

From: [Anne Dunlavy](#)
To: [Alvarez, Jose](#)
Subject: Planned development of 152nd Avenue Property
Date: Tuesday, September 17, 2019 4:55:32 PM

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Greetings,

I am unable to make the meeting tonight, so I'd like to express some concerns regarding the proposed development. I am not averse to low density housing, but the 'commercial development' portion concerns me.

I am very close to 152nd Ave/, and do not want to see commercial development in the area that might have 24 hour service, lots of neon lighting [like 7-11], or other businesses that would disrupt the peace I currently find in this area.

I also am concerned regarding possible haz/mat conditions that a gas station, dry cleaners, or other business that relies on chemicals or explosive materials. Certainly such businesses do not belong in a semi-rural area, especially since they are not difficult to access from this area.

Lastly, I've heard rumors of widening streets to accommodate additional traffic. I was in law enforcement for 27 years, and found the actual reality of more lanes was that everyone drove faster. My observations of 152nd Ave do not indicate additional traffic lanes are needed - at most a center turn lane would address any backup.

I'm sure if a business component is required, businesses that would not affect current residents could be identified. And I do believe the existing commercial property on Padden Parkway, which is mostly empty, should be filled before any additional business areas are added.

I do understand the need for homes, but reasoned planning is critical. Hopefully that will be the case for this area.

Thank you for your time. If you have any information that would address any of the identified concerns I would very much appreciate your response.

Sincerely,

Anne Dunlavy
15213 NE 107th ST
Vancouver

From: [Orjiako, Oliver](#)
To: [Albrecht, Gary](#); [Alvarez, Jose](#); [Anderson, Colete](#); [Hermen, Matt](#); [Kamp, Jacqueline](#); [Kay, Jenna](#); [Lebowsky, Laurie](#); [Lumbantobing, Sharon](#); [Orjiako, Oliver](#); [Sidorov, Larisa](#); [Wiser, Sonja](#)
Cc: [Cook, Christine](#)
Subject: FW: commercial to residential
Date: Tuesday, September 10, 2019 4:46:32 PM

Just as FYI. Thanks.

Oliver

Oliver Orjiako
Director
COMMUNITY PLANNING

564.397.2280 ext 4112

-----Original Message-----

From: David McDonald [<mailto:david@mcdonaldpc.com>]
Sent: Tuesday, September 10, 2019 4:20 PM
To: Orjiako, Oliver; Messenger, Rebecca
Cc: Blom, John; Lentz, Temple; Medvigy, Gary; Julie2.Olson@clark.wa.gov; Quiring, Eileen
Subject: commercial to residential

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

Councilors:

Please accept my apologies for the fact that this e-mail is coming shortly before your meeting tonight. I am still recovering from surgery and will not be able to attend this evening's hearings but had a chance to review these zone change requests today.

There are 4 CPZ zone changes on the agenda tonight.

This is to request that the following:

1. CPZ 2019-00003. The Council should reject this application. To approve such a rezone would be not only inconsistent with, but antithetical with the actions by the County during the last round of hearings on 179th Corridor. In fact, this land is open and much more ready for BP status than the currently zoned BP areas along the west side of NE Delfel. To allow this to go to ULD with CC would fly in the face of the County's stated goals of economic growth. Therefore this request should be denied.
2. CPZ 2019-0002. The Council should similarly reject this application. This is a scenario that has happened with much frequency over the years (and which I believe will eventually happen in the 179th corridor area and allowing this application would set a bad precedent. Basically this scenario has been frequently repeated over the years—but an area for community commercial in an area of residential area and then, once the residential comes into effect, there is a hue and cry from the owner of the commercial property that there is so much residential that commercial is either a) inconsistent with the residential development or that b) the residential development precludes the owner from finding a buyer who wants to develop as commercial. The County should reject this application.

