

RIVERVIEW ASSET – ANNUAL REVIEW – CPZ2017-00022

APPLICANT'S SUPPLEMENTAL RESPONSE

The Applicant responds to issues raised in the June 1, 2017 correspondence submitted by the Columbia River Economic Development Council ("CREDC"), and responds to issues raised in the initial staff report.

RESPONSE TO JUNE 1, 2017 CREDC COMMENT LETTER

In its role as an advocate for employment sites throughout Clark County, the CREDC requests careful consideration of the zone change requested by the applicant. The CREDC's June 1, 2017 correspondence cites the 2016 Employment Land Study, which evaluated supply and readiness of employment sites for the purposes of both short and long term market demand for employment growth. The study identified 56 employment sites that are 20 acres and larger, and tiered the sites based on market considerations, land use, and physical characteristics to assess site readiness.

In response to the CREDC's June 1, 2017 correspondence, the applicant submits the following to clarify the findings and action taken with respect to the subject property in the context of CREDC's 2016 Employment Land Study. Sites were initially identified, then were evaluated, and as a result of the evaluation process some sites were removed from the list of employment sites based on a variety of factors.

The subject Riverview Asset property was initially identified as "Site 50." See Employment Land Study List Draft dated May 25, 2016, attached hereto as **EXHIBIT A**. Through the course of the review process, Site 50 was deleted from the Employment Land Study List, and was placed on the landbanked sites table with reference to potential use for public school purposes. See June 1, 2016 Planning Advisory Group (PAG) meeting notes, attached hereto as **EXHIBIT B**. Currently, the subject Riverview Asset property is not included on any Employment Lands inventory lists or maps, and is not even a Tier I or Tier II target site. See current Employment Lands Inventory lists and maps, attached hereto as **EXHIBIT C**.

SUBJECT PARCEL - COMPATIBILITY WITH ELEMENTARY SCHOOL LOCATIONAL CRITERIA

The plan to provide for school facility development on the original Riverview Asset land identified as Site 50 in the CREDC study took a significant step forward with Battle Ground School District's acquisition of approximately twenty acres of Site 50 (portion identified as tax parcel 200305000) in September 2016. This acquisition by the School District leaves approximately 60 acres (Riverview Asset parcel) of Site 50 immediately adjacent to and surrounding the planned school district site.

Locating residential development upon the Riverview Asset acreage immediately adjacent to the School District site will accomplish a number of broadly accepted and significant land use objectives related to school siting, including goals and objectives detailed in Clark County's Comprehensive Plan.

CLARK COUNTY COMPREHENSIVE PLAN – CHAPTER 10: SCHOOL ELEMENT

Clark County's Comprehensive Plan recognizes that current land use plans and capital facilities funding mechanisms for schools present unique challenges under the GMA. The Plan recognizes that "[t]he county's school districts are facing the challenge of providing a quality education given the rapid growth and development of Clark County," and notes that "[s]chool capacity in the county has not kept pace with enrollment growth." Comprehensive Plan, School Element – p. 232.

The Comprehensive Plan specifically addresses school siting, and states that "[s]iting a new school requires several considerations... A typical elementary school is sited on approximately 10 acres, a middle school site is about 20 acres ... **These large parcels are hard to find, especially within an urban growth area... Districts must also compete with private developers for the land... Under the current growth conditions, land speculation drives the cost of land above its appraised value, putting the districts at a distinct disadvantage in land negotiations ...**". Comprehensive Plan, School Element – p. 233 (emphasis added). The Comprehensive Plan specifically references the "operational benefits of locating schools proximate to existing residential areas (i.e., maximizing community support and participation and minimizing student transportation costs)." Id.

The Comprehensive Plan emphasizes "Schools as Community Centers." The Plan states that "public schools serve as a community focal point and provide facilities used for a variety of community civic and recreational needs.... There is an increasing use of ball fields and gymnasiums, meeting rooms, computer labs... many school sites also serve as neighborhood parks...". Comprehensive Plan, School Element – p. 234. The Plan emphasizes the need for "safe walking" environments, and cites the social, environmental and health benefits of student travel by foot and bicycle, and notes that the built environment influences travel choices. Students traveling through higher-quality environments are more likely to bike and walk to and from school. Comprehensive Plan, School Element – p. 235. The Plan further emphasizes the role of schools as community centers.

