

**From:** [Jeffrey Delapena](#)  
**To:** [Snodgrass, Bryan](#); [Jose Alvarez](#); [Oliver Orjiako](#)  
**Cc:** [Bart Catching](#)  
**Subject:** RE: City of Vancouver written testimony for November 7 PC hearing on DEIS alternatives  
**Date:** Wednesday, November 6, 2024 4:10:00 PM  
**Attachments:** [24 11 07 COV to CCPC DEIS alts updated \(006\) \(002\).docx](#)

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Hello Bryan,

Thank you for sending this written testimony on behalf of the City of Vancouver.

I am entering this into the Comprehensive Plan Index of Record, and your comments will be sent to the Planning Commission before the end of the day.

Regards,  
Jeff Delapena

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**From:** Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>  
**Sent:** Wednesday, November 6, 2024 4:04 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>  
**Subject:** City of Vancouver written testimony for November 7 PC hearing on DEIS alternatives

**EXTERNAL:** 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.

Hi Jeffrey, Oliver and Jose  
Attached please find our letter, which we hope can be sent to the Planning Commission today if possible. Thanks very much



November 6, 2024

Chair Johnson and Clark County Planning Commissioners Baker, Bergthold, Halbert, Harroun, Morasch and Wogen:

RE: City of Vancouver recommendations for November 7 public hearing on Clark County Draft Environmental Impact Statement (DEIS) Land Use Alternatives

1. Countywide DEIS alternatives should implement the County's previously adopted growth decisions and its published DEIS Scoping Notice, not completely blow them up. Do not include the Northwest Partners alternative proposing 18,000 acres of Vancouver UGA expansions, or any alternative including every single UGA expansion request received.
2. Include a Cities Alternative based on proposals of the various Cities, and an Existing Boundaries Alternative accommodating growth in existing urban areas.
3. For the existing Vancouver UGA, include new commercial and employment designations near existing residential areas that lack them, which is needed to comply with GMA mandates and local Countywide Planning Policies.
4. Do not include recently recommended VUGA employment expansions that are located at hard to develop sites that largely lack market demand, and are based on a new needs analysis that does not fully show its work and appears inaccurate.

Chair Johnson:

Thank you for the opportunity to comment. The City of Vancouver is developing its own Environmental Impact Statement (EIS) for its Plan update, but also has a significant interest in the County process. As the largest city with the largest unincorporated area, we are significantly impacted by land use policies and actions throughout the county and particularly in the Vancouver Urban Growth Area (VUGA).

This process is about to enter its third and final year before the adoption deadline, in which we will need to analyze DEIS alternatives in detail for public comment; select a Preferred Alternative and analyze it the Final EIS; draft new Comprehensive Plan text and policies, new Capital Facilities Plans, and new zoning code regulation; demonstrate compliance with broad new housing and climate requirements of the GMA; submit all proposed changes for state review 60-days before adoption; and bring the package forward for Planning Commission and Council adoption workshops and hearings. We will not successfully finish all of this if we use upcoming decisions to completely revisit decisions that the County Council has already made, and redo notices that have been issued.

Over the past two years through numerous hearings the County Council adopted aggressive long term countywide growth forecasts of for this update, and cited these directly in the [EIS Scoping Notice](#) published this past summer, which states *“The Clark County Council adopted a 2045 projection of 718,154 persons and 269,000 jobs. The new growth from 2023-2045 will require accommodating 103,698 housing units and 88,500 jobs.”* The Council also adopted allocations of these totals to individual jurisdictions, and approved a VBLM capacity analysis in [May 2024](#) which found existing UGAs have sufficient land to accommodate all of the adopted population and housing forecast and almost all of the employment forecast. To comply with new housing laws, existing UGA capacity is now being proposed to be increased further through upzones identified by the jurisdictions in their alternatives submitted.

