zone with a net density range of 18.1 - 22 units per acre. In doing so, the proposal implements the city's recommended strategy and facilitates the creation of needed market-rate and covenanted affordable housings.

If approved, the proposal would provide an opportunity to infuse the housing market with up to 223 dwelling units, a potential net increase of as many as 166 units over the existing zoning. It would also likely result in development of apartments, a housing type that is not widely available in this area. Market rate units will have a lower monthly rental rate compared to single family detached units in the area thus the proposal will help provide enhanced housing options to a wider range of income levels. Additionally, the applicant has unilaterally committed to lease 5% of the future housing units to those making no more than 80% of area median income. In doing so, the proposal would facilitate the creation of covenanted affordable units, which is a key goal of the city's housing element.

3. The Proposal Meets All of the Applicable Criteria Contained in the Comprehensive Plan and Strategic Plan

As reviewed in detail in the applicant’s submission material, the proposal addresses and complies with all applicable criteria contained in the city’s Comprehensive Plan and Strategic Plan. A review of the relevant standards is provided below.

Chapter 1, Community Development	
CD-1 Citywide land supplies. Establish land supplies and density allowances that are sufficient to accommodate adopted long-term City of Vancouver population and employment forecast allocations.	The proposal increases available capacity along a well established corridor, ensuring that Vancouver can accommodate needed housing.
CD-2 Efficient development patterns. Encourage efficient development throughout Vancouver to ensure achievement of average density of 8 units per acre set by countywide planning policies. Encourage higher density and more intense development in areas that are more extensively served by facilities, particularly transportation and transit services.	The proposal meets the minimum density requirement and places higher density along a corridor with ample access to public facilities, including transportation systems. The proposal will facilitate the development of a project that will provide enhanced offsite transportation improvements, ensuring the smooth flow of traffic around the project site.
CD-3 Infill and redevelopment. Where compatible with surrounding uses, efficiently use urban land by facilitating infill of undeveloped properties, and redevelopment of underutilized and developed properties. Allow for conversion of single to multi-family housing where designed to be compatible with surrounding uses.	The proposal increases housing opportunity via redevelopment along a corridor characterized by multifamily and commercial development. A future project will provide enhanced setbacks and reduced building in height in order to fully integrate into the surrounding community.
CD-6 Neighborhood livability. Maintain and facilitate development of stable, multi-use neighborhoods that contain a compatible mix of housing, jobs, stores, and open and public spaces in a well planned, safe pedestrian environment.	The proposal will introduce a much needed housing typology into the existing neighborhood, while ensuring that compatibility is maximized. The size of the project site is such that it can be effectively planned to minimize impacts while enhancing circulation and the pedestrian environment.

<p>CD-9 Compatible uses. Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.</p>	<p>The proposal will facilitate the development of low-scale multifamily housing that fully compatible with the surrounding single-family and commercial uses. The future project will provide enhanced setbacks to ensure appropriate spacing between these uses and the new housing.</p>
<p>CD-10 Complementary uses. Locate complementary land uses near one another to maximize opportunities for people</p>	<p>The proposal will appropriately site residential uses next to existing residential uses with higher density located along a key corridor to facilitate a smooth transportation network.</p>
<p>Chapter 3, Housing</p>	
<p>H-1 Housing options. Provide for a range of housing types and densities for all economic segments of the population. Encourage equal and fair access to housing for renters and homeowners.</p>	<p>The proposal will enhance housing options by facilitating the creation of new market-rate and covenanted affordable rental units.</p>
<p>H-4 Innovative zoning. Encourage innovative housing policies that provide for affordable housing and maintain neighborhood character.</p>	<p>The proposal will facilitate much needed housing (both market-rate and covenanted affordable) in order to address the city’s housing deficit and support Vancouver residents.</p>
<p>H-5 Housing placement near services and centers. Facilitate siting of higher density housing near public transportation facilities and in designated centers and corridors.</p>	<p>The proposal will appropriately upzone along an established transportation corridor, which will ensure that people and goods can easily traverse to and from the project site.</p>
<p>Chapter 5, Public Facilities and Services</p>	
<p>PFS-1 Service availability. Consider water, sewer, police, transportation, fire, schools, storm water management, and parks as necessary facilities and services. Ensure that facilities are sufficient to support planned development.</p>	<p>The proposal documents includes a transportation study that demonstrates there is sufficient transportation infrastructure to accommodate a future project. The future project will include an onsite stormwater management system to fully address stormwater. As part of the development, the applicant will receive all necessary approval and pay all necessary fees to ensure that the project fully mitigates any impacts related to sewer, police, fire, schools, and parks. No construction will occur absent these approvals.</p>