Clark County Comprehensive Plan Policy 10.2.4 recognizes that "Elementary (K-5) schools are natural elements of residential neighborhoods," and Clark County Comprehensive Plan Policy 10.3.2 promotes development of pedestrian and bicycle corridors between schools and housing, within neighborhoods.

OSPI SITE REVIEW CRITERIA

Washington State's Office of Superintendent of Public Instruction (OSPI) recently published a site review checklist to guide the school siting evaluation process. Key inquiries include: a) whether the site will be free of industrial and traffic noise; b) whether the site is safe; c) whether the site is conveniently located for the majority of pupils; d) whether surrounding zoning and development enhance the school site; and e) whether the site can be shared with other community facilities.

EPA MODEL GUIDELINES

These considerations are a common theme with respect to school siting. In December 2007, Congress enacted the Energy Independence and Security Act (EISA). Subtitle E, Section 502 of EISA required the Environmental Protection Agency (EPA) to develop model guidelines for the siting of school facilities that take into account a number of factors. In relevant part, the EPA siting guidelines available online at https://www.epa.gov/sites/production/files/2015-06/documents/environmental_siting_criteria_considerations.pdf

emphasize the importance of siting schools in the neighborhoods of the students the schools serve. Community centered schools encourage students to walk and bike between home, school and centers of community activity. In addition, locations that allow community access to school playgrounds and facilities encourage physical activity outside of school time. The location of schools in neighborhoods may allow more children to participate in after-school activities such as clubs, intramural and physical activity clubs, interscholastic sports or activities sponsored by the community.

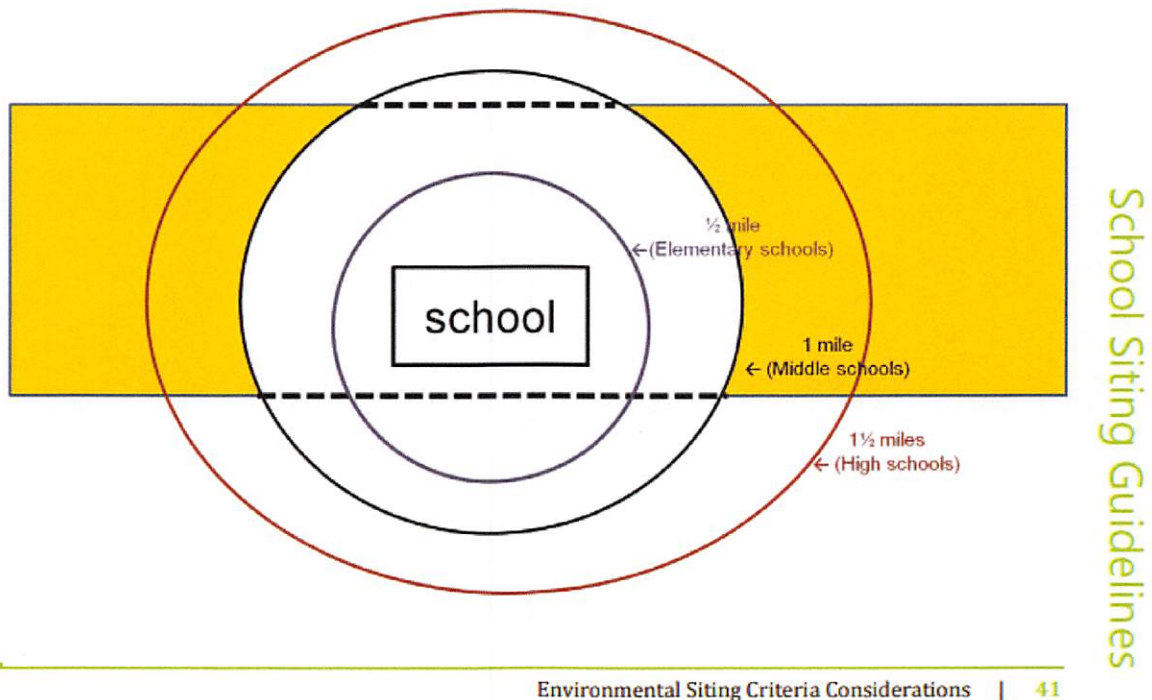
Schools located within neighborhoods can also increase access to public transportation for students, faculty and staff in the neighborhood and surrounding communities. The EPA publication emphasizes the importance of locational preferences for school facilities near existing populations to minimize transportation costs and related environmental, economic, public health and sustainability impacts.