DEIS alternatives being proposed which then expand UGA boundaries by several thousands of acres on top of this existing UGA capacity would require revisiting this work, since they would accommodate much more growth than the region has been planning for thus far and communicating to the community. The EIS Scoping Notice would likely need to be republished, and countywide growth forecasts re-adopted with significantly higher growth targets. The state HAPT tool would need to be rerun to determine the new housing requirements, and new growth allocations to the individual jurisdictions would need to be adopted. There is not time in our view to redo these steps, or a policy reason to do so given the aggressive growth forecasts we are all already working from.<sup>1</sup>

During the past two years the County has also collected and listed each site specific rezone request received on its [website](#), beginning sometime after the first submittal dated November 2021. Countywide [mapping](#) of the requests began, in our recollection, in 2023. Much of this information was available to be considered by decision makers and the public when countywide

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<sup>1</sup> The adopted countywide 2045 population forecast of 718,154 persons is approximately 20,000 persons higher than what the the state formally predicted is most likely to occur, and what the cities had jointly proposed. HB 1220 amplifies this by requiring local jurisdictions to plan for 103,000 *new* housing units to accommodate the population forecast. The countywide employment forecast of 269,000 jobs is tied to the population forecast through a highly aspirational target of one job per household.

growth forecasts were adopted in 2023, and almost all it was available when the Council adopted its growth allocations and VBLM assumptions in May 2024, when it found that almost all of the adopted forecasts could be accommodated in existing urban areas.

Going forward, private requests consistent with the County Council's foundational growth decisions made over the past two years can be included in the DEIS. Those private requests that are clearly incompatible with the Council's growth decisions should not be included in the DEIS in our view. Given the limited time and resources for the EIS (we understand only two action alternatives are budgeted), the DEIS alternatives should be practical, adoptable options that provide different ways of implementing the major decisions already made.

The City of Vancouver's specific recommendations are described below. We appreciate the Planning Commission stepping into this review, and the extensive work of County staff in coordinating individual jurisdiction alternatives. The two DEIS action alternatives recommended in the staff report are a reasonable start, but need changes in our view to be consistent with the County's past major growth decisions and recent EIS Scoping notice, and also to comply with key requirements of state and local law.

**1. Countywide DEIS alternatives should implement the County's previously adopted growth decisions and its published DEIS Scoping Notice, not completely blow them up. Do not include the recent Northwest Partners alternative proposing 18,000 acres of Vancouver UGA expansions, or an alternative including every single UGA expansion request received.**

The latest [NWP proposal](#) adding 18,000 acres and 70,000 housing units to the Vancouver UGA alone is completely out of scale with anything contemplated or requested in this process thus far. It proposes to add 18,000 acres, or about 25 square miles, to accommodate around 650 acres of VUGA expansion requests, or about one square mile, according to County request mapping. The 70,000 additional housing units it proposes to accommodate in the VUGA expansion, added to new units in other UGA expansion proposals, could almost double the 100,000 new units being planned for countywide. It would likely require republishing the EIS Scoping Notice, adopting a new higher countywide growth forecast of over 900,000 persons, and readopting individual jurisdiction's allocations accordingly. This would almost certainly lead to legal challenges of the County's final plan if implemented. Limited EIS resources should not be spent on this.

An alternative with all UGA expansion requests countywide would also add thousands of acres to UGAs according to the staff materials, and require significant changes to adopted forecasts, allocations, and the EIS Scoping Notice. Just one part of this alternative, requests for UGA expansions onto properties currently designated for agriculture, accounts for 1,700 acres alone countywide according to the [staff presentation](#). Thousands more acres would

likely also be added through expansions requested onto lands currently zoned for rural uses, and expansions onto intervening properties which haven't requested to be included but would be forced in to bridge physical gaps to requested expansion sites.

**2. Include a Cities Alternative based on requests of the various Cities, and an Existing Boundaries Alternative accommodating growth in existing urban areas.**

A 'Cities Alternative' has been supported in some form by all parties. The latest collective City proposals would require over 2,000 acres of UGA expansions according to the [staff report](#), approximately one third of this on Agricultural lands, which may require process delays to revisit past adoptions and notices. We understand the 2,000 acres of expansions are driven in part by private site-specific requests added recently for the good of the process. A Cities Alternative focusing on the core expansion proposals of the Cities as they define them would be more consistent with the past actions.

An 'Existing Boundaries Alternative' is arguably required by [WAC 197-11-440\(5\)\(b\)](#), which states that reasonable alternatives achieve or approximate a proposal's objectives with less environmental impact, since the County has already found there is sufficient land to accommodate virtually all of the growth targets within existing UGAs, and is now receiving upzoning proposals from the cities and its own staff to further expand existing UGA capacities to comply with new housing requirements. An 'Existing Boundaries' alternative could include site specific requests within existing urban areas, as well as site specific requests outside of urban areas to switch from one rural or resource designation to another.

