



June 12, 2017

## Clark County Planning Commission

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Subject : 2017 Annual Review proposals in the Vancouver UGA

Chair Morasch and County Planning Commissioners:

Thank you for circulating the 2017 Clark County Annual Review proposals located inside the VUGA. The City of Vancouver has not always commented on VUGA site specific map change in the past, but will try to do so going forward given the ever increasing economic, public service and annexation linkages between the Vancouver UGA and city areas.

We have no comments on the two proposals from residential to commercial designations at 10008 NE 117<sup>th</sup> Avenue, and from mixed use and industrial to industrial at 11000 NE 117<sup>th</sup>. (CPZ 2017-00019 and CPZ 2017-00020)

For the third proposal, changing designations from business park to residential at 10512 NE 152<sup>nd</sup> Avenue (CPZ 2017-00022), we offer the following:

- We support the County staff recommendation to deny the proposal, and the CREDC comments letter recommending replacements for employment land conversions of this type.
- Rezoning the 60-acre Trust property to residential as proposed would make it more difficult to develop the abutting 20-acre Davis properties to the north under their current BP designation, as they would be left as a thin remaining BP district with relatively limited frontage to 152<sup>nd</sup> Avenue sandwiched between two residential districts.

- Removing 60 acres (and effectively 20 more) of Business Park lands would eliminate opportunities for family wage employment in an area that appears to lack them. The proposal site is in a corner of the Vancouver UGA zoned overwhelmingly for single family housing. Within one mile of the existing BP node the only similarly zoned lands are a five-acre BP property at 99<sup>th</sup> Street, and 19 acres of IL land at 119<sup>th</sup> Street. There are similarly few commercially zoned lands near the site either. In the entire Vancouver UGA area east of 117<sup>th</sup> Avenue there appears to be a relative scarcity of new employment opportunities of any kind, as the industrial zoning cluster just north of the Padden on the east side of 117<sup>th</sup> Avenue appears to be largely taken up with mining and other developments. In our view counting on the proposed industrial land bank outside the UGA to fix employment deficits in the broader area is premature, since the GMA Hearings Board has ruled against the land bank proposal, and it is unclear if or when that will be reversed.
- We have no concern with the Battle Ground School District constructing a school on the 20 acres of the proposal site they own (200305000), but understand this could be approved through a conditional use permit, normally a more expedient process than a legislative change to the Comprehensive Plan and zoning map. If a designation change is somehow needed for the school site, perhaps it could proceed independently of the larger remainder of the proposed rezone site (200326000).

Thank you for the opportunity to comment. This proposal is admittedly over a mile from Vancouver city limits, and impacts from an apparent lack of employment land in the form of fewer jobs and less revenue for public services will be felt first in the UGA. However, the City of Vancouver will be impacted as well, as employment, particularly high wage employment, is a regional concern regardless of annexation timing issues.

Sincerely,



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