

CONCERNED RESIDENTS OF RAMBLE CREEK OPPOSITION TO PROPOSALS 2 & 3 **amended 6.2.25**

The Concerned Residents of Ramble Creek, a residential community located just blocks from the proposed Business Park (BP) expansion near NE 50th Avenue and NE 179th Street submit these objections to the proposed UGA expansion under Alternatives 2 and 3. We are deeply troubled by the direction and implications of the UGA expansion under Alternatives 2 and 3 in the 2045 Comprehensive Plan. The area in question borders the Mill Creek Overlay District, AG-20 farmland, and the WSU Vancouver campus, and includes residential zones like R-5 and rural communities such as ours.

We submit this comment to preserve our legal standing and our right to appeal under RCW 36.70A.290 if this proposal is adopted. Our concerns include serious environmental, land use, infrastructure, and procedural issues that must be addressed under both state law and Clark County Code. This expansion would impose disproportionate and irreversible harm on our neighborhood and the surrounding ecosystem.

1. Inconsistency with the Growth Management Act and Clark County's Comprehensive Plan. The proposal is inconsistent with the Growth Management Act (RCW 36.70A.040), which mandates that counties plan for growth in ways that are environmentally responsible, phased, and coordinated. The affected area is:

- Directly adjacent to the Mill Creek Overlay District, AG-20 farmland, and designated Urban Reserve
- Zoned R-5 and AG-20, serving as a buffer between urbanized areas and ecologically sensitive zones
- Home to multiple wetlands, drainage features, and critical habitat that contribute to the Salmon Creek watershed

The expansion of industrial zoning into this area without a full environmental review violates the GMA's protections for critical areas (RCW 36.70A.060, RCW 36.70A.172) and the County's obligation to use best available science in land use decisions.

2. Severe Environmental and Hydrological Impact. The Salmon Creek watershed is already under strain. The proposed BP expansion would introduce large areas of impervious surface (pavement, rooftops, driveways), exacerbating:

- Stormwater runoff and flooding risks
- Wetland degradation and habitat fragmentation
- Pollutant discharge into surface and groundwater systems

Unlike R-5 or agricultural uses, which maintain substantial pervious cover, Business Park developments create compacted soils and heat islands that disrupt natural infiltration and hydrological cycles. This threatens the health of Salmon Creek, its wildlife corridors, and water quality for residents downstream.

No Environmental Impact Statement (EIS) has yet been released to demonstrate mitigation of these harms. We understand from the County's SEPA Determination of Significance that an EIS is planned but not complete. Until that analysis is published, no zoning changes of this magnitude should be considered or approved.

3. Premature and Unjustified Expansion of Business Park Zoning The existing Business Park zoning nearby (established in 2016) remains largely undeveloped. Only two entities operate in the area, and there is no demonstrated market demand for additional BP acreage. This expansion would be:

- Inefficient land use
- Contrary to smart growth principles
- Incompatible with existing residential and agricultural uses

Meanwhile, more appropriate locations for Business Park expansion—such as near NE 199th Street and I-5—exist, with better infrastructure, freeway access, and fewer environmental conflicts. This would avoid disproportionately burdening our community with industrial zoning.

4. Conflict with Agricultural and Rural Preservation Goals. The conversion of reserve land next to AG-20 land and rural residential zones violates the intent of RCW 36.70A.060(1) and Clark County's Comprehensive Plan, which prioritize long-term preservation of farmland and open space. These lands are essential for:

- Local food production
- Carbon sequestration
- Groundwater recharge

- Climate resilience

Business Park development on farmland is irreversible and incompatible with the County's stated commitment to rural character and environmental sustainability.

5. Transportation & Infrastructure Deficiencies. The area lacks adequate transportation infrastructure to support intensified industrial use:

- NE 179th Street is already overburdened and the planned expansion will not remediate the adverse impact given the 600 Holt Homes residential units and the 100 additional units along the same road from another developer.
- NE Salmon Creek Avenue cannot be expanded
- Internal roads were not designed for commercial freight or employee commuter traffic

Adding a Business Park here would exacerbate traffic congestion and degrade safety for pedestrians, school buses, cyclists, and rural drivers.