**3. For the existing Vancouver UGA, include new commercial and employment designations near existing residential areas that lack them, which is needed to comply with GMA mandates and local Countywide Planning Policies.**

- New climate requirements in [HB 1181](#) require all local jurisdictions to lower per capita Vehicle Miles Travelled (VMT) in local Comprehensive Plans, including their land use elements. Achieving VMT reductions is likely impossible without some allowances for related land uses to locate nearer to each other, thereby allowing for shorter driving trips or non-driving trip choices for shopping, entertainment, healthcare, and employment purposes, among others.
- Local Countywide Planning Policy 1.4.1 on page 48 of the existing [County Comprehensive Plan](#) states "*Frequently used commercial activities and the residential areas they serve should be allowed and encouraged to locate near to one another.*"
- [WAC 365-196-310 \(4\)\(b\)\(iv\)](#) requires jurisdictions to first consider increasing capacity in existing urban areas before considering UGA expansions.

No jurisdiction integrates its land uses completely, but the Vancouver UGA is uniquely challenged even for an unincorporated urban area, as so much of its existing housing is located miles from the nearest commercial services or employment opportunities. Unfortunately, proposed VUGA mapping for the DEIS does not appear to include new commercial or employment designations that could help reduce VMT, in most areas doesn't encourage or even allow interrelated uses to locate near each other, and does not appear to have considered opportunities to increase existing urban employment capacity before turning to UGA expansions. Analysis conducted by the City of Vancouver indicates that the lack of employment land in the VUGA is a major contributor to congestion on local and state roads as people are forced to commute long distances to access jobs, including in Oregon. The City of Vancouver recently identified 17 potential existing VUGA locations to consider (see attached correspondence), but no new commercial or employment zoning appears to have been added in these locations or elsewhere in the existing VUGA.

None of this is to suggest the VUGA should attempt to look like a central city area, but some zoning changes are needed to comply with applicable requirements, particularly in regards to new climate requirements which the County is strongly pursuing in other areas but has not integrated into its land use considerations.

**4. Do not include recently recommended VUGA employment expansions that are located at hard to develop sites that largely lack market demand, and are based on a new needs analysis that does not fully show its work and appears inaccurate.**

The recently recommended expansion sites east of WSU and north of 199<sup>th</sup> Street appear ill suited for employment, as both are highly parcelized and contain extensive critical lands according to GIS mapping shown below:

WSU east expansion critical lands and parcelization



199<sup>th</sup> St. north expansion critical lands and parcelization



Neither area to our knowledge has been included in Columbia River Economic Development Council (CREDC) priority employment site inventories. There are no site-specific requests for employment zoning in the proposed WSU area according to the County website, and at the 199<sup>th</sup> Street area there are only two, representing only about 5% of that area's total parcels and total land area. The only reason cited for expanding into these locations is that they are zoned Urban Reserve, but this designation dates back to 2007 or earlier and can be changed now. UGA expansions and economic development planning are too important in our view to simply follow decades old designations when updating a Comprehensive Plan, without examining whether those earlier designations still make sense today.

There is also no demonstrated need for the expansions. There would likely be no need under the VBLM capacity modelling last approved by the Council in May 2024. The more recent VBLM modifications made and the logic behind them are unclear and unsupported by data. No development data is provided in support of the new assumption that commercial development will only account for 10% of MX zoned lands as opposed to 20%, or the assumption that there will be no vertical mixed-use buildings anywhere in the MX zone for the next 20 years. No explanation is provided about why the approved VBLM model would be reopened only for these assumptions and not also other unresolved assumptions resulting in much larger under-estimates of actual capacity. No explanation is provided as to how these proposed employment expansions comply with [WAC 365-196-310 \(4\)\(b\)\(iv\)](#) requirements to first look to increasing capacity in existing urban areas before considering UGA expansions.<sup>2</sup>

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<sup>2</sup> Page 2 of the 10/31 County staff memo in the [Land Use Narratives](#) portion of the hearing materials indicates the assumed split of land developed in the MX zone should change to 90% residential and 10% employment, based on recent development apparently showing an 80/20 split. No information is provided as to why 90/10 as opposed to 80/20 would occur over the next 20 years, even if it is allowed. Data is also absent to support the effective assumption that there will be no vertically mixed use buildings in the mixed use (MX) zone for the next 20 years. Any split adding up to only 100% percent effectively assumes all MX land will be devoted entirely to residential or employment, with none providing both, as regularly occurs with mixed use buildings that contain residential uses above first floor employment. Mixed use buildings exist currently, and assuming there will be no new ones for 20 years even in the VUGA appears inaccurate.