3. CPZ 2019-0004. The Council should reject this application. Again, this is a time honored practice in Clark County where parcels around a particular area, for a myriad of reasons, are allowed to develop at densities less than the zoning for a nearby and/or a adjacent parcel and then the owner of that parcel wants to rezone their property to have the higher density for their property. I recognize that property rights are important but, again, this is how this County has allowed for a number of areas around the County to slowly be up zoned from original zoning to a higher density zoning in the rural areas. This is simply bad policy as it just promotes the slow up zoning of areas previously zoned to the point where these "exceptions" eventually swallow the "rules" of the original zoning designation. There is a R20 parcel attached to the NE and an R-20 to the SE corner that abut this property and, it appears another R20 that abuts immediately to the East. Plus, according to the aerials, the R-20s are forested and (although it is unknown, it would helpful to know what is east of the 20s. In addition, there is a R10 to the SW of the property. If this zoning is allowed, and history is any indication, these R10s and R20s will soon be coming in for rezoning because this R10 parcel will now have 5 new homes under the cluster ordinance. This is not an appropriate rezone. This application should be denied.

Thank you for your consideration of these matters and, again, my apologies for submitting these comments at the 11th hour.

Best Regards,

David T. McDonald
Ridgefield, Wa



September 11, 2019

Subject: City of Vancouver testimony for the September 17, 2019 public hearing in opposition to the 152nd Avenue TSR Investments rezone proposal CPZ2019-00002 located in the Vancouver Urban Growth Area

Honorable Chair Quiring and Councilors Blom, Lentz, Medvigy and Olson:

Thank you for the opportunity to comment. On behalf of City of Vancouver we respectfully recommend against approving this rezone proposal. While the City has no current annexation plans for the area, the subject parcel is within the Vancouver Urban Growth Area (VUGA) and development enabled by the rezone will remain in place many years into the future during which time annexation is likely, as envisioned by the Washington State Growth Management Act.

Our primary concern is with the removal of scarce land for employment and commercial services in an area rapidly filling with housing. As indicated on the attached map, the rezone would eliminate the last commercially zoned property in the northeast corner of the Vancouver UGA east of 137th Avenue and north of the Padden Parkway and Ward Road, a 6.5 square mile area comparable in size to the City of Washougal. This area has no current commercial services, and the rezone would limit potential future economic activity and revenue, as well as possible nearby shopping and employment for local residents. Even in a suburban setting at the edge of the UGA, it is our view that forcing residents to commute a mile or more to reach the nearest commercial services would be detrimental to long-term livability. Having at least some closer options could benefit area children and teenagers who do not drive, seniors who do not or cannot drive, and anyone desiring a shorter commute to access commercial services or amenities.

Looking forward, shorter drive options will become increasingly important for everyone who lives in this area as the road network inevitably becomes more congested in this growing area. County Comprehensive Plan Policy 1.4.1 on page 47 of the County Plan explicitly encourages commercial uses to locate near the residential areas they serve, but this policy was not discussed at the June 20 Planning Commission hearing for this proposal, which we were unable to attend, and is not considered in the Commission's subsequent recommendation. This policy provides some latitude for interpretation and the Council may weigh it differently than the City of Vancouver does, but we would at least request it be included in your evaluation at the upcoming hearing.

In our view, relinquishing the commercial designation now in favor of residential uses will foreclose future options for the area and is premature given the extent of changes that are occurring in the vicinity.

Additionally, we respectfully offer the following considerations:

- The property may not have developed thus far in part because commercial uses typically follow residential development. Housing in the area has developed rapidly in recent years as noted in the County staff report. The attached County map of nearby vacant and underutilized residential land highlights the likelihood of that this growth will continue in the near future.
- Development at the rezone site until now may have been hampered in part by the fact that it is served by an unimproved roadway. County road improvements scheduled for the next few years, which extend from the site north to 99th Street and south to Padden Parkway, will improve 152nd Avenue by adding a turning lane, bike lanes and sidewalks within a new 70-foot right-of-way.
- The rezone parcel itself has some modest strengths. From a compatibility standpoint it is better suited for commercial development than most other sites in the area, as it is bordered on three sides by roads and an airport on the fourth, reducing potential conflicts with adjacent residences. The rezone site is vacant and to be developed requires no demolition or renovation of an existing building, unlike the former Albertson's site on the west side of 137th Avenue.
- From a parcel size standpoint, we have seen any number of commercial developments similar in size to the 8 acre proposal site be successful, and last year approved a rezone proposal nearby at 15306 Fourth Plain Boulevard that included an 8 acre portion of commercially designated land to be created at the developer's request from a larger residential property.
- Regarding traffic volumes at the site, we have been advised by consultants in a different context that daily volumes of 5,000 to 15,000 vehicles on corridors typically represent a "sweet spot" for attracting motorists to commercial sites. Currently about 7,000 daily trips pass this site on 152nd Avenue, and numbers will almost certainly increase because of several factors: the planned 152nd Avenue road improvements; continued development of nearby vacant and underutilized residential lands; continued growth in Battle Ground and Vancouver, since 152nd Avenue serves as a connector between the two cities; and potential further development if the Battle Ground or Vancouver UGAs are expanded in this area in the future.
- E-commerce is undeniably impacting various commercial activities at the national and local level, but it is not affecting all retail sectors or non-retail commercial services equally. We believe it is premature to begin to write off commercial zoning as a category while the situation remains in flux and overall numbers remain reasonable. Vancouver experienced no decline in commercial permit valuation from 2017 to 2018, and is on track for an increase this year.ⁱⁱ Focusing on retail, the applicant's study (page 7) in this case notes that countywide retail leasing increased slightly last year, although less than population.
- Maintaining commercial zoning on the site raises the possibility that the property will be developed for storage, but as the applicant testified at the Planning Commission hearing (minutes page 9), the site is not a prime storage location and several recent storage proposals in Clark County and Vancouver since the applicant's storage application raise the possibility that the market has become

oversaturated. There are new, larger storage facilities now in place on 117th Street in the County and East Fourth Plain Boulevard in Vancouver.

This is not to suggest the property is without challenges for commercial development, or that it should remain forever under commercial zoning if it does not develop. The 2024 County Comprehensive Plan process in our view provides a good upcoming opportunity not just to track ongoing changes near this site, but also to look more broadly at what types and locations of employment and commercial land are appropriate in the VUGA, and if updated policy guidance is needed.

Thank you again for the opportunity to comment on this proposal. Please do not hesitate to contact us if there are questions in advance of the Council hearing. Primary staff is Bryan Snodgrass, Principal Planner, bryan.snodgrass@cityofvancouver.us, 360-487-7946.

Sincerely,



Chad Eiken, AICP, Director
Community and Economic Development Department
chad.eiken@cityofvancouver.us

¹ County Comprehensive Plan Policy 1.4.1 reads in full:

1.4.1 Interrelated uses should generally be encouraged to locate in close proximity of each other:

- Frequently used commercial activities and the residential areas they serve should be allowed and encouraged to locate near to one another.*
- Schools or other frequently used public facilities and the residential areas they serve should be allowed and encouraged to locate near to one another.*
- Commercial, industrial or other employers and the residential areas they serve should be allowed and encouraged to locate near to one another, as long as negative impacts from non-residential uses on the residential areas are mitigated.*