6. Unfair Community Burden and Procedural Concerns.

Expanding BP zoning into a community that is:

- Already doing its part by hosting an underutilized BP zone
- Adjacent to natural resources and Urban Reserve lands
- Populated by residents, farms, and small-acreage landowners with horses, livestock, and family dwellings

...is inequitable and undermines public trust in land use planning. It also raises procedural concerns, including:

- The absence of a site-specific SEPA review
- Lack of transparency in UGA boundary changes
- Failure to provide localized cumulative impact analysis

7. Request for Action. On behalf of our community, we respectfully request that the County and Commission:

- Reject the proposed Business Park expansion near NE 50th Ave and Salmon Creek
- Preserve existing R-5, AG-20, and Urban Reserve zoning
- Redirect any required industrial zoning to NE 199th and I-5
- Ensure full SEPA compliance, including robust analysis of alternatives
- Engage directly with our neighborhood in any further discussions

8. Preservation of Right to Appeal. This comment is submitted as part of the official public record and is intended to preserve our collective right to appeal under RCW 36.70A.290. If the zoning amendment is adopted without reasonable resolution of the concerns outlined above, we will consider filing a petition with the Washington State Growth Management Hearings Board and engaging legal counsel.

Thank you for your time, and for your commitment to thoughtful, equitable, and environmentally responsible planning.

ADDENDUM I

While we acknowledge the existence of Business Park zoning nearby, the current zone—established in 2016—remains largely underutilized, with only two active businesses operating on the land after nearly a decade. Expanding this underdeveloped zone is neither justified by demand nor supported by infrastructure. It would compound planning failures, violate legal and environmental obligations, and impose an unfair and disproportionate burden on adjacent residential and agricultural communities.

1. The Proposal Violates Legal and Planning Standards

The proposed expansion is inconsistent with multiple governing legal frameworks, including:

- Clark County Code Title 40.250.060 – which guides the Mill Creek Overlay and prioritizes rural character, environmental protection, and smart subarea development.
- Clark County’s Comprehensive Plan, which promotes compact urban growth, preservation of farmland, and environmental stewardship.
- The Washington State Growth Management Act (RCW 36.70A.040) – which mandates that zoning changes be consistent with comprehensive planning, phased infrastructure, and rural area protection.

This proposal fails all three tests. It introduces intense commercial-industrial zoning in an area that:

- Lacks roads, transit, water, and sewer infrastructure
- Is surrounded by rural neighborhoods and farms
- Contains protected wetlands that flow into the Salmon Creek watershed

2. Incompatible with Infrastructure and Environment

The area under consideration is ill-suited for Business Park expansion for the following reasons:

- NE Salmon Creek Avenue is a rural road with no room for expansion
- NE 179th Street is already at or over capacity
- Utilities in the area are not built for industrial-scale development
- The land contains critical wetlands that drain directly into Salmon Creek, a vital environmental and ecological corridor

Industrial runoff, increased impervious surfaces, and vehicular traffic from BP uses will directly harm this ecosystem, violating the intent of the County's Critical Areas Ordinance.

3. Loss of Agricultural Land Threatens Long-Term Sustainability

This proposal directly impacts AG-20 farmland, some of the last productive agricultural space near Vancouver. Replacing farmland with warehousing and commercial infrastructure:

- Reduces local food resilience
- Destroys green buffers critical for environmental and climate mitigation
- Contradicts Clark County's farmland preservation goals

Once converted, farmland does not come back. This is a permanent and irreversible loss of valuable resource land, especially when other, better-suited areas exist.

4. Disproportionate Burden on a Rural and Residential Community

This expansion would place industrial use next to homes, horse properties, farms, and open space, introducing:

- Industrial noise and light
- Truck traffic

- Decreased property values
- Higher taxes based on speculative development value
- Additional permitting burdens for simple rural activities like keeping livestock

Meanwhile, more appropriate areas for Business Park development exist near NE 199th Street, where:

- I-5 access is immediate
- Infrastructure is already developed
- Impacts to farms, critical areas, and residential communities are minimized

This is not just poor planning — it's inequitable planning.

5. Misuse of the Vacant Buildable Lands Model (VBLM)

The justification for the BP expansion relies on flawed assumptions in the VBLM, claiming a reduction in “employment capacity” due to mixed-use and high-density housing. This outdated model:

- Ignores current development trends, where mixed-use zones often perform better economically and environmentally
- Assumes a 60/40 housing-to-jobs split, while real-world use and the county's own code support 90/10 or 80/20 splits
- Treats this rural area as a “fix” for speculative employment capacity lost elsewhere — at our expense

The VBLM should be modernized, not used to justify paving farmland.