The second VBLM modification cited, to account for housing allowances in Highway 99 impacting employment capacity, the change also appears reasonable *on principle*, but no information is provided about the specific model change made, or what development data was used to support the change.

The employment needs analysis also continues to rely on significant underestimations of countywide home based work which undermine the legal defensibility. As summarized in Vancouver's [2/27/24 submittal](#) to the County Planning Commission, former WESD Economist Scott Bailey found that 20% of Clark County jobs in 2022 were fully remote, and the 4% figure only represents recent incremental change, not the current or future share. In a 2/12/24 email sent to City and County staff, Bailey states that *"More importantly, I think, for land use planning purposes, is that the telecommuting numbers are unlikely to change much going forward. The 2022 number*

Thanks again for the opportunity to comment. The City of Vancouver supports a robust DEIS analysis of alternatives, but as a practical and legal matter these need to be consistent with major growth decisions that have been adopted in this process after many public hearings over the past two years and communicated to the public in the EIS scoping notice, as well as consistent with local and state laws.

Sincerely,

A handwritten signature in brown ink, appearing to read "Erik W. Paulsen". The signature is stylized with a large, sweeping flourish at the end.

Erik Paulsen

Vancouver City Councilmember

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*(available after the memo was written) put telecommuting at 20%, a slight decline, but probably well within the margin of error for the ACS."*



**ATTACHMENT: Recently suggested potential additional Commercial or Employment Sites in the VUGA (highlighted)**



August 16, 2024

Oliver Orjiako, Clark County Community Development Director, and Jose Alvarez, Program Manager II

RE: Potential future zoning designations in and near Vancouver for inclusion in the Clark County Environmental Impact Statement (EIS) alternatives

Dear Oliver and Jose

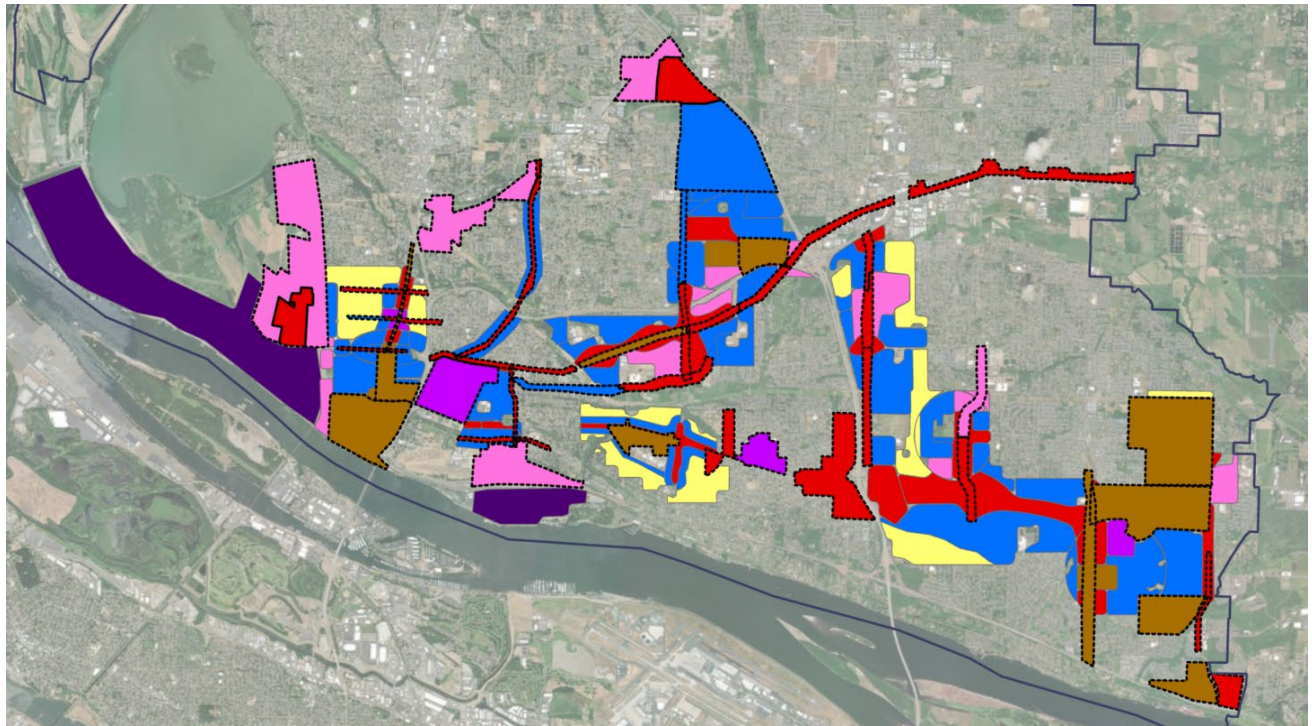
Enclosed as requested for the Clark County EIS is information on draft potential future zoning designations within the City of Vancouver as best they can be determined at this time, and our initial recommendations for designations in and around the Vancouver Urban Growth Area (VUGA). The VUGA recommendations are in two parts - responses to the private site-specific designation change proposals in and around the VUGA that you have received and shared with the cities, and initial additional recommendations for VUGA designations developed by Vancouver staff. All of these, particularly the designations with the City of Vancouver, are preliminary and high-level recommendations subject to update as the process moves forward.