Through coordination with adjacent residential development, safe sidewalks and trail networks that support walking and biking can be integrated to provide access between the school site and the community it serves. Points of emphasis include:

- Walkability
- Student transportation: transportation costs, emissions
- School facility to serve physical space needs of surrounding residential community
- Community visibility, interest and involvement
- Student safety and noise issues (consider distance, timing and intensity of commercial use noise/odor emissions, and the potential need for buffers, screening and fencing that would separate the school campus from the surrounding community)
- Integration of street patterns, sidewalks and trail networks
- Multiple purposes for use of the school by the immediate residential community: For example, potential use of the school by the immediate residential community as an emergency shelter

The EPA publication identifies a **½ mile radius** around the school as the commonly accepted maximum walking/biking distance for elementary schools (see EPA publication schematic, below). This underscores the importance of the use of the subject Riverview Asset property for development of residential housing in close proximity to the proposed school.

Exhibit 3: Example Enrollment Area that Creates a Prohibitively Long Walking/Biking Trip for Some Students



WASHINGTON STATE DEPARTMENT OF TRANSPORTATION / WASHINGTON TRAFFIC SAFETY COMMISSION / OSPI

In March 2010, the Washington State Department of Transportation, Washington Traffic Safety Commission, and OSPI partnered to produce a guide for planning and improving walking and bicycling options for students. The guide can be viewed at:

<http://www.k12.wa.us/Transportation/pubdocs/WalkRoutes.pdf>

This guide details state regulations that require school districts to establish suggested walk route plans for elementary schools. As with many other sources, the guide reiterates the current emphasis placed on the creation of communities that facilitate safe walk and bike routes between schools and the residential communities they serve. The guide notes that school districts are responsible for locating and developing school facilities that foster good walking and biking conditions, and observes that “[s]chool districts have a great opportunity to influence pedestrian and bicycle safety when they establish a new school. While evaluating a potential site for a new school, consider sites which are easily connected to the existing pedestrian system and within walking distance of residential neighborhoods served by the school.” Guide, page 14. Again, the content in this guide report emphasizes the importance of the type of use and development that will occur on the Riverview Asset acreage in terms of compatibility with the School District site.

CLARK COUNTY PHOTO SURVEY

A survey of schools in Clark County illustrates the compatibility of elementary school construction adjacent to residential development, and illustrates compatibility concerns and barriers to community connectivity when schools are constructed adjacent to commercial, business park-type development.

Sites surveyed include:

- A) Grass Valley Elementary adjacent to the Sunningdale Gardens residential development; 3000 NW Grass Valley Drive Camas, WA 98607; See photos and aerials attached hereto as **EXHIBIT D**.
- B) Woodburn Elementary adjacent to the Lake Hills residential development ; 2400 NE Woodburn Drive Camas, WA 98607; See photos and aerials attached hereto as **EXHIBIT E**.
- C) Orchards Elementary adjacent to commercial development to the south; 11405 NE 69th Street Vancouver, WA 98662; See photos and aerials attached hereto as **EXHIBIT F**.
- D) Fort Vancouver High School adjacent to commercial development to the east; 5700 E. 18th Street Vancouver, WA 98661; See photos and aerials attached hereto as **EXHIBIT G**.

The Grass Valley Elementary and Woodburn Elementary sites illustrate compatible integration of elementary schools into the residential communities they serve. In contrast, incompatible barriers are observed where commercial business-park type development separates portions of Orchards Elementary and portions of Fort Vancouver High School from the residential communities they serve.