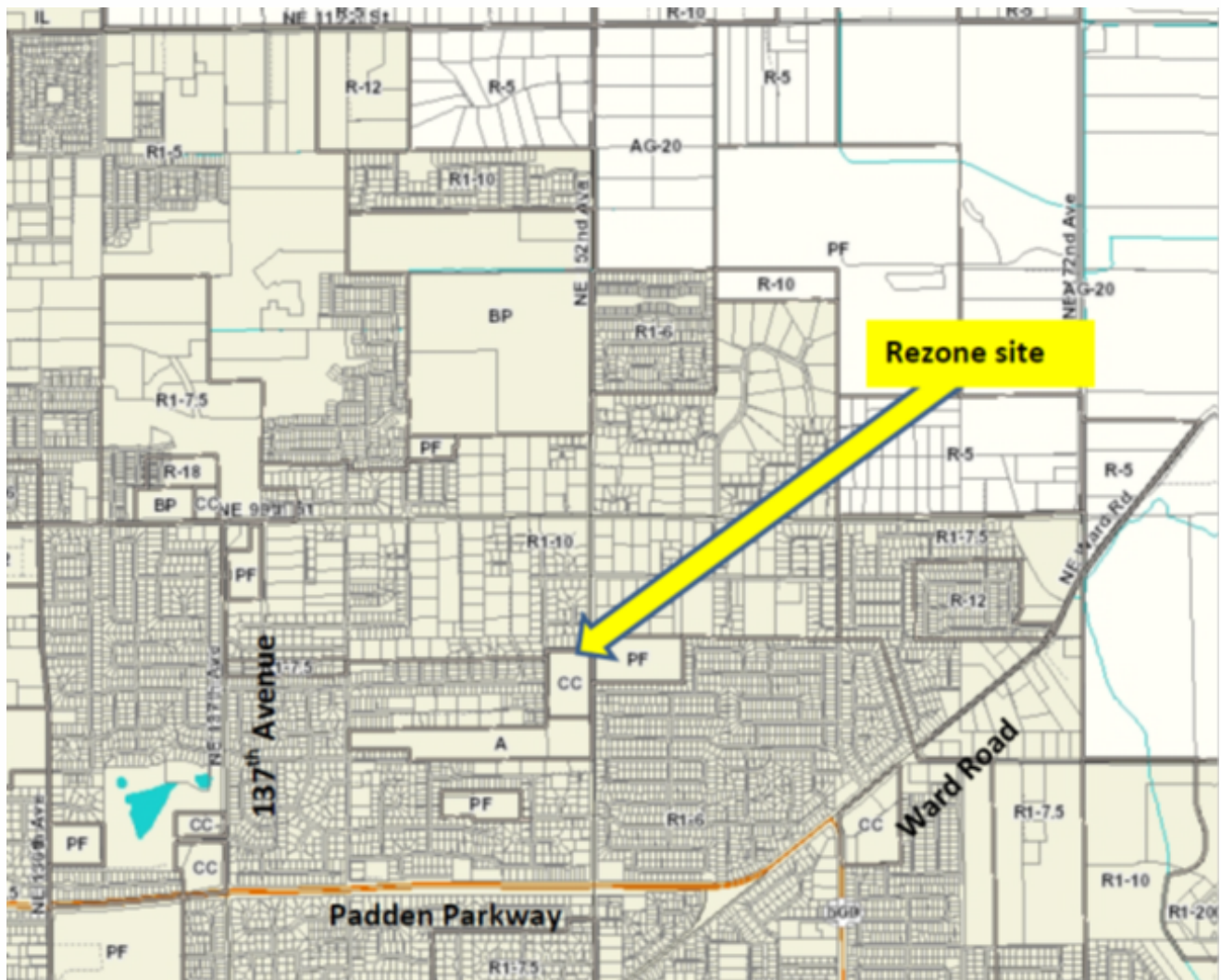
The application argues that 2-4 mile travel distances to the nearest commercial services fit with County policy, citing the Locational Criteria for the Community Commercial (CC) zoning district on page 34 of the Comprehensive Plan, which envisions new CC areas as generally spaced two to four miles apart. However, the Comprehensive Plan envisions that 2-4 mile spacing for the CC zone only, not all commercial zones. The Plan also provides locational criteria and envisioned spacing for the Neighborhood Commercial (NC), General Commercial (GC) and Mixed Use (MU) zones, all of which are lacking in the northeast portion of the VUGA in question, effectively forcing the remaining CC property proposed for rezone to serve their envisioned commercial service functions as well. Even if the CC Locational Criteria were the only relevant policy guidance, the proposal would still not fully comply since that criteria also states that the CC zone should “serve a population of 10,000 to 20,000”. The proposal site already doesn’t appear to meet this standard under its current CC zoning, since there are 30,000 persons currently with 2 miles of it and 107,000 within 4 miles according to the applicants study on page 5. If the rezone is approved and the CC designation removed, remaining CC properties farther west in the VUGA will be forced to serve considerably bigger populations than this.