We thank you for your patience as we draft initial new long term land use plans that respond to the ongoing housing affordability crisis, new state housing laws, and the need to best plan for our housing and economic futures. In our view this exercise makes clear that there is ample land in existing urban areas to accommodate the new housing requirements and to meet overall future growth needs. In its recent allocation of growth targets, the County Council found there was adequate capacity in the existing Vancouver UGA and City to meet those targets under current land use plans. Vancouver new land use plans will expand that capacity within city limits, and the private site specific rezone requests will expand capacity in the VUGA. Additional rezone opportunities in the VUGA identified in this letter will further expand VUGA growth capacity.

**I. DRAFT potential new zoning within the City of Vancouver**

For its Comprehensive Plan update the City of Vancouver has developed aggressive citywide long term growth forecasts of 38,000 additional total housing units and 43,000 additional jobs through 2045, both exceeding the City's formal long term allocation totals adopted by the County this spring. To

accommodate this growth the City is also pursuing a more simplified land use designation system allowing greater flexibility, with new city designations of Activity Center, Industrial/Employment, Institutional/Campus, Low Scale Residential, Mixed-Use, Medium Scale Residential and Heavy Industrial envisioned to replace current zoning districts citywide. The below best captures our most recent thinking, at least for the areas of most intense development in the City. We may also include a new Mobile Home Park zone for existing mobile home parks, not shown here.



We appreciate that more detail will be needed to include in the County EIS, and are working towards that in terms of more specific boundaries of the new district and their anticipated development yields, but wanted to provide you what we had in a timely manner. We will follow with more.

## II. City response to private site-specific requests received by the County for properties in and near the VUGA

Without committing to their ultimate zoning in the Comprehensive Plan, we generally support the County EIS including the below private sites specific requests located within the VUGA, with some caveats as noted. The recommendations are listed in geographic order, not by priority.

- Maurer (117896271, 3 acres on the south side of NE 136<sup>th</sup> Avenue at the intersection with 10<sup>th</sup> Avenue, IL and GC to PF for fire station)
- Pacific Lifestyle Homes and Wiesner (182155000, 182155005, 182200000, 182212000, 185490000. Five properties encompassing 35 acres, MX and R-20 to R1-10 to R1-5 on east side of NW 11<sup>th</sup> Avenue south of Fairground). Rezone to mix of R1-5 and higher density MFR zoning, with some **commercial on 11<sup>th</sup> Avenue**.
- Ginn/Weber (182128000, 40 acres on south side of 164<sup>th</sup> Street west of 6<sup>th</sup> Court. MX to R-22). Also include portion with higher density MFR zoning, and consider some **commercial abutting 164<sup>th</sup>**.
- Pfeifer (182141000 and 18215100, 15 acres on north side of 164<sup>th</sup> Street west of 6<sup>th</sup> Court, R1-10 to R1-6). Rezone to denser designation, given sites have no abutting larger lot single family, and 164<sup>th</sup> provides quick access to freeway. Consider including **commercial component**.
- AKS/DJS (179146000, 10 acres south of 209<sup>th</sup> Street and east of 10<sup>th</sup> Avenue, MX to BP). Consider implications for larger 60-acre MX district in which parcel is located.
- Eframson (181440000, 5 acres on west side of 50<sup>th</sup> Avenue north of 179<sup>th</sup> Street, R1-20 to R18).
- Howsley/Cedar Acres (181449000, 19 acres on west side of 50<sup>th</sup> Avenue north of 179<sup>th</sup> Street, R1-20 to R1-5). Include component of R-18 zoning to match abutting Eframson proposal.
- Jordan Ramis/Long (181689000, 2.7 acres on south side of 179<sup>th</sup> Street east of 34<sup>th</sup> Avenue. R1-7.5 to R-18).
- Pacific Lifestyle Homes/Newton and Prew (181687000 and 181704000, 16 acres at SW corner of NE 179<sup>th</sup> Street/50<sup>th</sup> Avenue intersection, MX to R1-7.5, R1-6 or R1-6). Include a **commercial component at corner of intersection**, MFR zoning below it.
- Lund (185957000 on NE Salmon Creek Avenue abutting WSU, R1-10 to unnamed higher density). Consider including MFR and high density SFR zoning.
- Ginn/Glenwood (199656000 and 199609000, approximately 45 acres on south side of 119<sup>th</sup> Street east of 87<sup>th</sup> Avenue, R1-5 to R-18). Include portions of denser residential. Consider **commercial component abutting 119<sup>th</sup> Street**

