



June 12, 2019

Clark County Planning Commission
PO Box 9810
Vancouver, WA 98660-9810

SUBJECT: City of Vancouver testimony for June 20 Clark County Planning Commission, in opposition to 152nd Avenue TSR and River View Asset rezone proposals located along 152nd Avenue in the Vancouver Urban Growth Area

Chair Morasch, Vice Chair Barca, and Commissioners Grimwade, Johnson, Swindell and Torres:

Thank you very much for the opportunity to comment on these proposals. We face similar conversion requests ourselves, and appreciate the challenges of evaluating current residential demand in today's hot market against longer term commercial and employment potential as our communities are building out.

These two proposals appear to be among the few remaining sites zoned for employment, retail and services within a large and growing portion of the northeast Vancouver UGA that has been developed almost exclusively with single family homes, many in recent years. More homes are likely in the future as vacant and underutilized residential lands in the area are developed. Traffic will increase from these developments, and from growth in Vancouver and Battle Ground, along and adjacent to the 152nd Avenue corridor that connects the two cities. Any future expansions of the Vancouver or Battle Ground UGAs in this general area would further add to long term development (see attached map). The City of Vancouver has no immediate plans for annexation, but current zoning decisions can have significant impacts on areas intended to become part of the City in the future, by enabling development that lasts for decades. Our specific comments are below, which follow similar concerns raised with prior proposals at the sites, and at the pre-application stage for the current applications:

- 1. 152nd Avenue TSR – Community Commercial to Single Family Residential R1-6 on 7.7 acres at NE 152nd Avenue and 93rd Street**

The TSR site appears to be the only commercially zoned property in the VUGA east of 137th Avenue and north of the Padden Parkway and Ward Road, and one of the largest undeveloped single CC or GC parcels anywhere in the VUGA north of Padden Parkway. The proposed TSR rezone would result in a modest loss of long term jobs and revenue, and may permanently force residents in large portions of northeast VUGA into lengthy commercial or employment commutes on roads which will only become more congested over time as development continues. We are not familiar with the interpretive history of County standards, but effectively requiring 2-4 mile minimum trips when other options might exist does not appear intended by the County Comprehensive Plan. County Plan policy 1.4.1 directs interrelated uses to locate near each other, including frequently used commercial activities and employers, and the residential areas they serve. Policy 1.4.7 also calls for higher intensity uses to locate near streets served by transit, which this site is. Page 34 of the County Plan describes the Community Commercial zones as generally spaced 2 to 4 miles apart, but this appears to be a general description applying to that individual zoning district only, not a goal that *all* commercial zones or activities be spaced that far apart in urban areas. The County Plan also contains descriptions of the Neighborhood Commercial, General Commercial and Mixed Use zones and their generally envisioned spacing, but none of these zones are applied anywhere in the VUGA east of 137th Avenue.

To be clear, the site and surrounding area are not likely to develop as a classic urban pedestrian commercial node. However, potentially foreclosing future possibilities for locating employment, shopping, dining, and services near existing residential areas may not be advisable, unless the site is clearly not viable for commercial development. While the site has some current commercial and employment limitations, it also appears to have some strengths over the mid-to long term:

- 152nd Avenue corridor traffic and commercial demand will likely increase with ongoing residential build-out in VUGA, Battle Ground and Vancouver. The fact that the site has not developed thus far is relevant but not determinative, as commercial development often follows existing housing.
- In terms of size the property is the same as the commercial portion requested by a developer of a larger residential site in a rezone approved by Vancouver last year at 15306 Fourth Plain Blvd.
- The site is buffered from nearby residences by roads on three sides and an airport on the fourth, lessening potential incompatibilities.
- The site is also served by the C-Tran #72 bus with 30-minute peak hour intervals, increasing workforce accessibility.
- Even without further growth, there are approximately 14,000 persons living within a mile of the site today, according to the applicant's market study, which is roughly the population of the City of Washougal. In addition, local households are considerably younger, wealthier, and better educated than countywide averages, with an estimated total annual buying power of \$250 million. See pages 10 and 6. In the VUGA north of the site's one mile radius are additional persons and potential shoppers.