When school districts have an opportunity to select the most suitable sites for elementary schools, they frequently integrate the elementary school campus with surrounding residential housing development. In the preset case, the request to rezone the acreage surrounding the school district site would enable compatible and necessary residential development to occur in a location where that type of development makes the most sense. This would be compatible with the vision for community-centered schools that *"...fit gracefully into the neighborhoods they serve... [are] located within a neighborhood and are safe for children to walk or bike to ... act as a neighborhood anchor and support community use of the school facility after school hours ... [are] well designed and fit in well with the scale and design of the surrounding neighborhood ..."*. McCann, B. and Beaumont, C.E. Build "smart." American School Board Journal, 190(10):24 – 27 (2003).

RESPONSE TO STAFF REPORT – HOUSING DEMAND

In response to planning staff's reference to housing demand, the applicant respectfully asserts that Washington Office of Financial Management (OFM) data fails to accurately represent present-day housing demand. On the ground, the fact that the recent residential developments in the immediate vicinity of the subject Riverview Asset property (for example: Dunning Meadows and Urban Oaks) completely sold out immediately upon construction is a strong indicator that supports the applicant's position regarding the demand for housing.

A June 7, 2017 article in The Columbian, “Report: Rental Rates Rising Out of Reach,” is just one example of numerous recent studies and articles that provide current snapshots of the housing situation in Clark County. The article indicates that despite development in the pipeline, rents in Clark County are expected to continue to rise because of the tight market and considerable ongoing net migration to the region.

2016 Census data , available online at <https://www.census.gov/quickfacts/table/> , reports Clark County’s population percent change from April 1, 2010 to July 1, 2016 at 9.8%, with a table graphic from that site pasted below:

Population	
Population estimates, July 1, 2016, (V2016)	467,018
Population estimates, July 1, 2015, (V2015)	459,495
Population estimates base, April 1, 2010, (V2016)	425,360
Population estimates base, April 1, 2010, (V2015)	425,363
Population, percent change - April 1, 2010 (estimates base) to July 1, 2016, (V2016)	9.8%
Population, percent change - April 1, 2010 (estimates base) to July 1, 2015, (V2015)	8.0%
Population, Census, April 1, 2010	425,363

In 2015, US Census Bureau population data reported Clark County’s annual growth rate at 1.7%, which far exceeded growth projections in place at that time. That trend of annual growth percentages over earlier projections has continued. Between July 2015 and July 2016, the County’s population grew by 467,018, an increase of 1.88% (U.S. Census data report). A related article published in The Columbian on March 23, 2017, examined the impact of that growth percentage and related population projections. This current census data supports the applicant’s contention that the present annual review application would satisfy the GMA goal of meeting demand for residential housing in an area where necessary services are readily available. As detailed in the applicant’s original narrative, residential development is a much more viable and compatible use of the subject acreage in light of geographical, transportation, and market demand issues. Population data and evidence regarding housing demand and school compatibility, coupled with the fact that the subject acreage was removed from the 2016 Employment Land Study List, support the applicant’s request. At the suggestion of County staff, the applicant also incorporated a commercial acreage element which, along with the school facility, would provide employment opportunities within the proposed residential neighborhood.

RESPONSE TO STAFF REPORT – INDUSTRIAL CONSIDERATIONS

The applicant appreciates planning staff’s reference to industrial land considerations. This invites a larger policy discussion, beyond the scope of the present annual review application, regarding the balancing of sometimes competing goals and objectives related to school, residential and industrial

sites. Clark County's Comprehensive Plan, School Element – p. 237, observes that “[s]chool planning cannot be in isolation. The relationship between school, land-use, economic development, housing and transportation policies must be in concert and directly tied to each other throughout the comprehensive plan.” Both the current and proposed comprehensive plan and zoning designations at issue allow school site development. School districts face great challenges in locating and acquiring property for school development. In this specific case, a school district has actually acquired and committed a portion of the subject acreage for school site development. This significant factor, and the Comprehensive Plan Goals and Policies associated with school site development, weigh in favor of the applicant's annual review request.