- Ginn/Wells (200326000, BP to R-22 on 60 acres on west side of 152<sup>nd</sup> Avenue north of 99<sup>th</sup> Street). **Retain northern 2/3 for employment**; include multi-family zoning component in southern 1/3
- Snell/Sarkala (200180000 and 200150000, MX to R-30 on 3 acres at on east side of SR-503 north of 107<sup>th</sup> Street). Consider **commercial component to serve surrounding area**, and R-43 zoning.
- Jordan Ramis/Union Corner/Brush Prairie Baptist (several parcels encompassing approximately 9 acres at SW corner of SR-503 and 119<sup>th</sup> Street, R-10 and CC to GC). **consider CC zoning depending on use involved**. Consider including multi-family residential component.
- MJTRH/Kohlberg/Highland Crossing (three parcels encompassing approximately 6 acres on east side of SR-503 just south of 119<sup>th</sup> Street, CC to R-30). Consider including some R-43 zoning, and extending north to SE corner of SR-503/119<sup>th</sup> properties not being use for commercial purposes.

We don't support including any of the other site specific request to expand the VUGA outside the current boundary, as this would appear to be inconsistent with the recent County Council growth allocation which found there was adequate land capacity countywide to meet adopted population forecasts and related housing targets within existing UGAs and existing land use plans, and only a small land deficit to meet countywide job targets, which can be met through small UGA expansions already being considered by some small cities.

If the County EIS does include any VUGA expansions, we recommend they be limited to those small site specific requests that immediately abut the current boundary, and have a demonstrable affordable housing component, or to requests abutting the current UGA that have a significant jobs component.

### **III. City recommended zoning changes in the VUGA**

These are also high level initial recommendations, intended to address new GMA requirements as well as overall long term planning. As you know HB 1220 will require providing capacity for over 30,000 additional units in the unincorporated VUGA, half of them of these affordable to below market income households. Meeting these targets, particularly the below market components, will require significant zoning changes to allow smaller and denser housing.

New HB 1181 climate requirements will also apply. Although these have no specific targets, meeting their goals will arguably necessitate some zone changes to expand opportunities for shopping, employment and services nearer to where people live, in order to reduce Vehicle Miles Travelled (VMT).

Fortunately there appears to be ample VUGA land that is not yet fully developed and could provide opportunities for zoning changes to meet the new requirements. County Assessor data show there are over 2100 parcels in the VUGA currently zoned for single family housing that are an acre or more in size

encompassing over 5500 acres in total. These include 770 parcels that are 2 acres or more. The below identifies specific parcel groupings to consider.

West Hazel Dell This area contains many oversized lots in mostly R1-5 and R1-7.5 zones, and is served by transit with nearby freeway access.