<p>PFS-2 Service standards. Establish service standards or planning assumptions for estimating needed public facilities, based on service capabilities, local land use designations and nationally recognized standards. Use LOS standards to encourage growth in designated centers and corridors.</p>	<p>The proposal is sited along an existing corridor, ensuring that people and goods can smoothly traverse to and from the project site.</p>
<p>PFS-4 Transportation system. Develop and maintain an interconnected and overlapping transportation system grid of pedestrian walkways, bicycle facilities, roadways for automobiles and freight, transit and high-capacity transit service. Include support programs such as traffic operations, transportation demand management, neighborhood traffic management, and the regional trails program. Work towards completing and sustaining individual components and programs to ensure success of the entire system.</p>	<p>The proposal will facilitate a future project that will likely include offsite transportation improvements that will help complete the city’s transportation network.</p>
<p>Strategic Plan</p>	
<p>Goal 1, Objective 1.1. Develop and maintain a safe, balanced and innovative transportation system that will meet the needs of future generations.</p>	<p>The city’s existing, multi-modal transportation system can support the requested proposal. Future site development will yield additional roadway improvements along SE 15th Street.</p>
<p>Goal 6, Objective 6.1. Support a strong, active neighborhood program that enhances livability and community connections</p>	<p>The proposal will increase housing supply, create diversity in housing options and will provide covenanted affordable housing units in an urban area equipped with services including transportation, utilities, employment, retail, education and recreation.</p>

4. Conclusion

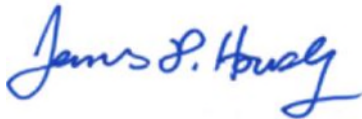
The proposal will provide a new housing typology in the immediate neighborhood including covenanted affordable housing units. These units will help address Vancouver’s housing deficit, and ensure that low-income residents are able to find a place to call home. The proposal will integrate seamlessly into the existing community through the use of enhanced setbacks and open space that includes mature trees, as well as limited building heights near existing single-family homes. The proposal will enhance the transportation network through offsite improvements, helping ease traffic flow.

Chair Ledell and Planning Commissioners
October 24, 2023
Page 7

As discussed above, the proposal is consistent with all applicable local and state criteria. City staff fully agree with this analysis. In response to the proposal, project opponents have not placed any evidence on the record to show that the applicable standards are not met. For these foregoing reasons, we respectfully request that the Planning Commission recommend approval of the proposal.

Very truly yours,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington

cc: Bryan Snodgrass via email Bryan.Snodgrass@cityofvancouver.us

From: [Kennedy, Rebecca](#)
To: [Deej H](#); [Snodgrass, Bryan](#); [City of Vancouver Washington General Info](#); [Pyle, Zachary](#); [City of Vancouver - Office of the City Manager](#); sarah.fox@cityofvancouver.us
Cc: [Nischik, Julie](#)
Subject: RE: No Re-zone @15th and 192nd.
Date: Tuesday, October 24, 2023 9:37:09 PM
Attachments: [image003.png](#)
[image004.png](#)

Thank you DJ, confirming this will be included in the public record for this project, and will be shared with Planning Commission and City Council. 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



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OUR FUTURE 2045

Learn more about [Our Vancouver](#): an effort to update our City's plan for growth and development over the next 20 years.

From: Deej H <deej.harriman@gmail.com>
Sent: Tuesday, October 24, 2023 9:34 PM
To: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>; Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>; City of Vancouver Washington General Info <CityInfo@cityofvancouver.us>; Pyle, Zachary <Zachary.Pyle@cityofvancouver.us>; City of Vancouver - Office of the City Manager <CMO@cityofvancouver.us>; sarah.fox@cityofvancouver.us
Subject: Re: No Re-zone @15th and 192nd.

Some people who received this message don't often get email from deej.harriman@gmail.com. [Learn why this is important](#)

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Thank you for your time, I would like these to be part of the public record and for the proposed developer to follow up.

Follow-up to the 15th Street discussion this evening. I believe a refuse lane should be considered by the developer for the traffic turning out of the Complex before the 192nd stoplight before the left turn holding lane. This will allow residents to exit the complex without having to worry about cross

from the site is not required to use local access streets through lower-density residential zones. ***(this was called out in tonight's public comments with the traffic cutting through WestRidge via 195th from 15th Street).***

Under the current considerations for R-22, this proposed complex doesn't meet any of the considerations under the same municipal code 20.420.025.

Please take these back to Gary Vance of the applicant group Vance Development to address these concerns.

Thank you,
DJ Harriman, PMP

On Tue, Oct 24, 2023 at 11:05 AM Deej H <deej.harriman@gmail.com> wrote:

Good Morning,

I just wanted to add my 2 cents about the rezone. **Not if favor**

The planned development location is already close to a number of high density residential housing alternatives, all located within a mile of each other, or are planned to be available in nearby planned developments (near the transit center and behind Banfield Corporate). It is important to note that every residential complex, both planned and existing, is located inside mixed-use zones or immediately next to commercial zones. The planned apartment complex is encircled by Urban Low Density designated zones on all four sides, which is inappropriate and inconsistent with previous construction precedents for this kind of building.

In addition, there are a number of other possible issues that our community may be concerned about, such as the effect on schools, traffic, noise, and crime, all of which need to be taken into consideration. Our teachers just got through a strike, I see adding this and the number of students that come with it (approx. 90) as a burden to an already fragile ecosystem.

The traffic study alone calls a need for change to 15th that would be needed with the high density flow off of 15th. As of right now the only other place that does that is off of 192 and 20th and that has 2 lanes of traffic allowing for a better flow. 15th is a single lane through-way that already has backups because of the timing of lights at 15th and 192nd.

Lastly, I would be concerned for our local station and police force having to take on additional services potentially increasing the response call time for our local neighborhoods.

Thank you,
DJ Harriman