As with other commercial properties, the rise of e-commerce poses challenges and brick and mortar stores will not return to the position they were in 20 years ago. However, commercial

zoning allows a range of dining, commercial services and other uses, and within the retail sector the magnitude of longer term change is uncertain.

We understand there is a possibility the applicant may choose to develop the site for RV storage if the current commercial zoning is maintained. If so there would be limited benefit to the surrounding area, but unlike a single family subdivision, RV storage could be readily redeveloped in the future as conditions change, and would likely not foreclose long term options.

If the property is converted to residential zoning, we would suggest considering devoting part of it to multi-family housing, which appears to entirely absent near the site, and anywhere in the VUGA east of 137th Avenue. As with the issue of commercial spacing, housing in the VUGA should not be expected to look just like the City of Vancouver, but some balance should be provided to meet the needs of the local population.

2. Riverview Asset Management – Business Park to R-10 with a strip of CC on 60 acres at 152nd Avenue north of 102nd Street.

The 60-acre site is one of the larger potential employment sites in the County, and the current BP zone allows a range of office, industrial, and supporting commercial uses. The 60-acre site is mostly bordered by roads, undeveloped properties also zoned BP, or large lot rural homesites, so potential incompatibilities between future employment or commercial development and surrounding uses would be limited.

The City of Vancouver supported the County's 2017 denial of the applicant's previous conversion proposal on this site, as well as the comment letter from the Columbia River Economic Development Council (CREDC), which was appropriately described during the 2017 County Council discussion as cautionary. The revised application includes a 6-7 acre commercial strip within the 60- acre site, but arguments that the larger site is unviable for long term employment do not seem to be supported by the evidence in our view:

- Lack of adequate transportation access is cited in the applicant's study on page 2 as an obstacle, but no studies or examples are provided to better understand this assertion, and there is no response to counterfactual examples cited by County staff in 2017 during the previous review of employment developments in Camas that have no better access.
- The study also provides no response to concerns raised by the Council as well as staff in 2017 that conversion of the proposal site would make it more difficult to develop the 20-acre property to the north also zoned Business Park.
- Lack of nearby commercial uses to support employment is also cited, despite the 6-7 acres of new commercial land now proposed on the site itself, or the fact that the current BP zone would allow supporting commercial uses even without the rezone.

We support the current County staff recommendation to deny the revised application. If the property is substantially converted to residential zoning, we would suggest it include some multi-family, which appears completely absent near this site as well as anywhere in the VUGA east of

137th Avenue. It could also include smaller lot single family housing as proposed by the applicant previously. In the R-10 zone now proposed, the median value of a newly developed homesite in the unincorporated VUGA last year was \$505,000, according to a review of assessor data. These prices are likely well beyond the reach of most County residents, and are \$150,000 more than the median values in the R1-5 zone in the VUGA.

Thank you again for the opportunity to comment on these proposals. Again, given the shortage of available land for employment, services and retail in the northeast portion of the VUGA, and the County-wide shortage of large lot employment sites, we would not suggest changing direction as proposed while the overall area is still developing. We appreciate that a strategy of patience places some demand on the property owners. In this case County GIS records indicate the properties have changed hands in recent years, long after the zoning was established, suggesting property owners were aware of the zoning designations involved.

Unfortunately none of our staff involved in this review are available on June 20th, so we will not be able to testify in person at the Planning Commission hearing. We do plan to testify before the County Council however. Don't hesitate to contact us if there are questions in advance of the Commission hearing. Primary staff is Bryan Snodgrass, bryan.snodgrass@cityofvancouver.us, 360-487-7946.

Sincerely,



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Northeast Vancouver Urban Growth Area Zoning