- The existing County R-18 district on the south side of 50<sup>th</sup> Street should be considered for expansion to the south and west. The existing County R-22 district on the south side of Alki Road and east side of Hazel Dell Ave could also be expanded westward to include most of the nearby lots, which are even larger than those further south. Even larger lots on the west side of Alki Road currently zoned R1-7.5 seem appropriate for higher zoning, recognizing that environment constraints will prevent development on parts of them.
- Church properties at 6902 and 6904 Hall Dell Avenue would seem appropriate for higher density zoning, such as R-43 which is already in place across the street. In general, some church sites may be appropriate for higher density zoning as they are typically large in size, providing an opportunity if desired to sell off portions while retaining the church. Several years ago, prior to the onset of new housing requirements, the City of Vancouver approved a rezone requested by a church on 162<sup>nd</sup> Avenue to allow this very thing.
- Existing R-43 zoning on the west side of Hazel Dell Avenue slightly north of these church properties should be extended westward, perhaps with less dense zoning such as R-22, to include a cluster of several mostly oversized single family lots currently zoned R1-7.5.
- Existing R-22 zoning on the west side of Hazel Dell Avenue at 90<sup>th</sup> Street could be expanded to large underutilized properties to the north zoned R1-7.5.
- There is a large grouping of older, somewhat oversized homesites at the NW corner of the intersection of Hazel Dell Avenue and 99<sup>th</sup> Street that is particularly well served by transportation, schools, and public and commercial services, and would be an appropriate location for higher density zoning such as R-43, perhaps with a buffer designation of R-22 at its very north and west edges where it abuts existing newer single family homes.

#### Felida

- Church sites at 907 and 2206 NW 99<sup>th</sup> Street, 10407 NW 21<sup>st</sup> Avenue, 3027 NW 119<sup>th</sup> Street, and 11718 NW 31<sup>st</sup>
- A one acre homesite at the SW corner of NW 99<sup>th</sup> Street and 21<sup>st</sup> Avenue located within a sea of R1-7.5 zoning may be an **appropriate site for NC** or higher density residential, as there are no commercial services or higher density housing in the area.
- There is a large grouping of oversized single family homes at the SW corner of NW 119<sup>th</sup> Street and 21<sup>st</sup> Avenue which would be appropriate for multi-family zoning. There is similar potential

on the east side of 21<sup>st</sup> Avenue just to the south. There are some similar opportunities along NW 16<sup>th</sup> Avenue between NW 119<sup>th</sup> and 109<sup>th</sup> Streets.

#### North Salmon Creek/Fairgrounds

- There is a sizeable cluster of larger underutilized single family homes west of 3<sup>rd</sup> Avenue north of 29<sup>th</sup> Street, as well as a nearby large underutilized lot at 308 NE 129<sup>th</sup> Avenue, all of which could be upzoned in whole or part to multi-family to help comply with HB 1220, and including a **commercial designation to help comply with climate mandates.**
- North and west of the Chinook/Alki/Skyview schools campus along NW 149<sup>th</sup> Avenue and Bliss Road are cluster of large underdeveloped R-10 and R1-7.5 properties that appear ripe for upzoning to multi-family densities, perhaps including **some commercial areas.** GIS mapping indicates many of these are wholly or partially free of critical lands.
- There are huge swaths of very larger, undeveloped or underutilized properties between Whipple Creek and 179<sup>th</sup> Street in the Vicinity of the Fairgrounds zoned R1-20, R-10 and MX. Many of these are partially or completely unconstrained by critical lands, and there is limited existing residential development, allowing more future options. Many or all of these properties should be changed to allow various designations allowing denser single family housing, multi-family housing to help comply with HB 1220 housing requirements, and **employment to help comply with HB 1181 climate requirements.** Some **commercial lands located south of 164<sup>th</sup> Street** may be appropriate to serve the area.

#### 179<sup>th</sup> Street east of freeway

- There are also wide swaths of large undeveloped or underdeveloped residential lots north of 179<sup>th</sup> Street east of the employment lands around 10<sup>th</sup> Avenue. There are similar swaths south of 179<sup>th</sup> Street east of 34<sup>th</sup> Avenue. Most of these properties appear to have significant portions unencumbered by critical lands. Many areas currently zoned R1-20, R1-10, R1-7.5 and MX could be changed to denser designations to help comply with HB 1220. **Selective commercial or other employment land designations could be at appropriate locations to help comply with HB 1181.**

#### WSU/Pleasant Valley

- There are underdeveloped properties north of 144<sup>th</sup> Street on the east side of 24<sup>th</sup> Avenue currently zoned R1-5 that could be rezoned to higher residential densities.
- There are large underdeveloped properties on both sides of NE Salmon Creek Avenue and Salmon Creek Street that could be rezoned to higher residential densities than the current R1-10 designation.
- There are numerous residential large lot concentrations sites north of 119<sup>th</sup> Street on both sides of 50<sup>th</sup> Avenue and extending eastward to near 72<sup>nd</sup> Avenue that have limited critical lands and could be rezoned to higher residential densities with **selective new commercial zoning to serve**

them. R1-10, R1-7.5 and R1-6 is the predominant current zoning. There are similar groupings on the south side of 119<sup>th</sup> Street in this area.

