

## Introduction

After reviewing the report from AECOM and considering the feedback offered by other commissioners, the demolition sub-committee has the following recommendations for handling demolitions in Clark County. These recommendations are intended to respond to the particular issue that we are facing in Clark County: that we are losing potentially significant and other older buildings without any documentation of what has been lost and without an established process or time to allow for advocates to attempt to prevent demolition. The following recommendations are intended to address this issue as effectively as possible.

The committee also recommends that this process should be re-evaluated in the future to ensure that any changes to demolition procedures are achieving their intended goal, and that those procedures are adequate to face any new issues that may arise in the future. Some of the policy options outlined in the AECOM report are solutions to problems that Clark County may not currently have, but could have in the future.

### Recommendation 1: Mitigation Measures for Recognized Historic Properties

The sub-committee originally considered leveraging the process already in place from the State Environmental Policy Act (SEPA) for demolitions of properties on the state and national register and on the Clark County Cultural Resources Inventory. However, the sub-committee feels that the SEPA process is too cumbersome, has too many exceptions, and is driven too much by parties other than the Commission.

Therefore, the Committee is recommending instead a public hearing process where mitigation measures are determined by the Commission. These could include:

- Minimum documentation standards such as HABS/HAER (which can vary depending on register/inventory)
- Consultation with DAHP (which can vary depending on register/inventory)
- Salvage of historic material
- Relocation of the resource
- Inclusion of an educational component

The code would need to spell out what mitigation measures can be required, and may need to include standards for when they can be applied.

**Clark County Cultural Resources Inventory Updates:** If buildings on the CCCRI are part of this, then it becomes more important to keep the CCCRI up-to-date. The Rules and Procedures or the code itself should be changed to ensure that the CCCRI is updated at a minimum of every 5 years. CCHPC should also be able to add a property to the Inventory at any time by majority vote. Additionally, the CCCRI update process should be modified to specifically state that buildings over 50 years old **shall** be evaluated for inclusion in the CCCRI and that buildings under 50 years old **may** be evaluated and included on the CCCRI if they otherwise meet the criteria of 40.250.030(E)(2).

### **Roles and Responsibilities:**

- Owner: May testify at public hearing, but would not be required to.
- County Staff: Facilitate public hearing.
- CCHPC: Conduct public hearing and determine mitigation measures.

**Regulatory Impact:** The Clark County code would need to be modified and the demolition permit approval process would need to be modified.

### Recommendation 2: Demolition Delay

The purpose of this recommendation is to give the public an opportunity to weigh in on demolitions and the opportunity to advocate for other solutions. For all buildings over 50 years old, the demolition permit would trigger a 45-day delay and a public hearing before the CCHPC where the public may make comment and the Commission may issue findings. This will provide the public and the Commission the opportunity to advocate for preservation and to potentially develop an alternate solution that the owner might find acceptable. This hearing would not be able to prevent demolition; once the 45-day delay and hearing are complete, the owner may proceed with demolition.

### **Roles and Responsibilities:**

- Owner: May testify at public hearing, but would not be required to.
- County Staff: Facilitate public hearing.
- CCHPC: Conduct public hearing.

**Regulatory Impact:** The Clark County code would need to be modified and the demolition permit approval process would need to be modified.

### Recommendation 3: Documentation

The purpose of this recommendation is to ensure that basic information about buildings is recorded before the buildings are lost. All demolition permits, regardless of building age, should be accompanied by photos of all building elevations. The information in Clark County's GIS system about demolished buildings should be archived and made publicly available through the county's GIS system.

Recording information about all buildings, not just ones that we recognize as significant today, provides value to the community. There are many examples where buildings that are not recognized as significant are later determined to be significant. And even buildings that are not significant provide context to the history of the community and to other buildings that may be evaluated as significant. This change would not slow down or prevent the demolition of any building and does not impose any significant burden on owners, so it is reasonable to apply it to all buildings, regardless of age.

### **Roles and Responsibilities:**

- Owner: Submit pictures of all elevations as part of demolition permit.
- County Staff: Archive Clark GIS data and make it publicly available through website.

- CCHPC: None.

**Regulatory Impact:** Update demolition form and procedure. Update GIS procedure. We do not believe this would require any regulatory change.

Recommended Process

Is the building on the Clark County Heritage Register?

NO

YES

CCHPC determines whether to issue a waiver of certificate of appropriateness for the demolition.

Is the building in a Vancouver Heritage Overlay District and also on the National Register of Historic Places or Washington State Historic Register?

NO

YES

CCHPC determines whether to approve the demolition based on the criteria in VMC 20.510.50(A)(3).

Current Process

Is the Building on the Clark County Cultural Resource Inventory, the state-wide Historic Property Inventory, the National Register of Historic Places, the Washington State Historic Register or the Washington State Historic Barn Register?

NO

YES

**Recommendation #1:** There is a 45-day demolition delay (45 days from public notice) and the demolition application goes to the CCHPC for review. CCHPC holds a public hearing during which it reviews the documentation, decides on any mitigation measure(s) and issues findings.

Is the building over 50 years old?

NO

YES

**Recommendation #2:** There is a 45-Day demolition delay during which advocates can try to find an alternative solution acceptable to the owner and a public hearing is held before the CCHPC where the public may offer testimony and the CCHPC may issue findings. Hearing cannot prevent demolition.

New Process

**Recommendation #3:** If the demolition permit is accompanied by the required images of all elevations, the demolition permit application is considered complete and is approved according to normal processes. The county archives data about the building and makes it publicly available through the County website.