The applicant’s study on page 17 also argues that most Clark County residents currently shop at distances well over a mile from their homes, and for the average County resident the nearest full commercial serves are 4-5 miles away. If

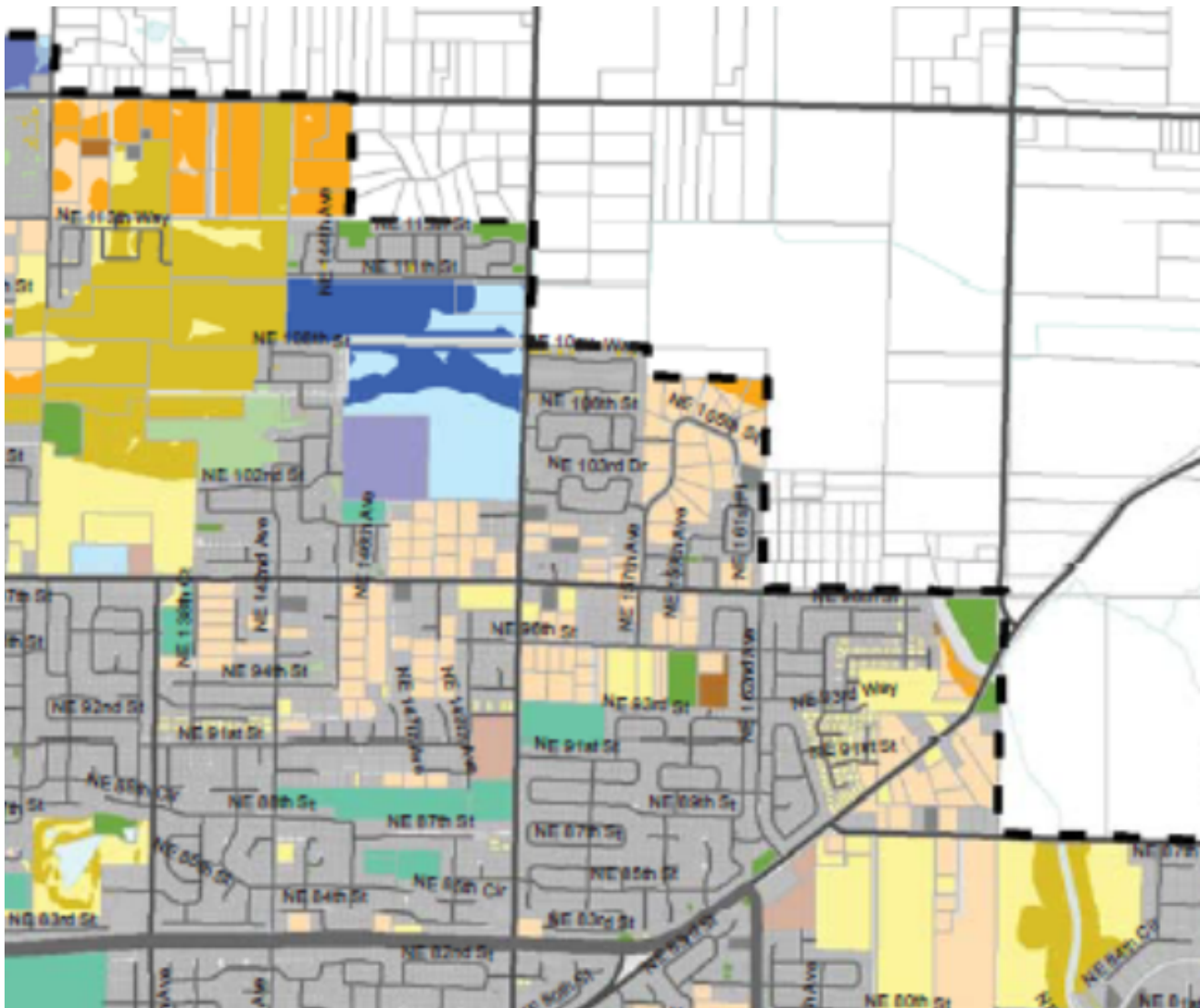
correct, this probably includes current data from rural areas, or still developing urban unincorporated areas. From our perspective current conditions in these areas should serve as a target for how the Vancouver UGA is built out for the long term. In our view the benefits of having a shopping or employment opportunity within short driving or walking or biking distance is not that all residents will then shift all of their shopping or employment to those areas, it is that there will be a choice which some will use frequently, and most can use occasionally.

ⁱⁱ <https://www.cityofvancouver.us/ced/page/fees-reports-publications-0>






Northeast Vancouver UGA Zoning



Northeast Vancouver UGA Vacant and Underutilized Land



Residential VBLM

-  Built
-  Mansions and Condos
-  Vacant
-  Vacant Critical
-  Vacant Exempt