#### Northeast Hazel Dell

- There are a range of oversized residential lots alongside NE 50<sup>th</sup> Avenue south of I-205 currently zoned R1-6. There are also grouping on both sides of 88<sup>th</sup> Avenue between 37<sup>th</sup> Avenue and St. Johns Road.
- Highway 99s predominant commercial zoning may be appropriate, but greater flexibility and allowances for multi-family residential outside of mixed use buildings should be introduced because of the large number of underdeveloped sites, and future BRT transit service.

#### Minnehaha

- There is a large grouping of underdeveloped residential properties on both sides of NE 31<sup>st</sup> Avenue immediately north of 68<sup>th</sup> Street zoned R1-6 that could be rezoned to higher density residential development.
- On the east side of St Johns Road, commercially zoned properties should be given greater allowances to be developed for single use multi-family residential, either through selective rezoning to higher density residential designations, or changes to commercial standards. This is particularly the case north of 54<sup>th</sup> Street, where there are several underdeveloped or vacant residential properties abutting St James.
- East of St Johns, R-18 zoned properties that have contain single family homes should be considered for a higher multi-family zoning designation to facilitate long term redevelopment opportunities.
- Larger vacant and underdeveloped residential properties at the intersection of Falk Road and SR-500 should be considered for higher density residential zoning, as well as properties just north at the NW corner of 32<sup>nd</sup> Street and 42<sup>nd</sup> Avenue.
- Larger underdeveloped residential properties on both sides of 51<sup>st</sup> Street should be considered for multi-family designations. The large Kunze farm properties east of terminus of 51<sup>st</sup> Street should be considered for rezoning to higher multi-family densities than the current mix of R1-6, R-12 and R-18. Nearby large lot underdeveloped R1-6 properties on the west side of 66<sup>th</sup> Avenue should also be rezoned.
- The grouping of large lot properties on the north side of 58<sup>th</sup> Street sandwiched between existing R-22 and R-18 zoning districts should be similarly zoned.
- Large underdeveloped residential properties on both sides of 50<sup>th</sup> Avenue extending north from SR-500 should also be considered for multi-family or higher density single family zoning, perhaps with some commercial zoning to serve the area.

- R1-5 and R1-6 zoned properties on the south side of Minehaha Street, on both sides of 63<sup>rd</sup> Street and on the west side of Andreesen Road just north of 63<sup>rd</sup> should be rezoned to multi-family designations.

#### Orchards

- Large lot underdeveloped R1-6 properties alongside and near 94<sup>th</sup> Avenue between 58<sup>th</sup> and 63<sup>rd</sup> Streets should be rezoned to higher densities.
- There is a linear series of undeveloped properties between 55<sup>th</sup> and 57<sup>th</sup> Streets, and the I-205 freeway and 107<sup>th</sup> Avenue that may be considered for higher density development than their current R1-7.5 zoning, if they are developable. They do not show on County GIS environmental mapping.
- Large R1-6 zoned sites that have not been fully developed on both sides of 88<sup>th</sup> Street between the I-205 freeway and NE 94<sup>th</sup> Ave should be considered for higher density zoning.
- Larger residentially zoned properties on the south side of 119<sup>th</sup> Street could be selectively rezoned for higher residential densities, with **some commercial designations to serve the area.**
- 5 and 10 acre undeveloped tracts zoned R1-7.5 and R1-5 east of 137 and south of 119<sup>th</sup> Street could be rezoned to higher residential densities.
- Underdeveloped large lot properties on both sides of 99<sup>th</sup> Street between 137<sup>th</sup> and 162<sup>nd</sup> Avenues could be rezoned to higher residential densities where appropriate. Properties at the NW corner of 152<sup>nd</sup> Avenue and 152<sup>nd</sup> Avenue could be zoned to **commercial to serve the larger surrounding area.**
- R1-7.5 zoned properties southeast of Ward Road should also be considered for potential zone changes.
- Two 5 and 10-acre underdeveloped sites south of 83<sup>rd</sup> Street at the far east end of the VUGA should be rezoned from R1-10 to a denser single family district.

Thanks again for your coordinative efforts and opportunities. We look forward to the continued conversation.

Sincerely,



Chad Eiken, City of Vancouver Community Development Director