Conclusion:

This proposal is:

- Legally unsound
- Environmentally reckless
- Economically shortsighted
- Deeply unfair to the residents of Salmon Creek, Ramble Creek, and the surrounding community

We strongly urge the Planning Commission and County Council

- to:

1. Reject the Business Park expansion near NE 50th Avenue and Salmon Creek

2. Preserve R-5, AG-20, Urban Reserve, and Mill Creek Overlay protections

3. Direct all future Business Park expansion to the NE 199th area near I-5, where infrastructure supports it

- 4. Modernize the VBLM and zoning assumptions to reflect sustainable growth patterns**

Thank you for your time, and for honoring your legal and ethical responsibility to plan for a future that respects rural communities, farmland, and environmental integrity.

ADDENDUM II

Across the country—and especially in growing areas like Clark County, Washington—local governments are rethinking how to balance economic development and residential housing needs in light of:

- The decline in demand for office space
- The surge in remote and hybrid work
- A housing affordability crisis
- Climate, environmental, and sustainability goals

Alternative and More Current Zoning Approaches

Here are modern, forward-looking alternatives that planning commissions are using instead of large-scale Business Park expansions:

1. Form-Based Zoning / Context-Sensitive Zoning

Rather than rigid land use categories like “Business Park,” cities are shifting to zoning that considers how land will be used in practice—prioritizing walkability, mixed use, scale, and community character.

- Why it matters: Business Parks often overestimate demand for isolated office/warehouse space, while form-based zoning allows flexible co-location of housing, light industry, retail, and even small-scale logistics (e.g., last-mile delivery).
- Model: Vancouver, WA and Portland Metro have piloted form-based and transit-oriented zones in place of traditional

commercial blocks.

2. Employment-Residential Mixed-Use Zones (MX)

Instead of separating jobs and housing, current best practice encourages integrated live/work zones, with mid-density residential, small-scale commercial, co-working, and flexible light industrial all co-located.

- Why it matters: It minimizes traffic, increases land efficiency, and responds to remote work trends.
- Example policies:
 - 80/20 or 70/30 housing-to-commercial zoning splits
 - Bonus density for affordable housing or local-serving businesses
 - Allowing adaptive reuse of buildings for hybrid commercial/residential purposes

3. Targeted Infill and Redevelopment Over Expansion

Best practice is redevelopment of underutilized parcels already zoned for employment before expanding into greenfield residential or agricultural zones.

- Clark County's current BP-zoned land—especially north of 199th—remains underutilized, making further expansion inefficient.
- SEPA and GMA principles strongly favor infill and reduced sprawl, aligning with environmental and infrastructure sustainability.

4. Land Use Scenario Planning + VBLM Modernization

Your zoning proposal references the Vacant Buildable Lands Model (VBLM). Modern updates to VBLM include:

- Accounting for vertical mixed-use potential
- Including actual market absorption rates rather than raw land supply
- Modeling climate resilience and transportation emissions
- Planning for last-mile logistics rather than large warehousing

Office & Warehouse Demand Outlook

Office Space (through 2045):

- Declining nationally due to remote work (WFH estimated to remain at 20–30%)

- Conversion to housing, especially in suburban fringe areas, is increasing
- Business parks that focus on office space may face decades of underuse

Warehouse/Light Industrial:

- E-commerce drove short-term warehouse demand, but growth is slowing
- Current zoning in Clark County already accommodates significant light industrial use, with vacancies in existing Business Parks
- Logistics need proximity to highways and freight, not residential corridors

What Should Happen with the Land in Question?

Given all of the above, the most appropriate use of the land near WSU Vancouver and Salmon Creek, looking toward 2045, would be:

A transitional mixed-use zone that:

- Preserves existing R-5 uses and natural assets
- Allows future consideration of student and workforce housing as WSU expands
- Encourages local-serving commercial, such as professional services, neighborhood retail, healthcare, and remote work hubs
- Disallows warehousing, freight, and large-scale industrial development incompatible with environmental goals and neighborhood context

Integration with environmental preservation:

- Protected wetlands and Salmon Creek drainage zones should form a green buffer and be used for green infrastructure
- Planning should incorporate Low Impact Development (LID) standards and consider these lands as carbon sinks and recreational resources

Policy and Legal Justification

- Washington's Growth Management Act (GMA) prioritizes environmental stewardship, compact urban growth, and avoiding leapfrog development.
- WAC 365-196-425 requires coordinated planning with utility, transportation, and stormwater services.

- The SEPA checklist and environmental impact statements should include climate resilience and alternatives to zoning expansion.

Page | 2

Contact: Sylvia Trujillo